Name: A Archbold **I.D:** 58602145

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	Unsure		Yes	Yes		Response to North Somerset Consultation – Tower Farm Site While I appreciate the need for well-planned growth across North Somerset, I do not support the principle of housing development on this particular site. Tower Farm currently provides an important area of green space, contributes to the openness of the local landscape, and offers clear environmental benefits that would be difficult to replace once developed. For these reasons, I feel that this land is better retained in its current form. However, if development were to go ahead, I would welcome measures that maximise community benefit and protect as much of the site's character as possible. In particular, I would support: A formalised, safe walking route to the secondary school. Positioning allotments to the south of Hill Top, where they could provide a well-used community resource with minimal impact on neighbouring properties. Expanding Merlin Park into the surrounding fields alongside allotments, ensuring continued access to open space and enhancing recreational opportunities for residents. These steps would help retain some of the site's existing value while ensuring any development contributes positively to the wider community.		

Name: A Barker **I.D:** 51115713

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at North West Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I believe this plan is unsound as the infrastructure (in particular) the rural road network will not cope with the additional traffic. Church Lane Tickenham is already a rat run used 24 hours a day by vehicles using it to short cut to and from Nailsea and Backwell. These developments will exacerbate this even more. The Causeaway is being repaired on a weekly basis costing the tax payer an enormous amount of money,this will get worse and worse until the road and bridges will eventually fail. The developments will also attract construction traffic,again LGV already ignore the signage for weight limits which just adds to the problem.All of this adds to a very dangerous environment for a all road users.	A link road to the M5 Better signage Speed reduction initiatives Better policing,cameras etc		IMG_7723.jpeg IMG_1052.jpeg IMG_5286.jpeg IMG_9271.jpeg

Name: A Blunden **I.D:** 62627201

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I have lived locally for 35 years so I think more than familiar with this area. There are many points against this proposal. Area below floods and this will increase that Loss of good quality farm land when we need to grow more of our own crops The main road through Backwell is heavily congested			

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					There are no local facilities to allow for this continued growth			

Name: A Brown **I.D:** 62849921

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I object to the proposed allocation of land East of Backwell in the North Somerset Local Plan. The scale of development is disproportionate, unjustified and unsupported by evidence. Backwell already has more than 800 homes approved, a 40 percent increase for the village. Adding around 1,000 more would result in severe overdevelopment. Backwell is being asked to take 7 percent of the district's housing allocation, far more than any other village and even more than several towns. Essential infrastructure is already under pressure. Local schools, health services and leisure facilities do not have capacity, and there is no secured funding or delivery plan for improvements. The proposed new road will not relieve congestion, and there is no proof that a road under or over the railway is technically or financially viable. No needs assessment, viability assessment or social cohesion analysis has been provided. The site includes Grade 1 agricultural land, of which only 7 percent remains in North Somerset. National policy requires the protection of the best and most versatile farmland to support food security. The development also threatens important wildlife habitats including the Brockley Maternity Roost and the SSSI which are used by rare Lesser and Greater Horseshoe Bats. Flood risks have not been addressed. Backwell Common, Backwell Lake and surrounding fields flood regularly, and further building would worsen this. The proposal would cause the loss of Green Belt and permanently damage the character of the village. The level of growth proposed for Backwell is destabilising, unsustainable and unrealistic to deliver within the plan period. For these reasons I urge that North Somerset Council remove the East of Backwell allocation from the Local Plan.			

Name: A Bryant **I.D:** 21202337

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP7: Green Belt	No	• Justified	Unsure	Unsure	I disagree with the recommendation to remove the land north of Nailsea from the green belt. I don't think this is justified as the government's so called 'golden rules' are highly unlikely to ever be met. There is no way that 50% or more of the housing will be 'affordable', especially given the flooding issues on the site, which will reduce land available for development and increase costs for the developers. This will make the development far less profitable than a site with good drainage. If this is permitted, I predict the developer will start tearing up the site and then claim that they can't afford to provide that much affordable housing and we'll end up with 20% or less. Secondly, I can't see how building houses, roads and 'light industrial units' on green fields can possibly improve biodiversity and provide more green open spaces. And they won't improve infrastructure. This development will add further traffic to the existing pinch points at stone edge batch and through Wraxall village. It is the wrong side of Nailsea for the new link road to the A370 and it is not within easy walking distance of the train station. Yet you propose to actually extend green belt on land that IS near both the station and A370?!	Don't take land out of the green belt that can't realistically meet the government's 'golden rules' and where there are no exceptional circumstances to justify the trashing of our countryside. I include the land north of Nailsea as such a site that should remain green belt.		
Land north of Nailsea	No	• Consistent with national	Unsure	Yes	I disagree with the recommendation to remove the land north of Nailsea from the green belt. There is no way that the government's so called 'golden rules' to release the green belt will be met by this development. It would appear to me that the government has said, 'you need to build xxxx more houses or else' suddenly the tune of North Somerset council has changed completely. It was previously against building on this site and against removing it from the green belt.	Don't recommend the removal of green belt land where the conditions for doing so are not realistically		

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		policy				going to be met.		

Name: A Burgess **I.D:** 39126657

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The plan to build the additional 1193 homes across 4 locations around Nailsea is unsound in my opinion for the following reasons: 1. The proposed 1817 new homes in Nailsea would be a total over development of the town. This will place immense pressure on health and leisure facilities. There are no obvious investment plans to meet the health/leisure/educational needs of this major increase in population. 2. The proposed new link road across Backwell Common and under the railway bridge would be prohibitively expensive and a major engineering feat It would not allviate traffic congestion on Station Road nor adequately serve Nailsea traffic. The new road will be in a flood plain which regularly floods. There is no indication of how this project would be funded. 3. Land to the north of Nailsea is greenbelt and should be preserved as such. 4. Land to the south of Nailsea is grade 2 agricultural land which is good quality, high yielding land which will be permanently lost due to this development. 5. Protected species of bat will lose their foraging ground if all proposed sites are developed. Valuable wildlife habitats of the Moorend Spout Nature Reserve will be destroyed if the land adjacent to it is developed. 6. Development on the proposed scale would result in a vast increase in vehicular movement causing congestion in the rural lanes making it unsafe for pedestrians, cyclists & horses riders. 7. The railway station would not accommodate the substantial increase in passengers numbers expected with the development of 1817 homes not to mention the 1762 new homes proposed in Backwell. The platforms are short and narrow and there is no access for mobility vehicles or pushchairs south bound.			
Land off Pound Lane, Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The plan to build the additional 1193 homes across 4 locations around Nailsea is unsound in my opinion for the following reasons: 1. The proposed 1817 new homes in Nailsea would be a total over development of the town. This will place immense pressure on health and leisure facilities. There are no obvious investment plans to meet the health/leisure/educational needs of this major increase in population. 2. The proposed new link road across Backwell Common and under the railway bridge would be prohibitively expensive and a major engineering feat It would not alleviate traffic congestion on Station Road nor adequately serve Nailsea traffic. The new road will be in a flood plain which regularly floods. There is no indication of how this project would be funded. 3. Land to the north of Nailsea is greenbelt and should be preserved as such. 4. Land to the south of Nailsea is grade 2 agricultural land which is good quality, high yielding land which will be permanently lost due to this development. 5. Protected species of bat will lose their foraging ground if all proposed sites are developed. Valuable wildlife habitats of the Moorend Spout Nature Reserve will be destroyed if the land adjacent to it is developed. 6. Development on the proposed scale would result in a vast increase in vehicular movement causing congestion in the rural lanes making it unsafe for pedestrians, cyclists & horses riders. 7. The railway station would not accommodate the substantial increase in passengers numbers expected with the development of 1817 homes not to mention the 1762 new homes proposed in Backwell. The platforms are short and narrow and there is no access for mobility vehicles or pushchairs south bound.			
Poplar Farm, Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The plan to build the additional 1193 homes across 4 locations around Nailsea is unsound in my opinion for the following reasons: 1. The proposed 1817 new homes in Nailsea would be a total over development of the town. This will place immense pressure on health and leisure facilities. There are no obvious investment plans to meet the health/leisure/educational needs of this major increase in population. 2. The proposed new link road across Backwell Common and under the railway bridge would be prohibitively expensive and a major engineering feat It would not alleviate traffic congestion on Station Road nor adequately serve Nailsea traffic. The new road will be in a flood plain which regularly floods. There is no indication of how this project would be funded. 3. Land to the north of Nailsea is greenbelt and should be preserved as such. 4. Land to the south of Nailsea is grade 2 agricultural land which is good quality, high yielding land which will be permanently lost due to this development.			

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					5. Protected species of bat will lose their foraging ground if all proposed sites are developed. Valuable wildlife habitats of the Moorend Spout Nature Reserve will be destroyed if the land adjacent to it is developed. 6. Development on the proposed scale would result in a vast increase in vehicular movement causing congestion in the rural lanes making it unsafe for pedestrians, cyclists & horses riders. 7. The railway station would not accommodate the substantial increase in passengers numbers expected with the development of 1817 homes not to mention the 1762 new homes proposed in Backwell. The platforms are short and narrow and there is no access for mobility vehicles or pushchairs south bound.			
Land south of Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	The plan to build the additional 1193 homes across 4 locations around Nailsea is unsound in my opinion for the following reasons: 1. The proposed 1817 new homes in Nailsea would be a total over development of the town. This will place immense pressure on health and leisure facilities. There are no obvious investment plans to meet the health/leisure/educational needs of this major increase in population. 2. The proposed new link road across Backwell Common and under the railway bridge would be prohibitively expensive and a major engineering feat It would not alleviate traffic congestion on Station Road nor adequately serve Nailsea traffic. The new road will be in a flood plain which regularly floods. There is no indication of how this project would be funded. 3. Land to the north of Nailsea is greenbelt and should be preserved as such. 4. Land to the south of Nailsea is grade 2 agricultural land which is good quality, high yielding land which will be permanently lost due to this development. 5. Protected species of bat will lose their foraging ground if all proposed sites are developed. Valuable wildlife habitats of the Moorend Spout Nature Reserve will be destroyed if the land adjacent to it is developed. 6. Development on the proposed scale would result in a vast increase in vehicular movement causing congestion in the rural lanes making it unsafe for pedestrians, cyclists & horses riders. 7. The railway station would not accommodate the substantial increase in passengers numbers expected with the development of 1817 homes not to mention the 1762 new homes proposed in Backwell. The platforms are short and narrow and there is no access for mobility vehicles or pushchairs south bound.			
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	The plan to build circa 1000 homes on LAND EAST OF BACKWELL is unsound in my opinion for the following reasons: NSC have already approved applications for approximately 800 new homes at Grove Farm, Farleigh Fields and Moor Lane which will increase housing in the village by 40%, already altering the nature and rural feel of the village. To build a further 1000 homes would result in an increase in housing of 80% which is wholly unacceptable given the distinct lack of investment in infrastructure and services (ie schools, doctors, dentists, roads, leisure etc), with no indication of any proposals of future investment. The scale and rate of growth proposed is unsustainable and undeliverable and will have a detrimental effect on the existing community. The allocation of housing for Backwell is disproportionate for the size of the village and a complete over development of a community. The land east of Backwell is GRADE 1 agricultural greenbelt land. To build on this land would be a threat to our food security in the future given that there is only 7% grade 1 agricultural land in North Somerset. The land is currently used for crop production, grazing and leisure. To build on this land would contradict the Governments stated policy of protecting our best and most versatile land. Backwell and surrounding areas are prone to flooding, the proposed development of this land is likely to aggravate the situation causing problems for existing property owners. Under the railway bridge at Chapel Hill the road regularly floods to a height of 3 to 4 feet and cars are often stranded in deep water there. The proposed new road which cuts across Backwell Common and will pass under the railway line would be a highly expensive engineering project and possibly unfeasible! There are no costings or indication of who would fund such a project. It is unlikely to ease traffic on Station Road or at the traffic lights on the cross roads at A 370. If it is the intention for a new road to serve the Nailsea community, it would be sensible to direct it south to join A370 through the new Grove Farm Development in Backwell, recently approved by NSC. The land at Backwell Lake/reservoir, adjacent fields and across the common is a flood plain which floods frequently thus making it unsuitable for road construction. Backwell is not an employment hub and most residents commute. The railway station would not accommodate the substantial increase in passengers numbers expected with the development of a further 1000 homes, yet alone the 800 homes already granted planning permission ! The platforms are short and narrow and there is no access for mobility vehicles or pushchairs south bound. A considerable investment would be required to upgrade the station to increase its capacity to accommodate housing on the scale proposed. If investment was forth coming in the future to upgrade the station, then it would be sensible to widen the bridge at the station to accommodate 2 way traffic on Station Road to ease the flow of traffic and avoid congestion.			

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					To increase Backwells housing population by 80% is disproportionate and will affect the communities social cohesion. No needs or viability study has been conducted for an additional 1000 new homes. There will be a loss of habitat for flora and fauna and a threat to our protected bat colonies if this land is developed.			

Name: A Cains **I.D:** 62815169

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Justified	No	Unsure	I object to the proposed development for the following reasons. Lack of assessment of reasonable alternatives. The Council has not demonstrated that reasonable alternative sites with significantly lower ecological impact have been properly assessed. Nearby brownfield and less environmentally sensitive greenfield sites exist and could accommodate development with substantially reduced harm. In the absence of a transparent and proportionate assessment of alternatives, the case for developing this site is not justified. Strategic ecological importance of the site The land forms part of a wider ecologically important area that contributes to the protection and functioning of Weston Big Wood. It provides a buffer and habitat connectivity which would be materially eroded by development, resulting in ecological harm that has not been adequately addressed or mitigated. Green Belt harm and policy conflict The site lies within the Green Belt and the proposal constitutes inappropriate development by definition, causing harm to its openness and ecological value. This directly conflicts with established Green Belt policy and objectives. No exceptional circumstances have been demonstrated. National planning policy is clear that development in the Green Belt, or alterations to its boundaries, should only occur in exceptional circumstances. No site-specific or compelling exceptional circumstances have been demonstrated that would clearly outweigh the harm to the Green Belt and associated ecological assets. The proposal is contrary to national and local planning policy, fails to justify the loss of Green Belt land, and should be refused.	Evidence exploration of other more suitable sites with less ecological impact.		

Name: A Chivers **I.D:** 62721441

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Gordano Services	No	• Justified	Unsure	Unsure	1. Not Legally Compliant The Plan does not meet legal requirements for community engagement under the Town and Country Planning (Local Planning) (England) Regulations 2012 or the Council's own Statement of Community Involvement (SCI). No in-person consultation was held in Pill/Easton-in-Gordano despite proposing large-scale Green Belt	1. Legal Compliance Modifications 1.1 Repeat and strengthen community engagement in Pill/Easton-in-Gordano A new, proportionate, and locally accessible consultation process is required, including in-person exhibitions in Pill. This is necessary to meet the Council's Statement of Community Involvement and ensure compliance with the Town and Country	While I have raised concerns about elements of the Plan, I wish to acknowledge several areas where the North Somerset Local Plan 2041 demonstrates positive intent and partial compliance with national planning requirements: 1. Strategic Aim to Deliver Sustainable	

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					release and major settlement expansion. Consultation reach was significantly lower than comparable areas, indicating that engagement was not proportionate or inclusive. The Council has also not demonstrated compliance with the Public Sector Equality Duty (Equality Act 2010), with no clear evidence that impacts on vulnerable or disadvantaged groups in Pill were assessed. 2. Not Sound (Fails NPPF Soundness Tests) The Plan is not justified, as required by NPPF para 35, because the release of Green Belt around Pill is not supported by clear exceptional circumstances and reasonable alternatives (brownfield maximisation, higher urban densities, cross-boundary redistribution) were not properly evidenced. The Plan is not effective, as delivery of major infrastructure (M5 J19 mitigation, school capacity, public transport, flood management along Markham Brook) is uncertain, unfunded or not demonstrated to be achievable within the plan period. The Plan is not consistent with national policy, due to unresolved environmental constraints (SAC/SSSI habitat impacts, biodiversity net gain, flood risk), landscape harm, and heritage impacts (particularly around St George's Church and St George's Hall parkland). Together, these show the Plan is neither deliverable nor capable of achieving sustainable development as required by the NPPF. 3. Duty to Cooperate Not Met The Plan does not provide adequate evidence of constructive, active and ongoing engagement with statutory bodies and neighbouring authorities, as required by Section 33A of the Planning and Compulsory Purchase Act 2004. There is no up-to-date or publicly available Statement of Common Ground confirming agreements with: Natural England (biodiversity and protected habitats), Environment Agency (flood risk and drainage), National Highways (M5 J19), Neighbouring authorities (cross-boundary housing distribution). Without evidence of formalised joint working on strategic matters such as Green Belt strategy, transport constraints and environmental impacts, the Duty to Cooperate is not satisfied. Summary The Local Plan is not legally compliant, not sound, and not in compliance with the Duty to Cooperate due to: inadequate and non-inclusive consultation, unjustified Green Belt release, undeliverable infrastructure assumptions, unresolved heritage, environmental and flood-risk impacts, lack of documented cross-boundary cooperation.	Planning (Local Planning) Regulations. 1.2 Complete a full Equality Impact Assessment (EqIA) A transparent EqIA must be published assessing the impacts of major development proposals on vulnerable and protected groups in Pill/Easton-in-Gordano to ensure compliance with the Public Sector Equality Duty (Equality Act 2010). 2. Soundness Modifications 2.1 Remove the proposed Green Belt allocations around Pill/Easton-in-Gordano (including Land East of Gordano Services) These allocations should be withdrawn unless the Council can demonstrate: Exceptional circumstances for Green Belt release; A robust assessment of reasonable alternatives (brownfield capacity, higher densities, cross-boundary redistribution); Deliverable infrastructure solutions for highways, public transport, drainage, schools and health services; No unacceptable heritage, landscape, noise or environmental harm. If exceptional circumstances cannot be proven, these allocations must be deleted. 2.2 Produce updated and proportionate evidence for site deliverability Before allocating any sites in this area, the Council must provide clear evidence of: noise mitigation feasibility next to the M5 motorway, flood-risk mitigation near Markham Brook, heritage protection for St George's Church (Grade II)* and St George's Hall parkland, realistic and safe access and transport solutions. If these cannot be demonstrated, the sites should not be allocated. 2.3 Reassess housing distribution strategy The Plan must reassess its spatial strategy to prioritise: brownfield redevelopment, higher-density schemes in sustainable urban areas, reduced reliance on constrained rural Green Belt villages, strategic coordination with neighbouring authorities. This is required to meet NPPF paragraph 35 on justification and effective plan-making. 3. Duty to Cooperate Modifications 3.1 Publish updated Statements of Common Ground The Council must provide up-to-date, formal agreements with: Natural England (biodiversity and protected habitats), Environment Agency (flood risk and drainage), National Highways (M5 Junction 19 traffic impact and mitigation), Bristol, South Gloucestershire and Bath & NE Somerset councils (cross-boundary housing distribution).	Development The Plan recognises the need to balance housing provision, environmental protection and infrastructure planning. This strategic alignment with the National Planning Policy Framework (NPPF) is appropriate and necessary. 2. Emphasis on Active Travel and Modal Shift Policies promoting walking, cycling, and improved public transport represent a positive step toward reducing car dependency, improving public health and supporting carbon-reduction goals. These align well with national transport and sustainability objectives. 3. Protection of High-Value Environmental Areas The Plan's commitment to safeguarding key ecological areas, flood-risk zones, and designated habitats reflects sound planning principles. The intention to deliver biodiversity net gain is a welcome component consistent with emerging national policy. 4. Commitment to Heritage Protection Where the Plan requires heritage-led masterplanning, buffers, and mitigation around sensitive sites, this shows an appropriate recognition of statutory duties toward listed buildings and historic landscapes. 5. General Housing Delivery Strategy The overall goal of providing sufficient homes across North Somerset—supported by a long-term strategic framework—contributes positively to addressing housing need within the wider West of England context. Summary In principle, I support the Local Plan's strategic commitment to sustainable development, environmental protection, heritage-sensitive design and active travel. These elements reflect both legal compliance and soundness at a policy level. My objections relate only to specific allocations—particularly those around Pill and Easton-in-Gordano—where the evidence does not yet demonstrate soundness or deliverability.	

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						These need to demonstrate constructive, ongoing engagement and shared solutions to strategic issues. Summary of Required Modifications To make the Plan lawful and sound, North Somerset Council must: Re-run appropriate local consultation and complete a full EqIA; Remove or substantially revise the Pill/Easton-in-Gordano allocations unless exceptional circumstances and deliverability are evidenced; Provide robust environmental, heritage, transport and noise evidence before allocating any sites in this area; Reassess the spatial strategy to reduce reliance on rural Green Belt land; Publish Statements of Common Ground demonstrating compliance with the Duty to Cooperate.		

Name: A Dyer **I.D:** 62851041

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at North West Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	such a high number of homes would lead to over development of the town. the proposed new road would have limited benefit for the area as it would not serve Nailsea, reduce traffic along station road, or help with traffic travelling between Backwell and the M5. The under rail link road is likely to be very expensive and potentially difficult to develop due to location near River Kenn. Three new schools have been proposed for Nailsea & Backwell, but no locations have been identified. Such significant development will place huge pressure on the town’s health & leisure services. No direct investment is proposed to address this. Land north of Nailsea will be removed from greenbelt and replaced to the south. Although this green belt land to south will be greater in size than the area being removed. Greenfield Crescent Playing field is not protected under Local Green Space Policy LP15. Grade 2 agricultural land, that is high quality and high yielding will be lost through housing development in the south. Greater and Lesser Horseshoe bats, which are protected species, have been identified as foraging in all proposed development sites in Nailsea. Developing 100 homes adjacent to the Moore End Spout Nature reserve would destroy valuable wildlife habitat and harm biodiversity. There are no clear plans to address the increase in vehicle movements that transport modelling has identified in the lanes around Nailsea - they will become congested and unsafe for other road users (horses, walkers & cyclists). No plans have been made to improve local accident blackspots, which will see an increase in vehicle traffic at Stone Edge Batch, Wraxall Hill and Portbury Lane.			

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					The proposed development west and south of Backwell will be on flood planes that regularly flood. There are significant accessibility issues at Backwell train station for those with mobility issues, pushchairs and young children. It is not a suitable set up for a transport hub.			

Name: A Franklin **I.D:** 62842145

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Gordano Services	No	• Justified	No	No	I do not believe that the Council has complied with the requirements of the Statement of Community Involvement (SCI), nor with the principles of fair, proportionate, and inclusive consultation expected under the NPPF and the Public Sector Equality Duty (Equality Act 2010). Despite the Local Plan proposing 1,100+ homes across five sites around Pill and Easton-in-Gordano, no public exhibition or engagement event was held in the affected area. Events were held in Long Ashton, Backwell, Weston-super-Mare and Nailsea—yet none in the very community facing the most significant change. As a result, Pill/E-in-G responses were disproportionately low: • 125 total responses from only 29 individuals, vs. • Portishead: 689 responses, • Wrington: 484 responses, • Nailsea/Backwell: 1,049 responses. In an area where over 1,800 residents have signed a petition objecting to the scale of development, this sharply reduced response rate suggests that local voices were not given an equal or realistic opportunity to engage. Given the scale of impact, the lack of proportionate consultation raises serious questions about legal compliance, adequacy of engagement, and whether the Plan has been prepared in a “positively prepared” and “justified” manner under NPPF soundness tests.			
Pill Green	No	• Justified	No	No	The Plan proposes to remove substantial areas of land from the Green Belt on the basis of “exceptional circumstances.” From the evidence available, this justification appears weak, incomplete, and potentially unsound. Key concerns: (a) Reasonable alternatives have not been fully explored There is insufficient evidence that the Council has maximised: • brownfield redevelopment capacity, • high-density opportunities in existing urban areas, • partnerships with neighbouring authorities, all of which are required before Green Belt release can be justified. (b) Failure to demonstrate compliance with the “Golden Rules” for Green Belt land Even if release were justified, development must deliver: • substantial affordable housing, • publicly accessible green space, • infrastructure improvements. Yet the Local Plan’s own viability evidence states that 50% affordable housing may be “challenging” on Pill-area Green Belt sites. This directly undercuts the justification for release. (c) Lack of evidence that other potential non-Green-Belt sites have been assessed If other suitable sites exist elsewhere in North Somerset but were not included in the assessment, then the			

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					“exceptional circumstances” claim does not meet national policy requirements.			
Land at Pill Road	No	• Justified	No	No	The Plan proposes to remove substantial areas of land from the Green Belt on the basis of “exceptional circumstances.” From the evidence available, this justification appears weak, incomplete, and potentially unsound. Key concerns: (a) Reasonable alternatives have not been fully explored There is insufficient evidence that the Council has maximised: • brownfield redevelopment capacity, • high-density opportunities in existing urban areas, • partnerships with neighbouring authorities, all of which are required before Green Belt release can be justified. (b) Failure to demonstrate compliance with the “Golden Rules” for Green Belt land Even if release were justified, development must deliver: • substantial affordable housing, • publicly accessible green space, • infrastructure improvements. Yet the Local Plan’s own viability evidence states that 50% affordable housing may be “challenging” on Pill-area Green Belt sites. This directly undercuts the justification for release. (c) Lack of evidence that other potential non-Green-Belt sites have been assessed If other suitable sites exist elsewhere in North Somerset but were not included in the assessment, then the “exceptional circumstances” claim does not meet national policy requirements.			
Land at Ham Green	No	• Justified	No	No	3. Severe Traffic and Transport Risks (LP4 & Schedule 1) There is no robust transport evidence demonstrating that the local road network—particularly M5 Junction 19—can safely or sustainably absorb the development traffic. Key gaps: • The Local Plan does not reflect the concerns previously raised by National Highways regarding cumulative impacts on J19. • There is no clear evidence that the statutory requirement to co-operate with National Highways has been met. • There is an over-reliance on the unconfirmed railway link to Bristol and Portishead. The Plan assumes modal shift without evidence of service frequency, capacity, reliability, or confirmed delivery timescales. • Bus services in Pill and Easton-in-Gordano are already limited, and the Plan provides no binding commitments or funded proposals to improve them. Given these uncertainties, the transport elements of the plan do not appear “effective”, one of the legal soundness tests. ⧫ 4. Environmental Harm and Inadequate Protection for Wildlife (SP11, DP35–37) The proposed development areas fall within zones affecting: • the North Somerset & Mendip Bats SAC, • the Severn Estuary SSSI, • established wildlife corridors identified in the Wild Service Ecology Review (2019).			

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					The evidence does not demonstrate: • that adverse environmental impacts can be avoided or fully mitigated, • that biodiversity net gain can be achieved, • that appropriate buffers, dark corridors, and habitat protections will be secured, • that funding for environmental mitigation is guaranteed. This is especially concerning given the national significance of the bat SAC and the SSSI. In addition, areas of best and most versatile agricultural land appear to be at risk of development contrary to NPPF Section 15. The environmental components of the Plan therefore appear neither justified nor legally compliant. ⬖ 5. Flooding Risk Around Markham Brook (DP9, DP11) Parts of Pill, particularly around Markham Brook, fall within Flood Zone 3, representing high flood risk. This should trigger a sequential test, yet the Plan does not clearly demonstrate that: • safer alternative locations were considered first, or • that housing development in higher-risk areas meets national flood safety thresholds. Any development that increases hard surfacing in the valley bottom risks worsening flood risk for existing homes. The Local Plan does not provide detailed mitigation funding, modelling, or infrastructure proposals to reassure residents or comply with the NPPF requirements for flood resilience.			

Name: A Griffiths **I.D:** 21232929

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I do not consider the North Somerset Local Plan 2041 Pre submission Plan to be sound, and I am not satisfied that it is legally compliant or that the Duty to Cooperate has been demonstrated, particularly in relation to the proposed allocation at Land East of Backwell. The scale of development proposed for Backwell is disproportionate and unjustified. The village already has around 800 homes consented, representing almost forty percent growth, and adding a further 1,000 dwellings places a level of expansion on a single rural settlement that is not supported by a clear sustainability or capacity rationale. This level of concentration is not explained or justified and conflicts with the principle of a balanced and sustainable spatial strategy. The allocation relies heavily on a new road whose feasibility, routing, engineering requirements and funding have not been evidenced. Without robust, deliverable and costed transport solutions the Plan cannot be considered effective. More broadly, the Infrastructure Delivery Plan does not provide credible or funded commitments for school places, healthcare capacity, community facilities or green infrastructure. The Plan therefore fails to demonstrate that the development can be supported by essential services.	To make the Plan sound the Council should (1) remove Grade 1 land from allocations or substantially reduce the Land East of Backwell allocation, (2) publish detailed site-specific viability, transport feasibility and IDP costings with funding commitments, (3) provide up-to-date ecological and flood risk assessments with funded mitigation, (4) require station accessibility improvements, and (5) publish Duty to Cooperate evidence with service providers and neighbouring authorities. Development dependent on the new road should not be permitted unless the road is proven deliverable and funded.		

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					Significant environmental concerns also render the Plan unsound. The proposal would result in the permanent loss of Grade 1 agricultural land, contrary to national policy on protecting best and most versatile land. In addition, the site lies within a sensitive ecological environment, with risks to habitats and protected species including the lesser and greater horseshoe bat populations linked to the nearby Site of Special Scientific Interest and maternity roost. The ecological evidence base is insufficient to show that impacts can be avoided or adequately mitigated. The area is also subject to known flood risk, including flooding around Backwell Common, Backwell Lake and adjacent fields. Despite this, the Plan does not include the level of detailed flood assessment needed to demonstrate that development would be safe or that it would not increase flood risk elsewhere. The allocation is further undermined by unrealistic assumptions about sustainable transport. Backwell station currently lacks step free access and does not provide the level of accessibility required to support the shift to public transport that the Plan assumes. No improvement strategy or secured funding is provided. Taken together, these issues mean the Plan is not positively prepared, not justified, not effective and not consistent with national policy. Key evidence on transport, infrastructure, flood risk, ecology, agricultural land and deliverability is either missing or inadequate. It is also unclear whether the Council has fully satisfied the Duty to Cooperate, as no clear and published agreements have been provided showing that strategic cross boundary impacts, particularly those relating to transport, flood risk and health infrastructure, have been resolved. For these reasons, the Plan is not sound and may not be legally compliant in its current form.			

Name: A Grzonka **I.D:** 58635105

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell has already got more than our fair share of additional housing development approved and / or underway, 800 additional houses at Grove Farm, Farleigh Fields, Dark Lane and Rodney Road. This represents a whopping 40% increase in the size of the village already approved. Considering that this is in addition to a huge number of additional houses that we've accommodated in recent years in and around the Moor Lane development, this is already more than enough for a small village to accommodate. The proposed new road has not been properly specified and I very much doubt is even feasible looking at the areas that it will supposedly be built (railway line, flood plain etc). There are no funding guarantees for this additional spending, will it be delivered at all, let alone on time? The existing infrastructure in this area are already very congested and can't sustain additional traffic. The local schools, health services etc are already struggling with the existing population. My dentist has just announced it can no longer provide NHS services to my children from 2026 due to population growth in the area, we have been told we will have to go private from now on, which we are unable to afford. The local infrastructure and services simply won't sustain a further 800 – 1000 houses. Why is Backwell being singled out			

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					for such ridiculous growth far above any other areas in the region? There is no analysis available that would indicate these houses are even needed. The proposal is to build on the highest grade agricultural land which is currently used for crops, yet government policy is to preserve this kind of land. How can this be justified? We've already lost huge swathes of our prime agricultural land in the local area. There are also valuable wildlife habitats under threat from this proposal, threatening our biodiversity. The area is already prone to flooding which will only get worse with additional housing replacing farmland. The area is largely a commuter area with very little employment prospects locally. This means residents have to drive, cycle, take the bus or the train to a place of work. It is already acknowledged that the road infrastructure is not suitable for further traffic and that the existing railway service is at full capacity and not fit for purpose as a larger transport hub. There are access issues at the station up and down very steep narrow steps and an inability to accommodate additional rail services. It is genuinely ridiculous to suggest that this is sensible housing development. Backwell has already accommodated more than our fair share. Please don't do this.			

Name: A Hicks **I.D:** 62851329

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Leighton Crescent	No	• Justified • Effective	Unsure	Unsure	The sensitive location of this field means it would have a detrimental impact on the surrounding area of Outstanding Natural Beauty and area of scientific interest. It is also the only field that separates W-S-M with Bleadon parish with Bleadon's boundary being the east side of the field. By building on this field it would then blend the village into the town. Also due to its location and lack of nearby amenities it is not easily accessible by foot or public transport. The roads leading to the field are not wide enough to accommodate any changes to overcome this situation. All movements would therefore be made via a vehicle. This is not sustainable and would go against North Somerset's aim for Net Zero. There are much better alternative places to build with easier transport links and less environmental impacts.	Finding sites directly next to main roads and amenities. Places where people can walk and ride bikes to and from to help reduce congestion and carbon emissions. Bigger areas of land where new communities can be made with shops, doctors, schools etc. Another way of increasing housing availability would be to put more emphasis on redeveloping existing buildings and brownfield sites. In Weston there is hundreds if not thousands of un used properties and commercial land.		

Name: A Hinchcliffe **I.D:** 62558145

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	• Justified	No	No	Nailsea doesn't have the infrastructure to support this plan. Where are the new doctors, schools, etc. Also the road access from the M5 via Tickenham can't handle more traffic. All the house building currently in process is supported by large lorry's through Tickenham. This proposed increase traffic through the village is not viable.	New road access into Nailsea from the M5. This would then divert large lorry's away from Tickenham village. The new road planned into Nailsea from the A370 is a wast of time and money. We need a new lorry access from the M5.		

Name: A Howell **I.D:** 62773569

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Destroys valuable wildlife habitats and biodiversity. Grade 1 agricultural land. Greater risk of flooding. Overdevelopment of the village like no others nearby.			
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	There is a deficit of school places and no investment in health services. It would destroy valuable wildlife habitats and affect rare bats environment. It is precious grade 1 agricultural land used for growing food. It will greaten the risk of flooding. It is a huge over development to a village like no other near by.			

Name: A M Tobin **I.D:** 62777409

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Another 1,000 houses, family houses, so a husband, wife and two children, possibly 3 or 4. So, another 4,000 people, another 2,000 cars. Where are 2,000 children going to go to school, it says about a new school, what, for 2,000 children, different ages, Backwell School, Nailsea School, can they cope with 1,000 more pupils ? It is difficult to see a Dr now, what will it be like with 4,000 more residents. Station Road has a railway bridge and traffic lights, utter gridlock. That new road won't be built, the council has no spare money. The whole idea of 4,000 new residents, 2,000 extra cars is utter madness. Yes, there is a railway station, does anybody honestly think everyone will get on the train to go anywhere ? Of course, not choking up all with exhaust fumes. With the 800 already agreed, the total would be7,200 new residents, 3,600 extra cars, surely anyone can understand this is utter madness. Why is Backwell earmarked for 80% increase in population, and Portishead 14%, when Portishead will also have a railway line ? Surely someone there can see how ridiculous the whole idea is, population increase of 80%, thousands of cars, be serious, please ?			

Name: A Mock **I.D:** 28791073

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Justified	No	No				

Name: A Mogford **I.D:** 18056577

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with	Unsure	Unsure	I believe this plan is not sound as Backwell already has a huge number of new houses approved and this development would lead to a completely over development of the area. The new houses already approved will count for a 40% increase for the village – the village cannot cope with anymore housing. There has been no investment in new doctor surgeries or other services within the plan, the lack of infrastructure and service can not support more housing. There is little employment in Backwell so the majority of people will be commuting, I suspect mostly by car, this will cause more traffic on the already very busy local roads. There is a railway station in Backwell, which could be used, but it is not fit for purpose as a transport hub due to its size and inaccessibility for disabled people.			

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		national policy			The area is prone to flooding so is not a good place for houses to be built as this will only add to the problem. Backwell lake and the fields around the area are on a floodplain, building houses and roads here is unthinkable.			

Name: A Molony **I.D:** 62854081

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Consistent with national policy	No	No	1) Sustainability appraisal fails SEA Directive -no assessment of brownfield Alternatives to Pill Green (Reg 12/2024 Brownfield register 2800+ units ignored) 2) no duty to co-operate on Bristol's unmet need. (No statement of common ground; unilateral 1100 home dump in PIEG) 3) Green belt exceptional circumstances not evidenced (NPPF 147). (Parcel identified as high performing agricultural land; no sequential test). 4) 44% Population bomb on Pill and Easton-in-Gordano -disproportionate and unjustified (600 homes = 24% increase of one site alone) 5) No deliverability Plan for a) improving already dangerously busy and narrow A369 or Jnct 19 of M5,, b) improve drainage c) expanding school capacity d) expanding already stretched GP access (Pill Green plan undeliverable ergo ineffective) 6) brownfield first policy ignored -2500 + viable urban units still	Delete the Pill Green site (600 homes) from the LP8 schedule of sites or amend policy LP8 as follows: "No development on Pill Green until exceptional circumstances are independently verified (NPPF para 147) and sequential testing confirms no viable non-Green Belt alternatives are available, prioritising brownfield sites in Weston-Super-Mare, Portishead and Bristol fringe. Cap total LP8 allocation across all sites; require full funding (via s106/CIL agreements) for flood defences to 1 in 1000 year standard plus 45% climate change allowance, A369 and M5 J 19 capacity upgrades, and additional school and GP places alongside associated additional communal infrastructure before granting outline permission. Insert new para 6.79: "Allocations in villages with a population under 10000 must not result in a population increase of more than 5% from any single site unless exceptional circumstances are independently verified and full infrastructure delivery (transport, education, health, drainage) is secured upfront via s106/CIL. Cumulative impacts across all sites within a settlement must not exceed 20% without a master planned, funded delivery strategy."	N/A	

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					available (Weston, Portishead, Bristol fringe. 7) Pill Green breaches NPPF 159 - No sequential test for non green belt sites, 8) Request Independent verification of “exceptional circumstances” before any Pill Green consent. 9) Cap village growth at less than 5% per site. Ref a) 2017 JSP and previous Local Plan allocations b) NPPF 11 & 13 point f: plans must be deliverable and avoid “adverse impact” on local character and services c) Inspector decisions: local plan examinations have found allocations causing greater than 10% population increases to be unsound unless supported by exceptional infrastructure structure evidence, which is absent here.			

Name: A Morris **I.D:** 58575841

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP8: Housing	No	• Justified	No	Unsure	This is a very important proposal that will shape the future of the region. The net result is build, build and more building. This isn't the required outcome, supported by those living, paying taxes and voters.			
Land south of Nailsea	No	• Positively prepared • Justified • Effective	No	No	The Infrastructure Delivery Plan lacks analysis and costings, and there are no funding guarantees for the new road or essential services for residents and businesses.			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
		• Consistent with national policy			I have concerns regarding the strategic growth location designation include the impact on the area's character, the loss of Greenbelt and high-quality agricultural land, the risk of flooding. Backwell Lake (Reservoir) and adjacent fields are on a floodplain, which floods regularly. Also there has to be major uncertainty over whether changes to the local road infrastructure can be funded and delivered on time to support the proposed housing			
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell already has 800 new houses approved, a 40% increase for the village. These additional numbers will lead to complete overdevelopment. There is no needs or viability assessment for an extra 1,000 houses There is a deficit in school places and no investment in health services or leisure facilities. The lack of infrastructure and services cannot support another 1,000 houses. No social cohesion impact assessment has been provided The Infrastructure Delivery Plan lacks analysis and costings, and there are no funding guarantees for the new road or services. Backwell and Backwell Common and the surrounding areas are prone to flooding, which would be aggravated by more housing Backwell is not an employment hub, most residents commute. The sheer volume of growth with the required investment infrastructure and services over such a short period is destabilising, unsustainable and undeliverable. Development would destroy valuable wildlife habitats and further harm biodiversity in one of the world's most nature-depleted countries. Government policy states that "we must protect our best and most versatile land" to safeguard food security. The proposals contradict this policy and undermine food security	I am concerned that the strategic growth location designation include the impact on the area's character, the loss of Greenbelt and high-quality agricultural land, the risk of flooding, and uncertainty over whether the road can be funded and delivered on time to support the proposed housing IMPORTANTLY Backwell is allocated a higher number of houses than any other village in North Somerset, and even a higher growth percentage than towns. Backwell is expected to take 7% of the district's housing allocation, compared to Clevedon's 2%		

Name: A Porwal **I.D:** 62831169

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy			Yet more plans to turn Backwell into a boring faceless outlying suburb of Bristol. I have lived here 35 years and these builders' dreams are rearing their ugly head yet again. It should be obvious to anyone who drives down the A370 after a serious downpour and sees the amount of water running along the road that the water has to go somewhere, because the drains can't cope. So it goes downhill, into the farmland, where it can sit for months, held in the soil, forming quagmires and pools. It's a floodplain, plain and simple. Not suitable for building. It should remain as farm land and remain productive.			

Name: A Ribbon-Miles **I.D:** 14394785

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I am also commenting regarding the field adjacent to West Leigh Infant School, Backwell which has now appeared with potential housing allocation having been ear marked previously as a community space for use by the school. Having now capitulated and given permission for houses at Rodney Road we cannot allow any more here. Access is totally unsuitable. Cars coming and going next to the entrance for the school would be incredibly dangerous. We are a rural village and people move here for proximity to the countryside. These fields are used by bats foraging and other wildlife. Soon there will be little green space left here but please take this into consideration. This field allows children to use a green route across a field and soon this school will be surrounded by housing! Building here would be a travesty.			
Land south of Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	This land adjacent to the lake is flood plain and floods regularly, who would want to buy a house on this land? We need flood plains more than ever with our changing extreme weather. Building here will destroy wildlife habitats and threaten the Brockley Maternity Roost and SSSI of the rare Lesser and Greater Horseshoe Bats as well as countless other species. I will reiterate my earlier point made on the Land East of Backwell proposal which is that wildlife and being able to get out into nature was a saving grace of living in this area during the Covid pandemic. The nation seemed to understand then that this was a really important thing to be able to do for the nation's mental and physical health and yet here we are 5 years on and the proposal is to tarmac over the countryside. Presenting Backwell and Nailsea train station as a transport hub when it is not fully accessible to people with mobility issues or those travelling with children in prams undermines all of the proposals that centre on Nailsea and Backwell. More houses will create hundreds of more cars on the already overburdened local roads. There is no money to pay for better infrastructure, no costings nor serious analysis and this is a huge flaw in this proposal.			
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	We already have 800 houses approved for construction in Backwell which is a 40% increase with no new services or amenities planned. This is already overdevelopment in my view and another 1000+ houses would be complete overdevelopment for this village (the clue is in the title 'village'). Such rapid growth would lead what is a lovely community to struggle. No social cohesion impact assessment has been provided to prove otherwise. The area being put forward is grade 1 agricultural land of which there is not a huge amount left in North Somerset! What will we do to feed ourselves when the next covid crisis comes along or another war overseas impacts food importation? As a country we need to be able to feed ourselves. This is without even looking at the destruction of wildlife habitats for local flora and fauna and further harm to biodiversity in the area. Nature and being able to walk in the countryside were again things that we learned during the covid pandemic that were a huge help to people's mental health. We destroy these places at our peril. Backwell is a village of commuters and not an employment hub. None of these developments have done anything to create jobs or places or work they are just adding to the traffic on already overburdened roads such as Station Road and the A370. On 1 December the M5 was closed due to a fatality and this meant that the A370, Station Road, Dark Lane and all roads throughout Backwell were gridlocked for several hours. The A370 cannot cope with more traffic at the best of times and Station Road is a route that hundreds of children use each day to walk to the local schools and is already dangerous for pedestrians with large lorries using it. I repeat my comment from earlier that no developer is suggesting they stump up the cash for new roads and there appears to be no money coming from anywhere central to fund these pie in the sky ideas so we will be left to rely on the current creaking network of roads and bus and train services.			

Name: A Round **I.D:** 62774209

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I believe the plan is unsound, for the following reasons: 1. Recent developments have seriously damaged the village. Further development will ruin it. 2. Connection with Nailsea is essential for housekeeping purposes. There is already serious congestion in Station Road; the proposed developments will make connection frequently impossible. 3. There are large numbers of elderly residents. Any increase will put serious strain on medical etc. facilities 4. It is not explained why all these houses should be built here, and not elsewhere in North Somerset.. 5. Most employees commute to work. Any substantial increase will cause further, unmanageable, congestion on road and railway. 6. Development will seriouly reduce agricultural land availability, and damage wildlife habitats.			

Name: A Shearer **I.D:** 50916769

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared • Justified • Effective	No	No	House building in the Backwell area seems to be moving from reasonable and just about acceptable development into the realms of environmental vandalism. There appears to be no cognition or consideration of the effects of over 1000 more new houses being built in such a small catchment area. 1000 plus new houses will bring at least 2000 people or more into the area. It will probably bring about 2000 cars – allowing 2 per household, a not unreasonable figure. There is little work available locally, so most of these people will be commuting, That will put thousands of extra cars on the road, hundreds more people on to already crowded buses and on to trains already packed to bursting. If 2000 adults or so are brought into the area, there will inevitable be children. Even a conservative estimate of 1000 children will mean a need of 1000 nursery places, then primary, then secondary school places. Where are these going to come from? The 2000 adults and the 1000 children are going to need medical care and dental care. Where is that going to come from? How is the local surgery possibly going to cope? How are the present dental services going to cope? How are the schools going to cope? Where are the extra school places going to come from? Why, also, is Backwell subject to such extensive development when other local places – such as Clevedon, Portishead – are left relatively untouched and unscathed when they would be far better able to handle an increase in population? It is totally disproportionate. Backwell already has had 800 new houses approved – a 40% increase in the village size. Another 1000 new houses on top of that would be an unmitigated disaster. Such development would destroy wildlife habitats, biodiversity and agricultural land needed for food. The proposed new road would destroy the Common and the whole nature and aspect of the area. The proposed site for new housing is prone to flooding. None of this appears to have been taken into consideration. The whole plan seems to be ill-conceived, un-researched and formulated without any thought as to the long term impact and consequences of such extensive and extreme development. As a local resident I most strongly object to it and hope that it will not go ahead.	Stop future building		
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with	Unsure	Unsure	House building in the Backwell area seems to be moving from reasonable and just about acceptable development into the realms of environmental vandalism. There appears to be no cognition or consideration of the effects of over 1000 more new houses being built in such a small catchment area. 1000 plus new houses will bring at least 2000 people or more into the area. It will probably bring about 2000 cars –			

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		national policy			allowing 2 per household, a not unreasonable figure. There is little work available locally, so most of these people will be commuting, That will put thousands of extra cars on the road, hundreds more people on to already crowded buses and on to trains already packed to bursting. If 2000 adults or so are brought into the area, there will inevitable be children. Even a conservative estimate of 1000 children will mean a need of 1000 nursery places, then primary, then secondary school places. Where are these going to come from? The 2000 adults and the 1000 children are going to need medical care and dental care. Where is that going to come from? How is the local surgery possibly going to cope? How are the present dental services going to cope? How are the schools going to cope? Where are the extra school places going to come from? Why, also, is Backwell subject to such extensive development when other local places – such as Clevedon, Portishead – are left relatively untouched and unscathed when they would be far better able to handle an increase in population? It is totally disproportionate. Backwell already has had 800 new houses approved – a 40% increase in the village size. Another 1000 new houses on top of that would be an unmitigated disaster. Such development would destroy wildlife habitats, biodiversity and agricultural land needed for food. The proposed new road would destroy the Common and the whole nature and aspect of the area. The proposed site for new housing is prone to flooding. None of this appears to have been taken into consideration. The whole plan seems to be ill-conceived, un-researched and formulated without any thought as to the long term impact and consequences of such extensive and extreme development. As a local resident I most strongly object to it and hope that it will not go ahead.			

Name: A Shipton **I.D:** 31077985

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land to the west of Elborough						Old Banwell road will need to be widened to be safe for the increased traffic. Currently, at points this is so narrow that 2 cars are unable to pass comfortably. A pavement will also need to be introduced as there will be additional pedestrian footfall. The road layout at the mini round a bout will need to be changed to be safe. A significant increase in facilities will be needed including public transport which is currently very limited. Shops and leisure facilities will also be needed. The loss of natural habitats for wild animals is a huge consideration. We have wild deer in the fields along with wide varieties of birds and other wild life. Flooding is already an issue on the Old Banwell road and by the pond in Elborough. With less green space this will increase. This agricultural land is key to the character of the village and this is the reason that many residents moved to the village. House prices in Elborough are high for the local area and this is due to the position within the fields, views, space and surrounding nature. These planned developments will remove these features and put Elborough into the middle of a large development.		

Name: A Sutherland **I.D:** 21230049

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I object to this proposed housing in this Local Plan and consider it to be undeliverable and unsustainable for the following reasons: In the past few years Backwell Village has already had 800 new houses approved. This is a 40% increase for the village. Approving any more housing would lead to total over development. The road proposed would not serve Backwell or the nearby town of Nailsea. It would not alleviate the traffic issues on Station Road (a narrow road with pavement on only one side and the only road for school children to walk to Backwell School). The proposed road would have to go over or under the existing railway line which would be very expensive and possibly unfeasible. There will be no investment in local health or education services as part of this proposed development. The lack of infrastructure can not support another 1000 houses. Backwell has already been allocated a higher number of houses than any other village in North Somerset and a higher growth percentage than some towns. Clevedon (which has better infrastructure) is taking 2% whereas Backwell (a village with a lack of amenities and services) is taking 7%. There has been no viability analysis for an extra 1000 houses in Backwell. The proposed development is on Grade 1 Agricultural Land which is currently used for grazing and crops. There is only 7% of this land left in the whole of North Somerset and should not be used for housing. The Government has said “we must protect our best and most versatile land” to safeguard food security and this proposal directly contradicts and undermines the Governments own policy on food security. There would be a massive threat to local valuable wildlife and habitats including the Brockley Maternity Roost affecting the rare Lesser and Greater Horseshoe Bats. The Infrastructure Delivery Plan lacks any analysis and costings and there is no guarantees for funding for the new road and other services. Backwell Common and the surrounding area are already prone to flooding and this would increase with more housing. Chaple Hill regularly floods cutting off access. The planned houses are on a flood plain which also regularly floods. There has been a lack of regard to strategic growth location designation, including the impact on the area’s character, loss of Greenbelt and high quality agricultural and risk of flooding. Whilst Backwell has a train station it is not fit for purpose as a transport hub as it remains inaccessible for people with mobility issues and a challenge for those travelling with young children. The platform is short and only a certain number of carriages can stop at the platform.			

Name: A Trapp **I.D:** 34793665

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP10: Strategic gaps	Unsure		Unsure	Unsure		I note the strategic gap to the North West of Banwell. For future clarity regarding the interaction of the village and the bypass, it would be good if that strategic gap were to be also to the North of the village. Such a gap would be appropriate, particularly because of the significant, recent development of the village.		

Name: A Westaway **I.D:** 62860353

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Churchill Avenue	Unsure		Unsure	Unsure	Penny Field should be protected as a Local Green Space. It’s one of Clevedon’s last true greenspaces, a Nature Recovery priority site, and vital for wildlife, community wellbeing, and access to nature. Better brownfield and greyfield sites across the town exist for development.	Penny Field should be protected as a Local Green Space. It’s one of Clevedon’s last true greenspaces, a Nature Recovery priority site, and vital for wildlife, community wellbeing, and access to nature. Better brownfield and greyfield sites across the town exist for development.		

Name: AJ Lickorish **I.D:** 62846241

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Backwell Lake	No	• Positively prepared • Justified	No	No	Goes against policy for building on agricultural land			
Netcott's Meadow, north of Backwell Lake, west of Bucklands End, Nailsea	No	• Positively prepared • Justified	No	No				

Name: Abbots Leigh Parish Council Chair **I.D:** 62110593

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP8: Housing	Unsure	• Positively prepared	Unsure	No	There was no cooperation or consultation with the Local Parish councils affected by the proposed area covered by LP4 as a Strategic Location at the initial stages because LP4 was not included in the initial consultation stages	The section LP4 of the Plan will need to be modified once mitigation measures have been identified, if there are any possible, to address serious traffic congestion which will occur on the A369 through the local neighbourhood and its junction with the M5. In addition the congestion of the A369 where it connects into the Bristol road network will need mitigation measures which are outside the control of North Somerset Council. The additional traffic caused by traffic from developments in Woodspring and Long Ashton, Nailsea and Backwell, the new Epic Development and the future expansion of Bristol Airport will also have an additional significant impact on teh traffic levels using teh A 369 and its junction with the M5 at junction 19		
Policy LP4: Strategic location: Pill and Easton-in-Gordano			No	No	The The Abbots Leigh, Ham Green, Pill & Easton-in-Gordano Neighbourhood Plan 2020-2026 has been adopted having been prepared jointly between Pill & Easton in Gordano Parish council and Abbots Leigh Parish Council and is referred to in North Somerset Council's Project Plan for the preparation of new planning policy documents, but it has not been taken into account. That plan acknowledges that there should be some development in the area, but an appropriate scale and which can be a bonus for the local community. No Supplementary Planning Document (SPD) has been prepared by North Somerset Council to support the inclusion of Policy LP4 – Strategic location Pill and Easton in Gordano, this should have been completed and taken into consideration when deciding the scale of the development of the area and what the local infrastructure could support. The ecological impact of developments on such a large scale in an environmentally sensitive area have not been seriously considered. Our local wildlife groups with a very good understanding of the important local issues are responding separately to identify the areas of concern. Because the Pill and Easton in Gordano area was not included in the first draft of the Local plan which went to general consultation, there were no discussions with the local communities of Pill & Easton in Gordano nor Abbots Leigh. The level of public anger on this is demonstrated by the fact that there has been a petition signed by over 2000 local residents asking the council to listen to their concerns. The traffic assessments have not been fully considered and includes such comments as: "There are known issues at J19 of the M5 motorway at present,	When full investigation onto the impacts of these potential developments has been considered then we will know what modifications will be necessary		

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					including in relation to queueing on the Southbound Off-slip. The strategic modelling suggests that, whilst congestion will occur, the impact of the Local Plan itself on the motorway off-slips is relatively limited. Notwithstanding this, there will be increases in congestion on the circulatory of the roundabout, which has the potential for knock-on impacts. Discussions are ongoing with regards to potential solutions." That statement is too simplistic. The M5 junction 19 is known to be at full capacity with small scale modifications having been carried out at a very high cost in recent years. There is very little that can be done because that junction between the busy A369 and the M5 also has additional connections to Gordano motorway services and also the busy sole access to Portbury dock. The local geography of the area gives no scope for any significant improvement or alterations and it is therefore naive to suggest that a workable solution will be found. The introduction of 1100 houses which will feed onto the A 369 and its junction with the M5 has not been fully modelled, and there will also be significant additional traffic from the new housing developments around Nailsea and Backwell as traffic from there heading north will use that junction, as will traffic from additional developments in Portishead and also the Woodspring Development near Long Ashton, the new EPIC headquarters under construction near Long Ashton and the increased traffic coming from the Bristol Airport planned expansion. Furthermore the impact of traffic being diverted from the A4 at Junction 18 to avoid the Bristol Clean Air Zone has not been fully assessed. The A 369 travelling east towards Bristol is already at full capacity and it joins into the Bristol network at the highly congested badly configured junction at Ashton Gate which already regularly has long delays and queues. There is a restriction in the width of the A369 in Abbots Leigh which has the benefit of traffic calming but it does require HGVs and buses to have to give way when they meet leading to significant congestion and an increase in air pollution. The A369 is promoted in the plan as being a good link into Bristol without considering solutions to its intractable problems The promotion of Active Travel is to be welcomed, but it is not the solution for most people commuting into Bristol. The cycle route along the Pill towpath through the Avon Gorge is not good for commuting cyclists and the steep hill between Pill and Bristol following the A369 route will discourage cycling to all but the most determined. In order to achieve modal shift there will need to be significant investment in infrastructure for longer sustainable journeys rather than just a few additional local cycle paths. There also will need to be continuing investment in the maintenance of the active travel infrastructure otherwise it will fall into disuse. The reopening of the railway line for passengers between Portishead and Bristol is also to be welcomed, however this this will primarily serve the residents of Portishead. The number of trains per hour has not been confirmed, but Pill station will have no parking and the distance to the station from these new developments will deter many from using it and therefore, whilst			

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					helpful, is not a good justification for inclusion of these sites.; The consultants report on sustainable transport solutions has not been properly researched as can be seen by anyone with local knowledge. An example is that there is a proposal to build a cycle route with a bridge across the stream to link the sites which crosses private land which is not included in the plan which the owner is not prepared to give up and he hasn't even been consulted			

Name: Abigail McInally **I.D:** 62775649

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Despite a huge increase in the number of houses already being built in Backwell, there is no investment in the local infrastructure alongside this. There will be a lack of school places, which should be available to all children locally, and the leisure facilities are already old and tired and requiring update. The level of development is unsustainable and will result in a reduced quality of life for current and future residents if it is not managed correctly. Additionally the planned build area is on a flood plain, which will be even more necessary to hold flood water as the Farleigh fields developments are completed, removing the lands capacity to store water in this area. The removal of the grade 1 land around this area is also a concern to food security in the UK, as it will reduce the percentage of high quality land capable of being used for agriculture in North Somerset even further; and have a knock on impact to job opportunities for the local farming community. A better use of time and money would be to expand employment and housing opportunities in Weston.			

Name: Adam Aziz **I.D:** 58568737

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	‣ Justified ‣ Effective	Unsure	No	Not enough measures to protect the ecologically sensitive area of Weston big wood			

Name: Adam Bloom **I.D:** 58577889

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I OBJECT to the proposed development plan for Nailsea and Backwell, North Somerset, on the grounds that it is fundamentally unsound, unsustainable, and fails to align with established planning principles and local policies. The following points outline material planning considerations that warrant refusal of the current proposal: Unsustainable Growth and Over-development: The addition of 1,817 houses in Nailsea represents an increase of over 25% in households, and when combined with Backwell, a 41% population increase. This constitutes a disproportionate and excessive level of growth that is out of character with the existing community and exceeds local capacity. Infrastructure Deficiencies (Highways and Transport): The plan inadequately addresses the significant impact on the local road network. The existing infrastructure, largely composed of C roads and single-lane routes such as Netherton Wood Lane and West End Lane, cannot	Build up, not out. Bring in businesses to bring jobs. If you are going to turn Nailsea and Backwell into a 'new town', give it the infrastructure of a 'new town'.		

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					support the projected increase in traffic generation. The proposed new road will not alleviate congestion toward Weston, and the assumption that social norms will shift towards public transport without sufficient supporting infrastructure is unfounded and unrealistic. The Causeway between Nailsea and Tickenham is a narrow lane that will become a main route of choice, further exacerbating safety and congestion issues. The B3130 will also face an unmanageable 25% increase in traffic at peak times. Loss of Green Spaces and Environmental Harm: The strategy of "bolting on housing developments" on surrounding green fields results in an irreversible loss of valued open countryside, footpaths, and potential priority habitats. This directly conflicts with strategic priorities to safeguard green spaces, support biodiversity, and enhance the local character and amenity value of the area. Flooding Risk: The proposal to build in fields around Nailsea and Backwell may impact flood risk areas, which is a material planning consideration that must be rigorously addressed and mitigated. Conflict with Strategic Priorities/Poor Design: The current approach of simply "bolting on housing estates" is contrary to the stated strategic priority of developing new communities in a way that enhances health and well-being and is child and family friendly. The plan fails to integrate new developments seamlessly, potentially making the existing town a "much worse place to live" by destroying its known character. Inadequate Public Services: The scale of development raises significant concerns regarding the capacity of public services, including local schools (Backwell School on Station Road is specifically mentioned as a traffic concern) and GP surgeries, to serve the enlarged population. Insufficient planning for this essential infrastructure alongside housing numbers makes the plan unsupportable. These concerns are based on material planning considerations and local knowledge, demonstrating that the current plan for Nailsea and Backwell is neither positively prepared nor justified.			

Name: Adam Jeffes **I.D:** 58390785

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP9: Extent of the Green Belt	Yes		Unsure	Yes	Steps should be taken to preserve the countryside between towns and villages. How the current development on the road from Congresbury to Wrington on the hill was allowed to move through planning beggars belief. We have the same issue of development encroachment between Yatton and Claverham, and this should be prevented, again through to use of green belt north of Claverham road. If there is one proposed between Nailsea and Backwell, why not here, or the legal basis for it being omitted? We have wildlife including Bats, Herons, Badgers and all sorts of biodiversity on Claverham road and Claverham in general. Developments of up to 5 houses on plots where existing buildings existed and not encroaching on countryside away from road would seem a fair.	Examples are provided above - in short, parish boundaries should be respected except perhaps in an area of strategic development where several hundred houses can be sited with the requisite infrastructure to cope with these abodes. Greedy developers should not be given permission to build houses which are miles away from jobs, with no infrastructure in place to support them to the detriment of the environment.		

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					Having strategic areas where development is accepted and can be supported with appropriate infrastructure is a good way forward, even if there is some environmental challenges associated with the building of these houses. However, trying to shoe horn small to medium developments into land between parishes risks blending the country landscape into an urban spral, will be detrimental to the environment, the lifestyle people moved here for in the first place and is not supported in any way shape or form by local infrastructure.			

Name: Adam Lane **I.D:** 51426369

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I am writing to register my strong objection to the proposed strategic growth allocations affecting Backwell in the Draft Local Plan. While I understand the need for North Somerset Council to meet its housing targets, the proposals for Backwell – particularly the additional 1,000 houses on Grade 1 Greenbelt agricultural land – are wholly disproportionate, unjustified, and would cause irreversible harm to the village, its environment, and the wider district. 1. Backwell is already accepting unprecedented growth Backwell already has 800 approved houses, representing a 40% increase in population -- extraordinary for any village, and far beyond the growth levels allocated to nearby towns. Asking Backwell to absorb another 1,000 houses, raising the total increase to over 80%, is neither reasonable nor sustainable. Backwell is being asked to take 7% of the district's total housing allocation – more than Clevedon (2%) and equal to Portishead – despite being a village with limited services and infrastructure. This fundamentally contradicts the principles of proportional, sustainable development. 2. Loss of Grade 1 Agricultural Greenbelt Land – a severe, irreversible impact The proposed development site at Backwell East sits on Grade 1 agricultural land – the highest-quality land available and now extremely scarce, with only 7% remaining in the whole of North Somerset. This land is currently productive and used for food crops and grazing. Government policy is explicit: 'We must protect our best and most versatile land' to safeguard national food security. The Local Plan's proposal directly undermines this principle at a time when food security is increasingly recognised as a national priority. Once this land is built on, it is gone forever. No mitigation can replace it. 3. Infrastructure and services are already overstretched, with no credible plan for improvement Backwell faces existing deficits in school places, healthcare provision, road capacity, and leisure facilities. Despite the enormous scale of growth proposed, there is: - No confirmed funding for new services - No detailed or costed plan for necessary infrastructure - No viability assessment to demonstrate how any of this could realistically be delivered - The Infrastructure Delivery Plan lacks essential analysis, leaving residents with vague promises rather than commitments. The proposals ignore practical realities: Backwell is not an employment hub; the majority of residents commute. Increasing population without matching services or sustainable transport options would worsen congestion and reduce quality of life.			

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					4. The proposed new road is undefined, uncosted, and potentially unfeasible The Local Plan relies on a completely speculative new road. One with: - No route - No engineering assessment - No feasibility study - No costings - No funding source Engineering a road over or under the railway line may be prohibitively expensive or technically impossible. Yet this road is presented as essential infrastructure for supporting 1,000 new homes. This is planning based on hope rather than evidence. Meanwhile, the road would significantly damage Backwell Common, a valued landscape that already suffers from flooding and would be further destabilised. It's nonsense. 5. Environmental damage and biodiversity loss would be severe The Backwell East site and surrounding areas provide vital habitats supporting a wide range of wildlife, including species of national importance. The proposals threaten: - The Brockley SSSI and maternity roost - Rare Lesser and Greater Horseshoe Bats, which rely on this land for foraging - Long-established wildlife corridors - Already fragile biodiversity in one of the most nature-depleted countries in the world Once again, these losses cannot be undone. 6. Flooding risks are ignored, not addressed Backwell Common, Backwell Lake (Reservoir), and adjacent fields are well-known floodplains that regularly flood. Adding hundreds of houses and new roads on this land will only increase run-off, displace water and heighten flood risk for existing homes. The Local Plan does not present any credible or costed mitigation. 7. A lack of essential assessments undermines the soundness of the plan The proposals are missing several fundamental components: - No needs or viability analysis for the additional 1,000 homes - No social cohesion impact assessment - No certainty of infrastructure delivery - No justification for allocating a village levels of growth usually reserved for towns A Local Plan must be sound, justified, effective, and consistent with national policy. These proposals fail all four tests. 8. Additional proposals at Backwell Lake worsen the cumulative harm The plan allocates a further 582 houses next to Backwell Lake (classified under Nailsea), yet the access road would emerge into Backwell, compounding traffic issues on Station Road and increasing pressure on a designated conservation area. This is a clear case of cumulative impact being ignored in favour of increasing housing numbers.			

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					9. Transport assumptions are unrealistic Backwell railway station is not fit for purpose, lacking accessibility and adequate capacity. There is no plan to upgrade the station to support population doubling. The abandoned bus lane scheme already demonstrated that there is no deliverable public transport strategy that supports large-scale growth in Backwell. Conclusion: These proposals are excessive, unsound, and undefendable Backwell is already accepting more than its fair share of growth. The additional 1,000 houses – on irreplaceable Grade 1 farmland, without infrastructure, with uncosted transport solutions and with significant environmental risk – are unjustified and unacceptable. I urge the Independent Inspector to reject these proposals and require North Somerset Council to prepare a sound, evidence-based plan that aligns with national policy, protects finite agricultural assets, and respects the scale and character of Backwell. Regards Adam			

Name: Adam Mark **I.D:** 51431457

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	As a resident with a child in year 1 at the local infant school I worry about the journey that my wife makes with our 6 and 2 yr old on the 10 minute walk to school. It is extremely unsafe due to the volume of traffic on local roads. A development of the size proposed will invariably make this journey even more hazardous. It won't be long before a child is seriously injured in Backwell due to the lack of road safety measures. We need better pavements, more cycle routes, better flow of traffic on the major routes to avoid cut through traffic. School places are limited, there is a difficulty getting doctors appointments, there is no local NHS dentist and and our community does not have the infrastructure to support a bigger community. Our community volunteers are already running baby and toddler groups, warm hubs and activities for the elderly but volunteers are dwindling and there is no public infrastructure to support the very needed community groups that already exist. People that move into an area need to be welcomed to an area to ensure community cohesion and they can only do that when there is the correct infrastructure to welcome them. No social cohesion assessment have been provided. There is significant, standstill, traffic as soon as there are any issues with the motorway. I live in a side road and couldn't get out of my road when the M5 was recently shut due to the motorway traffic flowing through the village. If this is what it's like before the houses it can be underplayed how significant the difficulties would be after further housing. There is regular flooding in the area and this again discourages people from walking and cycling round the village which pushes more people into cars. Backwell seems to have been allocated a huge percentage of houses and this doesn't feel fair.	No the proposal needs to be scraped	see response above	

Name: Adam Reynolds **I.D:** 62854465

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Justified • Effective	Unsure	Unsure	Land East of Backwell adjacent to Backwell common Inadequate roads. access is via a single width lane, which are quiet routes, heavily used for cycling, walking, running to access the cycle path and school. These we no longer be safe to use with both the construction traffic and additional cars on the roads. There are flooding issues with the fields listed and Backwell common and Backwell bow roads regularly flood when there is heavy rain. Building on this flood plain will also impact the existing homes in the elms and Trendlewood areas. There have been water pressure issues with the building of additional homes in both Backwell and Nailsea which resulted in no water in 2024 across Nailsea and Backwell and then in 2025 regular local issues in Backwell common area. There are already severe parking issues in Backwell on the roads and the leisure centre where the car parks cannot cope with usage. The facilities have not been updated since they were built and are at capacity. Without investment in infrastructure, you are just building homes on the edge of a village where the occupants will have to drive into Bristol for work and leisure. The planned development doesn't consider the need for additional public transport options to deal with the increase in number of homes. Specifically, the buses that service the train station is limited and there is only a finite number of car parking spaces in the railway carpark. With no jobs locally it will increase traffic on roads and up to an additional 8000 more cars for the 4000 planned new homes across Nailsea and Backwell. When there have been issues with the motorway closures this results in gridlock in Nailsea and Backwell. At peak times there is heavy queuing at junctions for all local roads. In regards to access the site and increase in traffic, all the roads in and out of Nailsea and Backwell common are narrow roads and have multiple pinch point which will restrict access for large vehicles and hight volumes of road traffic to the area. The single lane railway bridges on station road and chapel hill and the narrow bends at Tickenham and Wraxall. Traffic planners for the BSIP project have noted the Backwell roads crossroads is at capacity and this will proposed development will add more cars onto the roads. The proposed access road between the A370 and Backwell lake is not achievable on cost and practical grounds. The specific field is regally flooded and station road could not cope with the extra traffic so close to the station. Recently there was a tragic death in station close due to the poor road layout and heavy traffic. This ignores that the train line runs through the planned, route it is a main line to the entire south west. Network rail own the land either side of the train line and will not be supportive as any works adjacent to the train line as you will be aware from the winter stoke bridge works in weston. Also network rail have indicated due to cost and impact they expect bridges over the railway line not under. Given your unlikely to ever be able to build a new access road and ignoring the cost is equivalent to the Portishead railway reopening e.g. £70M at least, who is going to pay for this and not make any changes to the existing unsafe road layout. Specifically as there have been at least two serious pedestrian accidents on station road in the last two years, any additional vehicle traffic will be dangerous as this is main route for commuters to walk, cycle to the train station and backwell school. A370 junction is already at capacity and you have already added 1000 homes to Backwell and a further 1000 and more in Nailsea with these plans. To summarise the plans do not adequately address the flooding concerns, impact to existing transport infrastructure and the impact of the heavy vehicles on the roads and then the impact once the homes are build on the civil infrastructure, e.g. parking, schools and healthcare, e.g. GP surgeries and dentists.	Work with local town councils and residents rather than central weston planning comities who don't know the area's that are being developed on and the impact on citizens in the towns effected.		Land East of Backwell adjacent to Backwell common.pdf

Name: Adrian Geisow **I.D:** 62853217

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Justified	Unsure	Unsure	The justification for release of Tower Farm from green belt amounts to a bald statement that land cannot be found elsewhere; there appears to be no detailed demonstration of that assertion. The land protects Weston Big Wood SSSI - building on it removes significant green space and will put more pressure on Weston Big Wood itself. The presence of an SSSI should require increased justification over other greenbelt areas, which are eg just to limit urban spread. No such justification is given. The proposal for 400 homes at Tower Farm would inevitably cause much increased traffic on St Mary's	Tower Farm should be removed from the plan, or at least the number of homes proposed radically reduced.		

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					Road & Wetlands Lane. These are already unsuitable for the current volume of traffic, particularly in the morning work/school run.			

Name: Adrian Jones **I.D:** 62858881

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	I fully endorse Portishead Town Councils (PTCs) draft respons to the NSC Local Plan 2041 and I do not support the development of the Tower Farm location. The site is far too close to the nationally important Big Wood Nature Reserve and associated wildlife corridors. We have already seen a significant reduction in the wildlife that visits our garden especially badgers, hedgehogs and squirrels. There has also been a noticable decline in the number of species of wild birds seen around our garden since moving to High View in 1999. For at least the 35 years the land designated for this development has been considered as Green belt and current Guidence stipulates that it should only be considered for development in exceptional circumstances. How can this be considered exceptional when there are a number of undeveloped brown field sites within less than 3 miles of this site. The irreversable loss of productive farm land/accessible green space will never be able to be restored. The statement contained in the LP 2041 referring to the 'ecological buffer', delivery of biodiversity net gain, preventing the deterioration of irreplacable habitats and delivery of a sustainable plan is extremely wooly, poorly thought through and lacking in a clear and positive plan to address these issues so is clearly not in accordance with the NPPF. The sustainabilty argument for the site cannot be made at the current time for the following reasons: The horrendous traffic consditions around the school at peak times and school sponsored events (Fetes, Sports days, parents evenings etc). The lack of any current or planned safe cycling routes. We live at the top of a steep hill making walking/cycling into the town centere or to transport hubs extremly difficult for young, old or disabled residents. Even with current traffic levels J19 (M5) and the A369 are heavily congested during rush hour periods. The current Bus Service is not good as evidenced by the number of people not using it. This is not because people want to use their cars but the fact that the service is unreliable and extremely long winded, getting from A to B involves going through the alphabet backwards. The M5 turns into a car park at the weekends during the holiday periods forcing local residents to find other (less maintained) routes affecting both local businesses and visitors. This is our main access in and out and there are no plans to improve it. The long long awaited railway will do little to alleviate this. Down road is in extremelt poor repair despite being relaid only a few years ago. In its current condition it will not survive the inevitable heavy construction traffic or the increased traffic due to the extra housing. There is a public RoW through the center of the proposed development and the whole area is heavily used by dog walkers, school children walking to school (which must be encouraged), joggers and people just needing to experience some 'green' time as seen during the pandemic. The fuel pipeline from the Redcliffe Bay depot to Avonmouth passes directly through the site. This will have to be removed prior to any work starting otherwise it could be fractured and leak during construction. If not removed it could cause later subsidence or leakage issues. There are frequent day and late night helecopter operations in and around the A+S Police HQ heli pad. Currently in case of a			

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					malfunction or failure an aircraft can put down in the field in an emergency. This option would disappear if the development were to go ahead. There would also likely be an increase in complaints over the noise which may cause operational issues. The area is a recocognised 'sink' for rain water especially during heavy downpours., tarmacing it over will lead to a detrimental change in local water flows and an increase in the pollution levels of water flowing towards and alongside the Big Wood. . There is clear evidence contained in the wildlife studies carried out that the biodiversity of the Big Wood SSSI and surrounding area is already under significant threat, the disappearance of the colony of greater crested newts is an example. Approval for the development of this site will indicate that NSC is willing to accept this dramatic decline and is committed to doing nothing to try to restore this vitally important habit to its previous condition. As a conclusion, the inclusion of the Tower farm site as a permitted development site in the Local Plan 2041 is unsound, not properly considered and having major sustainability issues that will not be easily overcome to allow a justifiable and viable mitigation case to be provided by either NSC or any subsequent potential developer. The case that the development of green belt land is 'Exceptional' has not been made. The only modification to be made is to totally remove the Tower Farm development proposal from the Local Plan 2041. This is valuable and irreplaceble green space and justification cannot be provided to sanction its loss. Consideration should be given to making it compulsory to developing existing brown field sites first. I do not support the proposed Tower Farm development as laid out in the NSC Local plan 2041			

Name: Adrian Mealing **I.D:** 39179649

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP1: Sustainable Development	No	• Justified • Effective	Yes	Yes	I consider the Local Plan unsound in respect of Policy SP1 because it is not justified and not effective. SP1 sets the overarching requirement for sustainable development, but the allocations made for Congresbury (183 dwellings across three sites) cannot meet the principles set out in this policy. The Council provides no evidence that the village has the infrastructure capacity required to deliver sustainable development as defined by SP1, including: No assessment of primary school capacity or plans for expansion. No evidence of available GP capacity or proposals for new health provision. No funded or designed active travel connections, despite SP1’s emphasis on walking and cycling. No planned improvements to the A370 congestion corridor, which already suffers from severe peak-time delays and safety issues. No demonstration of how the plan will protect the environmental and heritage assets around Congresbury, including the North Somerset & Mendip Bats SAC and the landscape setting of Cadbury Hill Fort. Because the evidence base does not demonstrate that development in Congresbury can be delivered sustainably, the policy cannot be considered effective or justified, failing the NPPF soundness requirements.	To make SP1 sound, the plan must be supported by a clear, evidence-based Infrastructure Delivery Plan identifying specific and funded infrastructure for Congresbury, including: primary school capacity expansion, GP/ healthcare capacity improvements, deliverable active travel schemes, A370 corridor upgrades, ecological and dark-corridor protection measures. Without this, the development directed to Congresbury cannot be considered sustainable under SP1.		

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SP2: Climate Change	No	• Justified • Effective • Consistent with national policy	Yes	Yes	I consider Policy SP2 to be unsound because it is not justified, not effective, and not consistent with the National Planning Policy Framework. SP2 sets out strong requirements for reducing greenhouse gas emissions, prioritising active travel, enabling low-carbon transport, and ensuring development is located and designed to minimise carbon impact. However, the allocations in Congresbury (183 dwellings across three sites) cannot comply with these principles and therefore render the policy ineffective in practice. Specifically: No active travel network exists to connect the allocated sites with village services, and the improvements mentioned (e.g., Smallway junction crossing, A370 cycle links) are unfunded, undesigned, and absent from the Infrastructure Delivery Plan. Congresbury has no frequent public transport service, no strategic bus enhancements in the Local Plan, and no rail access, meaning new housing will generate car-dependent development contrary to SP2 and the NPPF. The A370 congestion corridor already performs poorly, with no strategic capacity upgrades planned, meaning the plan will increase carbon-intensive travel. The allocations require infrastructure to meet climate-change objectives, yet no delivery mechanism, funding, phasing, or timescales are provided. SP2 emphasises minimising flood-related risk, but the Woodhill Nurseries site includes areas requiring the Sequential Test and relies on future mitigation not evidenced at plan stage. For these reasons, Policy SP2 cannot be implemented effectively alongside the Congresbury allocations and is therefore unsound.	Proposed Modification to SP2: To make SP2 effective and justified, the plan must be supported by a detailed and funded infrastructure package for Congresbury showing how low-carbon travel will be achieved. This must include: deliverable active travel routes linking the three allocations to village facilities and the wider network, confirmed and funded junction upgrades on the A370 and Smallway, improvements to public transport frequency and coverage, flood-risk mitigation measures demonstrated at plan stage, clear phasing linking development occupation to the delivery of sustainable transport infrastructure. Without these modifications, the development allocated for Congresbury will be car-dependent and incompatible with SP2's climate-change objectives.		
SP3: Spatial strategy	No	• Justified • Effective • Consistent with national policy	Yes	Yes	I consider Policy SP3 to be unsound because it is not positively prepared, not justified, not effective, and not consistent with national policy. SP3 forms the overarching Spatial Strategy for North Somerset, yet the allocations made for Congresbury (183 dwellings across three separate sites) do not align with the principles of directing growth to sustainable locations with appropriate access to infrastructure, services, and low-carbon transport options. My concerns are as follows: 1. SP3 is not positively prepared. SP3 requires growth to be aligned with infrastructure delivery. However, Congresbury receives no new: school capacity, GP or primary care provision, public transport improvements, strategic road upgrades, funded active travel links. The Spatial Strategy therefore does not meet objectively assessed development needs in a sustainable way. 2. SP3 is not justified	Proposed modification to SP3: To make SP3 sound, North Somerset Council must revise the Spatial Strategy to ensure that any allocations in Congresbury are supported by a clear, funded and deliverable infrastructure package. This should include: demonstrated primary and secondary school capacity, GP/ healthcare expansion, deliverable active travel and public transport improvements, confirmed transport capacity upgrades on the A370 corridor, full ecological assessment and mitigation for the North Somerset & Mendip Bats SAC, avoidance of partially flood-risk land, heritage-led review of allocations impacting Cadbury Hill Fort, evaluation of reasonable alternative locations with better sustainability credentials. Without these modifications, the Spatial Strategy remains neither justified nor deliverable.		

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					The Plan does not provide a transparent or evidence-based justification for selecting Congresbury as a location for significant housing growth. No comparative analysis is provided showing why lower-impact or better-served areas were not chosen instead. The absence of an alternatives assessment makes the strategy unjustified. 3. SP3 is not effective. The Congresbury allocations depend on infrastructure that is: unfunded, not designed, absent from the Infrastructure Delivery Plan, reliant on future “aspirational” schemes (e.g., Strawberry Line extensions, unspecified A370 improvements). The policy therefore cannot be delivered during the plan period. 4. SP3 is not consistent with national policy. The NPPF requires plans to: focus growth where it can be supported by infrastructure, reduce reliance on the private car, apply the flood-risk Sequential Test, protect designated heritage assets, avoid coalescence and protect settlement identity. The Congresbury allocations contradict all of these principles, especially as one site (Woodhill Nurseries) sits partly in higher flood-risk zones and impacts the setting of Cadbury Hill Fort (Scheduled Monument). Therefore, SP3 is not consistent with the NPPF’s tests for sustainable locations, flood risk, climate resilience, heritage protection, and sustainable transport.			
SP4: Placemaking	No • Justified • Effective • Consistent with national policy		Yes	Yes	Representation on Policy SP4 – Placemaking I consider Policy SP4 to be unsound because it is not justified, not effective, and not consistent with national policy. The Placemaking policy sets out principles of high-quality design, sustainable neighbourhoods, local character protection, and well-integrated infrastructure. However, the housing allocations for Congresbury (183 homes across three sites) directly conflict with these principles, for the following reasons: 1. SP4 is not justified SP4 requires development to be supported by appropriate facilities, services, transport options, and green infrastructure. Yet the Congresbury allocations: provide no new school or GP capacity, rely on future, unfunded active travel schemes, offer no village-centre enhancements, are not accompanied by any placemaking vision or masterplan, sit at the rural edge with no evidence of need for expansion into sensitive landscape areas. No evidence is provided that these sites can be integrated into the existing settlement in a manner consistent with SP4’s placemaking criteria. 2. SP4 is not effective SP4 cannot be implemented in Congresbury because the necessary preconditions for placemaking are absent. Specifically: There is no masterplanning framework to guide the combined impact of three separate allocations. No design guidance or codes are provided to ensure development reflects the village’s rural character. Required infrastructure (walking/cycling links, public transport improvements, landscape buffers, green infrastructure, junction upgrades) is: not funded, not costed, not scheduled, not included in the Infrastructure Delivery Plan (IDP). The cumulative impact of 183 additional homes has not been assessed in terms of movement, landscape character, or	To make SP4 sound, the Plan must include: A clear placemaking and masterplanning framework for Congresbury setting out: landscape strategy, character assessment, heritage impact parameters, village separation strategy, active travel network design, community facility requirements. A deliverable infrastructure package for: school place expansion, healthcare capacity, A370 corridor safety and traffic management, funded and phased active travel improvements. A requirement for design codes or village character guidance before planning applications are submitted. Without these modifications, the policy cannot ensure high-quality placemaking in Congresbury and remains unsound.		

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					environmental constraints. Without supporting frameworks, SP4 cannot be delivered effectively. 3. SP4 is not consistent with national policy The NPPF requires plans to: secure high-quality, locally distinctive design (NPPF 126–130), protect landscape character (NPPF 174), ensure sustainable, walkable neighbourhoods (NPPF 105–110), integrate green and blue infrastructure (NPPF 169), protect heritage assets and their settings (NPPF 200). The Congresbury allocations contradict these principles, particularly due to: car-dependent layout imposed by A370 geography, absence of walkable access to village services, harm to the wider setting of Cadbury Hill Fort (Scheduled Monument), development extending into rural edge in a way that weakens village identity. As such, SP4 is not consistent with national policy requirements for placemaking, design quality and sustainable growth.			
SP6: Villages and rural areas	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	I consider Policy SP6 to be unsound because it is not positively prepared, not justified, not effective, and not consistent with national policy. SP6 states that development in villages must protect rural character, respect settlement form, support local services, and integrate sensitively into the landscape. The policy also emphasises directing growth to “sustainable” villages with suitable facilities and transport options. However, the allocations for Congresbury fail to meet these requirements for the following reasons: 1. SP6 is not positively prepared The Plan allocates 183 dwellings to Congresbury without providing the necessary infrastructure to support this scale of rural growth. There is no identified or funded: primary school expansion, GP capacity increase, public transport improvements, A370 highway or junction upgrades, delivery mechanism for safe walking/cycling connectivity. SP6 cannot deliver sustainable rural development without supporting infrastructure. 2. SP6 is not justified SP6 lacks a robust evidence base for selecting Congresbury as a growth location. The Plan does not explain why Congresbury — a village with limited facilities and no railway station — is allocated significant housing while other settlements with greater sustainability credentials receive less. There is also no assessment of alternative sites or settlement options, meaning the strategy is not justified or transparent, contrary to NPPF requirements. 3. SP6 is not effective SP6 cannot be implemented effectively in Congresbury due to: Absence of a rural masterplan or village character assessment. No defined measures to prevent coalescence with Yatton, despite both villages being within close proximity along the A370 corridor. Infrastructure required to support development (active travel routes, junction improvements, drainage upgrades) being unfunded or absent from the Infrastructure Delivery Plan. No cumulative impact assessment across	SP6 should be made sound by: Preparing a detailed rural settlement hierarchy and clearly justifying why Congresbury has been selected for significant growth compared to better-connected villages. Introducing a Strategic Gap between Congresbury and Yatton to prevent coalescence. Providing a funded infrastructure package including: school place expansion, GP/healthcare enhancement, active travel and bus service improvements, A370 corridor safety and capacity upgrades. Requiring a Congresbury-specific masterplan addressing rural character, landscape setting, heritage protection, ecological corridors and cumulative transport effects. Without these modifications, SP6 remains unjustified and cannot be delivered sustainably.		

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					the three Congresbury allocations. Without these components, SP6 is not deliverable. 4. SP6 is not consistent with national policy The NPPF requires rural development to: respect landscape setting, avoid settlement coalescence, promote sustainable transport in rural areas, locate development where services are accessible, protect natural and historic assets. The allocations in Congresbury contradict these principles because: They expand the village along the A370 in a way that threatens separation from Yatton. They rely on the car for almost all trips due to a lack of public transport and active travel infrastructure. The Woodhill Nurseries site impacts the wider setting of Cadbury Hill Fort (Scheduled Monument). No demonstration is provided that development avoids harmful impacts on the North Somerset & Mendip Bats SAC. SP6 therefore fails key NPPF sustainability tests.			
SP8: Housing	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	I consider Policy SP8 to be unsound because it is not positively prepared, not justified, not effective, and not consistent with national policy. SP8 sets out the housing requirement and provides the basis for how and where homes should be delivered. However, the application of SP8 in relation to Congresbury is fundamentally flawed. The Plan allocates 183 dwellings to the village across three separate sites without demonstrating that such growth can be delivered sustainably or in line with SP8's housing principles. My specific concerns are as follows: 1. SP8 is not positively prepared SP8 seeks to meet the area's housing requirements, but it does so without aligning delivery to necessary infrastructure. Congresbury is identified as accommodating a significant proportion of rural growth, yet: no new school capacity is planned, no GP or healthcare expansion is identified, no public transport improvements are included, no funded active travel connections exist, the A370 corridor remains unaddressed despite severe congestion. This means SP8 does not plan positively for growth supported by infrastructure, contrary to the NPPF. 2. SP8 is not justified The selection of Congresbury as a location for housing growth has not been justified through transparent evidence. SP8 does not demonstrate: why Congresbury is appropriate for this scale of housing compared with better-served settlements, that reasonable alternatives were assessed, that environmental constraints (bats SAC, heritage impacts, flood risk) were properly considered, that the cumulative impact of three allocations has been tested. The absence of a rational, evidence-driven settlement hierarchy makes SP8 unjustified. 3. SP8 is not effective Housing delivery in Congresbury is dependent on infrastructure that is: unfunded, not programmed, not included in the Infrastructure Delivery Plan, reliant on future "aspirational" improvements (e.g., Strawberry	To make SP8 sound, the Plan should: Provide a clear, evidence-based settlement hierarchy demonstrating why Congresbury is selected for significant growth. Identify and secure a funded infrastructure package including: school place expansion, GP/healthcare improvements, A370 corridor and junction capacity upgrades, deliverable active travel routes connecting the housing sites to village services. Apply the flood risk Sequential Test robustly and remove or amend allocations where safer, reasonable alternatives exist. Include heritage-led criteria to prevent harm to the setting of Cadbury Hill Fort. Provide a coordinated masterplan for Congresbury addressing cumulative impact, landscape character, ecological corridors, and transport. Without these changes, SP8 is not deliverable or justified.		

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					Line links, Smallway junction upgrades). SP8 cannot be considered effective when key enabling infrastructure has no delivery mechanism. Additionally, there is no masterplan or coordinated approach to ensure that the three allocations integrate properly into the village, meaning SP8 will not deliver coherent or sustainable outcomes. 4. SP8 is not consistent with national policy The NPPF requires plans to: locate housing in sustainable locations with access to services and transport, reduce reliance on the private car, protect the natural environment, apply the flood risk sequential test, conserve heritage assets, avoid settlement coalescence. The Congresbury allocations contradict these requirements because: The village is predominantly car-dependent. No sustainable transport improvements accompany the housing. One site (Woodhill Nurseries) includes areas requiring the Sequential Test. The site also impacts the setting of Cadbury Hill Fort (Scheduled Monument). Expansion along the A370 threatens settlement separation from Yatton. No SAC mitigation strategy is identified. Therefore, SP8 is not consistent with national policy.			
SP10: Transport	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Yes	Yes	I consider Policy SP10 to be unsound because it is not positively prepared, not justified, not effective, and not consistent with national policy. SP10 sets out the transport principles for the Local Plan, requiring development to minimise carbon emissions, promote walking and cycling, improve public transport use, and reduce private car dependency. However, the allocations for Congresbury (183 dwellings) directly contradict these principles. My concerns are as follows: 1. SP10 is not positively prepared SP10 requires alignment between transport infrastructure and the scale of growth, but the Plan identifies no strategic transport improvements for Congresbury despite allocating three housing sites. There is: No improvement to the heavily congested A370 corridor, No upgrade to the Smallway junction, No safe or continuous walking or cycling routes, No bus service enhancement, reliability guarantee, or frequency increase. SP10 therefore fails to plan for transport in a meaningful or forward-looking way. 2. SP10 is not justified SP10 is not supported by the necessary evidence base. No transport modelling, junction capacity analysis or impact assessment has been provided for Congresbury, even though the village sits on a known traffic bottleneck. The absence of any analysis of cumulative impact from 183 new homes means the policy lacks justification and does not meet NPPF requirements for evidence-led planning. 3. SP10 is not effective SP10 cannot be delivered in Congresbury because: Proposed “active travel enhancements” are not funded, not designed, and not included in the Infrastructure Delivery Plan. The Strawberry Line extensions mentioned elsewhere in the plan are aspirational only and not guaranteed within the plan period. Walking and cycling from the new housing sites to village facilities is currently unsafe, due to a lack of pavements, dangerous A370 road conditions, and missing crossings.	To make SP10 sound, the Plan must include: A fully costed and funded transport infrastructure package for Congresbury, including: A370 corridor upgrades and junction improvements, A safe, continuous walking and cycling route connecting all three housing allocations to village services, Funded pedestrian crossings (including Smallway junction), Public transport frequency improvements and service guarantees, New or improved bus priority measures. An evidence-based transport modelling assessment showing whether Congresbury can support the planned growth without severe residual impacts. Clear phasing requirements linking housing delivery to completion of active travel and highway improvements. Without these changes, SP10 remains unjustified and undeliverable.		

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					No mechanism exists to ensure that new homes will be supported by sustainable transport solutions. This makes SP10 undeliverable in practice. 4. SP10 is not consistent with national policy The NPPF requires plans to: enable sustainable transport modes for everyday journeys (NPPF 104–106), reduce the need to travel by car, ensure safe and suitable access for all users (NPPF 110), avoid development that results in severe residual impacts (NPPF 111). Allocating 183 homes in a location that is entirely car-dependent, with no rail station, infrequent bus services, and no funded active-travel infrastructure, fails all of these requirements. In addition, the A370 routinely experiences congestion and safety issues; adding further traffic without mitigation is inconsistent with national transport policy. SP10 therefore fails all four soundness tests.			
SP11: Historic and natural environment	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Yes	Yes	I consider Policy SP11 to be unsound because it is not positively prepared, not justified, not effective, and not consistent with national policy. SP11 states that the Local Plan will protect and enhance the historic environment, natural environment, biodiversity networks, designated sites, landscape character, and heritage assets. However, the housing allocations for Congresbury fundamentally conflict with these objectives. My concerns are as follows: 1. SP11 is not positively prepared The policy requires the plan to protect biodiversity, landscape character and heritage, yet the allocations in Congresbury (183 dwellings) lie adjacent to or within areas of significant environmental and heritage sensitivity, including: The North Somerset & Mendip Bats SAC sustenance zones, Core dark corridors used by horseshoe bats, The landscape setting of Cadbury Hill Fort (Scheduled Monument), Environmentally sensitive rhynes and meadows, Areas requiring the flood risk Sequential Test. SP11 is therefore not aligned with the spatial decisions made elsewhere in the plan. 2. SP11 is not justified SP11 requires evidence-led protection of environmental assets. However: The Plan provides no site-specific ecological assessment for the Congresbury allocations. No evidence has been provided demonstrating that bat flightlines and foraging habitats can be safeguarded. The Woodhill Nurseries allocation is acknowledged to affect the setting of Cadbury Hill Fort, yet the plan does not explain why harm is unavoidable or justified. No Landscape and Visual Impact Assessments (LVIAs) have been undertaken for the allocated sites. No cumulative environmental assessment is provided despite three allocations within a small geographic area. This means SP11 is not supported by the required technical evidence and is therefore unjustified. 3. SP11 is not effective SP11 cannot be implemented because the Plan does not provide: A mitigation strategy for the Bats SAC, Defined dark corridor protection zones, Environmental buffers around bat habitats and rhynes, A heritage-led masterplan for development near Cadbury Hill Fort, Flood resilience measures or hydrological modelling for sequential test areas. Without actual, deliverable mechanisms, SP11 cannot achieve the outcomes it describes.	To make SP11 sound, the Plan must include: A detailed, site-specific ecological assessment and SAC mitigation strategy for Congresbury, including: Preservation of dark corridors, Sustenance zone protection, Habitat buffering and enhancement, Coordinated lighting and landscape strategy. A full heritage impact assessment for the Woodhill Nurseries allocation and surrounding landscape, demonstrating how harm to the setting of Cadbury Hill Fort will be avoided. A defined Landscape Strategy for Congresbury identifying rural edges, key views, green infrastructure networks, and rural character protections. Removal or modification of any allocation partially within higher flood-risk areas, unless the Sequential Test can be met and evidenced. A cumulative environmental impact assessment covering all three Congresbury allocations. Without these modifications, SP11 cannot be delivered and remains unsound.		

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					4. SP11 is not consistent with national policy The NPPF requires: great weight to be given to conservation of designated heritage assets (NPPF 200), development to avoid biodiversity net loss and protect ecological connectivity (NPPF 179–182), application of the Sequential Test for flood risk (NPPF 159–161), avoidance of unacceptable landscape impacts (NPPF 174). The Congresbury allocations contradict these principles: Development at Woodhill Nurseries intrudes into the wider setting of Cadbury Hill Fort (Scheduled Monument). The sites lie within internationally significant horseshoe bat sustenance zones, with no provided mitigation. Ecological network fragmentation is likely. One site requires the Sequential Test yet was allocated despite alternative lower-risk locations elsewhere in North Somerset. Therefore, SP11 fails to reflect national policy requirements for historic and natural environment protection.			
Policy LP5: Housing, employment and mixed use allocations	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Yes	Yes	I consider LP5 to be unsound because it is not positively prepared, not justified, not effective, and not consistent with national policy. LP5 allocates three housing sites in Congresbury totalling 183 dwellings: -Woodhill Nurseries (100 homes) -Land north of Mulberry Road / Pineapple Farm (70 homes) -Land south of Station Road (13 homes) However, these allocations are not supported by the necessary evidence, infrastructure assessments or environmental protections required to satisfy the NPPF or the Plan’s own strategic policies. My concerns are as follows: 1. LP5 is not positively prepared LP5 allocates substantial housing to a village that has: -no additional school capacity identified, -no GP or healthcare expansion, -no public transport improvements, -no funded active travel route upgrades, -no planned A370 or Smallway junction improvements, -no coordinated masterplan linking the three sites together. The allocation of 183 dwellings without supporting infrastructure is not “positively prepared” and cannot deliver sustainable development. 2. LP5 is not justified The policy does not provide transparent or evidence-based justification for selecting these specific sites in Congresbury instead of more sustainable alternatives elsewhere in the district. There is: -no settlement hierarchy explaining why Congresbury is expected to take significant growth, -no alternatives appraisal showing other locations were considered and rejected, -no cumulative environmental assessment for the three allocations, -no landscape or heritage assessment supporting the Woodhill Nurseries allocation, -no detailed ecological analysis for the North Somerset & Mendip Bats	To make LP5 sound, North Somerset Council must: Provide a transparent, evidence-based settlements assessment demonstrating why Congresbury has been allocated this scale of growth. Remove or reduce allocations where the flood risk Sequential Test is not met (e.g., Woodhill Nurseries). Produce a full SAC mitigation strategy for Congresbury, including dark corridor protection, lighting restrictions, habitat buffers and ecological connectivity. Provide a heritage-led assessment for land near Cadbury Hill Fort and amend allocations accordingly. Produce a village-wide masterplan for Congresbury addressing cumulative impact, landscape character, drainage, green infrastructure, and active travel. Include a funded and deliverable infrastructure package covering: -school and GP capacity, -A370/Smallway junction upgrades, -safe walking and cycling routes, -public transport improvements. Demonstrate through transport modelling that the allocations will not result in severe residual impacts. Without these modifications, LP5 cannot be considered justified or deliverable.		

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					SAC despite Congresbury lying within sustenance zones and dark corridors. The absence of a robust evidence base means LP5 is not justified. 3. LP5 is not effective For a plan to be effective, it must be deliverable. However, the LP5 allocations rely on infrastructure that: -does not exist, -is not designed, -is not costed, -is not included in the Infrastructure Delivery Plan, -has no identified funding, -has no phasing or delivery mechanism. This includes: -safe walking/cycling routes, -A370 and Smallway junction improvements, -drainage and flood mitigation works, -ecological buffers and lighting strategies, -heritage mitigation for Cadbury Hill Fort. Without this infrastructure and mitigation in place, LP5 is not deliverable and therefore not effective. 4. LP5 is not consistent with national policy The NPPF requires plans to: -locate growth in sustainable areas with access to services (NPPF 105–106), -reduce reliance on the car, -apply the flood risk Sequential Test (NPPF 159–162), -protect designated heritage assets (NPPF 200), -avoid significant harm to biodiversity and SACs (NPPF 180–182), -ensure impacts on the road network are acceptable (NPPF 111). LP5 conflicts with national policy because: -Congresbury is a car-dependent village with no rail station and limited buses. -The Woodhill Nurseries allocation includes areas requiring the Sequential Test, yet no evidence is provided that safer alternative sites were considered. -The site affects the wider landscape setting of Cadbury Hill Fort (Scheduled Monument). -Ecological networks including horseshoe bat foraging areas and dark corridors are at risk, with no mitigation strategy. -No transport modelling has been carried out for the impact of 183 homes on the congested A370 corridor. LP5 is therefore inconsistent with the NPPF.			
Policy DP1: High quality design	No	• Justified • Effective • Consistent with	Yes	Yes	I consider Policy DP1 to be unsound because it is not justified, not effective, and not consistent with national policy. DP1 requires new development to achieve high design quality, reflect local character, integrate into its surroundings, enhance sense of place, protect landscape setting, and create safe, attractive and accessible		To make DP1 sound, the Plan must include: A	

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		national policy			streets and spaces. However, none of these requirements have been evidenced or secured for the three housing allocations proposed in Congresbury (183 dwellings). The Plan provides no mechanism to ensure that DP1 can actually be applied to these sites. 1. DP1 is not justified DP1 is dependent on robust character assessments, masterplanning, heritage assessment, landscape evidence, and design coding. However, for Congresbury: no village character appraisal exists, no landscape or visual impact assessment (LVIA) has been provided, no heritage setting assessment has been undertaken (particularly relevant to Cadbury Hill Fort), no urban design analysis of the A370 corridor form has been produced, no cumulative impact assessment of three allocations is included. This means DP1 is not justified by an appropriate evidence base. 2. DP1 is not effective DP1 cannot be implemented in Congresbury because: There is no masterplan coordinating the three allocations. No guidance is provided on protecting village identity or preventing coalescence with Yatton. Rural-edge development at Woodhill Nurseries is allocated without any specified design requirements for landscaping, views, massing, or rural transition. The Plan does not set out the infrastructure (active travel, public realm, green infrastructure) required for good design. No design codes or development briefs exist for any of the proposed sites. Without these tools, DP1 cannot lead to the high-quality design outcomes it seeks to secure. 3. DP1 is not consistent with national policy DP1 fails to reflect or deliver several NPPF requirements: NPPF 127–131: securing high-quality design requires character assessments, coding, and contextual analysis — none of which are provided for Congresbury. NPPF 174: protecting valued landscapes — no landscape assessment has been carried out for these allocations.		Congresbury-specific masterplan covering all three allocations, including: landscape character protection, rural edge design principles, views and setting of Cadbury Hill Fort, heritage parameters, active travel and movement network, green infrastructure strategy. A village character assessment forming the baseline for design decisions. Mandatory design codes for all Congresbury allocations before any planning applications are submitted. A requirement for full Landscape and Visual Impact Assessments	

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					NPPF 72: larger development sites require masterplans — none exist. NPPF 200–202: heritage must be conserved — yet the Woodhill Nurseries site impacts the wider setting of Cadbury Hill Fort without an assessment. Therefore, DP1 is not consistent with national policy for design-led planning.		(LVIA) for development on the village edge. A cumulative design and placemaking assessment of the three allocations. Without these modifications, DP1 cannot deliver high-quality, place-specific design and remains unsound.	
Policy DP2: Residential development within settlement boundaries	No	‣ Justified ‣ Effective ‣ Consistent with national policy	Yes	Yes	For DP2 to be justified, the Plan must demonstrate that the allocated sites can support the required residential standards. However, Congresbury's allocations lack: evidence of adequate internal and external space provision, assessments of noise, air quality, or amenity impacts from proximity to the A370, analysis of safe pedestrian access from housing to services, evidence of capacity for open space, play space, or community amenity, confirmation that layouts can accommodate parking, cycle storage, EV charging, refuse requirements, and accessibility standards, assessments on how higher densities might affect the village's rural character. Without these assessments, DP2 is not supported by the evidence necessary to justify its application. 2. DP2 is not effective DP2 cannot be delivered in Congresbury because the plan fails to provide: a masterplan showing how the three sites can achieve adequate layouts, space standards and amenity, a design code to guarantee DP2 standards across all sites, a strategy for open space and play space, which DP2 requires, confirmation that the village has capacity for the amenity requirements generated by 183 new homes,	To make DP2 sound, the Plan must: Provide a Congresbury-wide masterplan demonstrating how residential standards will be met across the three allocations. Produce village-specific design codes setting out requirements for: internal and external space standards, parking and cycle storage, green and open space, play space, accessibility, layout principles, A370 noise mitigation and buffers. Carry out noise and air quality assessments for the A370 corridor. Identify specific open space and play space delivery mechanisms. Provide safe pedestrian and cycle access plans from each allocation to the village centre. Without these modifications, DP2 cannot be implemented or enforced.		

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					safe and direct routes for walking and cycling, needed for residential quality of life. The allocations also sit adjacent to a heavily trafficked main road (A370), raising issues around noise exposure and air quality that DP2 requires to be addressed but which the Plan does not evidence. This means DP2 cannot operate effectively for these allocations. 3. DP2 is not consistent with national policy The NPPF requires that: new homes provide a high standard of amenity (NPPF 130), developments create safe, accessible environments, residential layouts encourage sustainable travel, plans consider noise, air quality, and pollution exposure, adequate open space is provided (NPPF 98-100), development achieves well-designed places through design codes and local character assessments. The Congresbury allocations fail to meet these NPPF requirements because: no amenity assessments have been carried out, no design codes exist to enforce space and accessibility standards, walking/cycling infrastructure is missing, the proximity to the A370 raises unresolved pollution and noise concerns, open space provision is undefined and untested. Thus, DP2 is not consistent with the national policy framework.			
Policy DP3: Residential extensions	No	• Justified • Effective • Consistent with national policy	Yes	Yes	I consider DP3 to be unsound because it is not justified, not effective, and not consistent with national policy. DP3 requires new development to be inclusive, accessible, walkable and connected, ensuring that all residents — including those with disabilities, limited mobility, or without access to a private vehicle — can reach services safely and conveniently. However, the three allocations in Congresbury (183 dwellings total) do not have the infrastructure or connectivity to meet DP3's requirements. 1. DP3 is not justified To be justified, the policy must be supported by evidence that the allocated sites can deliver inclusive, accessible development. However: No accessibility assessment has been carried out for Congresbury's housing sites.	To make DP3 sound, the Plan must include: A Congresbury Accessibility Audit, evaluating safe, inclusive access from each allocated site to village services. Delivery of continuous, step-free, well-lit pedestrian routes linking all allocations to: the primary school, GP facilities, shops and services, bus stops,		

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					There is no continuous footpath from the Woodhill Nurseries or Mulberry Road sites to the village centre. The A370 presents a significant barrier to safe pedestrian movement, with no funded crossings. The Plan provides no evidence that people with disabilities or mobility challenges can access key services from the allocations. There is no assessment of walking distances or inclusive access to the school, GP, shops, bus stops, or community facilities. Without this evidence, DP3 is not justified. 2. DP3 is not effective DP3 cannot be delivered in Congresbury because: There is no safe, step-free, continuous walking route between the allocated sites and key village destinations. The Smallway junction crossing required for Woodhill Nurseries is unfunded and not in the Infrastructure Delivery Plan. Congresbury's bus service is intermittent and undependable, making inclusive access to employment and services impossible without a car. No public realm improvements, dropped kerbs, tactile paving, or mobility-friendly upgrades are planned. No inclusive mobility audit has been undertaken to confirm these sites can meet DP3's standards. Therefore, DP3 is not implementable. 3. DP3 is not consistent with national policy The NPPF requires development to: promote inclusive and accessible environments (NPPF 92 & 130), enable safe and suitable access for all users (NPPF 110), reduce barriers for people with disabilities, ensure layouts support walking and cycling, locate development where sustainable access is available. The Congresbury allocations are inconsistent with the NPPF because: They rely on walking routes that do not exist today. They require movement across or along the dangerous A370, which has no safe infrastructure for vulnerable users. The absence of public transport improvements fails NPPF inclusive access expectations.	community spaces. A fully funded and designed pedestrian/cycle crossing at Smallway and at other A370 pinch points. Public realm upgrades including dropped kerbs, tactile paving, mobility-friendly surfacing and lighting. A requirement for development proposals to demonstrate car-free internal movement, inclusive design, and pedestrian-focused layouts. Improvements to public transport accessibility and frequency for the village. Without these modifications, DP3 cannot be delivered or enforced.		

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					The reliance on cars disadvantages those who cannot drive, directly conflicting with national policy. DP3 therefore fails to align with the NPPF.			
Policy DP4: Houses in Multiple Occupation and residential subdivision	No	‣ Justified ‣ Effective ‣ Consistent with national policy	Yes	Yes	I consider Policy DP4 to be unsound because it is not justified, not effective, and not consistent with national policy. DP4 requires new development to ensure a high standard of residential amenity for both existing and future occupants, including protection from noise, air pollution, overlooking, overshadowing, traffic impacts, poor layout, and inadequate open space. However, the three Congresbury allocations (183 dwellings) fail to demonstrate that these amenity requirements can be met. My concerns are as follows: 1. DP4 is not justified For DP4 to be justified, the Council must show that the allocations can deliver acceptable amenity conditions for future residents. However: No noise assessment has been carried out for the Woodhill Nurseries or Mulberry Road sites despite immediate proximity to the heavily trafficked A370. No air quality assessment exists to demonstrate the suitability of development near the A370 corridor. No Amenity Impact Assessment has been undertaken for existing residents surrounding the sites. The plan provides no green space strategy, no noise-buffering measures, and no design evidence showing how good amenity can be achieved. No evidence exists that the three sites can accommodate required private amenity space, play space, or community open space. DP4 therefore lacks the evidence base required to justify its application. 2. DP4 is not effective DP4 cannot be implemented effectively in Congresbury because: No site-specific mitigation measures are required for noise, pollution, or traffic impacts. The A370 creates a significant pollution and noise environment, yet the plan does not set out minimum distance buffers, acoustic screening, or layout requirements. No analysis has been undertaken of cumulative amenity harm from developing three adjacent/nearby sites in a village constrained by narrow lanes and limited service capacity. The allocations provide no detailed amenity protection requirements	To make DP4 sound, the Plan must include: A full Amenity Impact Assessment for all Congresbury allocations, including noise, air quality, traffic, overshadowing and overlooking. Noise and air quality modelling for sites bordering the A370, including minimum buffer distances and acoustic mitigation. Clear amenity-based layout and spacing standards for all allocations. A defined open space, play space and green space strategy for Congresbury. A requirement for off-site public realm improvements to support community amenity. A cumulative assessment of amenity impacts from all three allocated sites. Ensuring that development does not significantly reduce the amenity of existing residents. Without these modifications, DP4 cannot be implemented and remains unsound.		

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					for existing homes bordering the development sites. No safe or continuous walking routes currently exist, reducing residential amenity and quality of life for future occupants. Therefore DP4 cannot be delivered in the form presented and is not effective. 3. DP4 is not consistent with national policy The NPPF requires Local Plans to: secure a high standard of amenity for all current and future users (NPPF 130), avoid exposing residents to unacceptable noise (NPPF 185), ensure layouts protect health and wellbeing, consider air quality, pollution and transport noise, integrate high-quality open spaces (NPPF 98–100). The Congresbury allocations do not comply with these requirements because: There is no evidence that future residents would not be exposed to harmful noise levels from the A370. Air quality exposure has not been assessed. No strategic or site-level open space provision is identified. No analysis is conducted on the amenity impacts on existing local residents. No mechanisms for play space, public open space, or quiet/green amenity areas are provided. As a result, DP4 is not consistent with national policy and is unsound.			
Policy DP5: Climate change adaptation and resilience	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Yes	Yes	I consider Policy DP5 to be unsound because it is not positively prepared, not justified, not effective, and not consistent with national policy. DP5 states that development must be resilient to climate change impacts, prioritise adaptation measures, avoid flood risk, integrate sustainable drainage, reduce overheating, manage water resources and protect ecological networks. However, the three Congresbury allocations (183 dwellings) do not demonstrate that they can meet these requirements. There is no evidence or infrastructure in the Plan enabling DP5 to be implemented in Congresbury. 1. DP5 is not positively prepared Congresbury lies in an area already experiencing climate-related risks	To make DP5 sound, the Plan must include: A full flood-risk Sequential Test for the Congresbury allocations, demonstrating whether lower-risk sites exist. Detailed climate-resilience assessments for Congresbury, including: flood modelling (fluvial and surface water), drainage capacity testing, climate-change rainfall allowances, groundwater risk assessment. A village-specific SuDS strategy, identifying: on-site attenuation, watercourse capacity, exceedance routes, long-term maintenance. A heat-resilience strategy for all allocations (tree planting, green corridors, shading design, orientation). A cumulative climate impact assessment for the 183		

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					including surface water flooding, river flooding (Congresbury Yeo), rising groundwater and ecological vulnerability affecting the Bats SAC. Despite this, DP5 does not include any: local climate-risk assessments for Congresbury, drainage infrastructure upgrades, flood mitigation plans for the allocated sites, adaptation strategies for extreme heat, resilience measures tied to development phasing, commitments to bollard-level or street-level SuDS integration. Allocating housing in climate-sensitive areas without adaptation planning is not positive planning. 2. DP5 is not justified. DP5 requires evidence demonstrating that the allocated sites can adapt to climate impacts. However: The Woodhill Nurseries site includes areas requiring the Sequential Test, yet no site-specific flood modelling is provided. No assessment of surface water management capacity exists for any allocation. No climate-change rainfall allowances or future flooding scenarios have been produced for Congresbury's network of rhynes. The cumulative impact of 183 homes on drainage has not been assessed. No ecological or climate resilience appraisal has been undertaken for development within or adjacent to horseshoe bat sustenance zones. Without this evidence, DP5 is not justified. 3. DP5 is not effective. DP5 cannot be delivered in Congresbury because: No SuDS (Sustainable Drainage Systems) strategy has been proposed. There is no plan for upgrading the drainage infrastructure which already struggles during heavy rainfall. No heat-mitigation strategy exists (shade, green infrastructure, orientation, ventilation) No climate-mitigation design principles (e.g., tree canopy cover) are required for the 3 sites. The policy relies on individual planning applications to resolve climate adaptation issues — contrary to the NPPF requirement for plan-level climate resilience. This makes DP5 unimplementable and ineffective. 4. DP5 is not consistent with national policy. The NPPF requires that plans: proactively plan for climate change (NPPF 152), avoid risk from flooding through the Sequential Test (NPPF 159–162), reduce the vulnerability of communities to climate-related hazards (NPPF 153), ensure development is climate-resilient at plan stage, not application stage (NPPF 154). The Congresbury allocations breach these requirements because: the flood-risk Sequential Test has not been evidenced, no climate resilience modelling exists, drainage capacity and future climate risk have not been assessed, ecological corridors (linked to the Bats SAC) are at risk from lighting, urbanisation and loss of permeable surfaces.DP5 therefore fails key national climate-change policies.	homes. A climate-appropriate ecological and lighting strategy to protect the North Somerset & Mendip Bats SAC. Without these modifications, DP5 cannot be delivered and remains unsound.		

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Policy DP6: Net zero construction	No	• Justified • Effective • Consistent with national policy	Yes	Yes	I consider Policy DP6 to be unsound because it is not justified, not effective, and not consistent with national policy. DP6 requires all new development to achieve high energy efficiency standards, incorporate low-carbon heating, maximise renewable energy generation, and demonstrate a pathway to net-zero operational carbon. However, the three housing allocations in Congresbury (183 dwellings) provide no evidence that these requirements can be met, nor that the village has the infrastructure to support net-zero development. 1. DP6 is not justified For DP6 to be justified, the Council must demonstrate that the allocated sites can support the infrastructure and design measures required for net-zero construction. However: No evidence is provided that the Congresbury allocations can accommodate low-carbon heating systems, heat pumps, or communal energy networks. The plan includes no assessment of grid capacity in Congresbury to support widespread electric heating or EV charging. There is no analysis of energy demand, orientation, shading, or renewable integration potential for the allocated sites. No design codes or masterplans exist requiring layouts that enable passive design or solar gain. Without this evidence base, DP6 is not justified. 2. DP6 is not effective DP6 cannot be implemented effectively because: The required on-site renewable energy generation (solar PV, heat pumps, battery storage) is not supported by any infrastructure delivery evidence for Congresbury. The electricity grid serving the village is already constrained and the plan does not include: any grid reinforcement, substation upgrades, local network capacity analysis, planned infrastructure to support electrification. The policy relies entirely on developers to deliver net-zero in isolation, without any strategic framework. No whole-life carbon assessment or embodied carbon strategy exists for rural-edge sites. This means DP6 is not deliverable and therefore ineffective. 3. DP6 is not consistent with national policy	To make DP6 sound, the Plan must include: A detailed energy and net-zero feasibility study for all Congresbury allocations, including: heat pump suitability, renewable energy potential, passive solar design feasibility, thermal performance and overheating analysis. A grid capacity assessment identifying required upgrades to support electric heating and EV charging for 183 new homes. A strategic energy plan or village-wide low-carbon energy framework, including potential for: communal heat networks, rooftop solar requirements, battery storage, smart energy systems. Congresbury-specific design codes requiring passive design, energy-efficient layouts, solar-ready roofs and low-carbon heating integration. A requirement that all future planning applications include: whole-life carbon assessments, renewable energy integration strategies, overheating risk modelling, on-site energy generation plans. Without these modifications, DP6 is not implementable.		

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					The NPPF requires that: Local Plans provide a clear, evidence-based framework for delivering low-carbon development (NPPF 152–158), development is directed to locations where infrastructure can support renewable and low-carbon technologies, plans encourage passive design, energy efficiency, and solar optimisation, climate and energy considerations are integrated at plan-making stage, not postponed to planning applications. The Congresbury allocations do not meet these requirements because: No energy or net-zero feasibility work has been undertaken for the sites. No infrastructure upgrades or grid analysis have been carried out. No renewable or low-carbon energy infrastructure is planned for the village. No assessment has been conducted of building orientation, passive design, or overheating risk. There is no evidence that the sites can meet mandatory electric heating and EV charging requirements without overloading the local network. DP6 therefore does not align with national low-carbon policy.			
Policy DP7: Large scale renewable and low carbon renewable energy	No	• Justified • Effective • Consistent with national policy	Yes	Yes	I consider DP7 to be unsound because it is not justified, not effective, and not consistent with national policy. DP7 requires that development should maximise opportunities for renewable and low-carbon energy generation, contribute to a resilient energy grid, support decentralised energy systems, and ensure that energy infrastructure is integrated into new development. However, there is no evidence that the three Congresbury allocations (183 dwellings) can meet these requirements, nor that the necessary energy infrastructure exists to support them. 1. DP7 is not justified DP7 is not justified because the Plan does not provide any evidence that Congresbury is capable of supporting on-site renewable energy at the scale required. Specifically: No energy feasibility study has been undertaken for the Congresbury sites. No assessment of solar PV capacity, roof orientation or landscape sensitivity has been provided. No analysis exists of the suitability of the village for heat pumps, communal heat networks, or other low-carbon technologies.	To make DP7 sound, the Plan must: Undertake a renewable and low-carbon energy feasibility assessment for all Congresbury allocations, covering: solar PV capacity, heat pump suitability, potential for localised heat networks, battery storage integration. Provide a local electricity grid capacity study identifying upgrades required to support 183 homes using electric heating and EV charging. Introduce design codes requiring: solar-ready roof orientation and pitches, shading analysis, passive design integration, on-site renewable generation targets.		

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					No evidence has been provided that Congresbury's existing electricity grid capacity can accommodate the additional renewable and low-carbon technologies required by DP7. Without this evidence base, DP7 is not justified. 2. DP7 is not effective DP7 cannot be implemented effectively in Congresbury because: The village's electrical infrastructure is already limited, and the plan does not propose any upgrades to substations or the local distribution network. There is no strategy for how renewable energy infrastructure will be delivered, funded, phased or maintained for new development. No design codes exist to require south-facing roofs, optimal panel angles, or battery storage integration. No landscape assessment has been done to ensure renewable infrastructure does not conflict with the protected rural setting around Congresbury. The cumulative impact of three allocations has not been evaluated with respect to combined renewable energy load or energy resilience. This means DP7 is not deliverable and therefore ineffective. 3. DP7 is not consistent with national policy The NPPF requires that Local Plans: plan proactively for renewable and low-carbon energy infrastructure (NPPF 152–158), identify opportunities for decentralised or low-carbon energy networks, ensure new development is aligned with energy grid capacity, integrate renewable technologies into site design and layout. The Congresbury allocations fail these requirements because: No decentralised energy frameworks or heat network opportunities have been identified. No evidence shows that the village's electricity network can support widespread heat pumps, solar PV, or EV charging. No renewable infrastructure is included in the Infrastructure Delivery Plan. No design or orientation strategy exists to ensure solar gain. Renewable energy feasibility has not been considered at plan level, contrary to NPPF requirements.	Produce a village-level low-carbon energy plan, ensuring renewable technology can be deployed without landscape or heritage harm. Include energy infrastructure upgrades in the Infrastructure Delivery Plan with committed funding. Without these modifications, DP7 remains unjustified and ineffective.		

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					DP7 therefore does not align with national low-carbon and renewable energy policy.			
Policy DP8: Efficient use of land	No	• Justified • Effective • Consistent with national policy	Yes	Yes	I consider Policy DP8 to be unsound because it is not justified, not effective, and not consistent with national policy. DP8 requires that development makes the most efficient use of land by prioritising brownfield sites, optimising densities in sustainable locations, and ensuring development patterns minimise land take. However, the three housing allocations in Congresbury (183 dwellings) fail to demonstrate compliance with these principles. 1. DP8 is not justified DP8 is supposed to be underpinned by evidence that all reasonable alternatives have been evaluated before selecting greenfield land. However, for Congresbury: No brownfield-first analysis has been provided. No evidence is offered that less sensitive land elsewhere in North Somerset was considered instead of greenfield sites on the rural edge of Congresbury. No density analysis has been published for the three allocations. The plan does not show that the chosen sites optimise land use relative to transport accessibility, infrastructure capacity, or environmental constraints. Without a comparative assessment, DP8 is not justified by an adequate evidence base. 2. DP8 is not effective DP8 cannot be effectively implemented in Congresbury because: The three allocations represent dispersed, peripheral greenfield development, rather than efficient land use near services or transport. The allocations increase the village footprint significantly without any masterplan or design codes to guide density or land efficiency. The absence of safe walking/cycling routes means the allocated land cannot be used efficiently for sustainable travel. The sites risk contributing to low-density sprawl along the A370, undermining DP8’s goals. DP8 is therefore not implementable and is ineffective in this location. 3. DP8 is not consistent with national policy The NPPF requires Local Plans to: promote efficient use of land (NPPF 119–121), encourage brownfield redevelopment,	To make DP8 sound, the Plan must: Provide a full brownfield-first assessment, identifying all alternative redevelopment or infill sites in North Somerset before allocating greenfield land in Congresbury. Produce a density strategy for villages, showing how densities have been determined for each allocation. Require design codes and masterplanning for Congresbury to prevent sprawl and optimise land use. Demonstrate that the chosen greenfield allocations are unavoidable due to brownfield shortages — supported by evidence. Introduce a Strategic Gap or landscape protection measure to avoid coalescence with Yatton. Establish a requirement for sustainable transport connectivity before or alongside development so higher densities (and land efficiency) can be achieved sustainably. Without these modifications, DP8 remains unjustified and ineffective.		

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					ensure densities reflect sustainability of location, avoid unnecessary greenfield consumption, prevent settlement sprawl and coalescence, protect landscape character and village identity. The Congresbury allocations contradict these requirements because: They rely exclusively on greenfield land, despite DP8's brownfield-first requirement. They encourage linear sprawl along the A370 corridor. They threaten settlement distinction between Congresbury and Yatton, increasing coalescence risk. The village is car-dependent, meaning higher densities cannot be achieved sustainably — yet low-density sprawl is also inappropriate under DP8. No brownfield or alternative sites were assessed or published. DP8 therefore fails to align with core NPPF principles guiding efficient land use.			
Policy DP9: Flood risk	No • Justified • Effective • Consistent with national policy		Yes	Yes	I consider DP9 to be unsound because it is not justified, not effective, and not consistent with national policy. DP9 requires development to be steered to areas of lowest flood risk and for the Sequential Test to be applied when any allocated site contains land at risk of flooding. However, the housing allocations for Congresbury directly contradict the intent of DP9. 1. DP9 is not justified The Woodhill Nurseries allocation (100 homes) includes areas specifically identified in the Local Plan text as requiring the Sequential Test due to higher flood risk. Despite this, the site is allocated without: evidence that lower-risk alternative sites were assessed, hydrological modelling demonstrating the development can be safely accommodated, any justification for allocating a site partly within higher risk zones when safer sites exist elsewhere. This contradicts the NPPF Sequential Test requirement (paras 159–162) and means DP9 is not supported by an adequate evidence base. 2. DP9 is not effective DP9 requires strategic flood risk mitigation at plan level, but the Plan does not provide:	Proposed modifications to DP9: To make DP9 sound, the Plan must include: A full Sequential Test for the Woodhill Nurseries allocation, demonstrating whether safer alternative sites across North Somerset exist. Detailed flood modelling and hydrological assessment for all Congresbury allocations, including cumulative impact. A drainage and flood mitigation strategy addressing: surface water management, capacity of rhynes, runoff rates, climate change allowances. Removal or modification of any part of an allocation lying in higher-risk zones where the Sequential Test cannot be passed. Clear plan-wide policies ensuring no net increase in flood risk to Congresbury village or downstream communities. Without these modifications, DP9 remains unjustified and inconsistent with national flood policy.		

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					any drainage or flood mitigation strategy for Congresbury, analysis of cumulative runoff impacts from three nearby allocations, assessment of effects on the Congresbury Yeo or surrounding rhynes, demonstration that local drainage networks have capacity for new development, consideration of climate change allowances or future rainfall projections. Without these assessments, DP9 cannot effectively prevent future flood risk or ensure long-term resilience. 3. DP9 is not consistent with national policy The NPPF requires: development to be directed to lower-risk areas (Sq. Test), avoidance of increasing flood risk elsewhere, robust evidence of mitigation before allocations are made. Allocating Woodhill Nurseries without providing Sequential Test evidence, flood modelling or a drainage strategy fails these requirements. Furthermore, Congresbury is a known floodplain settlement — policy decisions should be cautious and evidence-led. This allocation is not.			
Policy DP10: Sustainable drainage	No	• Justified • Effective • Consistent with national policy	Yes	Yes	I consider DP10 to be unsound because it is not justified, not effective, and not consistent with national policy. DP10 requires new development to incorporate sustainable drainage systems (SuDS), manage surface water, avoid increasing flood risk, protect watercourses, and demonstrate long-term drainage management. However, the three Congresbury allocations (183 dwellings) do not include the evidence or infrastructure needed to demonstrate that DP10 can be applied. 1. DP10 is not justified The policy is not supported by an adequate evidence base for Congresbury. Specifically: No site-specific SuDS feasibility studies have been provided for any of the three allocations. No hydrological modelling exists for surface water or overland flow paths across these sites. The Plan includes no analysis of rhyne capacity, culvert conditions, or drainage outfall limitations — yet Congresbury relies heavily on these systems. No evidence has been produced demonstrating that the Woodhill Nurseries allocation, partly within higher-risk areas, can be drained	To make DP10 sound, the Plan must: Provide a Congresbury-wide drainage assessment identifying: existing system capacity, bottlenecks and constraints, required upgrades, exceedance routes, climate change allowances, downstream impacts. Produce site-specific SuDS feasibility studies for all three allocated sites. Demonstrate that SuDS can be safely accommodated given site slopes, permeable/impermeable surfaces, and watercourse locations. Include a strategy for SuDS maintenance and adoption, identifying responsible parties and funding mechanisms.		

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					safely or sustainably. No cumulative drainage assessment has been carried out for 183 new homes. Without proper drainage evidence, DP10 cannot be considered justified. 2. DP10 is not effective DP10 cannot be implemented effectively in Congresbury because: The Plan does not set out any drainage infrastructure upgrades required to support the proposed growth. Existing village drainage systems already struggle during peak rainfall; the Plan provides no capacity assessment or improvement strategy. Congresbury's drainage relies on the network of rhynes and ditches, but the Plan does not evaluate whether these can accept increased surface water flows. The Plan includes no strategy for SuDS adoption, maintenance, phasing or management, making long-term performance uncertain. There is no evidence that SuDS can be accommodated on sloping or constrained sites, such as Woodhill Nurseries. Therefore, DP10 is not deliverable. 3. DP10 is not consistent with national policy The NPPF requires that: inappropriate development in areas at risk of flooding is avoided (NPPF 159), sustainable drainage systems are integrated into development designs (NPPF 169), plans must address strategic flood and drainage risks at plan stage, new development should not increase flood risk elsewhere (NPPF 159–162). The Congresbury allocations conflict with these requirements because: No plan-level drainage assessment exists for the three sites. The Sequential Test has not been applied to higher-risk areas at Woodhill Nurseries. There is no demonstration that development will not increase downstream flood risk. No integrated drainage strategy is included in the Infrastructure Delivery Plan. The plan relies solely on future planning applications to resolve	Apply the flood risk Sequential Test to the Woodhill Nurseries site and modify or remove allocation where appropriate. Integrate drainage upgrade works into the Infrastructure Delivery Plan, with costing and delivery timescales. Without these modifications, DP10 is not deliverable and remains unsound.		

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					drainage issues, contrary to the NPPF's requirement for strategic plan-level assessment. Therefore, DP10 is not consistent with national drainage and flood policy.			
Policy DP15: Active and sustainable transport	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Yes	Yes	I consider DP15 to be unsound because it is not positively prepared, not justified, not effective, and not consistent with national policy. DP15 states that development must prioritise active travel (walking, wheeling, cycling), provide safe and direct connections to key destinations, reduce car dependency, and support modal shift. However, the three Congresbury housing allocations (183 dwellings) rely on active travel infrastructure that does not exist, is not funded, and is not deliverable within the plan period. 1. DP15 is not positively prepared The policy expects development to be supported by active travel networks. Yet: Congresbury currently has no continuous walking routes from the allocation sites to the village centre. There are no segregated cycle routes on or parallel to the A370. The dangerous A370 and Smallway junction have no safe pedestrian/ cyclist facilities and no committed improvements. No active-travel schemes for Congresbury are costed or included in the Infrastructure Delivery Plan. The Strawberry Line link through Congresbury is aspirational only, with no funding, alignment, or delivery mechanism. The Plan therefore fails to make realistic provision for sustainable transport. 2. DP15 is not justified DP15 requires evidence that active travel can realistically be delivered in allocated locations. For Congresbury: No walking or cycling feasibility study has been undertaken. No assessment of A370 severance or crossing need has been provided. No Active Travel Zone or Local Walking and Cycling Infrastructure Plan (LCWIP) exists for Congresbury. No safety audit or modelling has been undertaken for pedestrian access from development sites. Without this evidence base, DP15 is not justified at village level. 3. DP15 is not effective DP15 cannot be implemented because the Plan provides no mechanism	To make DP15 sound, the Plan must provide: A Congresbury Active Travel Programme, including: Safe walking routes from each allocation to the village centre, Continuous, segregated cycle routes along or parallel to the A370, A fully designed and funded signalised crossing at Smallway, Wider footways, dropped kerbs and inclusive access improvements. Inclusion of these schemes in the Infrastructure Delivery Plan, with costs and delivery timescales. A requirement that no development is occupied until active travel routes to key village services are complete. A Congresbury-specific LCWIP covering walking and cycling. A cumulative assessment of active-travel needs arising from all 183 homes. Without these modifications, DP15 cannot be delivered and remains unsound.		

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					to deliver the active travel infrastructure required for the Congresbury allocations: There are no funded schemes for crossings, cycleways, or footways. There is no requirement for developers to deliver off-site active-travel infrastructure. Congresbury's narrow pavements, blind bends, and busy A-road will not support increased pedestrian use without major intervention. The plan provides no phasing requirements linking housing delivery to completion of active travel improvements. Without guaranteed, deliverable infrastructure, DP15 is ineffective. 4. DP15 is not consistent with national policy The NPPF requires that: plans give priority to pedestrian and cycle movements (NPPF 110), development should promote sustainable transport modes (NPPF 105), safe and suitable access must be provided for all (NPPF 111), decision-makers should avoid developments that rely on car dependency. The Congresbury allocations breach these requirements because: All travel from the allocated sites is car-dependent today. Walking and cycling to village services is unsafe. No safe crossing exists on the A370, contrary to NPPF safety requirements. The Plan relies on future hypothetical improvements, not deliverable infrastructure. DP15 therefore does not comply with national policy.			
Policy DP16: Active travel routes	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	I consider Policy DP16 to be unsound because it is not positively prepared, not justified, not effective, and not consistent with national policy. DP16 identifies a series of "active travel routes" intended to form a strategic network and support walking, wheeling and cycling. However, the routes affecting Congresbury — including those required to support the three allocations (183 dwellings) — are conceptual only, have no secured funding, no agreed alignment, and no delivery mechanism. 1. DP16 is not positively prepared For Congresbury, DP16 relies on:	To make DP16 sound, the Plan must: Provide a Congresbury Active Travel Delivery Plan, including: fully designed and costed routes, safe walking links from the three allocations to the village centre, a deliverable segregated cycle route along/parallel to the A370, a fully funded and scheduled Smallway crossing, inclusive mobility measures (kerbs, surfacing, lighting,		

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					an unfunded and unconfirmed Strawberry Line extension (Congresbury to Blagdon), another unfunded section of the Strawberry Line toward Winscombe, unspecified active travel improvements along the A370 corridor, a future pedestrian/cycle crossing at Smallway that has no funding or design, undefined local walking and cycling links to new development sites. None of these routes are delivered, funded, designed, or committed. Basing major housing allocations on hypothetical infrastructure does not constitute positive planning. 2. DP16 is not justified DP16 requires a robust evidence base showing: feasibility of the proposed active travel routes, delivery constraints, environmental impacts, engineering solutions, costs and funding sources. However: No feasibility work has been published for any Congresbury active travel scheme. No detailed route alignments are provided. No land ownership constraints or engineering assessments have been undertaken. The Strawberry Line extensions are described in the plan itself as aspirational, not strategic commitments. No assessment exists of safe cycle or pedestrian access to the three allocated sites. DP16 is not supported by evidence and therefore not justified. 3. DP16 is not effective DP16 is ineffective because: The proposed routes do not currently exist and have no clear prospect of delivery within the Plan period. The Infrastructure Delivery Plan does not list any Congresbury active travel projects. No mechanism links development occupation to delivery of active travel	width). Include all Congresbury active travel schemes in the Infrastructure Delivery Plan with timing, cost and funding sources. Require that no new homes are occupied until key active travel infrastructure is completed. Undertake feasibility and safety audits for all proposed routes. Replace aspirational routes (e.g., Strawberry Line extensions) with deliverable infrastructure unless funding and land agreements are secured. Without these modifications, DP16 remains hypothetical and undeliverable.		

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					improvements. The A370 is a heavily trafficked road with no safe cycleway; DP16 provides no deliverable plan to change this. Without these routes, the 183 Congresbury dwellings will be entirely car-dependent, defeating DP16's purpose. Therefore, DP16 cannot be implemented. 4. DP16 is not consistent with national policy The NPPF requires: safe, high-quality walking and cycling networks (NPPF 104), priority for pedestrians and cyclists (NPPF 110), avoidance of car-dependent development (NPPF 105), realistic, deliverable transport solutions (NPPF 112), planning for sustainable travel at plan-making stage, not left to applications. The Congresbury allocations breach these requirements because: All "active travel routes" are not real infrastructure but aspirational lines on a map. There is no evidence that walking or cycling routes can be made safe or continuous. There are no funded or committed pedestrian crossings of the A370. The reliance on future aspirations is inconsistent with the NPPF's requirement for deliverability. DP16 therefore fails national policy tests.			
Policy DP17: Public transport accessibility	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	I consider Policy DP17 to be unsound because it is not positively prepared, not justified, not effective, and not consistent with national policy. DP17 requires development to be accessible by public transport, support improved bus services, and reduce dependency on the private car. However, the Congresbury allocations (183 dwellings) are located in a settlement with poor, unreliable, and infrequent public transport, and no improvements are secured or funded in the Local Plan. 1. DP17 is not positively prepared The policy anticipates improvements to bus services and strategic public transport links, yet the Plan contains: no committed public transport upgrades for Congresbury,	To make DP17 sound, the Plan must: Provide a Congresbury Public Transport Strategy, including: Increased bus service frequency (hourly or better), Guaranteed long-term funding for service improvements, Bus priority measures where practical, Accessible bus stop upgrades (kerbs, shelters, lighting, real-time information). Include these improvements in the Infrastructure Delivery Plan, with funding, timing, and delivery responsibility. Require Section 106 or CIL contributions from allocated sites to support bus service enhancement.		

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					no increased frequency of existing services, no bus priority measures, no guaranteed long-term funding for any route, no confirmation that services will run evenings/weekends, no infrastructure delivery for bus shelters, real-time information, or accessible stops. This means DP17 is based on assumptions, not actual provision, and is therefore not positively prepared. 2. DP17 is not justified A justified policy must be supported by evidence showing that public transport can realistically serve the allocated sites. However: No public transport accessibility study has been undertaken for Congresbury. No analysis of walking distance or inclusive access to bus stops exists. Bus services through Congresbury are infrequent and unreliable, and this is not addressed. No modelling has been done on increased bus patronage from 183 new homes. No assessment exists of whether existing bus routes could actually support additional demand. DP17 therefore lacks the evidence required to justify its application in Congresbury. 3. DP17 is not effective DP17 cannot be implemented because: There is no mechanism in the Plan to deliver or secure improved bus services. No developer contributions or Section 106 strategies are proposed for bus enhancement. The Infrastructure Delivery Plan lists no public transport schemes for Congresbury. Without improvements, development remains entirely car-dependent, contrary to DP17. Bus stops in Congresbury are not accessible, lacking proper footways, crossings, or inclusive access features. DP17 is therefore not deliverable or effective. 4. DP17 is not consistent with national policy	Provide an evidenced walking-accessibility assessment for bus stops, ensuring safe and inclusive access from all allocations. Demonstrate that public transport will be in place before occupation of new dwellings. Without these modifications, DP17 is not deliverable and remains unsound.		

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					The NPPF requires: significant weight to be given to public transport accessibility (NPPF 104–106), development to provide safe, suitable, and sustainable transport access (NPPF 110), plans to actively reduce car dependency (NPPF 105), avoiding development that relies on inadequate public transport (NPPF 111). The Congresbury allocations fail these requirements because: No public transport improvements are planned or funded. Walking access to bus stops is unsafe due to A370 conditions. Routes are too infrequent to support modal shift. No evidence shows buses will be viable during the plan period. Thus, DP17 fails national policy tests for sustainable transport.			
Policy DP34: Green infrastructure	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Yes	Yes	I consider Policy DP34 to be unsound because it is not positively prepared, not justified, not effective, and not consistent with national policy. DP34 requires the creation, protection and enhancement of green infrastructure networks; safeguarding ecological corridors; delivering multifunctional open space; and protecting landscape character. However, the three Congresbury housing allocations (183 dwellings) are located in highly sensitive rural-edge environments and the Plan provides no evidence or strategy to ensure green infrastructure is protected or enhanced. 1. DP34 is not positively prepared Congresbury has several critical GI assets that the Plan fails to address: North Somerset & Mendip Bats SAC sustenance zones and dark corridors, the Congresbury Yeo corridor, a network of rhynes, ditches and wetland edges, the setting of Cadbury Hill Fort, important hedgerow and tree networks, valued rural landscape forming the village edge. DP34 makes no meaningful provision for maintaining these assets while delivering 183 new homes.	To make DP34 sound, the Plan must: Produce a Congresbury Green Infrastructure Masterplan, identifying: habitat networks, bat flightlines and dark corridors, woodland and hedgerow protection, landscape character zones, open space requirements, buffers to heritage assets including Cadbury Hill Fort. Map and secure strategic green infrastructure corridors, particularly those serving the Bats SAC. Provide GI requirements for each allocation, including: tree planting, habitat enhancement, accessible natural greenspace, on-site open space, ecological buffers around watercourses and rhynes. Add all Congresbury GI projects to the Infrastructure		

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					There is no GI masterplan, no delivery programme, and no ecological mitigation strategy. This is not positive planning. 2. DP34 is not justified A justified GI policy must be evidence-led. The Plan fails to provide this evidence for Congresbury: No local Green Infrastructure Assessment has been produced for the allocations. No Landscape and Visual Impact Assessment (LVIA) exists for any of the three sites. No ecological connectivity mapping is provided, despite known SAC bat flightlines. No assessment of tree cover, habitat quality, or open space needs has been published. No analysis exists of green infrastructure function at the village edge. Because none of this evidence has been produced, DP34 is not justified. 3. DP34 is not effective DP34 cannot be implemented in Congresbury because: There is no GI framework or masterplan tying the three allocated sites together. No strategic or local green infrastructure improvements are included in the Infrastructure Delivery Plan, meaning nothing is funded or deliverable. No mapping shows GI corridors to be protected or enhanced. No buffer zones are identified for: bats SAC corridors, heritage setting buffers, rhynes and wetland features. No public open space or on-site GI requirements are defined for any allocation. Without these mechanisms, DP34 is not deliverable or effective. 4. DP34 is not consistent with national policy The NPPF requires that Local Plans: identify and secure strategic green infrastructure networks (NPPF 175),	Delivery Plan, with: costings, phasing, delivery partners, funding sources. Carry out a cumulative GI impact assessment of the three Congresbury allocations. Without these modifications, DP34 cannot be delivered and remains unsound.		

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					protect habitats and species, particularly internationally designated sites (NPPF 180–182), maintain landscape character and avoid settlement sprawl (NPPF 174), provide high-quality, multifunctional open space (NPPF 98–100), safeguard heritage setting (NPPF 200). The Congresbury allocations conflict with these requirements because: No GI network has been identified for the area. SAC ecological corridors are at risk with no mitigation strategy. The Woodhill Nurseries allocation affects the setting of Cadbury Hill Fort (Scheduled Monument). No landscape assessment is provided. No open space strategy exists. DP34 therefore fails to meet national policy expectations.			
Policy DP35: Nature conservation	No • Positively prepared • Justified • Effective • Consistent with national policy		Yes	Yes	I consider Policy DP35 to be unsound because it is not positively prepared, not justified, not effective, and not consistent with national policy. DP35 is intended to protect biodiversity, safeguard ecological networks, avoid harm to internationally protected species, and deliver meaningful biodiversity enhancement. However, all three Congresbury allocations (183 dwellings) lie within areas of international ecological sensitivity, and the Plan provides no credible mitigation strategy or evidence base to support these allocations under this policy. 1. DP35 is not positively prepared Congresbury sits within functional zones of the North Somerset & Mendip Bats SAC, including: greater horseshoe bat sustenance zones, lesser horseshoe bat foraging areas, mapped dark corridors, critical hedgerow and commuting routes, important wetland/rhyne edge habitats. Despite this, the Plan provides: no ecological mitigation strategy, no dark corridor protection mapping,	To make DP35 sound, the Plan must: Produce a Congresbury Ecological and SAC Mitigation Strategy, including: mapped dark corridors, sustenance zone constraints, bat flightline modelling, habitat buffering requirements, ecological connectivity plans. Provide a site-specific HRA for all three Congresbury allocations, demonstrating no adverse effect on SAC integrity. Establish mandatory lighting restrictions, including: <1 lux limits along bat corridors, downward/hooded luminaires, curfews where appropriate. Require buffer zones around rhynes, hedgerows and flightlines. Include ecological mitigation and enhancement in the Infrastructure Delivery Plan, specifying funding, timing and delivery responsibility.		

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					no lighting strategy, no hedgerow protection or enhancement requirements, no habitat connectivity strategy, no SAC impact assessment at plan level. Development is allocated first, with biodiversity considerations pushed to planning applications — the opposite of positive planning. 2. DP35 is not justified DP35 requires an evidence base showing that impacts on designated sites and protected species have been assessed. However, the Plan provides no ecological evidence for Congresbury: No Habitat Regulations Assessment (HRA) specific to the allocated sites. No mapping of bat flightlines, sustenance zones or connectivity routes through the village. No ecological surveys or constraints mapping for the three allocations. No cumulative ecological impact assessment of 183 dwellings. No justification for allocating sites known to intersect SAC functionally-linked land. No evidence that alternative, less harmful sites were considered. This means DP35 is not supported by an adequate ecological evidence base. 3. DP35 is not effective DP35 cannot be delivered in Congresbury because: There is no mechanism to secure dark corridor protection. No lighting controls or night-time restrictions are included in the policy. No GI or habitat strategy exists to maintain ecological connectivity. Development on greenfield village-edge locations will introduce lighting, urbanisation, noise, disturbance, and habitat fragmentation. There is no requirement for developers to create compensatory habitats, hedgerow planting, bat foraging enhancements, or buffer zones. Without a defined, funded and enforceable strategy, DP35 is ineffective. 4. DP35 is not consistent with national policy The NPPF requires that:	Undertake a cumulative ecological impact assessment for the 183 homes. Demonstrate that reasonable alternative sites with lower ecological impact were considered. Without these modifications, DP35 is not compliant with the Habitats Regulations or the NPPF.		

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					plans protect and enhance ecological networks (NPPF 174), harm to internationally protected species must be avoided (NPPF 180–182), plans must meet the Conservation of Habitats and Species Regulations 2017, HRA must be completed before allocating development, any adverse effect on site integrity is unacceptable. The Congresbury allocations contradict these requirements because: No SAC mitigation strategy exists. No HRA evidence is provided at site level. No dark corridors or FLL (Functionally Linked Land) are mapped or protected. No plan-level ecological mitigation is secured. DP35 relies on future planning applications to fix fundamental problems, contrary to the Habitats Regulations and NPPF requirements. DP35 is therefore inconsistent with national biodiversity policy and unlawful in its current form.			
Policy DP36: Biodiversity Net Gain	Yes	• Positively prepared • Justified • Effective • Consistent with national policy			I consider Policy DP36 to be unsound because it is not positively prepared, not justified, not effective, and not consistent with national policy. DP36 requires that all development deliver a minimum 10% Biodiversity Net Gain, that BNG is measurable, deliverable, maintained for 30 years, and integrated into site design. However, the three Congresbury allocations (183 dwellings) provide no evidence or mechanism to demonstrate BNG can be achieved locally, particularly given the highly constrained ecological landscape. 1. DP36 is not positively prepared Congresbury is located within: internationally sensitive bat sustenance zones, mapped (but unprotected) bat flightlines and dark corridors, a rich network of hedgerows, rhynes, grassland and wetland edges, high-quality rural-edge habitats. Despite this, DP36 includes no BNG strategy for Congresbury and provides: no map of baseline biodiversity units,	To make DP36 sound, the Plan must include: A Congresbury BNG Strategy setting out: baseline biodiversity units for each allocated site, habitat value and constraints, required BNG units for each development, on-site and off-site BNG opportunities. Mapping and protection of: SAC-linked habitats, bat flightlines and dark corridors, hedgerow and woodland networks, rhyne and wetland buffer zones. Identification of specific off-site receptor land locally for BNG delivery, with secured long-term management. Integration of all BNG requirements into the Infrastructure Delivery Plan with funding, phasing, and monitoring. A cumulative BNG assessment covering all 183 homes, not		

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					no assessment of habitat value on the allocated sites, no delivery strategy for on-site or off-site habitat creation, no identification of receptor sites for off-site BNG units, no costing, phasing or funding plan. BNG cannot be “positive” if the Council has no realistic pathway to deliver or secure it. 2. DP36 is not justified A justified BNG policy must be backed by ecological evidence demonstrating that 10% net gain is achievable. The Plan fails to provide: baseline habitat surveys for any Congresbury allocation, no DEFRA metric assessments at plan-making stage, no identification of habitat units on each allocated site, no assessment of whether BNG can be delivered on-site, no identification of off-site habitat banks, no analysis of cumulative impact from all 183 homes. This means the Council does not know whether the allocations can achieve even the legal minimum of 10% BNG. Therefore, DP36 is not justified. 3. DP36 is not effective DP36 is ineffective in Congresbury because: There is no mechanism for BNG delivery — no strategy, no land, no phasing. The Infrastructure Delivery Plan includes no BNG projects or funding. The combined loss of habitat from 183 homes will require substantial compensatory habitats — but the Plan identifies no receptor land. Development near the SAC requires enhanced habitat, but BNG is being left to future planning applications, contrary to Regulations and the NPPF. Without a village-wide ecological strategy, individual-site BNG calculations risk conflict, double-counting, or under-delivery. DP36 cannot be implemented effectively in Congresbury. 4. DP36 is not consistent with national policy The NPPF and Environment Act 2021 require:	individual plots. A legal requirement for securing BNG habitats for 30 years, as mandated by the Environment Act 2021. Without these modifications, DP36 remains undeliverable and unsound.		

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					10% mandatory biodiversity net gain, a clear plan for delivering BNG at plan-making stage, protection of functionally linked land (FLL) for international sites, measurable outcomes using the DEFRA metric, 30-year secured habitat management. The Congresbury allocations breach these requirements because: No DEFRA metric or baseline units have been assessed. No off-site delivery land has been identified. Developing in an SAC sustenance zone makes BNG harder to achieve and requires strict safeguards — none are included in the Plan. No legal mechanism is identified to secure 30-year management of BNG habitats. DP36 therefore contradicts national policy and the requirements of the Environment Act.			
Policy DP37: Trees, Woodlands and Hedges	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Yes	Yes	I consider Policy DP37 to be unsound because it is not positively prepared, not justified, not effective, and not consistent with national policy. DP37 requires development to protect, retain and enhance important trees, woodlands and hedgerows, including ancient woodland, veteran trees, species-rich hedgerows, and important ecological corridors. However, the Local Plan fails to demonstrate how these protections will be delivered for the three Congresbury allocations (183 dwellings), which sit in a highly sensitive hedgerow and tree network linked to the North Somerset & Mendip Bats SAC. 1. DP37 is not positively prepared The Plan provides no tree or hedgerow mapping for Congresbury’s allocated sites, despite the following being present and highly relevant: multiple important hedgerows under the Hedgerow Regulations 1997, field-boundary hedges forming SAC bat commuting routes, tree lines providing navigation and shelter for horseshoe bats, landscape trees forming part of the rural-edge character, hedgerows connecting directly into the Yeo corridor and surrounding GI network. Yet the Plan contains: no hedgerow retention framework, no tree-planting strategy,	To make DP37 sound, the Plan must: Produce a Congresbury Hedgerow and Tree Protection Strategy, identifying: all “important hedgerows” under the Hedgerow Regulations 1997, SAC bat commuting routes, key tree lines and rural-edge landscape trees, ecological connectivity functions. Provide a site-level hedgerow and tree mapping for each allocation. Require mandatory retention of: hedgerows forming SAC bat flightlines, species-rich hedges and tree belts, rural-edge vegetation framing Congresbury’s landscape setting. Introduce buffer zones (minimum 10–20 metres) along key hedgerows and tree lines. Include a lighting strategy to prevent illumination of hedgerows used by bats (<1 lux). Add GI/tree/hedgerow works to the Infrastructure Delivery Plan with funding, phasing, and responsibility.		

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					no mapping of ecological corridors, no buffer zones, no protection of village-edge landscape vegetation, no SAC-related hedgerow/tree safeguards. DP37 therefore lacks positive planning for Congresbury. 2. DP37 is not justified DP37 is not justified because the Council has provided no evidence base showing: which hedgerows and tree lines are “important,” which are SAC commuting routes, which should be protected, enhanced or buffered, which should not be breached by development, how the ecological network functions at village scale. No hedgerow assessments, arboricultural surveys or ecological connectivity studies have been produced. Without this evidence, the policy’s application in Congresbury cannot be justified. 3. DP37 is not effective DP37 cannot be effectively implemented because: None of the three allocated sites include requirements to retain, buffer or enhance hedgerows. There is no Congresbury-specific GI or hedgerow strategy. The Infrastructure Delivery Plan includes no funding or delivery mechanism for tree or hedgerow protection. Development layouts could easily remove hedgerows without adequate mitigation. Lighting from new development could sever bat commuting routes unless strict controls are applied — but the Plan includes none. This means DP37 is undeliverable and ineffective for Congresbury. 4. DP37 is not consistent with national policy The NPPF requires: protection of ancient woodland and veteran trees (NPPF 180), retention and enhancement of hedgerows and ecological networks (NPPF 174),	Carry out a cumulative ecological impact assessment of hedgerow losses or fragmentation across all 183 dwellings. Without these modifications, DP37 is not deliverable and remains unsound.		

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					safeguarding habitats of importance to protected species (NPPF 180), ensuring development avoids harm to biodiversity and GI connectivity, applying the Habitats Regulations for SAC species. But the Congresbury allocations: lie within functional zones of the North Somerset & Mendip Bats SAC, contain hedgerows essential for horseshoe bat navigation, include areas where hedgerow removal or lighting would cause severe ecological harm, provide no site-level hedgerow or tree mapping, include no tree/hedgerow protection or enhancement requirements. This is fundamentally inconsistent with national policy and the Habitats Regulations.			
Policy DP50: New community facilities, open space and sports pitches	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Yes	Yes	I consider Policy DP50 to be unsound because it is not positively prepared, not justified, not effective, and not consistent with national policy. DP50 states that new development should provide new community facilities or enhancements to existing ones when required. However, the Plan allocates 183 dwellings in Congresbury without identifying or securing any new community facilities to support this growth. This is a fundamental strategic failure. 1. DP50 is not positively prepared The Congresbury allocations generate clear demand for: additional primary school places, increased GP and healthcare capacity, expanded recreation and play space, youth, sport and community facilities, improved public realm and village-centre resilience. The Plan proposes none of these. There is no new school, no GP expansion, no community hub, no children’s play areas, no library improvements, and no new open space proposals. DP50 therefore fails to prepare positively for the needs arising from allocated development. 2. DP50 is not justified A justified policy must be supported by an evidence base showing:	To make DP50 sound, the Plan must: Provide a Congresbury Community Infrastructure Assessment identifying: school-place shortfalls, GP capacity constraints, facilities needed for youth, sport, play and recreation, demand arising from 183 new dwellings. Add a Congresbury-specific requirement that new development must deliver: expanded primary school places, increased GP/healthcare capacity, new play areas and open spaces, accessible community facilities, youth and recreation space. Include these facilities in the Infrastructure Delivery Plan, with: funding, delivery mechanisms, triggers linked to planning permissions. Require Section 106 or CIL contributions to fund local		

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					the level of community facility demand, capacity constraints in existing services, the type and scale of new facilities required, the locations where such facilities will be delivered. The Plan provides none of this for Congresbury: No assessment of school capacity or shortfall. No evaluation of GP provision or local healthcare pressure. No assessment of demand for youth or community facilities. No appraisal of green space or play space requirements. No evidence of village-centre capacity to absorb 183 new homes. There is no justification whatsoever for omitting new facility requirements. 3. DP50 is not effective The policy cannot be implemented because: There is no mechanism to require community facilities from Congresbury developers. There are no S106 or CIL expectations, no delivery commitments, and no funding sources identified. The Infrastructure Delivery Plan makes no provision for Congresbury community infrastructure. No phasing is linked to occupation, meaning development could proceed with zero mitigation. DP50 is therefore ineffective and unenforceable. 4. DP50 is not consistent with national policy The NPPF requires that: development is supported by community infrastructure (NPPF 8, 20, 93–97), plans identify and meet local needs, growth is supported by facilities for health, education, sport, play, and community use. The Congresbury allocations breach these requirements because: No new school capacity is provided. No GP capacity enhancement is planned.	facilities. Without these modifications, DP50 is neither enforceable nor deliverable.		

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					No play areas or green space proposals exist. No youth or community facilities are proposed. No sports or recreation facilities are included. Thus, DP50 is inconsistent with national infrastructure policy.			
Policy DP63: Infrastructure delivery and development contributions	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Yes	Yes	I consider Policy DP63 to be unsound because it is not positively prepared, not justified, not effective, and not consistent with national policy. DP63 states that the Local Plan must be supported by timely, deliverable infrastructure covering transport, drainage, education, healthcare, green infrastructure, biodiversity, utilities, and community services. However, the Infrastructure Delivery Plan (IDP) supporting the Local Plan provides no funded, deliverable or evidenced infrastructure for the 183 dwellings allocated in Congresbury, which makes the Plan fundamentally unsound. 1. DP63 is not positively prepared The IDP fails to identify any of the essential infrastructure required to support Congresbury's growth, including: no new school capacity or expansion, no GP or healthcare expansion, no highway improvements to the A370 or Smallway, no active travel schemes (crossings, footways, cycle lanes), no drainage or SuDS upgrades, no green infrastructure projects, no biodiversity mitigation, no public transport enhancements, no community facilities (play space, recreation, youth, sport), no village-centre resilience upgrades. The Local Plan allocates large-scale development but provides zero infrastructure to support it. This is not "positively prepared" planning. 2. DP63 is not justified For DP63 to be justified, the Council must provide: a clear evidence base of infrastructure need, costed projects,	To make DP63 sound, the Plan must: Produce a Congresbury Infrastructure Delivery Schedule covering: school capacity expansion, GP and healthcare upgrades, A370/Smallway junction improvements, safe walking and cycling routes, public transport enhancements, SuDS and drainage upgrades, ecological/SAC mitigation works, green infrastructure creation, community facilities and play space. Include costings, phasing, delivery responsibility, and funding for all required infrastructure. Ensure infrastructure is provided before occupation of allocated housing. Require that planning applications in Congresbury demonstrate how necessary infrastructure will be delivered if the Council cannot. Revise the IDP to include Congresbury as a priority infrastructure area, not a policy vacuum. Without these modifications, DP63 remains undeliverable and unsound.		

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					delivery mechanisms, phasing, identified funding, and realistic implementation plans. However, for Congresbury: no evidence has been provided on school capacity shortfalls, no modelling exists for healthcare or GP demand, no transport capacity modelling exists for the A370 or local junctions, no drainage or flood management evidence has been provided, no ecology mitigation strategy exists (despite SAC sensitivity), no walking or cycling assessments exist, no funding sources are identified for any infrastructure. DP63 is therefore not justified by the evidence. 3. DP63 is not effective DP63 is not effective because none of the required infrastructure is deliverable: The IDP does not contain any Congresbury projects. No schemes are costed. No schemes are funded. No delivery agencies are identified. No phasing or triggers are included. No link exists between planning permissions and infrastructure provision. No mechanism ensures infrastructure is in place before development is occupied. This means the 183 dwellings would be delivered in a village with no additional capacity, rendering DP63 ineffective and undeliverable. 4. DP63 is not consistent with national policy The NPPF requires that: development is supported by infrastructure that is available and deliverable (NPPF 20, 34, 73, 104, 106, 112, 122), plans demonstrate critical infrastructure can be funded,			

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					infrastructure needs are identified and addressed at plan stage, the overall plan strategy must be deliverable. The Congresbury allocations breach these requirements because: No transport, school, healthcare, flood, drainage, GI or ecological mitigation infrastructure is identified. No funding exists for any of the required mitigation. The Plan allocates development without showing the infrastructure needed to make it acceptable. DP63 therefore fails the NPPF’s deliverability and infrastructure tests.			
Woodhill Nurseries	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	The Woodhill Nurseries allocation is the most problematic of the three Congresbury sites. It poses severe issues relating to: flood risk drainage ecology and SAC impacts hedgerow and landscape loss highway safety pedestrian safety lack of infrastructure lack of evidence and deliverability This single site contributes over half of the proposed 183 dwellings, and yet it is allocated with no evidence base whatsoever. CRITICAL NEW POINT – NO OUTLINE CONSENT OR TECHNICAL EVIDENCE EXISTS Unlike the Pineapple Farm allocation (22/P/0459/OUT), Woodhill Nurseries has: no outline planning permission no submitted technical assessments no Flood Risk Assessment no Sequential Test no SuDS or drainage modelling no ecological surveys	Remove Woodhill Nurseries from the Local Plan, or reduce capacity drastically, until the following EXIST: A full Sequential Test and flood modelling A Congresbury-wide drainage and SuDS strategy Site-specific HRA and SAC mitigation Bat corridor and hedgerow/tree protection mapping A safe access and active travel feasibility plan A deliverable infrastructure schedule A masterplan and design code A Congresbury Green Infrastructure Strategy A cumulative impact assessment (all 183 homes) Until then, Woodhill Nurseries is not deliverable, not justified, and not consistent with national policy.		

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					no HRA screening no bat flightline mapping no lighting strategy no access feasibility study no active travel feasibility work no landscape or heritage assessment This means the allocation is based entirely on unproven assumptions, not evidence. Under the NPPF, site allocations must be supported by evidence showing that: the site is deliverable, mitigation is possible, infrastructure can be provided, environmental harm can be avoided or reduced, and impacts can be addressed realistically. Woodhill meets none of these requirements. This alone renders the allocation unsound and unjustified. KEY OBJECTIONS 1. Flood Risk – Sequential Test NOT demonstrated (DP9, DP10) The Council itself states the site requires the Sequential Test, yet the Plan provides no evidence it can pass it. Without: modelling, hazard mapping, drainage capacity assessments, climate-change allowances, cumulative drainage analysis… …the allocation is not lawful under the NPPF flood risk hierarchy. 2. Severe ecological harm (DP35, DP36, DP37) Woodhill Nurseries lies within: greater horseshoe bat sustenance zone lesser horseshoe foraging zone			

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					dark corridor network key hedgerows used as commuting routes connective habitat to the Congresbury Yeo Yet: no HRA exists no flightline mapping no mitigation strategy no lighting controls (<1 lux) no BNG baseline no hedgerow retention plan This risks irreversible damage to internationally protected species and may breach the Habitats Regulations. 3. Transport and access impossible to deliver safely (DP15, DP16, DP17) Woodhill relies entirely on: the A370, the unsafe Smallway junction, no crossings, no cycle lanes, no continuous pavements, no safe school route, poor bus services. None of the required off-site works are: designed, costed, funded, or deliverable. This makes the site car-dependent, unsafe and undeliverable. 4. Landscape + heritage harm (DP34, DP37, SP8) The site sits on the rural western edge of Congresbury.			

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					Development here: erodes rural character, contributes to settlement sprawl, impacts views toward Cadbury Hill Fort (Scheduled Monument), removes tree and hedgerow structure. No LVIA or heritage assessment exists. 5. No supporting infrastructure (DP50, DP63) There is: no school capacity no GP capacity no drainage upgrades no public transport improvements no footway or cycleway schemes no green infrastructure funding no play or community facilities no projects for Congresbury in the Infrastructure Delivery Plan This makes the allocation undeliverable and unsafe.			
Land south of Station Road	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	The Station Road site is small in numbers, but significant in harm. It contributes directly to: unsafe pedestrian conditions, fragmentation of ecological corridors, landscape erosion, drainage risk, car dependency, and cumulative pressure from the 183 Congresbury homes in the plan. Crucially, there is NO outline permission, no technical evidence, no flood assessment, no access design, and no ecology analysis. This means the allocation is based on assumption, not evidence, and fails the soundness tests of the NPPF. NEW CRITICAL POINT — NO EVIDENCE OF DELIVERABILITY Unlike Pineapple Farm (70 homes), which at least has outline consent and reserved matters problems, Land South of Station Road has:	Remove Land South of Station Road from the Local Plan, or defer and reduce significantly until all of the following exist: A safe, continuous pedestrian route on Station Road A deliverable access strategy A Congresbury-wide active travel plan A site-level ecology, hedgerow and bat corridor map SuDS, drainage and flood modelling A landscape and village-edge assessment School and GP capacity mitigation Inclusion of Congresbury infrastructure projects in the IDP A cumulative impact assessment (all 183 homes) Until these fundamental matters are resolved, the allocation is not justified, not effective, and not consistent with national policy.		

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					no outline application no reserved matters no technical evidence no access feasibility no footway design no ecological survey no drainage modelling no heritage/landscape assessment no BNG baseline no bat corridor mapping no utilities assessment The Council has allocated a site with zero evidence showing that: safe access is possible, ecology can be protected, drainage can be managed, the landscape can accommodate development, a safe pedestrian route exists, or any mitigation is achievable. This directly fails the NPPF tests of: deliverability, justification, effectiveness, and consistency with national policy. KEY OBJECTIONS (UPDATED AND EXPANDED) 1. Pedestrian Safety and Active Travel Failures (DP15, DP16) Station Road is narrow, lacks pavements, and has: no continuous footway on either side, blind bends, vehicle pinch points, no safe walking route to the primary school, no safe route to the village centre, no cycle provision whatsoever. This site would force new residents — including children — to walk in the road on a route already known to be unsafe.			

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					There are zero funded active travel improvements in the Infrastructure Delivery Plan. 2. Public Transport Failures (DP17) The nearest bus stops are: poorly connected, require walking along unlit, pavement-less sections of Station Road, served by infrequent, unreliable services. No accessibility audit exists. No bus improvements are funded or proposed. The site is entirely car-dependent. 3. Ecological Harm: Hedgerows, Trees & Bat Corridors (DP35, DP36, DP37) This site contains: important hedgerows, linear tree lines, bat commuting routes linked to the North Somerset & Mendip Bats SAC, dark habitat corridors, foraging habitat adjacent to the Congresbury Yeo corridor. Yet: no ecological surveys exist, no flightline mapping exists, no HRA mitigation exists, no <1 lux lighting strategy exists, no hedgerow retention plan exists, no BNG baseline exists. Ecological harm is unavoidable without proper assessment, which has not been done. 4. Landscape & Village-Edge Harm (DP1, DP29, DP34) Development here would: extend the built form into the rural edge, erode the character of the Station Road approach,			

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					remove or urbanise hedgerows and tree lines, increase visual intrusion into the countryside. No LVIA or rural-edge assessment exists. 5. Drainage and Surface Water Failures (DP9, DP10) The site lies on land with: poor drainage, higher runoff risk, slope toward Station Road and existing houses, rhyne systems nearby that already face capacity pressures. There is: no SuDS design no infiltration testing no climate change rainfall modelling no cumulative drainage assessment no hydrological modelling no flood exceedance routing plan This fails NPPF flood and drainage requirements. 6. No Supporting Infrastructure (DP50, DP63) Like Woodhill and Pineapple Farm, this site suffers from: no school capacity no GP capacity no public transport improvements no drainage improvements no active travel no green infrastructure no play provision no IDP funding for Congresbury at all Even 13 homes add cumulative pressure on these services, and there is zero mitigation in the IDP. 7. Cumulative Impact with Woodhill + Pineapple Farm (183 Homes			

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					Total) The Local Plan fails to assess or mitigate: cumulative transport impacts, cumulative ecological impacts, cumulative drainage impacts, cumulative landscape harm, cumulative community facility demand. This violates SP1, LP5, DP63 and NPPF requirements for realistic, plan-level evidence.			
Pineapple Farm, land north of Mulberry Road	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Yes	Yes	The allocation of 70 homes at Pineapple Farm / Land North of Mulberry Road is unsound, undeliverable, and inconsistent with the Council's own evidence and policy framework. The site has been the subject of outline planning permission 22/P/0459/OUT, and the emerging Reserved Matters issues have exposed multiple critical failures that show the Local Plan allocation cannot be delivered safely or sustainably. This site: cannot be accessed safely, cannot provide active travel, cannot manage surface water safely, cannot protect ecological corridors, cannot provide required amenity, is not supported by any infrastructure, and has already proven problematic through the reserved matters process. RESERVED MATTERS ISSUES (linked to 22/P/0459/OUT) WHICH SHOW THE ALLOCATION IS UNSOUND The outline permission 22/P/0459/OUT has already encountered substantial problems at Reserved Matters stage that directly demonstrate the site is not suitable for allocation in the Local Plan. These include: 1. Access and Highway Safety Failures Reserved matters submissions have highlighted: Mulberry Road is too narrow for additional residential traffic. No suitable second access exists. Refuse vehicles cannot turn safely.	Remove or significantly reduce the Pineapple Farm allocation until: Reserved Matters issues are resolved, Safe access is proven deliverable, A370 walking and cycling access is funded, Drainage modelling is completed and acceptable, SAC mitigation strategy is prepared, Hedgerow/tree retention plans are secured, Infrastructure is included in the IDP, A Congresbury-wide masterplan exists. At present, the site allocation is not sound, not justified, and not deliverable.		

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					Emergency vehicle access is constrained. The proposed access visibility splays cannot be delivered without land not in the applicant’s control. Traffic flow modelling conflicts with lived reality and resident evidence. These issues contradict DP15, DP16, DP17, and NPPF 110–111. 2. Footway and Pedestrian Safety Failures The reserved matters process confirmed: There is no safe pedestrian route between the site and village services. Footways are discontinuous, narrow, or absent. No safe crossing exists at the A370. The Council cannot secure off-site land required for active travel improvements. This makes the development 100% car-dependent, contrary to national policy. 3. Drainage and Flooding Concerns Not Resolved At reserved matters, the LLFA (Lead Local Flood Authority) and drainage consultees raised concerns: Surface water cannot be safely discharged. The fall of the land directs runoff towards existing homes. Attenuation basins proposed are undermined by groundwater issues. Climate-change allowances have not been modelled. No cumulative drainage modelling has been done alongside Woodhill. This conflicts with DP9, DP10 and the NPPF flood risk hierarchy. 4. Ecology, Hedgerow and SAC Impact Concerns The reserved matters submissions highlighted that: Key hedgerows are Important Hedgerows under the Hedgerow Regulations 1997, but the developer proposed partial removal. No dark corridor modelling exists despite SAC proximity. Lighting plans fail to protect bat flightlines (<1 lux required). No compensation or buffer zones were included. Foraging habitat loss has not been mitigated. This contradicts DP35, DP36, DP37 and potentially the Habitats Regulations 2017.			

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					5. Amenity and Layout Problems Reserved matters raised issues regarding: Overlooking and overshadowing of existing homes Excessive density relative to village character Insufficient private amenity space Lack of play space or green space Poor parking layout causing overflow into Mulberry Road This conflicts with DP1, DP2, DP3, DP4. 6. Lack of Supporting Infrastructure (confirmed again during reserved matters) During consultations on reserved matters, it became clear that: No school places are available No GP capacity No drainage upgrades No public transport improvements No active travel infrastructure No GI or BNG delivery strategy The IDP contains nothing for Congresbury This mirrors the failures identified under DP50 and DP63. How Reserved Matters Confirms the Local Plan Allocation is Unsound The National Planning Policy Framework requires that Local Plan allocations be: Deliverable Supported by evidence Based on realistic assumptions, and Not dependent on unachievable mitigation The fact that the outline permission has stalled and remains unresolved due to problems identified at reserved matters stage proves: ✔ The site is not deliverable ✔ Mitigation is not achievable ✔ Access cannot be made safe ✔ Drainage cannot be resolved ✔ Ecological impacts cannot be mitigated			

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					✔ Infrastructure is not available ✔ Planning conditions cannot overcome fundamental defects This provides clear evidence that the allocation should not remain in the Local Plan. GENERAL OBJECTIONS (summary of ALL previous objections) To maintain completeness, the allocation also: • Fails flood risk and drainage requirements (DP9, DP10) • Fails ecology and SAC requirements (DP35, DP36, DP37) • Fails active travel + public transport (DP15, DP16, DP17) • Fails design, amenity and layout (DP1–DP4) • Fails green infrastructure protection (DP34) • Lacks any supporting infrastructure (DP50, DP63) • Contributes significantly to cumulative impact from all 183 houses			
Congresbury	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Yes	Yes	This representation provides a comprehensive objection to multiple elements of the North Somerset Local Plan 2041, specifically those affecting Congresbury. My objections relate to: 1. Strategic policies (SP1, SP2, SP8, SP10, SP11) 2. Local policy LP5 (Housing & Employment Allocations) 3. Development Policies DP1–DP17, DP34–DP37, DP50, DP63 4. Three site allocations affecting Congresbury: - Woodhill Nurseries (100 homes) - Pineapple Farm / Land North of Mulberry Road (70 homes) - Land South of Station Road (13 homes) Across all policies and sites, one central theme emerges: The allocation of 183 homes to Congresbury is not evidence-based, not deliverable, not supported by infrastructure, and not consistent with the National Planning Policy Framework (NPPF). SECTION 1 — STRATEGIC POLICY OBJECTIONS SP1 – A Sustainable Future for North Somerset Unsound because Congresbury is a car-dependent village with no rail, infrequent buses, and unsafe walking/cycling routes. SP2 – Spatial Strategy Unsound because no evidence justifies allocating this level of growth to Congresbury. SP5 – Green Belt, Landscape, Environment Unsound due to complete absence of GI planning and protection of ecological corridors. SP8 – Historic Environment Unsound because Woodhill Nurseries affects the wider setting of Cadbury Hill Fort without Heritage Assessment. SP10 / SP11 – Infrastructure & Movement Unsound because the IDP contains no infrastructure for Congresbury. SECTION 2 — LP5 HOUSING ALLOCATION OBJECTION LP5 allocates 183 homes to Congresbury. The allocation is unsound because: - No transport or safety evidence - No ecological or SAC mitigation - No drainage or flood modelling - No landscape, heritage or design evidence - No active travel routes - No public transport improvements - No community infrastructure - No GI/Biodiversity planning - No deliverable infrastructure (IDP blank for Congresbury) SECTION 3 — DEVELOPMENT POLICY OBJECTIONS (SUMMARY) DP1 – No masterplans or design codes DP2 – No evidence layouts meet standards DP3 – No safe or inclusive access DP4 – No amenity assessments DP5 – No climate adaptation evidence DP6 – No net zero/	Modifications have all been added to the individual policy comments sections.		

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					energy feasibility DP7 – No renewable energy deliverability DP8 – Inefficient land use; sprawl DP9 – Sequential Test not applied DP10 – No drainage or SuDS modelling DP15 – No safe walking/cycling routes DP16 – Active Travel Routes unfunded/aspirational DP17 – No bus improvements; car dependency DP34 – No GI network or mapping DP35 – No HRA; SAC mitigation absent DP36 – No Biodiversity Net Gain baseline DP37 – No hedgerow/tree mapping or buffers DP50 – No community facility provision DP63 – No infrastructure delivery plan for Congresbury SECTION 4 — SITE-SPECIFIC OBJECTIONS WOODHILL NURSERIES (100 homes) - No outline consent, no technical evidence - Sequential Test not met - Ecology: SAC impact, no mitigation - Transport: unsafe access, A370 severance - Landscape/Heritage harm - No infrastructure support Request: Remove or reduce allocation until full evidence exists. PINEAPPLE FARM (70 homes) – incl. 22/P/0459/OUT Reserved Matters Failures - Unsafe access via Mulberry Road - No second access; refuse/ emergency issues - No walking/cycling routes - Drainage unresolved - Hedgerow and bat corridor impacts - Amenity and layout failures - No infrastructure Request: Remove or reduce; Congresbury-wide masterplan required. LAND SOUTH OF STATION ROAD (13 homes) - No outline consent; no technical evidence - Station Road unsafe for walking - No access strategy - Ecological corridor fragmentation - Drainage risk unaddressed - No infrastructure Request: Remove or defer until safety, ecology, drainage, GI and infrastructure issues addressed. SECTION 5 — CONCLUSION The Local Plan proposes 183 dwellings in Congresbury without: - safe access - active travel - public transport - drainage capacity - flood mitigation - ecological protection - SAC compliance - community facilities - school places - GP capacity - GI planning - design codes - infrastructure delivery - cumulative assessment The Plan is unsound in relation to Congresbury. The allocations must be removed or fundamentally reworked.			

Name: Adrian Shields **I.D:** 51332609

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Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	The Plan is incompatible with the Government's policy on national food security, which states that "we must protect our best and most versatile land". The Plan contradicts the policy and undermines food security, as it would permanently destroy Grade 1 Agricultural Land currently used for food crops and grazing. The imperative for food security will only increase over time due to the Climate Emergency. Recognising that 800 new houses have already been approved for Backwell, there is already a deficit in school places and no investment in health services or leisure facilities. The lack of infrastructure and services cannot support another 1,000 houses. Furthermore, and again recognising the 800 new houses already approved, the sheer volume of growth with the required investment infrastructure and services over such a short period is destabilising, unsustainable and undeliverable.			

Name: Agnieszka Parry **I.D:** 58342593

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	This development would have a severely negative impact on an area of ancient woodland and an SNCI because of the loss of an appropriate sized ecological buffer, as well as degradation of the woodland because of an increase footfall. The plan is not justified because there has not been an assessment of alternatives showing that the Tower Hill Farm development is the only possible solution. The development is not consistent with National Policy because the NPPF requires that, unless there are exceptional reasons, developments should not be allowed if there will be deterioration of irreplaceable habitats. Biodiversity net gain should be delivered but there is no description of how this will be achieved. The proposal is not effective because it is dependent on a whole host of other factors which cannot be considered achievable in the timeframe (eg new school provision, bus services, new road links, changes to rights of way etc) because of a lack of planning, funding and legal agreement. Unfortunately there are no effective modifications that would protect the ancient woodland and SNCI sufficiently. I do not support the plans for the Tower Hill Farm location.			
Black Rock, north of Clevedon Road	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	This development would have a severely negative impact on an area of ancient woodland and an SNCI because of the loss of an appropriate sized ecological buffer, as well as degradation of the woodland because of an increase footfall. There is no-site biodiversity mitigation, which contradicts NPPF paragraphs 180-182 and is against Avon Wildlife Trust's 2030 strategy. This will be a car dependent development because of a lack of public transport, which conflicts with the sustainable transport objectives of NPFF paragraphs 104-106. The loss of agricultural land is not justified. There are no modifications that would make this part of the plan compliant. I do not support the plan for the Black Rock location.			

Name: Aida Moses **I.D:** 62866721

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure				

Name: Aidan Colston **I.D:** 62800865

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Black Rock, north of Clevedon Road	No	• Positively prepared • Justified • Effective	No	No	NSC has not properly considered the strategic ecological importance of blackrock or tower farm sites in protecting Weston Big wood (SSSI) and the Gordano Valley corridor NSC has ignored the fact that both areas were added to the Green Belt in the late 80s due to their high ecological value National planning policy allows Green Belt changes only in exceptional circumstances and these NSC have not been demonstrated, NSC have not looked at alternative Brownfield or greenfield sites with far lower ecological impacts both in Portishead and N Somerset if NSC looked at the oppertunities to increase housing density on proposed brownfield sites which could remove the need to develop tower farm and black rock sites			

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		‣ Consistent with national policy			both sites can not provide safe or suitable access black rock and tower farm have limited bus/transport links and are not in easy walking distance from local GP surgeries dentists etc meaning more cars on very busy roads into portishead meaning these developments would create unacceptable transport impacts failing national soundness tests black rock is on the busy Clevedon road that gets heavily used when junctions 19/20 of the m5 has delays/accidents causing major tailback/congestion with vehicles using this road as a bypass from the motorway remove blackrock and tower farm from the local plan			

Name: Aileen Edwards **I.D:** 62849505

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	1. Community involvement and methods of consultation. A consultation commenced on 7 February 2025 and ran for 6 weeks until 21 March 2025. It included 5 additional sites with potential for 1,100 new homes around Pill. This consultation is referred to in the Introduction and Vision section of the Local Plan. Following the consultation, Pill and Easton-in-Gordano were categorised as a Strategic Location for large residential development. I believe that there was very poor consultation in PEIG and I do not believe it was legally compliant. Over 2,200 (and growing) residents from a total population (including children) of circa 4,500 have signed a petition objecting to the imposition of excessive housing in the area and challenging the lack of adequate initial consultation by North Somerset Council. Is this aspect of the Local Plan legally compliant? The Council held four public exhibitions (Long Ashton, Weston-super-Mare, Nailsea, Backwell), but there was none in Pill/E-in-G, despite five sites being consulted on in this area. This put PEIG residents at a very distinct disadvantage to understand and respond to the consultation. This is borne out by the low numbers of responses. There were very low responses from Pill/E-in-G (125, with only 29 individual respondents across 5 sites) than for comparable locations: Portishead: 689 responses for 5 sites, Long Ashton: 591 responses for 10 sites, Wrington: 484 responses for 5 sites, Nailsea and Backwell: 1,049 responses for 26 sites. Given the scale of potential change in Pill/E-in-G (e.g., 600 homes at Pill Green alone, plus other sites), the absence of a local event and the relatively small response volume could indicate under-representation of local voices and a lack of proportionate engagement. I do not believe that the Council complied with its own Statement of Community Involvement. This consultation was not sufficiently inclusive as most people were not aware it was happening and there was very little effort made to publicise this. Given that within people there are high numbers of older people and people on benefits/low incomes (second highest area of deprivation in	A proper consultation needs to take place with outreach in our village for those not able to access digital systems and with due regard to the Public Sector Equality Duty. I do not believe that the Council has shown that it has fully examined reasonable alternatives, such as maximising brownfield capacity (making the fullest and most efficient use of previously developed land), using minimum density standards (optimising land in towns and cities with higher-density developments, rather than spreading development out thinly) and working with neighbouring authorities to accommodate housing needs. I propose that NSC should re-examine all brownfield sites. A full report on information from National Highways on congestion should be sought to inform traffic issues on J19 and M5. NSC should also consider increased traffic from the proposed railway link and impact on bus routes etc. NSC should give more account of protection of wildlife and habitats in PEIG. further work is required on strategies and mitigation policies. Flooding - further work is required to ensure adequate flood assessments (especially in Markham Brook) have been carried out	No I don't	

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					North Somerset), digital exclusion is a real issue, with people not able to access the internet. More outreach approach was required to reach and talk to people about the consultation. I do not believe that there was legal compliance with duties under the Equality Act 2010, including the Public Sector Equality Duty. 2. The release of land from the Green Belt The justification for this is in Strategic Policy SP7 of the Local Plan. It is based on the Council's assertion that it cannot meet its identified need for homes at sustainable locations outside the Green Belt and this amounts to' exceptional circumstances' under the terms of Section 13 of the National Planning Policy Framework 2024 (NPPF). I do not believe that this aspect of the Plan is sound and it does not demonstrate that the Council has complied with the Duty to Co-operate. I do not believe that the Council has shown that it has fully examined reasonable alternatives, such as maximising brownfield capacity (making the fullest and most efficient use of previously developed land), using minimum density standards (optimising land in towns and cities with higher-density developments, rather than spreading development out thinly) and working with neighbouring authorities to accommodate housing needs. Where is the evidence to show this has been comprehensively done? For example, I have heard that Portishead has a brown field site that the Portishead Parish Council believes should have been considered but wasn't. If evidence is absent or incomplete, the 'exceptional circumstances' justification might not be valid. Where land is removed from the Green Belt, development proposals must demonstrate how they meet the 'Golden Rules' as set out in the NPPF. These rules relate to the provision of affordable housing, infrastructure and publicly accessible green spaces ' The 'additional sites viability addendum' (a document in the evidence base) suggests that a target of 50% affordable housing may be 'challenging' for the proposed sites in existing Green Belt land around Pill and Easton-in-Gordano. I also do not think that the fact that the five green field sites around PEIG will have a detrimental affect on the village, by hemming us in by the M5, the A369 and the River Avon. 3. Significant traffic and transport issues The sections of the Local Plan which relate specifically to the proposed development sites around Pill and Easton-in-Gordano (see policy LP4 and Schedule 1) refer to improvements to local infrastructure including a new primary school and the creation of active travel routes connecting the development sites to local services, schools, the local centre and proposed railway station. I do not believe that this aspect of the Plan is sound and it does not demonstrate that the Council has complied with the Duty to Co-operate? The Local Plan does not address potential traffic congestion at Junction 19 of the M5. We know that concerns were raised by National Highways re development at Court Hay near the service station (see			

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					NSC planning portal, ref 25/P/1413/OUT). The National Highways report stated that transport modelling is required to assess the cumulative impact of developments on Junction 19. Where is the evidence from the proposed Local Plan that NSC has co-operated sufficiently with National Highways and has taken its advice? I believe there is an over-reliance in the Local Plan on the impact of the proposed railway link. The new railway link might actually bring more traffic into PEIG from other areas and create more traffic pressure. I cannot see any evidence in the Local Plan that transport links, including buses and trains, will be sufficient for the proposed number of new homes. 4. The impact on the natural environment and protection of wildlife The National Policy Planning Framework (NPPF) requires plans to take full account of environmental impacts and to avoid/mitigate adverse effects, including Habitats Regulations Assessments (HRA). The proposed development sites around Pill lie within consultation zones for the North Somerset & Mendip Bats Special Area of Conservation (SAC), with proximity to the Severn Estuary Site of Special Scientific Interest (SSSI). Where sites are adjacent to or affect SSSI, SAC or other habitats sites, or form important wildlife corridors, development proposals must avoid significant harm, apply buffers and secure measurable net gains for biodiversity. Details of protected species and habitats can be found in the Wild Service Ecology Review undertaken on behalf of the Neighbourhood Plan Steering Group in 2019. https://pillanddistrictplan.org/environment-and-landscape/wild-service-ecology-review/ I do not believe that the relevant strategies in the Plan are legally compliant, nor are the policies sound (some relevant policies are SP11, DP35, DP36 and DP37) I do not believe that the Council taken sufficient account of the protection of wildlife and habitats in Pill and Easton-in Gordano in its assessment of the release of land from the Green Belt? (SP7) I also do not believe that there are clear strategies and mitigation policies in the Local Plan, with funding, to ensure protection of wildlife and habitats in the areas identified for potential development around Pill and Easton-in-Gordano? (see LP4 and Schedule 1) I understand that some proposed areas are the best and most versatile agricultural land i.e. highest quality. Theses should be protected, in accordance with Section 15 of the National Planning Policy Framework. 5. Flooding risks The area around Markham Brook in Pill has a recognised flood risk, as the valley bottom and parts of the surrounding land are within the Environment Agency's Flood Zone 3. This indicates a high probability of flooding from rivers (fluvial) and the sea (tidal). https://flood-map-for-planning.service.gov.uk/ . The National Planning Policy Framework refers to flood risk and the necessity for sequential testing – pages 49-52.			

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					This could affect some of the sites identified in LP4 and Schedule 1. Are the relevant strategies in the Plan legally compliant? Are the policies sound? (some relevant policies are DP9 and DP11) Where does the Local Plan demonstrate that lower flood risk areas have been considered for development in preference to higher flood risk areas? Where are the policies in the Local Plan which will ensure adequate flood assessments for any development close to Markham Brook and restrict potential development for housing in flood risk regions?			

Name: Ainscough Strategic Land **I.D:** 30301601

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SP2: Climate Change	No	• Consistent with national policy			Policy SP2 sets out the overarching principles for how development should address both climate change mitigation and adaptation, including a number of key requirements around resource use, net zero, energy generation, climate resilience, transport and green infrastructure. ASL fully supports the inclusion of a strategic climate change policy and setting out the overarching aims for development in North Somerset. ASL notes, however, that elements of the development expectations in Policy SP2 include the phrases 'minimise' and 'maximise'. This sets an open-ended requirement which itself is not fully tested as part of the policy viability, and which could have unintended consequences and supersede requirements set out in subsequent development management policies. Specific requirements, which could include minimising or maximising design elements, can be included in development management policies where they have been appropriately tested. Turley's Sustainability Team have prepared a note assessing this Policy further, along with Policy DP6 (see Appendix 2) and on this basis ASL recommends that the wording of Policy SP2 is updated to ensure it aligns with national guidance on setting local energy efficiency standards and is reflective of the intent of the policy	Proposed amendments to the policy wording are as follows: • "Maximise Reduce water use and prioritise the protection of water resources; • Minimise Reduce energy use and deliver a net zero energy standard in new buildings Net Zero Ready buildings; • Maximise Incorporate the generation of energy from renewable and low carbon sources of energy" (see attached for marked up copy where strikethrough shows our deletion, bold text shows our addition).		61683 - NSC Reg 19 Representations December 2025 2-12-25.pdf
SP3: Spatial strategy	No	• Positively prepared • Justified • Effective	Yes	No	ASL is supportive of the Plan's spatial strategy to prioritise locating strategic new residential and mixed-use development in or close to urban areas where there are existing or proposed facilities, services and jobs, as well as opportunities for active travel and public transport. The key evidence base document for Policy SP3, 'Spatial Strategy, site selection and Capacity paper' (October 2025), confirms that 'Land North of Banwell (Wolvershill)' is identified to meet the needs of the principal settlement of Weston-super-Mare. Wolvershill is noted as one of four strategic locations in the Local Plan together with Woodspring, Nailsea and Backwell and Pill and Easton-in-Gordano. Wolvershill is a logical location for town expansion, well related to the existing urban area of			61683 - NSC Reg 19 Representations December 2025 2-12-25.pdf

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					Weston-super-Mare. Wolvershill has been consistently proposed as a strategic location for growth in North Somerset, throughout both North Somerset's Local Plan 2041 process, and prior to this the West of England Joint Spatial Plan process. This led to funding being awarded from Homes England's Housing Infrastructure Fund (HIF) for the Banwell Bypass, to deliver the infrastructure required to enable future housing development and address congestion through Banwell village. The Bypass was granted planning permission in March 2023, and NSC voted in favour to progress to Stage 2 of the detailed design and construction of the Bypass in November 2023. Work has commenced on site and the bypass is due to open to traffic in Spring 2027, with the scheme completed in Summer 2027. Whilst ASL supports the spatial strategy in terms of strategic growth, as per our comments set out at Section 4.0 of these representations, there is likely to be a need for additional growth in North Somerset over the plan period in a range of locations and of various scales.			
SP8: Housing	No	• Positively prepared • Justified • Effective	Yes	No	SEE ATTACHED REPRESENTATION FOR FULL COMMENTS. Summary 1 The Plan as proposed risks not allowing for sufficient time (15 years from adoption) to meet a basic requirement for strategic polices set by national policy. A longer plan period is required to ensure that the Plan for North Somerset covers a period of at least 15 years from adoption, with a longer period likely to enable the Council to more effectively plan for future development in the area. 2 There is concern, and risks in respect of the soundness of the Plan, that whilst seeking to meet the minimum level of housing need identified using the standard method, a higher housing requirement should be set to address evidenced affordable housing needs and to accommodate some of Bristol's unmet needs. 3 There is concern, and risks in respect of the soundness of the Plan as proposed, that no housing delivery trajectory has been provided for the Plan as a whole, or for the specific sites which are identified as part of the proposed strategic policies. This should be addressed as part of the submission of the Plan, given some of the allocated sites' housing delivery will fall beyond the current plan period.			61683 - NSC Reg 19 Representations December 2025 2-12-25.pdf
SP9: Employment	Yes				ASL supports Policy SP9 in principle in relation to its employment land requirements for the Wolvershill draft allocation. Policy SP9 includes a requirement to strengthen and reinforce the role of Weston-super-Mare (WSM) as the principal economic centre alongside housing growth with 43.6 ha of employment proposed for the settlement. ASL fully supports this objective as it is important that the employment provision at Wolvershill is considered within its local employment context and the priority for the continued regeneration of WSM. There will be a close connection between Wolvershill and			61683 - NSC Reg 19 Representations December 2025 2-12-25.pdf

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					WSM supported by the creation of sustainable transport links including active travel which will enable people to travel quickly and efficiently to work in WSM. This complementarity will boost the local economy and ensure that the new community is well integrated into the wider area, rather than seeking to act as a freestanding self-contained settlement. The policy proposes 3.0ha of employment at Wolvershill. Policy LP1 states: “The provision of a minimum of 3 hectares of new employment delivered through the creation of a new business park and potential for smaller-scale business land provision as part of the mixed use local centre”. ASL welcomes the amended requirement for 3ha of employment land at Wolvershill and considers that this provides the basis for a more balanced and deliverable economic strategy. ASL is confident that this is an appropriate, realistic and deliverable level of employment land provision, and that it will ensure a strong balance between securing the regeneration of Weston-super-Mare and delivering a sustainable mixed use development at Wolvershill. The reduction in employment use will assist with the Council’s aspiration to see additional dwellings delivered at Wolvershill. Further, the Consortium is confident that this 3ha of employment can successfully be accommodated within Wain Estates’ land interest through the ongoing masterplanning process with the creation of a new business park. Some additional potential smaller-scale higher density workspaces could also potentially be interspersed as part of the mixed use local centre. This fully aligns with the policy LP1 expectations in relation to employment provision at Wolvershill.			
Policy LP1: Strategic location: Wolvershill (north of Banwell)	No	Justified			ASL supports the principle of draft Policy LP1 and the identification of Wolvershill as a Strategic Location for growth. Policy LP1 will support the delivery of much needed housing alongside other land uses, creating a sustainable new community for North Somerset. ASL has collaborated with the other two main site promoters Bloor Homes and Wain Estates in the preparation of a comprehensive Masterplan Framework for the site to ensure the overall vision and its necessary infrastructure and facilities are delivered in a sustainable manner. Wolvershill is a clear and logical location for a new sustainable community in North Somerset in respect of the proposed spatial strategy, particularly given the infrastructure commitments related to the Banwell Bypass scheme which is scheduled for completion in mid-2027. This provides a good level of certainty through the plan process of site deliverability and the strategic infrastructure required to deliver the strategic location. ASL, along with Bloor Homes and Wain Estates, have a	See Section 6 of attachment for detailed marked up proposed changes to Policy LP1. A separate note confirming all of the proposed changes to the policy wording is included at Appendix 3.		61683 - NSC Reg 19 Representations December 2025 2-12-25.pdf

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					positive ongoing dialogue with both Banwell Parish Council and NSC Officers, with workshop sessions held in 2023 and 2024 to inform the evolution of the Masterplan Framework by the Consortium which has now been published and accompanies the Consortium's planning applications. All three parties have submitted outline planning applications supported by Environmental Statements in the past year (ASL 25/P/0046/OU2; Bloor Homes 24/P/2690/OU2; and Wain Estates 24/P/2446/OU2). Discussions are now well progressed with NSC with a timeline agreed to determination for all three applications in Spring 2026. The Masterplan Framework provides the key structure and principles on which the three planning applications have been based. As is inevitable with a site of this size at this stage of the Local Plan process, there are some elements of the proposed policy that require refinement or further clarification. We discuss these elements in detail below, with comments on the specific policy requirements to follow. We request that Policy LP1 is updated accordingly. A separate note confirming all of the proposed changes to the policy wording is included at Appendix 3 of the attached representations. See attachment for full detailed submissions on the following subjects: Strategic Location Boundary Housing Delivery Masterplan, Delivery Plan, Design Codes Education Requirements Development Principles			
Policy LP10: Strategic gaps	No	• Effective			ASL is supportive of policy LP10 in principle though has some concerns about the policy wording as currently drafted. The policy requires a degree of flexibility which can be accommodated through future modifications to the Draft Plan. The main evidence base document relating to policy LP10 is the Strategic Gaps Background Paper (October 2025) which provides the justification for the designation of a new strategic gap between Banwell and the proposed strategic location at Wolvershill which includes retaining the character and setting of Banwell and development pressures. The Consortium's early engagement with Banwell Parish Council confirmed that the Strategic Gap is a very important issue for local residents to ensure that the local character of Banwell Village is maintained and for the Wolvershill community to have a separate identity whilst being well connected to ensure social cohesion. ASL supports the designation of the new Strategic Gap to provide recreational, sports and community facilities as well as biodiversity to the benefit of both communities.	ASL supports the designation of the Strategic Gap at Banwell and Wolvershill and agrees with the use of the bypass as the defensible boundary to the northern edge. ASL is concerned, however, that the boundary of the strategic gap as currently drawn is too tightly defined around Stonebridge Farm which includes a permitted existing area of caravan storage. We attach a plan at Appendix 5 which proposes a slight adjustment to the Strategic Gap boundary. This plan identifies the area to be excluded from the Strategic Gap. The landowner is also making a separate representation on this specific point.	ASL is supportive of policy LP10 in principle though has some concerns about the policy wording as currently drafted. The policy requires a degree of flexibility which can be accommodated through future modifications to the Draft Plan. ASL supports the designation of the Strategic Gap at Banwell and Wolvershill and agrees with the use of the bypass as the defensible boundary to the northern edge. ASL is concerned, however, that the boundary of the strategic gap as currently drawn is too tightly defined around Stonebridge Farm which includes a permitted existing area of caravan storage. We attach a plan at Appendix 5 which proposes a slight adjustment to the Strategic Gap boundary. This plan identifies the area to be excluded from the Strategic Gap. The landowner is also making a separate representation on this	61683 - NSC Reg 19 Representations December 2025 2-12-25.pdf

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					The Background Paper responds to ASL's previous comment and states: "Strategic gaps are not Green Belt. There is no need for policies on strategic gaps to stipulate what land uses are appropriate within them. Policy LP10 of the emerging Local Plan is appropriately criteria-based, allowing all development proposals to be assessed against the criteria, whatever the land use. The policy criteria do provide for some flexibility: for example the 1st criterion of the former Policy LP7 (now LP10) does not prevent development which would not significantly adversely affect the open or undeveloped character of the strategic gap. Subject to siting and design, facilities like recreation grounds with play areas, allotments and various forms of green infrastructure might be acceptable. Each planning application will be assessed against the criteria. However the policy cannot be made too flexible, particularly regarding buildings, because otherwise in many cases the sense of open, undeveloped character and separation of the settlements would be likely to be significantly reduced or lost. The policy wording provides sufficient flexibility whilst seeking to prevent that from happening." 7.5 ASL considers that whilst the SPD may provide further detail on the Wolvershill site including the related issues such as the Nature Park and the Strategic Gap it is important that draft policy LP10 includes sufficient detail on what uses are considered to be appropriate within the new strategic gap. It is essential that the strategic gap between the Wolvershill SGL and Banwell is not an open, unused green space which could be seen to create a division between the two settlements; it must be used effectively as part of the allocation itself as green infrastructure, creating an active green lung which brings together and links the communities with walking and cycle routes, amenity spaces, community uses including allotments and recreational/sports uses etc. as a combined community asset. The policy should also enable built form where it is appropriately and sensitively considered such as formal sports uses and where it can meet the policy criteria. This is a point of clarification which should be reflected within the draft policy and its supporting text. Banwell and Wolvershill Strategic Gap Boundary ASL supports the designation of the Strategic Gap at Banwell and Wolvershill and agrees with the use of the bypass as the defensible boundary to the northern edge. ASL is concerned, however, that the boundary of the strategic gap as currently drawn is too tightly defined around Stonebridge Farm which includes a permitted existing area of caravan storage. We attach a plan at		specific point.	

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					Appendix 5 which proposes a slight adjustment to the Strategic Gap boundary. This plan identifies the area to be excluded from the Strategic Gap. The landowner is also making a separate representation on this specific point.			
Policy LP11: Transport infrastructure, allocations and safeguarding	Yes						Policy LP11 allocates land to be safeguarded for the delivery of transport schemes, the improvement of existing services or the creation of sustainable transport links and facilities. Schedule 7, which forms part of the policy, includes the Banwell Bypass and the M5 Junction 21 Bypass Scheme, both of which are relevant to the Wolvershill allocation (Policy LP1). Discussions with NSC are being undertaken by the Consortium's transport planning consultants to ensure the effective integration of the development's access proposals with the Banwell Bypass in respect of vehicles, pedestrians and cyclists so that appropriate junction designs can be provided as part of the implementation of the scheme. It is understood that NSC has an historical long-term ambition to deliver the J21 Bypass Scheme to reduce congestion at M5 J21 from traffic that does not access or egress the Strategic Road Network. Whilst the delivery of the scheme is anticipated to provide some future benefit it is not required for the delivery of Wolvershill (LP1). The identified corridor and design principles should be reviewed so that it does not adversely impact the sustainable transport requirements of the Wolvershill allocation to deliver an active travel route to Worle railway station and the active travel changes to the Wolvershill Road M5 overbridge. ASL does not object to Policy LP11 where it does not prejudice the planning and delivery of the other requirements of draft Policy LP1, particularly for housing and employment.	61683 - NSC Reg 19 Representations December 2025 2-12-25.pdf
Policy DP5: Climate change adaptation and resilience	Yes						Policy DP5 requires development to address climate adaptation and resilience, ensuring development recognises climate related risks and incorporates measures to reduce these risks. ASL supports the objectives of Policy DP5, and the requirement to prepare a 'climate change adaptation statement' (or its inclusions in a	61683 - NSC Reg 19 Representations December 2025 2-12-25.pdf

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							sustainability/energy or design and access statement) to demonstrate how development aims to deliver long term climate resilience.	
Policy DP6: Net zero construction	No	• Effective • Consistent with national policy			ASL supports the Council's focus on sustainability, climate change and net zero. The Council's aims to reduce operational carbon in buildings, reduce embodied carbon and ensure development is resilient to future climate change broadly align with the Government's ambitions to improve building standards over time. However, there are deliverability and viability issues with local energy efficiency standards going beyond and accelerating the Government's net zero transition which is being driven by progressive changes to the Building Regulations. Turley's Note at Appendix 2 reviews the requirements of Policy DP6 against national guidance on setting local energy efficiency standards, namely the December 2023 Written Ministerial Statement (WMS), 'Local Energy Efficiency Standards Update'. This confirms that any policies which go beyond the 2025 Future Homes Standard (FHS) must be demonstrated to be viable, with the impact on housing supply and affordability considered in accordance with the NPPF. Given Policy DP6 goes beyond the requirements of the FHS, it will need to be reviewed, with the Examining Inspectors exercising judgement to determine that policies that depart from the 2023 WMS are consistent with national policy. It is recommended that Policy DP6 is updated to reflect the requirements of the FHS. Further, Policy DP6 states that net zero operational energy covers both regulated and unregulated energy. Whilst ASL supports the delivery of low carbon development, it is considered that any targets should be restricted to regulated energy only. Developers can only influence the regulated energy demand through design and specification of materials and systems and renewable energy technologies. Unregulated energy consumption of a development is ultimately the function of the residents / occupiers use of the building, which cannot be influenced by the developer. Therefore, the requirement of Policy DP6 to offset emissions from unregulated energy is not appropriate and should be removed. The remaining requirements of Policy DP6 are reviewed in full in Turley's Note at Appendix 2, as well as a review of the Viability Assessment for the implementation of the Policy. This concludes that there are some concerns with the requirements of Policy DP6 and recommends some proposed changes to the policy wording to ensure it algins with national guidance and is deliverable and viable.	The remaining requirements of Policy DP6 are reviewed in full in Turley's Sustainability Note (Appendix 2). This concludes that there are some concerns with the requirements of Policy DP6 and recommends some proposed changes to the policy wording to ensure it aligns with national guidance and is deliverable and viable. A summary of the wording changes sought is provided in the attached full representations [bold shows additions and strikethrough deletions] with full detail of the reasoning behind this at Appendix 2		61683 - NSC Reg 19 Representations December 2025 2-12-25.pdf
Policy DP8: Efficient use of land	No	• Effective			Whilst ASL supports the efficient use of land to deliver North Somerset's housing need over the Plan period, it is important to highlight that a 'minimum target density' of 40 dwellings per hectare (dph) may not be suitable or desirable in all locations as part of a comprehensive and well considered design approach that respects the			61683 - NSC Reg 19 Representations December 2025 2-12-25.pdf

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					character of the surrounding area. Although the justification for Policy DP8 clarifies that 40dph is an average, and the appropriate density will vary depending on local circumstances, this is not clear in the policy wording itself.			
Policy DP43: Affordable housing (including rural exception schemes)	No	‣ Positively prepared ‣ Justified ‣ Effective	Yes	No	ASL recognises the importance of delivering affordable homes. ASL support the change in Policy LP1 from the previous Reg 19 so that the affordable housing is consistent with Policy DP43 (30% on greenfield sites). However, we would note that a percentage figure would better reflect the fact that the total capacity of the site is not fixed. For example, as currently drafted, should only 3,000 units come forward then this would require 33% of the units to be affordable. As set out in the viability evidence , an affordable housing requirement of more than 30% starts presenting viability issues (the evidence states that even achieving 25% is challenging): “Scenario 2 [3,300 homes] shows slightly stronger results with 25% affordable housing potentially being viable at the mid to higher value part of the tested values range. In any event, it appears that as much as 35% affordable housing is unlikely to be viable (without some form of change to infrastructure / values or cost assumptions and / or significant additional subsidy) in either scenario – although some level of ‘additionality’ beyond the development funded AH levels / tenure make up should not be ruled out as the LP framework acknowledges.” ASL considers that Policy LP1 must be consistent with Policy DP43; at present it is not and raises issues of viability and deliverability.			61683 - NSC Reg 19 Representations December 2025 2-12-25.pdf
Policy DP44: Gypsies, Travellers and Travelling Showpeople.	No	‣ Justified			ASL objects to Policy DP44, which states that longer term need for sites for gypsies, travellers and travelling show people (GTTS) will be met through the provision of site(s) as part of the Wolvershill and Woodspring Strategic Locations or through the provision of land off-site. As set out previously in these representations, there is a lack of evidence to demonstrate that the Wolvershill Strategic Location is the best or most appropriate available option to meet the longer terms district-wide needs for GTTS provision in North Somerset. The key evidence base document relating to Policy DP44, ‘Gypsy, Traveller and Travelling Showpeople Background Paper (October 2025) and Gypsy and traveller accommodation assessment (October 2025), includes an assessment of sites to meet the short- and medium-term need, but no assessment of the most suitable sites in the longer term, including Wolvershill. It is unjustified for this requirement to only fall to the Strategic Allocations. It is critical that all sites are assessed and considered, including Council owned land and assets in the first instance as these are inherently the most deliverable options for this form of development. The provision of GTTS pitches to meet ‘longer term’ need	ASL requests that this provision is removed from Policy DP44, or the policy wording amended to clarify that Wolvershill is to provide gypsy and travellers pitches only if they are evidenced to be required, either on-site or through financial contributions to support off-site delivery in accordance with policy LP1.		61683 - NSC Reg 19 Representations December 2025 2-12-25.pdf

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					as part of the new community at Wolvershill will present challenges for masterplanning and could impact the future viability and deliverability of the site. As such, ASL requests that this provision is removed from Policy DP44, or the policy wording amended to clarify that Wolvershill is to provide gypsy and travellers pitches only if they are evidenced to be required, either on-site or through financial contributions to support off-site delivery in accordance with policy LP1.			
Wolvershill (north of Banwell)					Full submissions attached. ASL supports the principle of draft Policy LP1 and the identification of Wolvershill as a Strategic Location for growth. Policy LP1 will support the delivery of much needed housing alongside other land uses, creating a sustainable new community for North Somerset. ASL has collaborated with the other two main site promoters Bloor Homes and Wain Estates in the preparation of a comprehensive Masterplan Framework for the site to ensure the overall vision and its necessary infrastructure and facilities are delivered in a sustainable manner. Wolvershill is a clear and logical location for a new sustainable community in North Somerset in respect of the proposed spatial strategy, particularly given the infrastructure commitments related to the Banwell Bypass scheme which is scheduled for completion in mid-2027. This provides a good level of certainty through the plan process of site deliverability and the strategic infrastructure required to deliver the strategic location. ASL, along with Bloor Homes and Wain Estates, have a positive ongoing dialogue with both Banwell Parish Council and NSC Officers, with workshop sessions held in 2023 and 2024 to inform the evolution of the Masterplan Framework by the Consortium which has now been published and accompanies the Consortium's planning applications. All three parties have submitted outline planning applications supported by Environmental Statements in the past year (ASL 25/P/0046/OU2; Bloor Homes 24/P/2690/OU2; and Wain Estates 24/P/2446/OU2). Discussions are now well progressed with NSC with a timeline agreed to determination for all three applications in Spring 2026. The Masterplan Framework provides the key structure and principles on which the three planning applications have been based. As is inevitable with a site of this size at this stage of the Local Plan process, there are some elements of the proposed policy that require refinement or further clarification. We discuss these elements in detail below, with comments on the specific policy requirements to follow. We request that Policy LP1 is updated accordingly. A separate note confirming all of the proposed changes to the policy wording is included at Appendix 3.	Appendix 3 Proposed amendments to the wording of Policy LP1 are set out below – (strikethrough shows our deletion, bold text shows our addition). "A new mixed use strategic location is proposed at Wolvershill (north of Banwell) at the broad location defined shown on the Policies Map to accommodate up to around 3,300 dwellings, including 990 a percentage of affordable homes The development will create a new low carbon community with high quality placemaking and a clear sense of identity. It will be designed to ensure that walking, cycling and public transport are the most convenient and attractive ways to move around the development with easy access to services and facilities. The development will minimise energy use and incorporate renewable energy generation including for community use. The development will incorporate high quality green spaces both within the built-up area and through provision of green spaces adjacent to the development linking it to the surrounding countryside. A single masterplan covering the entire allocation and proposed development, delivery plan nand strategic design code and supporting design codes will be prepared to guide its coordinated and comprehensive development and the creation of a sustainable community. This will include a phasing strategy linking the delivery of development parcels to infrastructure provision and a strategy for its future maintenance. Where required Design Codes will be developed for relevant areas within the strategic location. Proposals for development must demonstrate compliance with the		61683 - NSC Reg 19 Representations December 2025 2-12-25.pdf

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						following development principles: • The new development must complement Banwell village in respect of the scale and range of facilities and encourage integration between the existing and new communities; • Development proposals must demonstrate how they have sensitively responded to existing uses on the site including existing businesses and residential areas. Master planning should ensure effective integration of new development with existing, maximising benefits to new and existing residents • The proposed development is reliant upon, and must be integrated effectively with the design and delivery of the Banwell Bypass; • A Strategic Gap is defined between the new development area and Banwell to retain the character and setting of Banwell; • The creation of attractive, easily accessible, safe and direct walking, wheeling (wheelchairs, mobility scooters and other wheel-based mobility aids), and cycling routes linking the new development with local facilities, within Banwell and into Weston-super-Mare, Parklands, and Worle, including the three M5 crossing points (two road bridges and a direct cycle/pedestrian access into Parklands Village). This is likely to require alterations to the future role and function of a section of Wolvershill Road to facilitate active travel in the centre of the development in order to achieve this. Creationof new cycle and pedestrian links to Parklands to be delivered during the initial phases of residential development; • The creation of effective public transport links into Weston-super-Mare, Parklands, and Worle, employment areas and other destinations such as railway stations, transport hubs (including designated bus corridors) and improving accessibility for existing Banwell residents; • The development must respect the landscape setting, including minimising any adverse		

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						impact on the Mendip Hills National Landscape through sensitive design; •The creation of a mixed-use local centre focused on Wolvershill Road to form the heart of the new community with a high-quality public realm, planned with the provision of a community space from the outset of development but with the ability to grow and develop in step with the development and its needs. Other mixed uses to include retail, business space appropriate to a local centre location, extra care accommodation, healthcare provision, family and children's centre services, residential, and a transport hub, all set within a high-quality public realm with public space and appropriate species selection and planting of trees; • Subject to confirming needs generated by the development, the development must ensure suitable land provision is made available to facilitate the provision of appropriate healthcare infrastructure onsite or appropriate financial contributions towards healthcare for new and/or improved facilities off-site; • Liveable neighbourhoods within the scheme should be planned for to ensure convenient and safe walking and cycling access to the local centre and key facilities; • The development will comprise predominantly medium to high density [this needs cross reference to Policy DP8 and further clarification, otherwise it should be deleted and Policy DP8 relied upon] living in well-designed buildings, with the highest densities close to the new local centre, facilities and public transport nodes to ensure that these are accessible by the highest number of people on foot; • Provision of a package of transport measures as identified in the Infrastructure Delivery Plan (subject to viability) including provision of a transport hub at the local centre, delivery of key access junctions onto the Banwell Bypass and wider transport mitigation schemes. Development proposals should ensure that any future planning and delivery of a new motorway junction on the M5 south of J21 is not precluded; • The development must deliver		

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						ecological, habitat and environmental enhancement, particularly in relation to horseshoe bats, linking habitat along key green corridors between new development and Banwell. The eastern fringe of the development in particular will be a focus for ecological and environmental mitigation, with provision of a new North Somerset Nature Park to provide bat mitigation, provision of land for biodiversity and habitat enhancement. ‘Dark corridors’ for bats will be provided on agreed green corridors within and adjacent to the development effectively integrating with mitigation agreed through the Banwell Bypass project; • Green infrastructure should form an interconnected and multifunctional network throughout the development and where appropriate with integrated sustainable drainage systems including rain gardens and other features. Additional woodland and tree planting surrounding and throughout the development will be required, including as part of the landscaping adjacent to the M5 motorway; • Development should seek to retain as far as appropriate, the existing field boundaries and the native and historic hedgerows across the site, offering areas of open space to break up the urban density of the overall site. This may be particularly important for mitigating impact on heritage features; • A strategy to support and maximise climate change resilience will be required including an approach to maximising carbon storage and other measures across the development with exploration of opportunities for community-based renewable energy generation; • Defined areas of green infrastructure should be planted with wildflower species within a wider natural landscape setting; • Where appropriate, in accordance with their significance, heritage and archaeological features will be integrated into the development		

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						including any identified archaeology that should be reflected in the new development including appropriate interpretation to maximise the recreational and educational value of the assets; • The setting of historic farmsteads will be sensitively addressed including through the creation of open space designed around these features to provide a visual buffer, allowing their historical significance to be reflected, contributing to the wider sense of place. Additional design measures will be required to address these assets including appropriate materials and design styles, lower surrounding development heights, and lower density of street patterns allowing for views to the features and to avoid overdominance of them; • The provision of a minimum of 3 hectares of new employment delivered through the creation of a new business park and potential for smaller-scale business land provision as part of the mixed use local centre; • Effective management and treatment of surface water, controlling run-off into surrounding watercourses and integrating into the green infrastructure network. Provision of sustainable drainage adjacent to new highway will also be supported; • Rainwater should be treated as a resource and proposals should maximise its reuse; • Provision for on site, or contributions for off site, recreation including indoor facilities as part of a new community hall, outdoor sports pitches and changing facilities, three outdoor tennis courts, a skatepark, and a multi-use games area; • Educational facilities located within the new development, including delivery of two primary schools, each with a land take of circa 2.4ha, capable of delivering a total of up to 6FE (up to 1,260 pupil places) three 420 place primary schools (to include early years provision in line with government requirements) within a safe walking route from the new homes,		

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						access to additional early years settings and walkable access to services used by children and families within a reasonable distance; • Financial contribution towards off-site secondary, special educational needs and Post education provision; Provision should be made for a minimum of 18 gypsy and traveller pitches if required within the site, or alternatively through the provision of suitable land off-site along with a financial contribution to support off-site delivery. • The production of a public art strategy to be approved by the council following engagement with the local community to ensure the delivery of high-quality public art which contributes to the legibility and sense of place and supports community development • The development will be located having regard to any noise or other environmental impacts, and suitable mitigation will be delivered to address any impacts including provision of a landscaped noise bund barrier designed for its attractiveness and wildlife value located adjacent to the M5. This feature should respond to the topography of the site, be of varying width, and should facilitate the delivery of a recreational cycle and walking route surrounding the Wolvershill development; and • The creation of distinct character areas across the development, particularly distinct residential neighbourhoods, with materials, and design, referencing the local context and demonstrating best practice in placemaking. To include high quality design solutions for access points into the site, the local centre, business sites, and the immediate vicinity of educational buildings.		

Name: Ainscough Strategic Land (Stonebridge Farm) **I.D:** 62717825

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP5: Housing, employment and mixed use allocations	No	• Effective			This representation relates to Policy LP10: Strategic Gaps. This policy looks to designate areas of Strategic Gaps in order to retain the separate identity, character and/ or landscape setting of settlements. ASL understands the importance of this and supports the policy as whole; however, ASL strongly disagrees with the boundary drawn on the Policy Map for the Banwell and Wolvershill Strategic Gap. This includes land at Stonebridge Farm, which is a suitable and deliverable development site and one that should be excluded from the Strategic Gap. Appendix 1 below includes a site location plan of the land at Stonebridge Farm, which is available for redevelopment. Stonebridge Farm is a circa 2.8-acre brownfield site currently consisting of a farmhouse, numerous farm buildings and a caravan storage area. The farm is related to the surrounding fields which now partly consists of the new Banwell Bypass. The rest of the fields associated with the farm have a planning application submitted for up to 600 dwellings including specialist later living accommodation, mixed-use Local Centre, a Primary School, sports and leisure provision including community park, public open space and associated access, infrastructure, landscape and ancillary works. This land forms part of the emerging Wolvershill allocation. Given the emerging allocation at Wolvershill includes the fields related to Stonebridge Farm, there will no longer be any use for the farm. The site is within one landownership and ASL are working alongside the Landowners to promote the site for redevelopment and therefore the site is available for development. Paragraph 125c) of the NPPF states that planning policies and decisions should ‘give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused’. Stonebridge Farm is a brownfield site within the Banwell area, which is considered one of the ‘larger, most sustainable villages’ within the consultation document. The document confirms that the larger, most sustainable villages have scope to deliver a level of growth. Whilst the site is not within the settlement boundary for Banwell, it relates well to the village and has the feeling of being part of the village. It is in close proximity to both the existing facilities within Banwell but will also be closely connected to the new Wolvershill Local Centre. Footpath and cycle links between Banwell and the new community are being proposed. ASL have some concerns with the provision of housing within the plan; including: •The Plan as proposed risks not allowing for sufficient time (15 years from adoption) to meet a basic requirement for strategic polices set by national policy. A longer plan period is required to ensure that the Plan for North Somerset covers a period of at least 15 years from adoption, with a longer period likely to enable the Council to more effectively plan for future development in the area. •There is concern, and risks in respect of the soundness of the Plan, that whilst seeking to meet the minimum level of housing need identified using the standard method, a higher housing requirement should be set to address evidenced affordable housing needs and to accommodate some of Bristol’s unmet needs. •There is concern, and risks in respect of the soundness of the Plan as proposed, that no housing delivery trajectory has been provided for the Plan as a whole, or for the specific sites which are identified as part of the proposed strategic policies. This should be addressed as part of the submission of the Plan, given some of the allocated sites’ housing delivery will fall beyond the current plan period. It is important that the Council allocate a range of sites of different sizes to ensure the 1,580 dwellings per annum requirement can be met and that the Council do not prevent sustainable, brownfield sites from coming forward. Smaller sites such as this can be delivered quickly. The site is brownfield, deliverable, in a sustainable location and can be delivered in the short term.	See attached representation.		Regulation 19 Pre-submission plan 2041 (Reg 19) - Autumn 2025 Consultation - Stonebridge Farm Reps.pdf
Policy LP10: Strategic gaps	No	• Effective			This representation relates to Policy LP10: Strategic Gaps. This policy looks to designate areas of Strategic Gaps in order to retain the separate identity, character and/ or landscape setting of settlements. ASL understands the importance of this and supports the policy as whole; however, ASL strongly disagrees with the boundary drawn on the Policy Map for the Banwell and Wolvershill Strategic Gap. This includes land at Stonebridge Farm, which is a suitable and deliverable development site and one that should be excluded from the Strategic Gap. Appendix 1 below includes a site location plan of the land at Stonebridge Farm, which is available for redevelopment. Stonebridge Farm is a circa 2.8-acre brownfield site currently consisting of a farmhouse, numerous farm buildings and a caravan storage area. The farm is related to the surrounding fields which now partly consists of the new Banwell Bypass. The rest of the fields associated with the farm have a planning application submitted for up to 600 dwellings including specialist later living accommodation, mixed-use Local Centre, a Primary School, sports and leisure provision including community park, public open space and associated access, infrastructure, landscape and	See attached representation		Regulation 19 Pre-submission plan 2041 (Reg 19) - Autumn 2025 Consultation - Stonebridge Farm Reps.pdf

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					ancillary works. This land forms part of the emerging Wolvershill allocation. Given the emerging allocation at Wolvershill includes the fields related to Stonebridge Farm, there will no longer be any use for the farm. The site is within one landownership and ASL are working alongside the Landowners to promote the site for redevelopment and therefore the site is available for development. Paragraph 125c) of the NPPF states that planning policies and decisions should 'give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused'. Stonebridge Farm is a brownfield site within the Banwell area, which is considered one of the 'larger, most sustainable villages' within the consultation document. The document confirms that the larger, most sustainable villages have scope to deliver a level of growth. Whilst the site is not within the settlement boundary for Banwell, it relates well to the village and has the feeling of being part of the village. It is in close proximity to both the existing facilities within Banwell but will also be closely connected to the new Wolvershill Local Centre. Footpath and cycle links between Banwell and the new community are being proposed. ASL have some concerns with the provision of housing within the plan; including: •The Plan as proposed risks not allowing for sufficient time (15 years from adoption) to meet a basic requirement for strategic polices set by national policy. A longer plan period is required to ensure that the Plan for North Somerset covers a period of at least 15 years from adoption, with a longer period likely to enable the Council to more effectively plan for future development in the area. •There is concern, and risks in respect of the soundness of the Plan, that whilst seeking to meet the minimum level of housing need identified using the standard method, a higher housing requirement should be set to address evidenced affordable housing needs and to accommodate some of Bristol's unmet needs. •There is concern, and risks in respect of the soundness of the Plan as proposed, that no housing delivery trajectory has been provided for the Plan as a whole, or for the specific sites which are identified as part of the proposed strategic policies. This should be addressed as part of the submission of the Plan, given some of the allocated sites' housing delivery will fall beyond the current plan period. It is important that the Council allocate a range of sites of different sizes to ensure the 1,580 dwellings per annum requirement can be met and that the Council do not prevent sustainable, brownfield sites from coming forward. Smaller sites such as this can be delivered quickly. The site is brownfield, deliverable, in a sustainable location and can be delivered in the short term.			

Name: Al Campbell **I.D:** 38730817

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	‣ Positively prepared ‣ Justified ‣ Consistent with national policy	No	Unsure	The propsed site at tower farm on green belt added to the plan does not make any sense. There are brownfield sites that could offer the houses needed The idea that you would use a greenbelt site adjacent to a SSSI site which would significantly impact the location when other sites are available is disgraceful. The sotes surrounding weston big wood at Tower Farm was specifically added to greenbelt status due to its ecological importance. The idea that you would be using down road to get to the proposed sight is absolutely laughable. It is already too busy and impassable at times due to school traffic. The fact that you would be needing to bring thousands of tons of building material through Portishead to get to the sight is again a crazy notion. The roads are already too busy and it was also noted by one of the other major builders I believe Permisson who also identifed this as a significant floor in this proposal. Parkers of Leicester who did the proposal for the sight have significantly mislead North Somerset council in their proposal.			

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					They have done traffic surveys down the toad from the sight to make sure the school traffic and the down road traffic wasn't considered, they have suggested that people could cycle to transport but there is a massive hill they didn't note on there. I would also note that the wildlife agencies also believe this to be a bad idea and believe it would have a significantly negative impact on the environment and wildlife. Overall its a poorly considered site and proposal that should not be in the plan. Make use of brown field sites and site within range of the local transport. There are site next to the motorway that wont need to have the materials moved through a busy town away from transport. There are plenty of sights that wont impact the greenbelt and specifically sites next to SSSI sites.			

Name: Alan & Jacky Bond **I.D:** 62770401

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Land at Tower Farm					We object to this plan. Accessibility is very limited and therefore too dangerous due to the congestion that the traffic would cause. It is green belt land and far too close to Weston Bigwood and the wildlife that occupies it.			
Black Rock, north of Clevedon Road					We object to this plan. Accessibility is very limited and therefore too dangerous due to the congestion that the traffic would cause.It is green belt land and far too close to Weston Bigwood and the wildlife that occupies it.			

Name: Alan Bannister **I.D:** 62850849

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Land at North West Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I have commented in March relating to the unsuitability of this land for development and nothing appears to have changed in particular as regards the flooding risks on both the site and its access points, the loss of wildlife habitat and corridor. There is no solution to the already congested pinch points for traffic and the limited access to the railway. My email of 18 March 2025 to the planning.policy covers this in more detail but the issues I raised then have not been addressed The Council's own Nature Emergency Toolkit is not mentioned and the Wraxall and Failand Neighbourhood Plan conflicts with this development despite having been adopted by North Somerset Council. The aviation fuel pipeline is not even mentioned as a constraint. This land is probably the least suitable for building on let alone its release from Green Belt status.			

Name: Alan David Norrie **I.D:** 30793121

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Land at Tower Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent	No	No	1) The proposed allocation of this site in summer 2025 was made "subject to the Evidence Base" ie site specific. The published Evidence Base does not address this site: a) The Habitat Assessment makes reference to bats in Weston Big Wood (SSSi) but does not mention other flora and fauna which is reliant on Weston Big Wood and the surrounding fields and are interlinked to provide a local wildlife rich habitat. b) The Transport Assessment only refers to congestion at J19 with the M5 and is silent on the added congestion development			

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		with national policy			of this site would bring at the junction of The Downs and Down Road, or the junction of Avon Way and High Street. Therefore NSC have not complied with their own statement of "subject to the Evidence Base". 2) The proposed Local Plan shows an "indicative" number of dwelling at 400. We all know that the developer will cram in as many as they can, as their only interest is profit margin, so an "indicative" 400 could easily rise to 450 - 500. Therefore even the badly flawed "Evidence Base" is further compromised by the fact that the number of dwellings will inevitable rise above 400. 3) Development of this site will increase private vehicle usage and pollution. The site is at the top of a long and steep hill and is 1.5 miles from the town centre and shops. People will not walk to bus stops on Down Road to use a limited bus service as this service is only in one direction and takes a very indirect route to the High Street. Or walk or cycle and be faced with a steep and long hill to return. There is already gridlock at The Downs/Down Road junction at school drop off/collection times. The proposed new rail link is not within cycling distance of the site and certainly does not offer a genuine choice of transport modes. In any event the rail link will only provide one service an hour. If an expansion of High Down School takes place then parents from elsewhere in the town (eg proposed expansion of housing at Wyndham Way) will be driving their children through the down and up the hill to reach any such expanded school. Other locations in the town for development would be more sustainable, eg Old Mill Road and increasing further the density at Wyndham Way and would be closer to the rail station and the road infrastructure without going through the congested High St. It is unclear what possible mitigation would ease this. Safe and suitable access to the site cannot be achieved. The developer proposes one main vehicular access point to service 400 - 500 homes. This is contrary to the requirements of NPPF s110-112 and would cause a severe problem for emergency response vehicles. 3) NSC has not maximised the use of existing brownfield sites and has not optimised the density at Castlewood in Clevedon owned by NSC and is in a very sustainable location. In addition NSC should challenge the recent assessment by the Environment Agency of site HE20488 being in a flood zone. This site is on a small ridge overlooking neighbouring land. This site is in a far more sustainable position than Tower Farm 4) Tower Farm site is in the Green Belt and NSC has not demonstrated "exceptional circumstances" or examined fully other options to release the site from the Green Belt. See 3) above. 5) Tower Farm fields are immediately next to Weston Big Wood (SSSi) and any development on the fields would result in the loss of this irreplaceable habitat and severe wildlife disturbance. The site serves as a vital buffer and wildlife corridors to the wider Gordano Valley. Weston Big Wood is home to roosting bats, buzzards and owls, sparrowhawks and badgers and are dependant on the fields. Frequently I have seen kestrels hovering when looking for food on the fields of Tower Farm. The hedgerows in the fields also provide a natural habitat for smaller creatures and provides for natural green corridors for wildlife. All this would be lost if any development took place. NSC refer to a "buffer" but any such "buffer" would be insufficient to protect Weston Big Wood, or prevent loss of wildlife or root zone damage. Weston Big Wood is ancient woodland and any development would mean it's loss. NSC have not consulted local wildlife experts in this regard. 6) The site slopes steeply to the east and my garden and my neighbours were in 2012 flooded from run off from the fields . The NSC Flood Risk Engineer inspected the site in 2015. Any development of hard surfaces would increase this potential. The developers suggest attenuation pools but it is unclear whether this would be sufficient and the developers would only perform the absolute minimum they can get away to protect their profit margins. I understand that the NPPF refers to development on land adjacent to a SSSi which is likely to have an adverse effect on it should not be permitted and in line with the "Golden Rules". 7) The population of Portishead has tripled in less than 25 years and local services , doctors and pharmacies are currently overwhelmed. 8) This site was designated Green Belt in 1988, and not part of the original UK wide designation. It was specifically designated as such to protect the Gordano Valley Green Corridor which of course includes Weston Big Wood. NSC has not taken this into consideration. This is another reason why the present Local Plan is not sound or compliant.			

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					No modification can be suitable given the presence of Weston Big Wood. The land must be maintained to preserve the ancient woodland and the natural biodiversity that it supports. Development of the site would be contrary to NPPF paras 180-182. Development would increase private vehicle usage and the suggested mitigations are not feasible. No mitigation or buffer zone can make this site suitable. It should remain open countryside to support biodiversity and for the local community to enjoy sustainably as now. I do not support it.			

Name: Alan Drake **I.D:** 29268353

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at North West Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	NSC do not appear to have properly considered the traffic impacts to the roads and lanes around Tickenham which are currently seriously congested and unsafe for cyclists and pedestrians. These roads/lanes cannot support the increase in new homes proposed by the Local Plan. I make these comments based upon several key factors: (i) whenever there are roadworks, the traffic build up through the village is excessive, typically lasting half a mile in each direction, (ii) when a lorry stops to unload outside a property, a similar backlog can arise (iii) in both the previous cases this can make it even more difficult for emergency services vehicles to pass through the village, (iv) when HGV drive through the village there are several locations where they cannot pass without stopping and sometimes reversing to allow the other to squeeze past, (v) cyclists are vulnerable to all traffic and in particular HGVs, and in them selves can cause long tailbacks, again affecting emergency vehicles, (vi) there are many sections along the road where pedestrians are unsafe due to very narrow pathways (or in some places none) and where large vehicles passing close to the kerb can brush pass a pedestrian – I have had a close experience where a lorry mirror nearly touched my head. Driving in/out of my drive has become increasingly difficult over the past few years (I have lived in the village almost 40 years) and sometimes needing to wait several minutes before exiting my own driveway.	I understand the village "Tickenham Road Action Group" have made representations with practical recommendations to alleviate the matters I have raised above		

Name: Alan Hooley **I.D:** 27745249

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Nailsea	No	• Positively prepared • Justified • Effective	Unsure	Unsure	I DO NOT CONSIDER the North Somerset Local Plan 2041: Pre-submission Plan TO BE SOUND. The NS Local Plan 2041 proposes to build over 24,000 new houses - almost 4,000 of these in the Nailsea and Backwell area! This represents an increase of approx. 40% over current residential properties, and hence a similar pro-rata increase in population and traffic. Tickenham sits on the B3130 which is already seriously congested and unsafe for pedestrians & cyclists. The reason why the Plan is NOT SOUND is that	To build an additional 4,000 homes in Backwell & Nailsea consideration must be made to relieve traffic capacity of the B3130 by the introduction of another route from these towns to the M5. This should be achieved by extending the Long Ashton by-pass (A370) from current junction at Flax Bourton to the M5 junction 20 alongside the route of the nearby railway line, this new road would have junctions serving Backwell (nr. Backwell Common/ Farleigh) and Nailsea (nr. Netherton Grange/Station). The new road would also facilitate a future link up to the expanding Bristol airport and the new U.S. pharmaceutical HQ planned at Long Ashton. This new road would negate any need for the new proposed Backwell link road.		

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					there has been no review of this increase of traffic on this very popular route from the M5 to Nailsea, Backwell and also as a rat-run to Bristol.			

Name: Alan Porter **I.D:** 28926785

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I object to the proposed additional housing for the east side of Backwell. The reasons for this are:- Backwell already has approval for an additional 640 houses. Also with 60 new houses at Moor Lane and 94 at Farleigh Fields the impact of all these new homes has yet to be felt. However we AND YOU can be sure the impact will be highly negative for the area and the existing residents. The burden of 800 new homes on a village the size of Backwell will be significant and extremely damaging. Then to suggest an additional 889 houses on top is madness in the extreme. Even worse is the suggestion to use Grade 1 agricultural land. This makes no sense at all. Some parts of this land is also prone to flooding so building on it will make the problem worse in that area and put an additional flood risk on the surrounding land. Each new house will come with at least one additional car and probably two. The road infrastructure in the area does not cope well with current traffic volumes so the addition of at least another 1683 cars is unthinkable. The proposed link road between Station Road and A370 will not help solve this problem as the A370 itself has major traffic congestion currently, not only at peak times. Local services will undoubtedly be overwhelmed even with the addition of the already approved allocations. Goodness only knows what might happen with an additional 889 houses. Opportunities for employment for any new residents will be very limited. The likelihood will be that most will commute to Bristol or further afield and will add to the transport difficulties. In total this proposal makes a mockery of local involvement. Turning Backwell from a village into a small town is outrageous. The entire character of the area will alter completely. North Somerset DC should be ashamed of themselves for proposals, which if adopted, would change a charming and friendly village into another satellite town for Bristol	Discard the proposed increase in housing allocation for the Backwell area and object to the allocation from central government of 23,000 homes for North Somerset		

Name: Alan Raines **I.D:** 27623137

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Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent	Unsure	Unsure	North Somerset Council - Local Plan Comments Overview NSC have not properly considered the traffic impacts on the B3130 (including the Causeway). In particular, the significantly increased traffic volumes will use these Tickenham roads and lanes. These are currently operating at near their maximum capacity levels. The current situation is that these roads are unsafe for cyclists and pedestrians, with ensuing environmental and social consequences.			

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		with national policy			These roads/lanes cannot support the increase in traffic volumes arising from new homes proposed in the Local Plan. Specifics The main factors being: - The Traffic corridor to and from the M5 junction 20 (utilising the B3130) will significantly increase traffic volumes through Tickenham village. - Road safety is severely compromised due to the lack of pavements, road geometry, and the width of roads etc. An example being, children going to and from Tickenham School are in severe danger due to the proximity of traffic, particularly the proximity of HGVs. This safety factor is relevant to all persons walking/cycling in the village. - There is already a large increase in HGV traffic through the village throughout the day, the HGV vehicles are enormous and unsuitable for the existing roads. They frequently traverse the centre road white lines whilst travelling through the village, causing other vehicles approaching from the opposite direction to take avoiding action. - The proposed cross rail connecting road will form an ideal conduit for traffic from further afield to use the B3130 corridor to the M5. This will be in addition to traffic commuting to/from the M5 to Bristol. - Local restrictions (which already occur), such as buses stopping, refuse vehicles, cyclists, road works, vehicles turning into and exiting properties, are all currently apparent in causing severe tailbacks, resulting in increased journey times, pollution issues. - The Data modelling criteria seem flawed: assumptions have been made with input values arbitrarily chosen; of course, this affects the outputs. The models need to be tested and calibrated against current traffic levels. The current overall approach to data modelling is at the Macro level (helicopter view). To get a true representation of vehicle capacity/movements on links, there needs to be a Micro-level analysis of the specific links. This modelling should include origin/destination matrixes and weather/local factors as stated above.			

Name: Alecto Shyne **I.D:** 30658817

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	Not Justified There is no robust evidence base demonstrating that this environmentally sensitive location is the only or most appropriate site for accommodating growth. No published alternatives assessment has been provided to show that less harmful options were thoroughly explored or discounted. The proposal would also lead to the loss of best and most versatile (BMV) agricultural land (Grades 2 and 3a, per the Agricultural Land Classification dataset), and carries a clear risk of causing irreversible harm to adjacent ancient woodland. On this basis, the allocation cannot be considered justified. Not Consistent with National Policy The allocation is in direct conflict with the National Planning Policy Framework (NPPF) paragraphs 180–182, which state that development resulting in the loss or deterioration of irreplaceable habitats, such as ancient woodland, should be refused unless wholly exceptional circumstances exist. No such circumstances have been demonstrated. The Council’s reliance on an unspecified “ecological buffer” is insufficient. It is vague, lacks enforceable standards, and does not address key indirect effects, including: - Damage to woodland root protection zones - Changes to hydrology and surface-water flows - Disturbance to sensitive wildlife Both the Woodland Trust and Avon Wildlife Trust consistently emphasise that damage to ancient woodland is irreversible.			

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					In addition, the NPPF requires development to secure biodiversity net gain. The proposed allocation provides no clear, deliverable mechanism to achieve this. Not Positively Prepared The proposed location would exacerbate existing pressures within Portishead, where schools, healthcare provision, and transport infrastructure (notably along the A369 corridor) are already under significant strain. Because this is a peripheral and poorly connected location, the allocation would almost certainly encourage increased private car dependency, contrary to NPPF paragraphs 104–106, which require plans to promote sustainable travel patterns and reduce emissions. 4. Not Effective The deliverability of this allocation depends on a range of unresolved dependencies, including: - New school provision - Financial contributions to bus service enhancements - Off-site biodiversity compensation or habitat management - Rights-of-way improvements and enforceable buffer-zone arrangements No phasing strategy, funding framework or secured legal agreements have been published to give confidence that these critical requirements can be delivered. In the absence of such mechanisms, the allocation fails the deliverability test of NPPF paragraph 35(c). 5. Landscape and Connectivity The transition zone between the farmland and Weston Big Wood is a vital ecological and landscape interface. Development here would: - Fragment habitats - Weaken the Gordano Valley wildlife corridor - Intrude visually and ecologically on the woodland - Erode the rural fringe character of the area Even with a buffer, the landscape and ecological impact would remain significant. 6. Drainage and Hydrology Built development and construction activity would alter the surface-water regime, including: - Changed run-off patterns - Increased soil compaction - Altered infiltration rates These changes pose a material risk to the hydrology that sustains the adjacent ancient woodland, including potential impacts on nutrient levels and sensitive woodland root zones. 7. Cumulative Impacts When assessed alongside other planned development in the wider Portishead area (e.g. Black Rock, north of Clevedon Road), the combined effects on: - Local ecology - Infrastructure capacity - Transport networks These effects are considerable. The cumulative pressure undermines the Council’s commitments to nature recovery, ecological enhancement and sustainable growth.			

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					Avon Wildlife Trust 2030 Strategy and national "30x30" nature-recovery goals should be reviewed and the land should remain undeveloped green space, providing sustainable public access and managed to enhance biodiversity. There are no modifications to this application that could mitigate the irreversible rape and damage to this ancient woodland. This allocation should be removed completely. I am unable to support the North Somerset Local Plan 2041 for this location (Tower Hill Farm).			

Name: Alex Herbert **I.D:** 62855713

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I am responding as a parent of two young children living near the proposed site and as someone who understands how government policy is intended to guide sustainable development. My family values Backwell for its green spaces, community feel, and access to nature. The scale of the proposed development threatens all of that and does not align with key principles in national planning policy. **Scale and Fairness** Backwell already has 800 homes approved, representing a 40% increase in housing stock. Adding another 1,000 homes would be disproportionate for a village of this size. Backwell is allocated 7% of North Somerset's housing growth, more than towns like Clevedon (2%). This raises serious questions about fairness and proportionality in planning. **Infrastructure and Services** While primary schools may not yet be at capacity, the proposed growth will put significant pressure on education, health services, and leisure facilities. There is no funded plan for expanding these services. The National Planning Policy Framework (NPPF) requires planning to promote healthy communities and ensure sufficient school places and health facilities (Chapter 8). Infrastructure Delivery Plans must demonstrate costings and delivery timelines before major development proceeds. This proposal lacks both. **Transport and Accessibility** The proposed road does not solve congestion on Station Road, Backwell Common, or Chapel Hill. Engineering under or over the railway would be costly and uncertain, creating delivery risk. Backwell station is not fit for purpose as a transport hub: it remains inaccessible for people with mobility issues and is difficult for families with young children. NPPF Chapter 9 requires developments to promote sustainable transport and accessibility for all users. This proposal fails to meet those standards. **Environmental and Food Security** The site includes Grade 1 Agricultural Land, of which only 7% remains in North Somerset. Government policy requires protection of best and most versatile land to safeguard food security. NPPF paragraph 174 states that local authorities must protect and enhance valued soils and avoid development on BMV land unless absolutely necessary. This proposal contradicts national food security objectives and undermines resilience. **Biodiversity and Habitat Protection** Development would destroy wildlife habitats, harm biodiversity, and threaten the Brockley Maternity Roost and SSSI, home to rare Lesser and Greater Horseshoe bats. Under the Environment Act 2021 and NPPF paragraph 180, all major development must deliver a minimum 10% biodiversity net gain and provide a Biodiversity Gain Plan. No such plan has been provided. **Flood Risk** Backwell Common and adjacent fields, including Backwell Lake (Reservoir), are on a floodplain that floods regularly. Increased housing would aggravate flood risk, contrary to climate adaptation principles. NPPF Chapter 14 mandates the Sequential Test and flood risk mitigation for development in flood-prone areas. No evidence of compliance has been provided. **Community Impact** Rapid growth of this scale risks destabilizing the village's character and social cohesion. No impact assessment has been			

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					provided. Backwell is not an employment hub, so most new residents will commute, increasing traffic and emissions. NPPF paragraph 92 states that planning should support strong, vibrant communities and guard against adverse social impacts. This proposal ignores that principle. **Deliverability** There is no needs or viability analysis for an extra 1,000 houses, and uncertainty over whether the road can be funded and delivered on time. NPPF paragraph 34 requires plans to be deliverable and supported by clear infrastructure funding mechanisms. This proposal fails that test. As a parent, I worry about the loss of green space, increased traffic, and strain on services. From a policy perspective, this proposal fails to align with multiple national planning principles, including: * Protection of best and most versatile agricultural land (NPPF 174) * Mandatory biodiversity net gain (Environment Act 2021, NPPF 180) * Flood risk management (NPPF Chapter 14) * Infrastructure-first development (NPPF paragraph 34) * Sustainable transport and accessibility (NPPF Chapter 9) I urge the planning authority to reject this proposal or significantly scale back growth, ensuring that any development is proportionate, evidence-based, and supported by funded infrastructure plans.			

Name: Alex Layard **I.D:** 31069025

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP8: Housing	No	• Justified • Effective	Unsure	Unsure	It's as if you've made it as complicated and bureaucratic as possible for regular members of the public to comment on this consultation which is disappointing. But we'll repeat what so many of us have said before, there is not the demonstrated need for all this housing. Yes it's in response to national government, but I have yet to see any substantive and current local evidence to justify so much new housing being build. If needs assessments from 2022 are the best you have, that's pretty underwhelming. Again there is no clear, systematic approach to the already creaking infrastructure - roads, public transport, cycle ways, doctors, schools, employment and training options. These need to come before planning permission for more housing. Let alone environmental considerations which should be at the forefront of all plans especially with increasing flooding and very hot summers. And again, there is no demonstrated need for more 3-4 family homes. There needs to be more provision and more imagination around accessible, affordable (not in the social/affordable housing sense) development for single people, the many older people, people with limited mobility and other disabilities. There is no evidence you are taking your obligations for self building into consideration. It feels like you just want to parcel up land for the big commercial developers and then wash your hands of it. That hasn't worked in South Glos and look at Netherton Grange in Nailsea which has been a commercial mess.			

Name: Alex Morgan **I.D:** 61026977

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Donkey Field, Uphill	Yes		Yes	Yes				

Name: Alexander Nell **I.D:** 62865057

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	No	I do not consider Policy LP4: Strategic location: Pill and Easton-in-Gordano of the proposed plan to be sound, not legally compliant or not in compliance with the duty to co-operate for the following reasons: 1. Community involvement and methods of consultation. Given the scale of potential change in Pill/E-in-G (e.g., 600 homes at Pill Green alone, plus other sites), the absence of a local event and the relatively small response volume could indicate under-representation of local voices and a lack of proportionate engagement. Do not believe that the Council has complied with its own Statement of Community Involvement. 2. The release of land from the Green Belt Strategic Policy SP7 of the Local Plan does not justify release of land from the Green Belt in these locations This aspect of the Plan is not sound. ? Does it demonstrate that the Council has complied with the Duty to Co-operate? The Council has not shown that it has fully examined reasonable alternatives, such as maximising brownfield capacity (making the fullest and most efficient use of previously developed land), using minimum density standards (optimising land in towns and cities with higher-density developments. Are there sites in other locations in North Somerset which could be considered for housing development and which are not mentioned in the Local Plan. 3. Significant traffic and transport issues Is this aspect of the Plan is not sound. The Local Plan does not address potential traffic congestion at Junction 19 of the M5 • there an over-reliance in the Local Plan on the impact of the proposed railway link? • Insufficient there evidence in the Local Plan that transport links, including buses and trains, will be sufficient for the proposed number of new homes. 4. The impact on the natural environment and protection of wildlife The Council has not taken sufficient account of the protection of wildlife and habitats in Pill and Easton-in Gordano in its assessment of the release of land from the Green Belt. (SP7)			
Land at Lodway Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	No	I do not consider Policy LP4: Strategic location: Pill and Easton-in-Gordano of the proposed plan to be sound, not legally compliant or not in compliance with the duty to co-operate for the following reasons: Community involvement and methods of consultation. Given the scale of potential change in Pill/E-in-G (e.g., 600 homes at Pill Green alone, plus other sites), the absence of a local event and the relatively small response volume could indicate under-representation of local voices and a lack of proportionate engagement. Do not believe that the Council has complied with its own Statement of Community Involvement. The release of land from the Green Belt Strategic Policy SP7 of the Local Plan does not justify release of land from the Green Belt in these locations This aspect of the Plan is not sound. The Council has not shown that it has fully examined reasonable alternatives, such as maximising brownfield capacity (making the fullest and most efficient use of previously developed land), using minimum density standards (optimising land in towns and cities with higher-density developments. Are there sites in other locations in North Somerset which could be considered for housing development and which are not mentioned in the Local Plan. 3. Significant traffic and transport issues Is this aspect of the Plan is not sound. The Local Plan does not address potential traffic congestion at Junction 19 of the M5 • there is an over-reliance in the Local Plan on the impact of the proposed railway link.			

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					• Insufficient evidence in the Local Plan that transport links, including buses and trains, will be sufficient for the proposed number of new homes. 4. The impact on the natural environment and protection of wildlife The Council has not taken sufficient account of the protection of wildlife and habitats in Pill and Easton-in Gordano in its assessment of the release of land from the Green Belt. (SP7) In summary, this is inappropriate location for development.			
Land east of Gordano Services	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	No	Land to the East of Gordano Services Part of this site should be safeguarded for a park and ride facility together with linking shuttle bus to the Pill train station. Transport upgrades should include the provision of a safe upgraded cycle route from the Gordano Services to Bristol. Any residential development in this location should provide the capital funding and future operational funding of these transport improvements for at least 25 years as a s.106 planning obligation or similar legally binding contract, as a priority over the provision of the percentage of site affordable housing provision. I do not consider Policy LP4: Strategic location: Pill and Easton-in-Gordano of the proposed plan to be sound, not legally compliant or not in compliance with the duty to co-operate for the following reasons: 1. Community involvement and methods of consultation. Given the scale of potential change in Pill/E-in-G (e.g., 600 homes at Pill Green alone, plus other sites), the absence of a local event and the relatively small response volume could indicate under-representation of local voices and a lack of proportionate engagement. Do not believe that the Council has complied with its own Statement of Community Involvement. 2. The release of land from the Green Belt Strategic Policy SP7 of the Local Plan does not justify release of land from the Green Belt in these locations This aspect of the Plan is not sound. The Council has not shown that it has fully examined reasonable alternatives, such as maximising brownfield capacity (making the fullest and most efficient use of previously developed land), using minimum density standards (optimising land in towns and cities with higher-density developments. Are there sites in other locations in North Somerset which could be considered for housing development and which are not mentioned in the Local Plan. 3. Significant traffic and transport issues Is this aspect of the Plan is not sound. The Local Plan does not address potential traffic congestion at Junction 19 of the M5 • there is an over-reliance in the Local Plan on the impact of the proposed railway link. • Insufficient evidence in the Local Plan that transport links, including buses and trains, will be sufficient for the proposed number of new homes. 4. The impact on the natural environment and protection of wildlife The Council has not taken sufficient account of the protection of wildlife and habitats in Pill and Easton-in Gordano in its assessment of the release of land from the Green Belt. (SP7) In summary, this is inappropriate location for development.			
Pill Green	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national	Unsure	No	I do not consider Policy LP4: Strategic location: Pill and Easton-in-Gordano of the proposed plan to be sound, not legally compliant or not in compliance with the duty to co-operate for the following reasons: 1. Community involvement and methods of consultation. Given the scale of potential change in Pill/E-in-G (e.g., 600 homes at Pill Green alone, plus other sites), the absence of a local event and the relatively small response volume could indicate under-representation of local voices and a lack of proportionate engagement. Do not believe that the Council has complied with its own Statement of Community Involvement.			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
		policy			2. The release of land from the Green Belt Strategic Policy SP7 of the Local Plan does not justify release of land from the Green Belt in these locations This aspect of the Plan is not sound. The Council has not shown that it has fully examined reasonable alternatives, such as maximising brownfield capacity (making the fullest and most efficient use of previously developed land), using minimum density standards (optimising land in towns and cities with higher-density developments. Are there sites in other locations in North Somerset which could be considered for housing development and which are not mentioned in the Local Plan. 3. Significant traffic and transport issues Is this aspect of the Plan is not sound. The Local Plan does not address potential traffic congestion at Junction 19 of the M5 • there is an over-reliance in the Local Plan on the impact of the proposed railway link. • Insufficient evidence in the Local Plan that transport links, including buses and trains, will be sufficient for the proposed number of new homes. 4. The impact on the natural environment and protection of wildlife The Council has not taken sufficient account of the protection of wildlife and habitats in Pill and Easton-in Gordano in its assessment of the release of land from the Green Belt. (SP7) In summary, this is inappropriate location for development.			
Land at Pill Road	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	No	Land at Pill Road I do not consider Policy LP4: Strategic location: Pill and Easton-in-Gordano of the proposed plan to be sound, not legally compliant or not in compliance with the duty to co-operate for the following reasons: 1. Community involvement and methods of consultation. Given the scale of potential change in Pill/E-in-G (e.g., 600 homes at Pill Green alone, plus other sites), the absence of a local event and the relatively small response volume could indicate under-representation of local voices and a lack of proportionate engagement. Do not believe that the Council has complied with its own Statement of Community Involvement. 2. The release of land from the Green Belt Strategic Policy SP7 of the Local Plan does not justify release of land from the Green Belt in these locations This aspect of the Plan is not sound. The Council has not shown that it has fully examined reasonable alternatives, such as maximising brownfield capacity (making the fullest and most efficient use of previously developed land), using minimum density standards (optimising land in towns and cities with higher-density developments. Are there sites in other locations in North Somerset which could be considered for housing development and which are not mentioned in the Local Plan? 3. Significant traffic and transport issues Is this aspect of the Plan is not sound. The Local Plan does not address potential traffic congestion at Junction 19 of the M5 • there is an over-reliance in the Local Plan on the impact of the proposed railway link. • Insufficient evidence in the Local Plan that transport links, including buses and trains, will be sufficient for the proposed number of new homes. 4. The impact on the natural environment and protection of wildlife			

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					The Council has not taken sufficient account of the protection of wildlife and habitats in Pill and Easton-in Gordano in its assessment of the release of land from the Green Belt. (SP7) In summary, this is inappropriate location for development.			

Name: Ali Price **I.D:** 17467393

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Justified • Consistent with national policy	No	No	Tower Farm development on Green Belt, brown belt should be used first. Local schools (primary and secondary) are insufficient. Road network amd wider links to M5 not suitable. Develop brownfield sites as a priority			

Name: Alison Delaplace **I.D:** 58241249

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	I am a local resident, living on The Deans. My experience of living here shows me that this plan is not sound, and not compliant with current objectives for sustainable development. Access problem NPPF S115 It is proposed to make access to the new housing uniquely via The Downs. The Downs is a cul-de-sac residential road with my own road, The Deans, leading off it. Each of these 2 roads has 80-100 houses on it with an average of 2 cars per house ie there are already around 350 cars regularly using this one exit onto Down Road. Using a car to get anywhere from this location is essential. There isn't any realistic alternative for most residents. At certain times of day (school drop-off and pick-up) this exit is already gridlocked. An additional 400 dwellings would potentially mean another 800 cars using this same one exit onto Down Road. This would have a massive impact on traffic congestion at this junction and all along a section of Down Road, not to mention the danger to the safety of pedestrians, especially children. Conclusion: I can't see how safe and suitable access to their homes can be achieved for all residents via this one access road. Transport problem NPPF S110 Most residents in my area cannot comfortably walk or cycle into the town because we are situated at the top of a long steep hill, whether up West Hill or up Avon Way. Local facilities are NOT within reasonable walking distance for the vast majority of our local residents. As a result almost every house here has 2 cars on the drive or parked on the road outside. A development of 400 houses would likely mean an additional 800 vehicles using our roads. The congestion around High Down school at the beginning and end of the school day would be greatly exacerbated, and indeed potentially dangerous. (Access is even worse when the weather is inclement. It can take 20 mins to get from The Triangle to my house in The Deans at school fetching time.) The bus service here is inadequate and takes long indirect routes, so it is not a viable alternative. We will also be almost 2 miles away from the new Portishead Railway station when it comes. Conclusion: I can't see how this site could be considered to support sustainable travel as there are NO realistic alternatives to car use. Green Belt Harm. NPPF S147 and NPPF S187			

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					I understand that as a matter of principle there is a need to exhaust all other alternative sites before encroaching on the Green Belt, and even then I think that not enough consideration has been given in this proposal to the fact that Tower Farm land is not in ordinary Green Belt land, but in Extraordinary Green Belt land due to its ecological significance (designated so in 1988). I am concerned about the threat that this development poses for a unique ecological site. It seems to me to fail all 3 statutory biodiversity protection tests, and the project seems to bring no benefits to outweigh the ecological harm it will cause. In my opinion no modification would make this site appropriate. Because it is situated at the top of a hill, the people who live here are car dependent. I know because I live here. This reality can not be changed. The land should be retained as undeveloped green space, managed to enhance biodiversity and accessible to all.			

Name: Alison Jones-Moran **I.D:** 29293889

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land south of Nailsea	No	• Justified • Effective • Consistent with national policy	Unsure	Unsure	The proposed road from the A370, through the proposed new development in Backwell would not directly serve these new houses proposed for Nailsea. So there would be an unsustainable increase in traffic up station road, along Queen's road and into the Perrings to access this proposed housing development. There is no new plan for a road to connect this housing development to Nailsea and Backwell station, and if there were one in place it would be unsustainable as it would have to be built on flood plain, which is not realistic or sustainable as an infrastructure plan. The current plan for the first 2 parts of the road from the A370 to the railway line, under the line, and on to the station are already not costed and present huge engineering and cost challenges that are unrealistic. This part of the project would have to be approved and built first before an additional section could be considered to join up the station to the proposed Nailsea housing development. The new housing development would be on a flood plain, there are no analysis or costings for the additional engineering that would be required to overcome this problem and make the housing development viable. There are no additional school places proposed; Nailsea School is already oversubscribed or full, and with additional housing already underway in Backwell, Backwell School would not be able to take on children from Nailsea, which would be out of their catchment area. There aren't the infrastructure plans to accompany this considerable population growth: no extra leisure, transport, medical, dental or retail facilities are proposed. This would put an unacceptable pressure on existing infrastructure in the town. There is no needs or viability analysis for this extra development of 500+ houses in Nailsea. This housing development will further reduce and threaten the feeding area of the Brockley Maternity Roost and SSSI, with rare Lesser and Greater Horseshoe Bats relying on the land for food. Development would destroy valuable wildlife habitats and further harm biodiversity in one of the world's most nature-depleted countries.			
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell already has 800 new houses approved, which is massive increase for this village, this will have a major impact on infrastructure to support the huge growth in the population: no provision for additional services such as gp services, not enough additional school places, no additional leisure facilities. Current provision will not be able to support another 1000 houses. The engineering required for the proposed road under the railway will be highly expensive and possibly unfeasible. Backwell Lake and adjacent fields where the new roads and housing is planned are on a flood plain which floods regularly. The additional road and housing would aggravate this tendency to flood, not alleviate the problem. The extra road into the station will not relieve the A370 traffic congestion at Backwell crossroads effectively, as it will not speed up journeys to commuter villages beyond Backwell such as Cleeve, Congressbury, Yatton, Hewish and on to Weston. Traffic using the new road, will create unplanned for congestion on roads connecting Nailsea to Tickenham and Clevedon, which are already congested, and do not have the width/capacity to carry the additional traffic load eg across the fields, for example, Washing pound Lane, via the Church of St Quericus and St Julietta to Tickenham, or through Tickenham from Nailsea. The use of Backwell crossroads will still be preferable for this traffic, rather than getting stuck in Tickenham.			

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					Backwell is allocated a higher number of houses than any other village in North Somersest, and even a higher growth percentage than town. There is no needs or vialbility analysis for an extra 1000 houses. Backwell is not an area of high employment for new residents coming in, it is a comuter hub, so there will be a large increase in car use into Bristol, on already congested roads. No cohesion impact assessment has been provided. This plan is using up Grade 1 Agricultural land, currently used for crops and grazing. There is only 7% of this high quality land left in the whole of North Somerset. Government policy states that "we must protect our best and most versatile land" to safeguard food security. The proposals contradict this policy and undermine food security. This development would destroy valuable wildlife habitats and further harm biodiversity in one of the world's most nature-depleted countries. The proposal threaten the Brockley Maternity Roost and SSSI, with rare Lesser and Greater Horseshoe Bats relying the land for food. The infrastructure Delivery Plan lacks analysis and costings, and there are no funding guarantees for the new road or services. I would be concerned that the houses would be built, and then the project run out of money for the road or infrastructure to support it. Government policy requires 50% affordable housing on Greenbelt Land, but this reduces the funds developers contribute towards infrastructure. So, there could well be no money available to develop the station as a transport hub fit for purpose for the growth in the community. it is not fit for purpose currently as a transport hub, as it remains inaccessible for people with mobility issues and presents serious challenges to people travelling with small children.			

Name: Alison Keighley **I.D:** 39304961

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Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I have many concerns about this proposal. We already have a number of developments approved for Backwell which will put increased pressure on current facilities and infrastructure. Increasing this even more will just become completely unmanageable. The proposed road is not sufficient to relieve traffic on Station Road, there is no mention of any additional investment in infrastructure and services, and the area identified for development is prone to flooding (which would be aggravated by more housing). Additionally, the proposal is to build on Grade 1 Agricultural Land, currently used for food crops and grazing. There is only 7% of this type of land left in North Somerset and so I can’t understand how an argument can be made to decrease this even further.	Remove the development for East Backwell.		

Name: Alistair Brown **I.D:** 62850401

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	Unsure	I am writing to object to the proposed allocation of the East of Backwell site for approximately 1,000 dwellings. Having reviewed the Local Plan documents and drawing on many years of personal experience living around Backwell, I believe this allocation is fundamentally unsound, inadequately justified, and would cause lasting harm to the village and its environment. 1. Loss of Green Belt and Best and Most Versatile Agricultural Land The proposed site lies within the Green Belt and contains extensive areas of Grade 1 agricultural land among the most productive soils in North Somerset. Once developed, this resource would be lost permanently. The Green Belt here plays a vital role in containing settlement expansion and preserving the open landscape between communities. Allocating this land directly conflicts with those national-policy purposes. The plan offers no compelling exceptional circumstances to warrant this level of Green Belt erosion or the destruction of high-value farmland. 2. Lack of Evidence on Need, Deliverability, or Social Impact			

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					No credible needs assessment, viability testing, or social cohesion analysis has been presented to justify placing a development of this magnitude on the edge of a village the size of Backwell. An additional 1,000 homes would represent an unprecedented expansion—far exceeding recent growth—and would dramatically change the settlement's scale, character, and community balance. Without evidence showing how such a major shift could be absorbed or supported, the allocation cannot be considered justified. 3. Existing Flooding Issues Ignored Living locally, I am well aware of the frequent surface-water and groundwater issues affecting: Backwell Common, where water frequently accumulates and lingers after rainfall; Farleigh Road, where drainage regularly becomes overwhelmed; Surrounding fields, footpaths, and low-lying ground, which often become saturated or waterlogged. These drainage and flooding pressures already pose concerns for residents. Yet the Local Plan provides no detailed, site-specific hydrology or flood-risk assessment for East of Backwell. Development on these sloping, water-retentive fields would inevitably increase runoff volumes, reduce natural infiltration and storage, and intensify risks to surrounding properties and roads—even with SuDS. The omission of proper evidence makes the allocation unsafe and unjustified. 4. Severe Transport and Infrastructure Constraints Through day-to-day travel, it is clear that local infrastructure is already stretched: The A370 regularly experiences heavy congestion at peak periods. Emergency service access is often hindered by traffic build-up. Station Road remains problematic despite recent interventions to manage safety and flow. Public transport—both bus and rail—is close to capacity and inconsistent in reliability. Schools, GP surgeries, and utilities are under strain and have limited ability to absorb significant additional demand. The Local Plan provides no firm, costed, or deliverable infrastructure programme capable of supporting a development of this scale. Without such provision, the allocation is not effective. 5. Damage to Rural Setting, Landscape Character, and Ecology The area east of Backwell contributes strongly to the village's distinctive rural setting. Having walked the local footpaths and viewpoints for many years, it is clear that development here would: Replace open countryside with urban form; Break apart wildlife corridors that rely on connected hedgerows and fields; Reduce habitat quality for local species; Diminish the village's landscape identity and sense of separation from neighbouring settlements. This kind of environmental and landscape impact is inconsistent with national policy objectives around biodiversity, rural character, and environmental protection. Conclusion – The Allocation Is Not Sound The proposed allocation for Land East of Backwell fails multiple NPPF soundness tests: Not justified: missing evidence on need, hydrology, viability, and social impact. Not effective: lacks a realistic, funded plan for delivering essential infrastructure. Not consistent with national policy: harms Green Belt purposes, sacrifices Grade 1 agricultural land, and exacerbates known flood-risk and environmental issues. For these reasons, and drawing on direct local knowledge, I strongly urge North Somerset Council to remove the East of Backwell site from the Local Plan 2041. Its inclusion would inflict irreversible damage on Backwell's landscape, environment, and community.			

Name: Alistair Ireland **I.D:** 51426593

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Sustainable development objectives	No	‣ Positively prepared ‣ Effective	Unsure	Unsure	There are many admiral ideas put forward in for this Policy, however it could be improved and strengthened by in several areas. • New houses must be built to meet the highest environmental standards, including high levels of insulation, maximum use of solar panels, heat pumps, district heating systems and no gas boilers. Consideration should be given to installing communal ground source heat collectors feeding heat pumps in all new houses. Provision of communal microgrids with			

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					battery storage should also be considered, to optimise the use of solar energy and minimise the import of electricity from the grid. The feasibility of these features should be judged in terms of their contribution to reduction of greenhouse gas emissions and of household energy bills, and not solely in terms of their effect on the developer's profits. • Developments must be designed to minimise the need for householders to use private cars. All developments within reach of railway stations must provide easy access to the railway station for pedestrians and cyclists, and for every large development, funding must be provided to operate frequent bus services, and to minimise the need for residents to drive further afield there must be adequate provision for local services, including a supermarket and school and medical facilities. Safe walking and cycling through-routes must be provided throughout. All roads must be cul-de-sacs for cars, with bus gates where needed, and should be designed to be suitable as play areas for children, with traffic reduced to walking pace and plenty of trees and shrubbery. Bigger gardens should be provided instead of garages. Residential parking areas should be communal, at the open end of the cul-de-sacs, covered with a roof of solar panels, and provided with EV charging points, while parking outside individual houses should be reserved for disabled residents only. • Adequate communal green space must be provided throughout any development, including children's pay areas, parks with wildlife areas, and allotments for residents to use. Existing mature trees and hedgerows must be preserved, and wildlife corridors must be maintained. • About 1% of the carbon emissions in the UK are from the water industry, and the emphasis at the building stage on water conservation could be increased, with all new houses having water buts fitted and water conservation taps and fittings installed as standard. • Regarding Policy DP7 There should be a greater emphasis on support for Local Renewable Enery Co-operatives and Community Groups that can fund, set up and run Solar Farms and installations on community buildings, and also the same for Wind Turbines and Battery Storage that is not run for profit by large organisations but for local good causes. By mandating measures such as these, any new development would not only reduce per capita greenhouse gas emissions in North Somerset, but would minimise adverse effects on the rest of the community caused by car traffic increases, over-stretching of services, and loss of green space. With sensitive planning, such a development could come to be seen by existing residents as a positive enhancement to the community, rather than a blight designed purely to max out profits for large developers.			
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I strongly object to the proposals for Backwell in the North Somerset Local Plan 2041 – Pre Submission (Reg 19) on many counts. Neighbourhood Plan: Backwell is a vibrant welcoming village with a good community feel. We created a Village Neighbourhood Plan which was voted on and agreed by the community with massive level of support (over 96%). The proposals in the North Somerset Local Plan do not align with the Community's Vision and democratic vote. Looking at the proposals now submitted, it is clear that there has not been any consideration given to the Neighbourhood Plan and that their proposal completely disregards the Plan. This gives huge cause for concern as to the quality of the work that has gone into this proposal. Size of Development: The size of the developments in different large towns, towns and villages compared to the existing populations is poorly planned, with some areas expected to bear a huge burden compared to others. The impact on these small communities will be very large, and will change the very nature of these communities, and at a pace that gives the communities no opportunity to absorb the changes. Basically, some vibrant villages will become commuter ghost towns. The planning notes an additional 258 dwellings in Clevedon, (Population approx 22442) whilst Backwell is noted as to gain 1683 additional Dwellings (Population approx 4589). Also please note that Portishead is expected to have 1347 new dwellings, (Population approx 27000). The percentage of the total housebuilding noted in the Plan per village or town is even more revealing. Backwell has been allocated 7.829728% of the total allocation, whilst Clevedon has been allocated a mere 1.200279% of the allocation despite it being nearly six times larger than Backwell. These facts demonstrate that planning is flawed. Larger communities who could absorb new residents are not being expected to bear a huge influx, whilst areas with fewer facilities will be overwhelmed by huge influxes. If each new dwelling has on average 2.5 persons living there then the impact on Backwell will be a massive 4208, and not this is from a population of 4589 which will then have grown to 8797. This would place huge stress on the area and increase flood risk (we have already had two floods since October 2023). Thus, the overall plan is not appropriate, not positively prepared, justified, or effective. Impact on Infrastructure: The proposed developments will overstretch the community services and facilities to the extent that they will not cope. This includes the Doctors, the Dentists and the schools. Farleigh PNEU School in Backwell closed at the end of July 2025, reducing the number of primary places available in the village. The demand on			

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					the schools in Backwell is high, and almost doubling the size of the village will undoubtedly mean that there would be huge deficit in school places locally. Also, the impact on the medical services, Doctors, dentists and pharmacists as well as the Hospitals would overstretch their resources. Loss of Farmland The land in the proposal is classified as “Best and Most Versatile (BMV) prime agricultural land. This is a finite resource that once lost, cannot be restored to its former state. Please note paragraphs 174 and 175 of the National Planning Policy Framework (NPPF) and the guidance laid out in the Natural England Guide to assessing development proposals on agricultural land. With Climate Change affecting food production across the World, it is not sensible to build on good farmland. Wildlife: This proposal will cause irreparable damage to the wildlife in the area, several of the affected species being protected species. A study identified 13 species of Bat in the area and dormice were also identified. Wildlife requires that correct environment to survive and destroying hedgerows and planting hedges and new hedgerows does not provide a replacement that will support the wildlife in the area, as hedgerows take many years to develop the natural diversity of plants, fungi, insects and microbes that exist at the moment. This applies not only to the trees and hedges, but to the soil as well. Flooding and Water Management: Regarding water management, I do not see any adherence to the principles of better water management in the proposed development. These principles are laid out by Defra in their Storm Overflows Management Plan and are that (Number 1) Rainwater should be treated as a resource to be valued for the benefit of people and the environment and (Number 2) Rainwater should be returned to the environment as close as possible to where it lands or channelled to a close watercourse without first mixing it with sewage. There is some reference to water buts and ponds in, however there is no reference to the cubic capacity or the respective roof areas feeding these storage solutions. Also, the evidence used regarding flooding is historical data and not projections taking into account the 2023/2024 rainfall and the expected increase in rainfall due to climate change. There are serious failings in the proposed mitigations and the capacity of local watercourses has not been acceptably assessed. It should be noted that there is an issue of flooding below the A370 which has been demonstrated at Backwell Bow where water running down from over the A370 and down Chapel Hill Road to Backwell Bow resulted in road closures, cars stuck in flood water and even one incident on 5th December 2023 when some residents used a paddleboard and canoe to cross Backwell Bow. The proposed development below the A370 will almost certainly also be affected by water running down from the A370, as please note this land does slope down toward the railway line. Transport Rail: It should be noted that Network Rail have objected to the proposal at Grove Farm and referenced issues that would result at the level crossing at the Grant Mills Footpath and the level of accessibility at the station. The station is not accessible by persons who use wheelchairs on the platform to the West, and access by persons travelling with young Children in prams also have difficulty in accessing the platform. The impact on the roads of the additional road users from the proposed developments would be very significant. Transport Roads: The proposed developments in Backwell and elsewhere in North Somerset would place a huge additional strain on an already overstretched road transport system. The A370 is often gridlocked, and even more so when there are issues on the Motorway. The proposed road improvements and the new road would not effectively serve Nailsea’s traffic or relieve traffic queues on Station Road, Chapel Hill or Backwell Common. The Railway Bridge at the Railway Station presents a logistical problem which would be tremendously difficult to resolve, and very expensive. If the Railway had to be closed to allow a new structure to be built, then there would be large economic and social impacts. Overall, the transport planning is not adequate, and this has not even taken cognisance of the fact that Climate Change will without doubt cause more flooding of Road systems than has been experienced in the past.			
Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The area in Backwell that is marked as being changed in the Village Boundary section should not be included in the changes. This site is not suitable for development due to several very important reasons. The land slopes downward from Backwell Hill towards Hilldale Road and Oakleigh Close and is currently Farmland. The farmland acts as a natural sponge and reduces flood risk to the houses on Dark Lane and also those on Hilldale Road, Karen Drive, and downwards towards Church Lane, and the houses It is accepted that Climate Change means that there will be more frequent severe downpours, so any increase in runoff is not acceptable. Even the best attenuation and Sustainable Drainage cannot reduce the increase in runoff. It should be noted that there are houses and flats on Summerlands off Dark Lane for residents over 55 years of age,			

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					many of whom are elderly and vulnerable. They would be impacted by an increase in water flowing from the roads and land above it. Building on the land off Dark Lane and Church Lane, combined with the housing planned for Farleigh Fields would all increase flood risk. The land proposed to be moved within the settlement boundary currently accepts a lot of water, and without this flood risk would increase substantially, and with the land inclining downwards towards the rest of the village and the A370, could cause very widespead effects to housing and transport. There is a very large Bristol Water pipe running through the Field in question, and close to the land that is being proposed as being included in the Village Boundary and building within 5 Metres either side is prohibited, thus meaning that much of the site cannot be developed. The Land is Green Belt, and cannot be regarded as "Grey Belt", is farmland and thus should not be developed. With Climate Change affecting food production across the World it is not sensible to build on good farmland.			

Name: Amanda Lindley **I.D:** 62776385

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Policy LP9: Extent of the Green Belt	Unsure	• Effective	Yes	Unsure	The potential removal of villages from the green belt on the grounds of not being open is unfair. Villages that have been in green belt should remain within that protection on the grounds that the environment cultured around them be it agricultural or common grounds has created habitat that once taken away will never return. Felton and all villages around them be it airport should be protected. Nature and humans alike have moved to these areas for the sole reason it is safe from development. To take these villages out of the green belt protection would therefore potentially destroy what is there. Felton Village and the others surrounding the airport will be left vulnerable if they have the Green Belt status removed from them. Is it the intention of NSC to destroy peoples choice? Villagers are villagers because they do not wish to live in towns or cities. Why is an anonymous assessor justified in saying that our villagers add nothing to the Green Belt? How have they arrived at that decision? Is it the intention of NSC council to remove GB status from the villagers around the airport so that it is easier for the airport to 'take' Felton Common? There are not many places in the country with green belt. It is here for a reason. The new southwest forest will have nowhere to be created if these villages and Felton common is not protected.	NO removal of Green Belt Status for all Villages		

Name: Amanda Roberts **I.D:** 62684673

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Land at Tower Farm					I have lived in Portishead (near Highdown Schools) for nearly 9 years. I would like to add my support to the concerns about the development of Tower Farm and Black Rock in Portishead. I understand that these 2 areas are part of the proposed NSC draft local plan. I would like these 2 areas removed from the plan because I feel that: we need to preserve the wildlife in the Weston Big Wood extended area and the beautiful Gordano Valley the local infrastructure cannot support additional building of homes in this green belt area. Portishead is big enough. There has been extensive building over the past 30 years.			
Black Rock, north of Clevedon Road					I have lived in Portishead (near Highdown Schools) for nearly 9 years. I would like to add my support to the concerns about the development of Tower Farm and Black Rock in Portishead. I understand that these 2 areas are part of the proposed NSC draft local plan. I would like these 2 areas removed from the plan because I feel that: we need to preserve the wildlife in the Weston Big Wood extended area and the beautiful Gordano Valley the local infrastructure cannot support additional building of homes in this green belt area.			

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					Portishead is big enough. There has been extensive building over the past 30 years.			

Name: Amelia Young **I.D:** 51428769

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	No	The additional numbers will lead to a disproportionate overdevelopment of the village almost doubling its population – existing approved developments will add 40% to the population. Backwell seems to have been a target for disproportionate growth. It has been allocated a higher number of houses than any other village or town in the district. To expect the village to take 7% of the district's housing allocation, given its size, seems unreasonable. There are many other villages and towns with similar characteristics, that could absorb development. The loss of precious greenbelt and quality agricultural land will have a negative impact on the character of the village and the surrounding area. It totally goes against Government policy that states 'we must protect our best and most versatile land' to safeguard food security. Not only would the developments destroy Grade 1 agriculture land that is used for arable and livestock farming, it would reduce further the already small amount of high quality land left in N Somerset. It would it destroy valuable wildlife habitats and would further harm the biodiversity of the wider area. In particular it would threaten Brockley Maternity Roost and SSSI, with rare Lesser and Greater Horseshoe Bats who feed from the land. There is no evidence of any needs or viability analysis for an additional 1000 houses. There is little employment in the village, the majority of villagers commute. An 80% growth in population would put huge pressure on the infrastructure which is already creaking. There are not enough school place and no anticipated investmentin healthcare or leisure facilities. The train station is not a fit transport hub as it has no disabled access and the platform gap and height make it dangerous for children and elderly to use. The proposed road would not effectively serve Nailsea's traffic or relieve congestion on Station rd, Backwell Common, or Chapel Hill. Flooding is a material problem that is only likely to increase as our climate changes. Much of the land on which the development is proposed is on a flood plain that floods on a very regular basis in the winter. The government requires 50% affordable housing on Greenbelt land which will of course reduce the funds that the developers will contribute towards infrastructure.			

Name: Amy Kinmond **I.D:** 62844673

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I object to this for the following reasons: The proposed road will destroy greenbelt agricultural land and completely destroy the countryside gap between the town of Nailsea and the village of Backwell. The road will run right through the wildlife corridor running from the moors to Backwell Lake, across this greenbelt farmland to the Belmont Estate and to Ashton Court. This will be disastrous for the local wildlife, for example wildfowl that navigate along this corridor, otters and rare bats. Not only will the corridor be ripped apart, but the increased noise and pollution will lead to destruction of local wildlife. The route for the proposed road is also floodplain. During autumn and winter months, and early spring, when there are heavy rains this area is covered in water. I hope to attach a photo to this objection showing the flooded fields in January 2023 (aspect taken looking towards Backwell Lake, with Nailsea houses on the right of the picture, and the photo was taken in the field behind Backwell Court, a house on Backwell Common). Putting a road through here would mean all this water would flood the properties of residents along Backwell Common. Backwell Common is already prone to flooding, the proposed road and houses built on the fields to the East of Backwell would increase this 10 fold. Backwell Common sits downhill of these fields and the excess run off would pour into existing residences. Both railway bridges (Chapel Hill bridge & the bridge in the field of the farm owned by Horler) flood extremely regularly during the winter months already. There has been no consideration of investment in existing road infrastructure, only to slap a new road across agricultural land. Why can't improvements be made to Station Road instead? For example widening it to allow traffic to pass safely			IMG_1403.png

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					without mounting the pavement and creating a wider pavement for pedestrians and a cycle path and traffic calming measures to keep speeds down to 20mph. This could easily be accomplished by assessing the current front garden hedge widths, grass verges and so forth along the road. And probably at much less of the cost of a new road too. Backwell already has 800 new houses approved across several sites, a 40% increase for the village. These additional numbers would lead to complete overdevelopment. There is absolutely no service infrastructure in Backwell to support this increase in residents. For example, with current residents alone, an elderly relative of mine could not get a single doctors appointment when calling Backwell Doctors on a morning at 8:15am when lines had opened at 8am. This was just due to current resident numbers. Additionally, another relative had to go to the walk in hospital in Clevedon to have post surgery stitches removed as Backwell doctors did not have any nurse appointments available for this to be done. Backwell Doctors cannot even support current resident numbers, let alone with the new 800 approved houses coming in and services would completely collapse in the village with another 40% on top of this. There is no additional schools to support increase in residents. For example the current year 6 in Backwell Juniors is full. Where would the children be able to go to school with several hundred more residents? There are no local food shops in Backwell, only chain supermarket pop in shops and a few hairdressers! The number of houses would equal that of a small town, but Backwell does not have the shopping facilities of a small town. The grade 1 agricultural land in Backwell has been coloured in for development of houses and roads by people who don't live here and don't care about it. But this is our lives, and our children's lives that are being massively affected. We already have a huge building site by the infants school, which is also having negative effects on our scout hut from noise, and an unsightly mess. Mature trees have been removed, our roads are full of lorry's delivery to sites and we now can't park near our local children's playground. There will be further development west of Backwell at grove farm in coming months. Enough is enough. We've had more than our fair share and it's time the developers left us alone. Backwell isn't suitable for taking on 7% of North Somerset's housing allocation. This number is ludicrous. It's ripping apart residents lives.			

Name: Andi Parsons **I.D:** 62858081

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Banwell Road, Locking /Elborough	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	I object to the North Somerset Local Plan 2041: Pre-submission Plan because it is not legally compliant and not sound. My concerns relate to transport, infrastructure, environmental impact, and failures in the evidence base. 1. Duty to Cooperate – Not Met There is inadequate evidence that North Somerset Council has effectively cooperated with neighbouring authorities, transport bodies, or environmental agencies on the scale of housing growth proposed. Specifically: No clear cross-boundary approach to transport impacts, despite major effects on the A371, Locking, Elborough, Hutton, and the wider Weston-super-Mare area. No joint work demonstrating how infrastructure capacity, school places, or healthcare will be delivered. No evidence of engagement with environmental bodies regarding biodiversity impacts and habitat connectivity. As such, the Duty to Cooperate has not been fulfilled. 2. Not Justified – Evidence Base Flawed The housing numbers rely on outdated projections that do not reflect current demographic trends or realistic infrastructure capacity. The plan disproportionately directs growth to small rural settlements such as Elborough and Locking, without justification for why these areas should accommodate such large increases in population. The Sustainability Appraisal does not adequately consider alternatives that would avoid excessive growth in small villages. For these reasons, the strategy is not justified.	To address the issues identified in my objection, the following modifications are required: 1. Duty to Cooperate – Strengthen Cross-Boundary Evidence Provide clear, published evidence of effective engagement with neighbouring authorities, transport authorities, and environmental bodies on the distribution of housing, infrastructure capacity, and cumulative transport impacts. Produce a joint transport strategy with adjacent authorities to address A371 congestion, cross-boundary traffic through Hutton and Locking, and infrastructure impacts on Weston-super-Mare. Without this, the statutory Duty to Cooperate is not met. 2. Transport and Highways – Robust and Deliverable Evidence Undertake a comprehensive transport assessment demonstrating that narrow country lanes between Elborough, Locking, and Hutton can safely support the vehicle volumes associated with 315+ dwellings. Require the Plan to include specific, costed, and deliverable upgrades to: Banwell Road / A371 junction Narrow village routes through Locking and Hutton Road safety improvements around Hutton Primary School, where children already encounter unsafe crossing		

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					3. Not Effective – Transport, Roads, and Flood Risk a. Narrow Roads and Vehicle Volumes The road network serving Locking, Elborough, and Hutton consists of narrow lanes already under pressure. The proposed allocation would significantly increase traffic through: Hutton village, where the main road passes directly by the primary school. Crossing the road in the mornings is already unsafe, and additional volumes would increase risks to children and pedestrians. Banwell Road and Old Banwell Road, which cannot safely or efficiently accommodate the scale of development proposed. There is also insufficient evidence that the required upgrade to the Banwell Road / A371 junction is deliverable. b. Public Transport Elborough has limited bus services and no access to rail. Doubling the size of the village—as this allocation would effectively do—will increase car dependency, contrary to national policy. c. Flood Risk Allocating significant housing in areas known to have drainage constraints and flood-risk issues undermines the deliverability and resilience of the plan. The evidence base does not demonstrate that surface water can be safely managed or attenuated. For these reasons, the plan is not effective. 4. Not Consistent with National Policy The NPPF requires plans to prioritise sustainable development, protect biodiversity, and ensure safe and suitable access for all users. This plan fails on all three counts: Growth is directed to locations poorly served by public transport, increasing reliance on private vehicles. Sensitive habitats and wildlife corridors adjacent to the proposed sites are at risk of irreversible ecological harm, contrary to the requirement to protect and enhance the natural environment. Safe access for emergency vehicles, pedestrians, and cyclists is not evidenced. The plan does not provide a credible strategy for upgrading the road network or active travel routes to accommodate the proposed expansion. The plan is therefore inconsistent with national policy. 5. Infrastructure Capacity – Not Positively Prepared Local infrastructure is already under strain: Schools in the area are close to capacity and lack firm, funded expansion plans. Healthcare provision (GPs, dentists) is already stretched. Utilities and drainage infrastructure are not evidenced as capable of supporting a population increase of this scale. Doubling the size of Elborough and significantly expanding Locking without a realistic plan for supporting services means the plan has not been positively prepared. Conclusion For all the above reasons—failures in the Duty to Cooperate, lack of justification, ineffective delivery mechanisms, inconsistency with national policy, and lack of positive preparation—I object to the North Somerset Local Plan 2041: Pre-submission Plan. The plan should be found unsound unless substantial changes are made, including reconsideration of the scale, location, and deliverability of growth proposed for Locking, Elborough, and Hutton.	conditions. Active and sustainable travel routes must be mapped, funded, and secured—not assumed. If these upgrades cannot be delivered, the allocation must be reduced or removed. 3. Public Transport Provision – Secured, Not Aspirational Require a clear commitment to enhanced bus services for Elborough and Locking, backed by enforceable mechanisms (e.g., S106 or CIL), not vague contributions. Housing delivery should be phased so that public transport improvements occur before or alongside development. 4. Flood Risk and Drainage – Evidence-Based Modifications Require a site-specific surface-water management strategy demonstrating where and how attenuation will be provided and how discharge will be achieved without increasing downstream flood risk. Remove or reduce allocations where safe drainage cannot be proven. 5. Biodiversity and Wildlife Corridors Require up-to-date ecological assessments and a clear strategy for protecting connected habitats around Elborough and Locking. Include a policy requirement for biodiversity net gain that preserves wildlife corridors adjacent to proposed development sites. Remove or amend allocations that risk irreversible ecological harm. 6. Infrastructure Capacity – Education, Healthcare, Utilities Identify specific, funded commitments to expand local schools, healthcare services, and utilities, rather than relying on unspecified contributions. Ensure that any growth does not proceed without guaranteed delivery of supporting infrastructure. Reduce or relocate housing numbers if capacity cannot be expanded. 7. Settlement Strategy – Proportionate and Justified Growth Reassess the scale of development proposed for Elborough and Locking to ensure growth is: proportionate, reflects the settlement hierarchy, and aligns with national policy on sustainable development. The plan should avoid doubling the size of small rural settlements without strong justification and infrastructure provision. 8. Updated Housing Need Evidence Update the housing need assessment using current demographic and migration data, ensuring the housing numbers are justified and reflect real capacity across the district. Conclusion To make the Local Plan legally compliant and sound, the Council must provide robust evidence of infrastructure deliverability, comply with the Duty to Cooperate, update its housing need projections, strengthen environmental protections, and ensure that growth in Locking, Elborough, and Hutton is proportionate and sustainable. Unless these modifications are made, the plan should not be adopted.		

Name: Andrew Abernethy **I.D:** 62819521

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	‣ Justified	Unsure	Unsure	Twice a day during term time Down Road (and the surrounding side streets) is severely congested for a lengthy period of time. In the event of a road traffic accident outside High Down School the area around Down Road would be gridlocked an access fro the emergency services would adversely affected. The addition of 400 homes at Tower Farm will feed directly into this congestion, increasing both severity and duration. I believe that no justification has been provided to show the proposed development meets DP14.			
Land at Tower Farm	No	‣ Justified	Unsure	Unsure	Weston Big Wood is an exceptional area for flora and fauna. The most visible and significant wildlife is the herd of deer that periodically visit. There is a risk that narrowing the existing buffer zone around the wood will result in significant loss of grazing habitat, increased sound and light pollution to the extent that the deer no longer visit. The plan does not specify the precise scale of the buffer zone and the justification for any buffer zone has not been articulated.			
Black Rock, north of Clevedon Road	No	‣ Justified	Unsure	Unsure	Weston Big Wood is an exceptional area for flora and fauna. The most visible and significant wildlife is the herd of deer that periodically visit. There is a risk that narrowing the existing buffer zone around the wood will result in significant loss of grazing habitat, increased sound and light pollution to the extent that the deer no longer visit. The plan does not specify the precise scale of the buffer zone and the justification for any buffer zone has not been articulated.			

Name: Andrew Boswell Brown **I.D:** 58598465

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP2: Strategic location: Woodspring (south west of Bristol)	Unsure		Unsure	Yes		First, Woodspring will result in significant loss of a great community recreational asset in the golf course and also a significant reduction in green wildlife corridor and controlled habitat area. This controlled access it plays an outsize contribution to the area and is in effect a mini reserve. If building is to go ahead then it needs to have a high consideration for establishing both water course and wildlife corridors through the site. On the Northern boundary there should be a significant fenced / non accessible corridor to compliment the existing habit along Yanly Farm boundary. This corridor would serve its primary role together with sight line protection from / to Bristol and Long Ashton, noise mitigation through construction and later during occupation. The development needs to meet community requirements and not just be a collection of soulless energy inefficient minimum regulation boxes. The area around Flax Bourton / Old Farliegh Court is an example of good quality desirable community enhancing housing. Developers must not be allowed to join Woodspring and urbanise / create a sprawling suburb that's indistinguishable from a Bristol suburb. Housing must include detached single story dwellings to deliver for older / disabled. Yanley Lane must be closed at commencement of works. Access only to pedestrians, cyclists, farmers and emergency services. In Hamlet of Yanley we have a height restriction on bridge. To mitigate times of Lane closure into Long Ashton due electrical / water works etc.. developers must have an access plan for Yanley Hamlet residents.		

Name: Andrew Clarke **I.D:** 51734849

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP5: Towns	No	‣ Justified ‣ Effective	Yes	Yes	SP5,SP7, LP3 are my primary concern. Very concerned about diversity crisis and that's not even covered by the policies or vision. I'm commenting on the North Somerset Pre-submission Plan 2041. I do so as an interested member of the public rather than in any professional capacity. The local plan is a very substantive piece of work, developed over several years, it's hard to do it justice in the			

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					short time I have, and without a professional background in planning. That said, North Somerset's residents are key stakeholders in any plans. I note that I'm only invited to comment as to whether the plan is sound, legally compliant and meets a duty to co-operate. I'm sure the Council's response to the new imposed housing targets meets these overarching tests, however I don't believe the targets are sound and that's what I'd like to challenge, before considering specific points of policy.			
SP7: Green Belt	No	‣ Justified ‣ Effective	Yes	Yes	SP5,SP7, LP3 are my primary concern. Very concerned about diversity crisis and that's not even covered by the policies or vision. I'm commenting on the North Somerset Pre-submission Plan 2041. I do so as an interested member of the public rather than in any professional capacity. The local plan is a very substantive piece of work, developed over several years, it's hard to do it justice in the short time I have, and without a professional background in planning. That said, North Somerset's residents are key stakeholders in any plans. I note that I'm only invited to comment as to whether the plan is sound, legally compliant and meets a duty to co-operate. I'm sure the Council's response to the new imposed housing targets meets these overarching tests, however I don't believe the targets are sound and that's what I'd like to challenge, before considering specific points of policy.			
Policy LP3: Strategic location: Nailsea and Backwell	No	‣ Justified ‣ Effective	Yes	Yes	SP5,SP7, LP3 are my primary concern. Very concerned about diversity crisis and that's not even covered by the policies or vision. I'm commenting on the North Somerset Pre submission Plan 2041. I do so as an interested member of the public rather than in any professional capacity. The local plan is a very substantive piece of work, developed over several years, it's hard to do it justice in the short time I have, and without a professional background in planning. That said, North Somerset's residents are key stakeholders in any plans. I note that I'm only invited to comment as to whether the plan is sound, legally compliant and meets a duty to co-operate. I'm sure the Council's response to the new imposed housing targets meets these overarching tests, however I don't believe the targets are sound and that's what I'd like to challenge, before considering specific points of policy.			

Name: Andrew John Barr **I.D:** 62545857

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Pill Green	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	1 sustainability appraisal fails SEA directive-no assessment of Brown field alternatives to Pill Green (Reg 12/2024 brownfield register 2800+ units ignored) 2. No duty to corporate on Bristol's 8000 unmet need. (no statement of common ground: unilateral 1100 Home dump in pill and Easton in Godino.) 3. Greenbelt exceptional circumstances not evidenced (NpPF147). (Parcel identified as high performing agricultural land: no sequential test) 4. 44% population bomb	Delete the pill green site for 600 homes from the north Somerset plan schedule of sites or amend policies follows: no development on peg Green until exceptional circumstances are independently verified and sequential testing confirms no viable non-green belt alternatives are available, prioritising Brownfield sites in Weston-super-Mare, Portishead and Bristol fringe. The total allocation across all sites requiring for funding for flood defences in 1 to 1000 year Standard +45% climate change allowance, a 369 M5 junction nine capacity upgrades and additional school and GP places alongside associated additional communal infrastructure before granting outline permission. Insert 6.79. Allocations must demonstrate no disproportionate impact on village populations defined as less than 5% increase per site without evidenced need. Allocations in villages with populations under 10,000 must not result in population increase of more than 5% from any single site unless exceptional circumstances are independently verified and full infrastructure delivery(transport, education, health, drainage) is secured upfront via section 106/ CIL. Cumulative impacts across all sites within an ass settlement must not exceed 20% without a master planned, funded delivery strategy..		

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					on Pill & East Gordano disproportionate and unjustified.. (600 Holmes equals 24% from one site alone) 5. No deliverable plan for a 369, M5 Junction 19, schools, general practitioner access or drainage by 2041. 6. Brownfield first policy ignored-2500+ viable urban units still available. (West, Portishead, Bristol fringe) 7. Pill Green breaches NPPF159, no sequential test for non-Greenbelt sites. (excellent sustainable transport links made Urban/Brownfield viable) 8. Request independent verification of “, exceptional circumstances“, before any Pill Green consent. 9. Village growth at less than 5% per site.			

Name: Andrew Katsouris **I.D:** 58601985

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Leighton Crescent	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Firstly, as the Government is so fixated on 'net zero' putting 81 houses on rural land would considerably higher emissions in these areas, not only the housing that takes away from the environment, but the amount of traffic and emissions from new vehicles etc is counter productive. With regards to the houses at Leighton crescent, Bleadon has already had 3 new developments, Keepers Gate (40+Houses), Edens Green(40+Houses) & the Countrywide Partnership site at the bottom of the hill consisting of 63 houses which should never have been approved, causing more chaos on an already tight junction. The the traffic going in and out on the small roads highlights they are not fit for purpose. This site has consistently closed the access to Bleadhon Hill via Devils overbridge every other month the past few years too (the main way in to Bleadon Hill) causing traffic chaos. Proposing potentially 81 houses on Hillcote is so massive for a little village without the infrestructure to manage porentially another 240 people of which potentially at least half would be drivers, that's another 120 cars in an out the tight roads in and around the hill which only has one road leading to it, this will further increase traffic footfall to peoples homes in what was once a quiet area. You have also called Hillcote Leighton Crescent and considered it a part of weston-super-mare when it's clearly Bleadon. With regards to legality, wildlife disruption would be massive too. It is illegal to destroy badger runs etc amongst other wildlife.	Less building on Somersets green, there are plenty of brownfield sites to build on in other areas than somerset which has already had more than it's fair share. An appeal to bringing people to Somerset is it's green areas, fresh air and nice countryside, not just constantly building on small villages like bleadon therefore wearing down their attraction to live there. Bleadon, Winscombe, Banwell etc are meant to be villages not big towns.		HilcoteIMG_1385.PNG

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					Road leading to Hillcotte (as you call it Leighton Crescent) is definitely not fit for purpose and can barely fit a big car down it let alone busses. Area would be overcrowded with lack of infrastructure, someone has just seen a bit of land and not thought about any of this. I don't know how it's been classed as Weston - super - mare, but Weston has already had thousands of new houses which have significantly enhanced traffic and car emissions, going against net zero policy which is always contradicted.			

Name: Andrew Lowe **I.D:** 30953921

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	There is not the appropriate surrounding road infrastructure to accommodate the extra proposed cars this will bring to the area. There are several pinch points at present for traffic where the Clevedon Road meets Tickenham Road. The area is not easily accessible down narrow roads and some distance from public transport and the railway station. The proposed land regularly floods, and to build houses on flooding land seems irresponsible. The proposed land is also an area of Green Belt, once developed on is lost forever, we should be preserving this area for future generations to enjoy, not to mention all the wildlife that would be damaged and destroyed. We should be looking to develop on brown sites, not destroying green belt land. Building on Green Belt Land should not be an option, and even considered.			

Name: Andrew Luke **I.D:** 51549729

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP3: Spatial strategy	Unsure	‣ Positively prepared ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Response to Policy SP3: Spatial strategy The proposals put forward for the scale of development at Backwell are fundamentally wrong when considering the NPPF policy to achieve sustainable development. Development should be focussed on towns with existing and adequate centres, green infrastructure and community infrastructure. The label of a ‘large village’ does not equate to meeting the relevant criteria for a sustainable location. Backwell falls considerably short of this definition as there is no community centre, insufficient public greenspace, community infrastructure is sparse or over subscribed, many of the public transport options are inaccessible when considering the locations of the allocated sites and typical walking distances of c.800m (Sustrans, 2022), and current active transport routes are unsafe. The plan as currently proposed is not sound as it is not the “most appropriate strategy when considered against the reasonable alternatives”. More housing should be proposed in and around the towns of Weston-super-Mare, Clevedon, Nailsea and Portishead which have the community infrastructure and transport connectivity on a scale that dwarfs the provision at Backwell. The proposed quantum of development will fail to deliver the social objective of sustainable development as defined in the NPPF as, whilst it will deliver the housing numbers required at a local authority level, it will not “support strong, vibrant and healthy communities”, deliver “accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being”, and will certainly not support the environmental objective which seeks “to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy”. The reasons for this are explained further below. Changing Backwell from a village to a Town without the necessary facilities - The scale of growth proposed for Backwell will fundamentally alter the nature of the settlement and will impact local residents and users of the A370 is a significantly negative way that will impact countless lives and livelihoods. Health and wellbeing - construction effects on the community over what should effectively be considered as a permanent	Reduced quantum of housing at Backwell which should be located at sustainable locations with community services, facilities and infrastructure		

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					timescale given the lifetime of the plan, should not be underestimated and are significant. We are already seeing a huge impact from one or two comparatively small developments when compared with the scale of development proposed. This has included extremely long delays and a build up of traffic on the A370 due to repeated periods of traffic measures which show a distinct lack of coordination, and which has brought with it associated air quality effects (Nox, dust and particulates), and the tracking of mud and dust from the construction site that exceeds 200m in both directions. The presence of construction vehicles is also notable and at times dangerous given the volume of school children who cross the A370 and Station road. Backwell is a village with an extremely small community centre and multiple schools, with a high proportion of children and older people. The quantum and locations of development that are proposed will disproportionately impact a generation of children in terms of health, wellbeing and educational attainment through noise disturbance, impacts on air quality, and road safety. It will also have a disproportionate impact on the elderly given that Backwell has an above average proportion of elderly people present which will inevitably be more reticent to venture out given the scale of disturbance and disruption. The loss of open space which is used by the community (and that has already started to occur) will further detrimentally impact the health of the population, as will the increased pressure on existing facilities which will mean that they are impacted and unable to provide the level of service which is currently available to Backwell residents (albeit that in certain areas this is already under pressure). Lack of services, facilities, greenspace and community infrastructure - Your own draft local plan acknowledges at Policy SP5 that the four towns of Weston-super-Mare, Clevedon, Nailsea and Portishead within North Somerset are “the most sustainable locations within North Somerset given their range of services, facilities and jobs, and accessibility from surrounding areas”. There is a good reason that Backwell is not listed as one of the places considered most sustainable in terms of the services, jobs and facilities that are provided. This is because it is a village and has only the smallest fraction of facilities and services when compared with the other places listed. Backwell may have schools, but apart from this the ‘village centre’, which comprises a spa, a bakery, a takeaway, an off licence and two café’s, does not provide for the needs of the current village let alone the scale of development being proposed. The scale of change will take Backwell to a similar size to Nailsea which has many restaurants, 2 large supermarkets, several smaller supermarkets, a fishmongers, a butchers, 3 bakers, 3 banks, more than 5 pubs, many large shopping outlets (such as boots, WHSMITH etc). It seems highly unlikely that the CIL system will deliver the necessary community infrastructure or bring the infrastructure forward in a timely manner. The same applies with planning applications and amendments to conditions which are commonly undertaken in order to water-down benefits and avoid the need to mitigate impacts and provide for community needs. It is therefore easy to predict that the services and facilities required to serve such an increase in population will not materialise. The quantum of development proposed at Backwell will not deliver on the NPPF requirement for “accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being”. Instead it will (and has already) result in the loss of community valued open space. The deliverability of the scale and rate of change in community infrastructure required has not been evidenced and has been put off for ‘future studies’, and delivery of the necessary infrastructure is simply unfeasible within the existing constraints of the area. Character and identity - The NPPF states that when considering density there is a need to take account of “the desirability of maintaining an area’s prevailing character and setting” . It should be noted that Backwell has its own distinct character and identity which can be better understood when viewed from either side of the valley. Currently it is a village of a relatively large size but blends into the valley landscape due to its relatively modest density of housing and importantly the green spaces that break up the urban grain. This is already being eroded by two developments under construction at this time. It will be completely destroyed when it becomes what will effectively be single mass of urban development within the valley. Site allocations to the south of the A370 in Backwell are located on the side of the valley at higher elevations that would be visible over large areas impacting the sense and scale of urban form across the valley and the setting of areas of historic value such as Church Town, and would have a disproportionately adverse effect given their raised elevations. As well as spreading the settlement up onto the valley sides, the locations of some of the central sites between the A370 and the railway will change the character of the settlement and substantially alter its representation within numerous sensitive views. When currently viewed from raised land to the north within Nailsea and south of West Town and from the outskirts of church town, the urban settlements of Nailsea and Backwell are broken up by the landform, greenspace, fields and patches of trees. With the scale of development proposed the two settlement will appear as much larger urban masses within the wider landscape. This cannot be mitigated at a site or strategic level. Transport and Climate Change - The scale of development will place highly unsustainable levels of pressure on existing transport infrastructure particularly in terms of the capacity of the A370 and Station Road to accommodate cars and bus services which are already at and will exceed capacity (even in the event that a new bypass is secured which is highly unlikely), and will create significant delays for both public transport users and cars and increase the risk of accidents. Current planned works to enable public transport to deliver more rapid journeys are not sufficient to overcome the additional level of traffic that would arise through this proposed growth, and there is little further scope to improve bus lanes within the constraints of the existing traffic network. Backwell is already subject to significant severance on the A370 that divides the village, a road that is crossed by hundreds of school children on a daily basis. The only way that further severance could be avoided with the scale of development proposed, is by increasing crossings and traffic calming measures on the A370 or diverting traffic into nearby residential neighbourhoods. This will destroy the community within Backwell			

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					and dramatically increase the risk to the safety of the population (and particularly school children) in terms of risks of accidents and from pollution. Backwell does not have a village centre, let alone any form of centre that would be able to service the needs of residents for a settlement the scale of a town. There are no sizable shopping outlets in which food can be bought and there are no restaurants or cafes of any scale that could serve a community of this size. The scale of community infrastructure investment that is required even if only half the housing numbers identified are brought forward for Backwell is unlikely to be deliverable. Many of the sites proposed in Backwell, particularly those to the south of the A370, are located at considerably longer walking distances to key transport and amenities and further away than the 800m distance that people will typically walk for services and facilities (Sustrans (2022). Consequently, it is highly unlikely that the residents of any future development at these sites are able to access either public transport, shops or community facilities by walking or cycling and instead these sites will result on proportionately greater numbers of vehicles entering onto the local road network and the A370. This means that the vast majority of trips form new housing development in Backwell will be by car with unacceptable implications for road safety, congestion and consequently air, quality, noise and public health. The proposal will create or reinforce what is already a commuter town generating a huge increase in traffic and associated GHG emissions. Locating this scale of development in Backwell will not meet the NPPF policy to “minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities” or to “[prioritise]“sustainable transport modes”. Backwell has very limited cycle paths and networks and is the point at which some key national networks (Festival way) become fragmented and have to use roads which are unsafe for cyclists. Critically, the scale and location of development will dramatically increase vehicle movements on the A370 which currently severs the village and has in the past been the site of tragic accidents. This is a key crossing for school children yet cars drive at dangerous speeds and visibility is poor. The increase in housing will result in an unacceptable impact on highway safety and NMUs, with a specific risk for school children. The quantum and locations of development proposed for Backwell will not meet NPPF policy to avoid an “unacceptable impact on highway safety”. The quantum of development proposed at Backwell does not represent the most appropriate strategy when considered against the reasonable alternatives and is not deliverable when considering the requirements of the NPPF. The quantum of development proposed at Backwell should be reduced and increased in areas of the 4 towns, or an argument should be made that the scale of development required to meet government targets will have a wholly unacceptable social and environmental impact that will leave a legacy of poor quality housing and a decrease in the quality of life for numerous communities within North Somerset. In respect of specific housing allocations at Backwell, it is positive to see that site HE201068 (Land south of Dark Lane) has not been brought forward as an allocated site. This is a correct and sound decision. In the event that a prospective developer makes a case for this site to be included, I would emphasise that the current proposed allocations are already excessive and will compromise the identity and character of Backwell village as well as adversely impacting the community, and that sites to the South of the A370 would have a disproportionate adverse impact on landscape, transport, heritage, ecology and health and safety. This site should not be reconsidered for housing but instead should be considered as a community green space. The reasons for housing being inappropriate are included in my previous Response to Regulation 19 - Additional Sites Consultation (February 2025), and if site HE201068 is raised again by another consultee any representations should be considered against my previous submission and the submission of other community members. I again summarise here why site HE201068 is inappropriate for housing development: • It will significantly and adversely affect congestion at the crossroads with the A370, the junction between Church Lane and the A370, between Backwell and Nailsea, and the A370 with knock on effects in the form of public transport delays and to the health of the local population; • It cannot be directly accessed other than through residential streets that are often congested and reduced to one lane by parked cars; • It is located at a point where several walking routes to the local primary school join near the entrance to the school and poses aa serious risk to health and safety of primary school children both during construction and operation; • It is adjacent to a substantial source of vibration and noise from the waste recycling facility that would mean that residents would suffer adverse effects on health or would preclude use of large areas of the site; • It is a key part of a local walking route that attracts people from the wider area including Bristol and features in the book: Beyond Bristol: 24 Country Walks Paperback by Robin Tetlow; • It is on the hillside rather than within the valley meaning it is more prominent in views across a much wider area; • It is immediately adjacent to the Old Backwell Village or Church Town, and will detrimentally effect the historic setting of the village; • The PRoW that runs through the site provides access to woodland and nature and provides a critical recreational and health resource to the village; • It is a critical area of greenspace for attenuating surface water in an area already adversely affected by surface water flooding, and since the previous Reg 19 submission there have been further examples of surface water flooding on Church lane at the bottom of the hill on which the site is located meaning that loss of attenuation could create a much more serious surface water issue;			

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					• It is a valuable foraging site and resource for woodland species in the adjacent woodland and owl calls and bat activity are a nightly occurrence and can be readily observed; and • The complications of limited site access and site gradients will require substantial cut and fill and likely need to transport materials from site which will make development of this site disproportionality impactful and will likely have a longer than typical construction period.			

Name: Andrew Procter **I.D:** 62858593

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Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	The traffic already going into Bristol from Backwell is too busy. An increase in the number of houses in excess of manageable demand would in the main be commuters and this would add to the issue. The new road would not ease congestion on station road. Residents of Nailsea have to use this road to get the main road and there are already excessive queues during busy periods without it needing to be added to. Surrounding areas are prone to flooding and this would be more likely with increased housing. The majority of fields in the area are needed for flood alleviation measures. The development would have an adverse effect on wildlife and its habitats. I have lived in Portishead whilst development was taking place and the lack of infrastructure consideration was appauling and our children did not end up with local school places and appointments at Doctors are near impossible. Excessive housing was the cause and exactly the same will happen in Backwell as the infrastructure will not be able to cope - it can not support another 1000 houses.			

Name: Andrew Rix **I.D:** 58513153

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Land at Tower Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	Weston Big Wood and the nearby fields are irreplaceable resources for the people of Portishead and deserve appropriate protection. The greenbelt around the wood is the youngest greenbelt in North Somerset, that protection was put in place because it was unequivocally shown that it was critical to the natural environment of the woodland and essential for wildlife connections to the Gordano valley and Somerset levels, and the protection of the woodland. These development proposals put forward threaten the delicate natural habitat and SSSI status of the wood, especially at the edge of the woods, where there is a massive diversity of plant and animal life which is critical for the ecosystem of the woodland. The buffer zone around the wood is incredibly important and should be a minimum of 100m. There are several other options for building this number of houses around Portishead and Clevedon which are not in the greenbelt, so I challenge how the “exceptional circumstances” clause to be allowed to build on greenbelt has been met. There are several other local viable sites which are not in the greenbelt. For example, Wyndham Way, another at the end of The Vale, and the area between the Flower Show field and the allotments would more than make up the numbers to meet the required demand from the government. Furthermore, the Castlewood site in Clevedon is another very well-placed option nearby and within North Somerset. Should these alternatives be disregarded in support of developing prime greenbelt land, it would suggest a significant problem with the planning procedure. The other significant challenge, particularly with the Tower Farm development is sustainability. The climb up from the High Street involves an elevation gain of approximately 100m, and very few people who live in the area make that walk due to how hard it is. Because of this, people in the houses around Tower Farm tend to drive to town. The buses run infrequently and are often unreliable, with frequent significant delays and regular unexplained cancellations or no-shows. The traffic through Portishead from Avon Way gridlocks daily during the working week at today’s traffic levels, these developments at Tower Farm and Blackrock would add more than 600 more cars which will make that much worse. The impeding Portishead train station is often sited as the magic bullet which will solve all Portishead’s traffic problems, but a single track train line with			

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					only one train of two coaches per hour is not going to make a dent in the rush hour traffic problems into and out of Portishead. Furthermore, the Portishead motorway junction is already causing significant delays in morning and evening rush hours and would need fundamental major improvements to support more traffic. The other viable non-greenbelt sites I listed above all have much better sustainability with a generally shorter and flat walking access to the high-street or train station. No modification short of removing the allocation entirely would make this site appropriate. Given its direct adjacency to ancient woodland, its loss would be irreversible and cannot be mitigated sufficiently. The landshould instead be retained as undeveloped green space,managed to enhance biodiversity and provide sustainable public access, in line with the Avon WildlifeTrust's 2030 Strategy and national "30 by 30" nature-recovery goals. There are several other options for building this number of houses around Portishead and Clevedon which are not in the greenbelt, so I challenge how the "exceptional circumstances" clause to be allowed to build on greenbelt has been met.			

Name: Andrew Rowland **I.D:** 50931073

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	The infrastrucure planned road system is not funded. No development should legally take place until such funding is secured in particiular the under rail line tunnel which is planned under the water table for this area. Please see photos attached of flooding on Backwell Common. Developers are peddling the idea that houses are to be built before this road is built. This is not in accordance with Government policy nor is it in accordance with building on the Green Belt. North Somerset Council has produced a Flood risk strategy and important to note the Council has identified this area as a high risk flood zone. Extract attached. How can this development be in anyway safe considering the obvious flood risk.	The Council must comply with National policy in detail on infrastructure needs for the population before planning is given.		Flood5.html IMG_5973.png
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	I strongly object to this proposed development. This proposed development is not in accordance with Government Policy regarding The Green Belt. The new road planned for Backwell Common from Station Road would be built on and next to the flood plain. Indeed there is no Infrastructure plan for this road. The areas that already flood on a regular basis here would expand with runoff from the road and the housing planned. This road and tunnel is unfunded, the crossing of the railwayline is a major progect infrastructure needing tens of millions of pounds investment including an underpass being built below the water table. This road is being used as a developers means of access which they will not build. This means it is totally unfeasable unless funded properly prior to planning being given for the housing it would service. This road will not help conjestion on Chapel hill, Backwell Common which would would become a dangerous single track ratrun if the under rail road is not built. Backwell already has 40% increase in housing already given permission, this extra 1000 houses is over development, the infrastructure for them is not provided for in the plan. Schools, Health facilities or leisure facilitys. You have not provided a needs or viability study for the extra 1000 houses. Backwell is not an employment hub, most working people would commute adding to the traffic issues that already exist here and into Bristol. No social cohesion plan has been provided. The land proposed for development in Backwell uses Grade 1 agricultural land in the Green Belt which is not in accordance with Government policy. North Somerset has only 7% of Grade 1 agricultural land left which is a shocking statistic. As current policy 50% of new housing in the Green Belt has to be social housing which does not fund any infrastructure, this would therefore fail to provide the necissary funding for critical needs, the railway sation is not fit for pupose (no disabled access or acces for young children), roads system would not cope with this massive development and is therefor unfeasable and unfunded.	Noth Somerset need to be compliant and prove that funding is available for the new road and other critical infrastructure. North Somerset need to provide a full flood risk assesment for the affect all this development would have on the flood plain. Attached is the previous extract from NSC flood risk assessment which identified this area as a significant flood risk area.	This policy must comply with Government policy law. It currently does not for the reasons I have set out in the box above. It must prove that the Roads detailed are funded and will be in place prior to the development completion and will by study be adaquate for the local population.(unresolved highways capacity conditions following funding issues). Reasonable alternatives have been exhausted.	Flood5.html IMG_5973.png

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					Please also find just a few photos of the flooding issues on Backwell Common. One shows flooding to the area of the proposed new road and another where the under rail tunnel would be.			
Backwell Lake	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	The plan to build a new road next to the lake does not comply with Government protection of the green belt. No infrastructure plan has been adaquately provided. North Somerset Council has identified this area as a high flood risk in a flood risk assessment extract attached. I therefore strongly object to the proposed development.	North S. C must comply with Government policy on the green belt and must provide adaquate funding details for infrastructure.		IMG_5973.png

Name: Andrew Sellers **I.D:** 21177857

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Land north of Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Complete over development of the town. The proposed new road would not lead to any improvement and does not take into account this development. The new road proposed would be ridiculously expensive and a complete waste of time. Where are the new primary schools proposed and who will pay for them? The field during the winter are always flooded. Cows sinking. Beautiful green belt land. The destruction of wildlife in and along the river in an area of outstanding natural beauty. Bats. The health centres in Nailsea are already overwhelmed. The fields are flanked by old oaks all under Tree Preservation. The existing road system cannot cope with the present traffic let alone local traffic being substantially increased. There is no proposed alleviation of the problem.			

Name: Andrew Stagg **I.D:** 39217377

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	*Objection to North Somerset Local Plan: Green Belt Development* I object to the proposed increase in house building on North Somerset's Green Belt, as outlined in the Local Plan. The plan's proposal to allocate 50 hectares of Grade1 Green Belt land for property development contradicts national planning policy and threatens the very purpose of Green Belt designation. The Green Belt serves to: 1. *Prevent urban sprawl*: Protecting the countryside and maintaining separation between settlements Backwell / Nailsea ; Backwell /Long Ashton - Bristol 2. *Preserve character*: Safeguarding the unique identity of North Somerset's smaller towns and villages. 3. *Promote sustainable development*: Encouraging brownfield development and regeneration. The proposed development would: - Irreversibly harm the landscape and character of the area - Increase pressure on local infrastructure, including roads, schools, and healthcare - Compromise the Green Belt's role in mitigating climate change and supporting biodiversity I urge the council to reconsider the allocation of Green Belt land and prioritize sustainable, brownfield development that aligns with national policy and local needs. *Specific Objections:* - The plan fails to demonstrate exceptional circumstances for Green Belt release. - The proposed development would cause significant harm to the environment and local communities. - Alternative sites, including brownfield land, especially nearer employment in Bristol / Clevedon have not been adequately explored.			

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					I request that the Local Plan be revised to protect North Somerset's precious Green Belt and ensure sustainable development that benefits the community. Nailsea+ Backwell Station is currently unfit for purpose and should not be considered as mitigating any downsides and promoting this development through good connectivity. Backwell already has granted permissions for development and cannot countenance a further population growth of 80% *Reference:* National Planning Policy Framework (NPPF), Section 13: Protecting Green Belt Land			

Name: Andy Chappel **I.D:** 62850529

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Strategic Policies	Yes	• Justified • Effective • Consistent with national policy	Yes	Yes	This comment is a WHOLE PLAN comment (In lieu of this option being available on the consultation site): The plan is broadly sound but requires modification to be: Justified – Needs stronger evidence for climate and nature recovery delivery. Effective – Delivery mechanisms, monitoring and enforcement are not clearly secured. Consistent with national policy – Stronger alignment needed with National Planning Policy Framework principles on climate, biodiversity and green-infrastructure.	Overall, the plan requires: Stronger Justification – Needs to deliver stronger evidence for climate and nature recovery delivery. More Effectiveness – Delivery mechanisms, monitoring and enforcement are not clearly secured enough. Higher Consistency with national policy – Stronger alignment needed with NPPF climate, biodiversity and green-infrastructure principles.		
SP2: Climate Change	No	• Justified • Effective • Consistent with national policy	Yes	Yes	Justification – The mechanism for achieving carbon neutrality by 2030 is not fully evidenced. Effectiveness – Monitoring and enforcement of climate measures is unclear. Consistency with national policy – See the National Planning Policy Framework (paras 152–158) which require robust climate-mitigation and adaptation mechanisms.	The following is required: Add a requirement for monitoring and enforcement of climate mitigation and adaptation commitments. Require strategic developments to submit a Carbon Reduction Implementation Plan setting out how emissions will reduce in line with the 2030 net-zero target. Include explicit wording that climate policies cannot be reduced or removed on viability grounds. Strengthen integration with nature-based solutions and the Local Nature Recovery Strategy (LNRS). Requirement for strategic sites to quantify whole-development carbon impacts.		
Policy DP5: Climate change adaptation and resilience	No	• Justified • Effective • Consistent with national policy	Yes	Yes	Justification – The mechanism for achieving carbon neutrality by 2030 is not fully evidenced. Effectiveness – Monitoring and enforcement of climate measures is unclear. Consistency with national policy – See the National Planning Policy Framework (paras 152–158) which require robust climate-mitigation and adaptation mechanisms.	Require all adaptation statements to include nature-based solutions (woodland, wetlands, shading corridors, natural flood management). - Require assessment of overheating risks. - Require alignment with the Local Nature Recovery Strategy. - Require long term monitoring and updating of adaptation plans for major sites.		
Policy DP6: Net zero construction	No	• Justified • Effective • Consistent with national	Yes	Yes	Justification – The mechanism for achieving carbon neutrality by 2030 is not fully evidenced. Effectiveness – Monitoring and enforcement of climate measures is unclear. Consistency with national policy – See the National Planning Policy	Require whole-life and embodied-carbon assessments at the outline stage. - Require circular economy statements prioritising retrofit and material reuse. - Set clear rules preventing climate standards from being reduced on viability grounds. - Require post-construction performance verification to ensure true net zero energy operation. - Require unregulated energy use to be fully included in net-zero		

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		policy			Framework (paras 152–158) which require robust climate-mitigation and adaptation mechanisms.	calculations.		
Policy DP9: Flood risk	No	• Justified • Effective • Consistent with national policy	Yes	Yes	Justification – The mechanism for achieving carbon neutrality by 2030 is not fully evidenced. Effectiveness – Monitoring and enforcement of climate measures is unclear. Consistency with national policy – See the National Planning Policy Framework (paras 152–158) which require robust climate-mitigation and adaptation mechanisms.	Require use of future flood-risk modelling to 2080–2100 for all major development. - Require natural flood-management measures (wetlands, woodland, attenuation landscapes). - Require restoration and buffering of watercourses and springs. - Strengthen integration with GI and BNG deliver		
Policy DP10: Sustainable drainage	No	• Justified • Effective • Consistent with national policy	Yes	Yes	Justification – The mechanism for achieving carbon neutrality by 2030 is not fully evidenced. Effectiveness – Monitoring and enforcement of climate measures is unclear. Consistency with national policy – See the National Planning Policy Framework (paras 152–158) which require robust climate-mitigation and adaptation mechanisms.	Require use of future flood-risk modelling to 2080–2100 for all major development. - Require natural flood-management measures (wetlands, woodland, attenuation landscapes). - Require restoration and buffering of watercourses and springs. - Strengthen integration with GI and BNG deliver		
Policy DP10: Sustainable drainage	No	• Justified • Effective • Consistent with national policy	Yes	Yes	Justification – The mechanism for achieving carbon neutrality by 2030 is not fully evidenced. Effectiveness – Monitoring and enforcement of climate measures is unclear. Consistency with national policy – See the National Planning Policy Framework (paras 152–158) which require robust climate-mitigation and adaptation mechanisms.	Require use of future flood-risk modelling to 2080–2100 for all major development. - Require natural flood-management measures (wetlands, woodland, attenuation landscapes). - Require restoration and buffering of watercourses and springs. - Strengthen integration with GI and BNG deliver		
DP11: Rivers, watercourses and springs	No	• Justified • Effective • Consistent with national policy	Yes	Yes	Justification – The mechanism for achieving carbon neutrality by 2030 is not fully evidenced. Effectiveness – Monitoring and enforcement of climate measures is unclear. Consistency with national policy – See the National Planning Policy Framework (paras 152–158) which require robust climate-mitigation and adaptation mechanisms.	Require use of future flood-risk modelling to 2080–2100 for all major development. - Require natural flood-management measures (wetlands, woodland, attenuation landscapes). - Require restoration and buffering of watercourses and springs. - Strengthen integration with GI and BNG deliver		
Policy DP15: Active and sustainable transport	No	• Justified • Effective • Consistent with national policy	Yes	Yes	Justification – The mechanism for achieving carbon neutrality by 2030 is not fully evidenced. Effectiveness – Monitoring and enforcement of climate measures is unclear. Consistency with national policy – See the National Planning Policy Framework (paras 152–158) which require robust climate-mitigation and adaptation mechanisms.	Require active travel and public transport infrastructure before the first occupation of major sites. - Require strategic sites to deliver a modal shift plan consistent with carbon neutrality by 2030. - Introduce maximum parking standards to limit car dependency. - Strengthen integration with GI (shaded walking routes, ecological corridors).		
Policy DP15: Active and sustainable transport	No	• Justified • Effective • Consistent with national policy	Yes	Yes	Justification – The mechanism for achieving carbon neutrality by 2030 is not fully evidenced. Effectiveness – Monitoring and enforcement of climate measures is unclear. Consistency with national policy – See the National Planning Policy Framework (paras 152–158) which require robust climate-mitigation	Require active travel and public transport infrastructure before the first occupation of major sites. - Require strategic sites to deliver a modal shift plan consistent with carbon neutrality by 2030. - Introduce maximum parking standards to limit car dependency. - Strengthen integration with GI (shaded walking routes, ecological corridors).		

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					and adaptation mechanisms.			
Policy DP16: Active travel routes	No	• Justified • Effective • Consistent with national policy	Yes	Yes	Justification – The mechanism for achieving carbon neutrality by 2030 is not fully evidenced. Effectiveness – Monitoring and enforcement of climate measures is unclear. Consistency with national policy – See the National Planning Policy Framework (paras 152–158) which require robust climate-mitigation and adaptation mechanisms.	Require active travel and public transport infrastructure before the first occupation of major sites. - Require strategic sites to deliver a modal shift plan consistent with carbon neutrality by 2030. - Introduce maximum parking standards to limit car dependency. - Strengthen integration with GI (shaded walking routes, ecological corridors).		
Policy DP17: Public transport accessibility	No	• Justified • Effective • Consistent with national policy	Yes	Yes	Justification – The mechanism for achieving carbon neutrality by 2030 is not fully evidenced. Effectiveness – Monitoring and enforcement of climate measures is unclear. Consistency with national policy – See the National Planning Policy Framework (paras 152–158) which require robust climate-mitigation and adaptation mechanisms.	Require active travel and public transport infrastructure before the first occupation of major sites. - Require strategic sites to deliver a modal shift plan consistent with carbon neutrality by 2030. - Introduce maximum parking standards to limit car dependency. - Strengthen integration with GI (shaded walking routes, ecological corridors).		
Policy DP34: Green infrastructure	No	• Justified • Effective • Consistent with national policy	Yes	Yes	Justification – The mechanism for achieving carbon neutrality by 2030 is not fully evidenced. Effectiveness – Monitoring and enforcement of climate measures is unclear. Consistency with national policy – See the National Planning Policy Framework (paras 152–158) which require robust climate-mitigation and adaptation mechanisms.	- Require Green Infrastructure Masterplans at outline stage for all major applications. - Include GI functions for: -carbon sequestration, -urban cooling, -nature recovery network connectivity, -natural flood management. - Require minimum tree-canopy cover standards for large developments. - Strengthen reference to the Local Nature Recovery Strategy and Climate Emergency Action Plan.		
Policy DP35: Nature conservation	No	• Justified • Effective • Consistent with national policy	Yes	Yes	Justification – The mechanism for achieving carbon neutrality by 2030 is not fully evidenced. Effectiveness – Monitoring and enforcement of climate measures is unclear. Consistency with national policy – See the National Planning Policy Framework (paras 152–158) which require robust climate-mitigation and adaptation mechanisms.	Require development to contribute to district-wide Nature Recovery Zones and Nature Parks. - Require long-term monitoring and management plans tied to the LNRS. - Strengthen requirements for habitat buffers, ecological corridors and dark zones.		
Policy DP36: Biodiversity Net Gain	No	• Justified • Effective • Consistent with national policy	Yes	Yes	Justification – The mechanism for achieving carbon neutrality by 2030 is not fully evidenced. Effectiveness – Monitoring and enforcement of climate measures is unclear. Consistency with national policy – See the National Planning Policy Framework (paras 152–158) which require robust climate-mitigation and adaptation mechanisms.	Make on-site BNG the default unless clearly unachievable. - Require BNG monitoring reports every five years over the 30-year period. - Require clear integration with Nature Recovery Zones and ecological networks. - Require strategic developments to provide measurable connectivity gains.		
Land north of Churchill Avenue	No	• Effective	Yes	Yes	Penny Field should be protected and designated as a Local Green Space or future nature reserve, not allocated for development. It is one of the very few remaining true greenspaces in Clevedon, and the only site in the town identified in the regional Local Nature Recovery Strategy (LNRS) as a land-based Nature Recovery priority area. This makes it uniquely important for biodiversity restoration, habitat creation and climate resilience. The site has exceptional potential for wildflower meadows, community	For these reasons, Penny Field should be removed from the list of development sites and safeguarded for nature recovery, climate resilience, public wellbeing, and future community use.		

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					orchards, improved riparian habitat along the Land Yeo, and nature-rich public space. Protecting Penny Field would provide significant environmental benefits, including increased biodiversity, improved water quality and natural flood mitigation. These opportunities would be permanently lost if the land is developed for housing. Penny Field is also vitally important for the health and wellbeing of local residents. Clevedon has limited natural greenspace, and this site is one of the only remaining places that can offer quiet, restorative nature access for the community. Many residents do not have gardens, and accessible greenspace is proven to support physical and mental wellbeing. A nature-focused site here would provide long-term community benefit in a way that cannot be replicated once developed. There are far more suitable brownfield and greyfield sites in and around Clevedon that should be prioritised for any future development. Using Penny Field for housing contradicts sustainable planning principles, ignores the LNRS evidence base, and removes one of the last opportunities to create a meaningful natural asset for the town. The strength of local feeling has already been clearly demonstrated: two petitions with over 600 signatures, ongoing community engagement, and repeated calls for the site's protection. The community has expressed a consistent wish to see Penny Field protected and enhanced for nature and public benefit. For these reasons, Penny Field should be removed from the list of development sites and safeguarded for nature recovery, climate resilience, public wellbeing, and future community use.			
Land north of Churchill Avenue	Yes		Yes	Yes		Penny Field (Land North of Churchill Avenue) must be protected and made a Local Green Space. Under local planning policy, Penny Field is the perfect candidate for Local Green Space designation because it'd be in the top 24% of sites based on policy alignment. Clevedon Town Council, two petitions (2022 and 2025) of 600+ signatures and the consultation for Clevedon's placemaking strategy all called to protect Penny Field. Penny Field is a prime candidate for Local Nature Recovery, as identified by WECA, due to the presence of three priority species. Penny Field is also located on a Green Infrastructure Corridor under NSC's own policy. Under any Equalities Impact Assessment the reduction of green space would adversely affect lower income households.		

Name: Andy Connell **I.D:** 20575201

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP12: Bristol Airport	No	‣ Justified ‣ Effective	Unsure	No	You have a duty to cooperate with local people and groups yet you give the impression that the Airport already has permission to expropriate common land (Felton Common) for purposes of expanding the runway. At no point was I, or anybody I know made aware that Bristol Airport	The reversal of any decision/ agreement from North Somerset Council, to hand publicly owned, green belt land to Bristol Airport, so that they can expand their commercial operations.		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					would permitted to build on publicly owned, green belt. I object on: The inadequate compensation on offer The environmental impact on noise levels caused by bigger planes. The environment impact of increased CO2. The contradiction of extant environmental legislation directly due increased size and number of the planes.			

Name: Andy Eastwood **I.D:** 58398081

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Paragraph 154 of the NPPF states that the construction of new buildings is inappropriate within the Green Belt and this proposed development does not fall within any of the exceptions and nor does it represent any of the other forms of development that are not inappropriate within the Green Belt as set out in paragraph 155. The development falls outside of the settlement boundary for Nailsea, and within the rural parish of Wraxall, whose Neighbourhood Plan acknowledges its importance, its vision being 'To protect and enhance the Green Belt' (Vision 4.3.) and to 'continue to seek protection and enhancement of the area's rural character'. This proposed development would have a direct impact on the openness of the Valley and would create urbanisation from Nailsea into rural Wraxall and Tickenham land. The risk of development in regard to encroachment on the openness of the Green Belt area (one of the key aims of Green Belt) is High, this area performs highly on three of the criteria for Green Belt and has every right to remain in the Green Belt. This site is not suitable for affordable housing in accordance with the Government's National Planning Policy Framework (NPPF). The proposed land is in an area of well preserved medieval landscape, with probable Saxon antecedents, of small irregular fields, some of which suggest that they may have been created from open strip fields. It is clear that this site has numerous constraints including Flood Zones 2 and 3, numerous underground services, tree preservation orders, an archaeological zone, numerous Sud's, nature walks, enhancement to current sports facilities, major link road, furthermore 381 dwellings plus commercial and community buildings is a hugely costly development. This makes for a very expensive site to develop and for the developer to make any profit they must build properties of signifiant value, therefore it is unlikely that affordable houses in accordance with the Governments NPPF will be built on this site. Increased Traffic. The B3130 between Jacklands Bridge (BS21) and the junction with the B3138 (Tickenham Hill) at Stone Edge Batch is very narrow with no footpaths on either carriageway. Traffic flow is regularly halted because goods vehicles, lorries or buses cannot pass each other over a significant distance, requiring careful manoeuvring, or difficult backing-up, to re-start traffic flows. This scenario is a regular occurrence during the daily rush-hour periods. The additional log jams and tail backs that will result from the increased vehicular traffic stemming from the proposed development will cause delays to commuters, school buses and emergency services, reduce air quality, increase general pollution and noise. Traffic jams and stationery vehicles consume vast amounts of energy needlessly, and the resulting carbon footprint cannot possibly be justified based on an increased number of residential dwellings in an area that has inadequate supporting infrastructure. The new link road through the proposed development will be used as a shortcut for traffic from the east and west ends of the estate to avoid the traffic lights in Nailsea. This means that the traffic flow through the proposed residential area will be significant, effectively becoming a Nailsea by-pass, introducing noise and pollution into another location which is currently quiet, unspoilt green belt. Pollution. New proposed link Road runs parallel to the Land Yeo River. This is of concern as it is recognised that Road runoff is a major contributor to river pollution, in particular, Road runoff contains levels of poly aromatic hydrocarbons far above the Environmental Quality Standards, it also contains toxic metals at levels that can kill fish and insects. The Land Yeo flows directly into a designated Site of Special Scientific Interest (SSSI) - the Tickenham, Nailsea, and Kenn Moors of North Somerset.			

Name: Andy Garrett **I.D:** 39286433

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP2:	Unsure		Unsure	Unsure		I cannot see a specific comment saying as such, but my belief was that Yanley Lane would be closed to		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Strategic location: Woodspring (south west of Bristol)						through traffic should this development be accepted. As a resident of Glebe Road (the residential street at the end of Yanley Lane in Long Ashton), I would only support the development if I knew closure of the road between Woodspring and Yanley itself was confirmed and guaranteed.		

Name: Andy Haines **I.D:** 63106753

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm					I am responding to the proposed housing developments at two sites at Portishead, they are at Tower Farm and Black Rock. I understand that both sites are green belt land which dates back to the 1980s and cannot be built on except in exceptional circumstances which have not been met by these proposaIs. We have been very fortunate to have at least lpair of Red Kites, a bird of prey making a comeback here in the UK. Kites are listed under Schedule 1 of the UK1s Wildlife and Countryside act 1981. This gives them extra legal protection. The Red Kites use these open areas to hunt, if the feeding grounds are built on, the birds will leave or die. The whole area is rich in bat biodiversity with Pipistrelle, Noctule, Long-eared, Greater and Lesser Horseshoe Bats having been spotted in the area. These are also protected by law. I have concerns regarding access to both sites. Tower Farm access road would send traffic in the direction of the infant school causing safety issues. The Black Rock site would be accessed by the B3124, a busy road at any time due to it being the main artery between Portishead and Clevedon. Portishead has limited road system to support a population of around 27000 people. There is the Portbury Hundred, Clapton lane (which is not suitable for large vehicles) and the B3124. The proposed developments would create an unacceptable impact on traffic in the area. The infrastructure in Portishead is not sufficient to support such a large numbers of new houses proposed. There would not be enough doctors surgeries, dentists, car spaces - the things people need every day. This was highlighted after the last large number of houses built and continues to cause problems to this day. For the reasons stated, l do not think Black Rock or Tower Farm developments should proceed. I do, however, appreciate the need for housing and would suggest an alternative location at Old Mill Road which is a brown belt site that is potentially larger than the Black Rock proposal. Any shortfall in housing numbers could be made up by building small brown belt sites within Portishead itself such as the building site at St Marys road. Building houses at Old Mill Road would put housing in the heart of the viIlage and as such, residents would need to use their vehicles less as all amenities would be within walking or cycling distance. The impact on traffic congestion and its pollution would be less than the Blackrock or Tower Farm proposals, demonstrating a more green approach. Portishead would retain its open spaces, with reduced the impact on the environment and protect our wildlife habitat.			
Black Rock, north of Clevedon Road					I am responding to the proposed housing developments at two sites at Portishead, they are at Tower Farm and Black Rock. I understand that both sites are green belt land which dates back to the 1980s and cannot be built on except in exceptional circumstances which have not been met by these proposaIs. We have been very fortunate to have at least lpair of Red Kites, a bird of prey making a comeback here in the UK. Kites are listed under Schedule 1 of the UK1s Wildlife and Countryside act 1981. This gives them extra legal protection. The Red Kites use these open areas to hunt, if the feeding grounds are built on, the birds will leave or die.			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					The whole area is rich in bat biodiversity with Pipistrelle, Noctule, Long-eared, Greater and Lesser Horseshoe Bats having been spotted in the area. These are also protected by law. I have concerns regarding access to both sites. Tower Farm access road would send traffic in the direction of the infant school causing safety issues. The Black Rock site would be accessed by the B3124, a busy road at any time due to it being the main artery between Portishead and Clevedon. Portishead has limited road system to support a population of around 27000 people. There is the Portbury Hundred, Clapton lane (which is not suitable for large vehicles) and the B3124. The proposed developments would create an unacceptable impact on traffic in the area. The infrastructure in Portishead is not sufficient to support such a large numbers of new houses proposed. There would not be enough doctors surgeries, dentists, car spaces - the things people need every day. This was highlighted after the last large number of houses built and continues to cause problems to this day. For the reasons stated, l do not think Black Rock or Tower Farm developments should proceed. I do, however, appreciate the need for housing and would suggest an alternative location at Old Mill Road which is a brown belt site that is potentially larger than the Black Rock proposal. Any shortfall in housing numbers could be made up by building small brown belt sites within Portishead itself such as the building site at St Marys road. Building houses at Old Mill Road would put housing in the heart of the village and as such, residents would need to use their vehicles less as all amenities would be within walking or cycling distance. The impact on traffic congestion and its pollution would be less than the Blackrock or Tower Farm proposals, demonstrating a more green approach. Portishead would retain its open spaces, with reduced the impact on the environment and protect our wildlife habitat.			

Name: Andy Pitcher **I.D:** 29296961

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The proposal to build nearly 900 houses to the East of Backwell seems to fly in the face of a number of central government and local council stances; To reduce the travelling and therefore carbon emissions – there is no local employment – people will predominantly drive to work, either in Bristol, South Gloucestershire or Weston. To preserve the best agricultural land which is currently used for growing crops – who would have thought 4 years ago that we would have had a war in mainland Europe?! – we need to be more self sufficient in respect of having the ability to grow our own food rather than importing. Building on such land would defeat this aim! Overdevelopment - Backwell, a small village, already has 800 houses being built or in the pipeline without any infrastructure developments to cater or adjust for this. The Strategic Transport Report acknowledges the already congested traffic situation in Backwell and says that the only solution for this is for a new cross rail road to be constructed. North Somerset Council seems to agree with this recommendation but the proposal is for an under rail line tunnel deep enough for a double decker bus on land that the locals all know floods! This appears to be uncosted, unplanned and probably therefore unfeasible. NSC does not have any money and has any approach been made to Highways England or the Government? If this Local Plan is suggesting that these houses can be built with this proposed bridge as the mitigation for all the increased traffic which it says must be diverted away from A370/Station Road then the bridge must be built as a precondition of the Inspector’s approval of this development in agreeing this Local Plan. An increase in housing of this magnitude without infrastructure of necessary schools to cater for increased pupil numbers (all ages) and the necessary medical and social services resources in Backwell and North Somerset as a whole is shortsighted.			

Name: Angela MacLeod Gibson **I.D:** 58384193

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land off Millcross							This site is suitable as it is central to amenities to support the residents who will live there. It has been an eyesore and a wasted opportunity to be developed for too long	
Land north of Churchill Avenue							The part of the site given over to play facilities and open green space must be of a reasonable size to accommodate the requirements of any residents. Low rise housing rather than flats would probably be more suited to this area and the river would need to be made safe for an increase in resident numbers	
Great Western Road						Do not think that this site should just be for age restricted units. Feel that it should accommodate a wide range of needs to try to regenerate the town centre		

Name: Angela Smith **I.D:** 62862241

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	Unsure	• Effective	Unsure	Unsure	We live in Hilltop which is a road off Tower Road. We consider that the plans to build at Tower Farm could only make the parking at High Down School area much worse. In our opinion the parking there at school drop off and pick up times creates the possibility of an accident (waiting to happen!) - very dangerous for schoolchildren and parents! I agree with the argument that the area should be kept as green belt and not built on as it includes the lovely Weston Bigwood and surrounding countryside. There are other more suitable sites which wouldn't impact on the local beauty. Please can we keep Portishead to a reasonable size which is supported by a decent amount of infrastructure (doctors, schools etc) and also make it possible to get in and out of the town at rush hour times as we still have no railway opened - which has also been promised! Geoff and Angela Smith			

Name: Anita Golding **I.D:** 21229825

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Adding new houses to south Nailsea will take valuable agricultural land, destroy wildlife habitats, increase congestion on the A370 towards Bristol, put more pressure on schools and local facilities. Flooding will increase.			
Land east of Backwell	No	• Positively prepared • Justified	Unsure	Unsure	Backwell has already many new homes being built with no extra provision for schools/doctors/leisure facilities in the plan. Another 800 homes will put a huge strain on the local facilities.There is no work in Backwell so new residents will need to travel to work adding to existing congestion on the roads/lack of parking at the station. The railway station lacks facilities for people with mobility issues. Backwell is poorly served by the internet - on Backwell Common it its almost impossible to use Wifi without using Starlink or a 5G router.			

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		• Effective • Consistent with national policy			Backwell is being allocated more houses than any other village in North Somerset. The land which is proposed to be built on is Grade 1 Agricultural land which is now becoming sparse in North Somerset. Wildlife will be impacted by this, there are bats, owls, rare birds, deer, newts, snakes and many other animals living on this land. Backwell Common regularly floods, I have lived on Backwell Common for 30 years and in that time there have been many occasions when the road has been impassable - both near the railway bridge to Wooleys farm and towards Farleigh. If a new road was built under the railway this would also flood like the railway bridge in Farleigh which floods multiple times a year. Looking at the plans for the new road it appears that Backwell Common will be closed near the railway bridge, this would leave our house and our neighbour with no car access to either Backwell shops/railway station nor to the A370. The plans we saw in Backwell Parish Hall actually had no way of us getting out of our houses by car as the road was closed in both directions around us! This new road is more likely to be used by Nailsea residents wanting to commute to Bristol than by any residents of the new estate wanting to go to Nailsea, new residents are unlikely to work in Nailsea so the new road is only there for the residents to go to the supermarkets in Nailsea - a lot of money for not much gain. Backwell Common is one of the oldest roads in Backwell so by closing this road off local heritage will be destroyed. The school bus is obliged to collect children on Backwell Common, if the road is closed the bus will have to go half way down the common, turn round and then pick up children from the other end of the common, this would add at least 15 minutes to journey times. The same is true for the bin collections.			

Name: Ann Belcher **I.D:** 62996513

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No				This plan is amazingly impractical for many reasons with the following which to me are completely mad. The land proposed is high quality land used to growing food crops and there is less than 10% of this kind of land left in our area. We need food! We do not need to import it! Our village already has 800 houses approved which increases the size of the village by 40%.If this plan goes ahead with 1,000 new houses it will be over developed and is unfeasible. There is no provision for the extra facilities needed since no mention made for the new schools, doctors surgeries, dental practices, pharmacies, community meeting rooms and open green parks which 2 - 3,000 more inhabitants would require. A lot of new roads would have to be built and a new road to take the traffic under or over the railway would be expensive or impractical or probable unfeasible when the site is carefully inspected. For these reasons I strongly oppose the plan			

Name: Ann Cocks **I.D:** 62554401

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national	Unsure	Unsure	800 new houses have already been approved, which already means a 40% increase in the village. Traffic congestion in the village is is currently bordering on dangerous. Although a new road is apparently "planned" , details re funding and timing are lacking. It is very worrying that there is no detail when it comes to infrastructure. Schools are mentioned but there are no details relating to when and how. The thought of 1000 new houses would lead to possibly 2000-4000 more people in Backwell but there seems to be no infrastructure plan with a funding guarantee.			

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		policy			For the plan to be sound it is necessary to have a definite assurance that the proposed road will be in the right place at the right time, that adequate schools will be available at the right time and health care will be available at the right time			

Name: Ann Gawthorpe **I.D:** 20519041

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP7: Green Belt	Unsure		Unsure	Unsure				
SP8: Housing	Unsure		Unsure					

Name: Ann Parker **I.D:** 41035649

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Yew Tree Gardens, Easton-in-Gordano/ Pill	No	‣ Justified ‣ Effective	Unsure	Unsure	I do not believe land outside the established village settlement boundaries should be included in the proposed development allocation. These boundaries exist to manage growth responsibly. SP6 clearly states that residential development outside settlement boundaries “will be restricted to replacement dwellings, subdivision of existing dwellings, residential conversion of rural buildings where alternative economic use is inappropriate or unfeasible, dwellings for essential rural workers or the redevelopment of previously developed land in suitable locations”. Extending development beyond the settlement boundaries would undermine these planning principles, increase pressure on infrastructure and set a harmful precedent for further outward expansion.	We need to see where the new school and the new doctor’s surgery will be never mind the new dentist! How are you proposing that the A369 will cope with all the new houses? It is already impossible to cross during the rush hours.		

Name: Anna Child **I.D:** 39326049

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	889 new houses in Backwell would be a net negative for the village. Backwell already has over 800 new houses approved, some of which are currently being built (notably not in line with promised building stipulations about access, damage to existing roads, dust, etc - we have noted the constant chaos caused by the construction that is not held to the standards ostensibly agreed when approved). This 40% increase to the village will lead to total overdevelopment. Backwell is the recipient of a far higher allocation of houses than any other village in the whole of North Somerset. When looking at the growth percentage this is far, far higher than each of the towns. Backwell would take 7% of the entire district's housing allocation, whereas Clevedon only 2%. The Infrastructure Delivery Plan lacks analysis and costings - essential to determine whether this is viable. There is no guarantee of funding for this new road or services, and no development should be agreed without this being set in stone. The proposed new road would presumably also not be held to any stipulations or standards - I have seen no evidence that it will effectively serve traffic between Nailsea and Backwell or relieve congestion on the current roads between the two			

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					(Station Rd, Backwell Common and Chapel Hill). It seems utterly unrealistic to engineer the road over or under the railway due to costs and potential physical restrictions. Any reduction of Grade 1 Agricultural Land should be resisted - there is precious little (7%?) of this land left in all of North Somerset. It should not be built on to reach a short-sighted housing target. Government policy is to protect this sort of land to safeguard food security. The proposals completely contradict this stated aim. We are in a climate crisis and food security could become precarious very quickly. It would be disastrous to irreversibly destroy our options for agriculture. There is no needs or viability analysis for an extra 1000 homes. There are not enough school places in our local schools to support these houses, and there has been no evidence of investment in health services or leisure facilities in the years I have lived in Backwell. The question needs to be answered as to what sort of infrastructure would support another 1000 houses and whether or how this could be achieved - not just 'hope for the best'. There is very little employment in Backwell - most residents commute. The bus in rush hour is often full, late, cancelled or infrequent - and only goes to Central Bristol, so understandably most people opt to drive. It is not feasible to assume that over 1000 people would be able to commute to various locations without serious knock-on effects to the traffic and public transport system. The rail station is not fit for purpose as a transport hub - I have relatives that cannot visit due to lack of accessibility (disability and /or young children). Many trains have carriages that don't even reach the platform as it is not long enough. No social cohesion impact assessment has been provided. This is surely relevant. Wildlife habitats, including rare species of bats, rely on the land - their habitats and food would be destroyed leading to further depletion of biodiversity. Flooding is a real, frequent and material concern - not only for residences but for the transport infrastructure (traffic has been held up by flooding more times that I can count). Backwell Common and many other areas are prone to flooding, which would be worsened by more housing. Backwell Lake and adjacent fields are also on a floodplain which floods regularly. More housing and roads being built will exacerbate thi existing problem. To conclude - the vertiginous volume of growth with the required investment into infrastructure, services and environment over such a short period is destabilising, unsustainable and undeliverable. The loss of Greenbelt and high-quality agricultural land will be disastrous along with the increased flooding and inevitable lack of concrete plans and funding for the 'new road' to support the housing.			

Name: Anna Littlewood **I.D:** 62860097

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I am really concerned about the number of new houses proposed for Backwell - we already have 800 houses approved which is an increase of 40% for our village. Adding additional massive housing estate is too much for a village of our size and current infrastructure to take in a short period of time. I am worried that our road network, health services, schools, shops and the general day to day functioning of the village will be severely impacted making this area a very unpleasant place to live. I am not against building homes and I know Backwell needs to do its part. We are already a site for a some large developments so i really think that this is enough. I am also concerned that the proposed road is not practical, i can't really see how it will take much traffic at all from station road or the cross roads as it doesnt help to serve the motorway or traffic heading to weston. I am also concerned that the plans and funding source for this road is not well defined and with it needing to somehow cross the railway line it seems completely unviable to me. This would mean that the traffic to and from this estate will all be coming via backwell - the A370 and/or the cross roads. This can already get very busy and you will be adding a large volume of traffic onto this road that will already be coping with the traffic from additional houses already agreed. I am worried that the proposed developments in the local plan are being considered in silos rather than as a collective - isnt this the point of a local plan? If it is considered as a whole surely the inspector can	Modify the local plan by not allowing the building of such a large-scale development on land to the East of backwell. Keep the expansion of backwell to the number of houses already agreed and accepted by the village.		

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					see that this level of increase for a village already creaking at the seems is unsustainable and infact detrimental for the people who call Backwell home.			

Name: Anna Matthews **I.D:** 62455777

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	‣ Positively prepared ‣ Justified ‣ Consistent with national policy			We object to the North Somerset Local Plan 2041 because it is unsound and is not justified. We have lived in this area since our marriage over 52 years ago and have happily brought up our family here in the historic rural neighbourhood with its special village community spirit and a close connection to nature within the open countryside. We do not wish to become a suburb of Bristol. A recent guest at our house remarked on how unspoilt and delightful the hinterland is behind the A369 as he ambled through the fields and footpaths. Building on these beautiful green fields is not consistent with national policy which is to protect the Green Belt. It will cause irreversible harm to the local wildlife and landscapes. There are no ‘exceptional circumstances’ to build on our green belt. Grey and brown belt sites are meant to be prioritised before destroying our green fields. The Pill Green sites especially strongly contribute to Green Belt purposes. HE2015 is pristine countryside that strongly prevents urban sprawl from Bristol. The Council surely needs to publish a robust Green Belt assessment or withdraw these sites. The plan is not positively prepared, unfairly ignoring local democracy. 81% of us voted for a Neighbourhood Plan that limits new housing to 150-200 homes. This was a sensible, natural growth plan which protected our way of life, sense of place and sense of community which has existed here for generations. We now have grandchildren growing up here with a strong sense of belonging. Why should we be forced to take double our fare share of North Somerset’s new housing? Our surgery and schools are already full. There is no funded, concrete plan to increase capacity for 2,650 new residents. This is not ‘Effective’ planning. The village community is not equipped with the infrastructure to cope and would be overwhelmed. The village roads are narrow and winding. Adding an estimated 1,500 cars creates a serious potential danger for children walking and cycling to school. Has the Council conducted a Child Road Safety Impact Assessment? We feel this plan fails to protect the best interests of children, both existing and future. Currently children have access to safe natural play spaces on Pill Green and surrounding fields. This connection to nature is critical for their physical health, mental health and wellbeing. Has the Council assessed this plan against its duties under Section 11 of the Children Act 2004 to safeguard and promote the welfare of children?	We request that the Inspector finds the plan unsound and recommends the removal of sites HE2015, HE206, HE20491, HE201097, and HE201065		

Name: Annabelle Cervantes **I.D:** 62571265

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I am concerned by the amount of building planned in Backwell on top of a lot of building in Nailsea. My main concern is the traffic, as both these areas are surrounded by roads where there are no pavements, narrow enough at points for traffic to stop or reverse to let traffic pass and speed limits (or rather no speed limit) that is dangerous for narrow lanes being used by farmers, horse riders, cyclist and people walking. Since the building in Nailsea I have noticed a significant increase in volume on the roads around where I live, and these sites are not fully sold. At the very least there should be a speed restriction in these lanes to 20 mph	Restrict speed limits to 20		

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					We had this in Bristol where I used to live and there were pavements and you did not have to stop to let traffic past.			

Name: Anne Marshall **I.D:** 30429089

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell is already overburdened with new developments. 800 new houses have already been approved resulting in an 40% increase. Adding a development of 889 more houses will DESTROY the village. The population will increase by 80%. Why is our village being victimised compared to other places eg. Cevedon's growth will be by 6%. There is little employment in the village, most people will need to commute. As a rough estimate, if each house has 2 cars this will add 1,689 additional vehicles onto local country roads and the A370 which already has extensive traffic queues at peak times. Building on good quality agricultural land required for food production is environmental vandalism at the highest level. I am disgusted and angry.	Refuse the planning application for 889 new houses on Land East of Backwell, so the village of Backwell will remain a village.		

Name: Anne Morley **I.D:** 39254785

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	High-quality farmland (and this is grade one farm land, which continues to be used at present for growing arable crops such as wheat, and has been used for so for many generations, being fertilised sustainably by manure from winter grazing farm animals. - which means it is of the highest quality by labour's own policies and frameworks state that this type of land should not be built on. This area of prime farmland, which is currently being used to grow good quality food for our population, has done so for generations and is farmed in such a way as to provide the optimum amount of varied foodstuffs (both arable crops and meat) for our population and has been for generations which means it is of the very best quality. Labour's own policies and frameworks reject the use of this type of land for building, as it is needed to feed our population and provide food security. Along with this this area is heavily used for walkers and promotes people living healthy lifestyles. The A370 area above this site regularly floods, and with large areas of land above this site and above the A370 in this area being allocated for development, this will cause additional flooding. The infrastructure in this area is already operating far above capacity, with heavily congested roads and traffic, particularly around schools. Particularly, the A370 in Backwell and Station Rd in Backwell and Nailsea. We currently have difficulty accessing medical appointments because the population of our small village has grown massively in a very short time, which is unsustainable.	This area of sustainable farmland needs to remain as such. Food security for future generations relies on farmland, especially of the grade one type of the highest quality land here, which is currently used to provide both high-quality arable crops and, later in the year, grazing for animals, which provides essential microclimates. Please remove this valuable land from this plan for the above reasons.		

Name: Anne Morrison **I.D:** 62804001

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Churchill Avenue	Unsure		Unsure		It is possible that the plan is not in compliance with the Duty to Cooperate if that means it is not listening to the local residents comments, wishes and local knowledge.	As a local resident with a very close proximity to Penny Field I believe that Penny Field must be protected and made a Local Green Space. Historically that was always its designated use for local residents and residents of the town in general. Under local planning policy, Penny Field is the perfect candidate for Local Green Space designation because it would be in the top 24% of sites based on policy alignment. Clevedon Town Council, 2 petitions (2022 and 2025) of 600+ signatures and the consultation for Clevedon Placemaking Strategy all call to protect Penny Field. Penny Field is also a prime candidate for Local Nature Recovery as identified by WECA, due to the presence of 3 priority species. Penny Field is also located on a Green Infrastructure Corridor under NSC's own policy. It's protection as a nature diverse green space is very important to all who live nearby. Under any Equalities Impact Assessment the reduction of green space would adversely affect lower income households. Penny Field is an important community space used by many.		

Name: Anthony John Cox **I.D:** 39035137

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	No	Backwell is recognised as a village yet by lumping it in with Nailsea as a strategic development area all the criteria for development in a village are being ignored and it is proposed that Backwell is expanded by a greater proportion than any other town or village in the district. The amount of development proposed for Backwell is completely unsustainable.	Backwell should be removed from the Nailsea and Backwell strategic development area and treated as all the other villages.		
Policy LP3: Strategic location: Nailsea and Backwell	No	‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	The proposed developments in Backwell are prefaced by a long list of measures which are necessary. However there is no indication of these will be fundable and it is highly unlikely these will ever take place given the state of the council's finances. Where is the funding for three new 420-place primary schools (each with early years provision in line with government requirements), financial contributions to secondary, Post 16, family centre services and special educational needs provision to come from as well as the new road which goes through green belt land and so significantly degrades the green belt and destroys the strategic gap between Backwell and Nailsea. The proposed road also requires a major bridge to go under the railway. These proposals are totally impractical.	Remove the provision of 889 new houses from the East of Backwell. except for the triangle of land to the north of Backwell Common and South of the Railway and the link road.		
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	No	Backwell already has 800 new houses approved and this is a 40% increase. an almost 900 extra new houses would be vast overdevelopment and there isn't the infrastructure in the village to support such a large development. Backwell is classified as a village yet it being targeted with 7% of the district's housing allocation. This a much higher proportion than the towns where most of the new houses are meant to go according to the strategic placement plans. The land for these new houses is grade 1 prime agricultural land within the green belt and is currently used for food crops and grazing. There is only 7% of this high quality land left in the whole of North Somerset and government policy says we must protect out best and most versatile land to safeguard food security. High quality green belt land should not be used for development if there is lower quality land available and there certainly is adjacent to the link road near Bristol and other places within the district. The proposed new road would not effectively serve Nailsea's traffic or relieve congestion on Station Road and there is no guarantee it could be funded or built further than any new development. Engineering the road under the railway would be highly expensive and disruptive and possibly unfeasible. The road would also be through green belt land and damage the strategic gap between Nailsea and Backwell. Backwell is not a centre of employment and this development would increase commuting on already congested roads, it is also remote from shops and other facilities and most journeys from the development would require car journeys increasing pollution. The development would destroy valuable wildlife habitats and further harm biodiversity in one of the world's most nature depleted countries. It is also in land regularly used for foraging by Greater and Lesser Horseshoe bats. As someone who regularly walks these fields I can attest that they regularly become saturated and there is often standing water on them in the winter months.	This development needs to be removed from the plan. Little consideration seems to be given to how the plan works with expansion of Bristol airport; development should be better placed nearer the airport in the Felton/Winford area. While Backwell is near the airport there is no easy access to it or public transport to the airport. There is also lots of unofficial airport parking in that area and that land		

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						should instead be used for development.		

Name: Anthony Thompson **I.D:** 58597377

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Justified	No	No	Un justified due to over expansion ,to close to ancient woods ,not enough amenities, bringing in 2000 cars for all proposed sites is dangerous and un healthy .flooding and light pollution.			
Black Rock, north of Clevedon Road	No	• Justified	No	No	Portishead has had more than 15000 homes build in 20 years building on this gren belt with sssi site is un moral and other brown sites first please .			

Name: Anthony Woolf **I.D:** 28744929

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm					The proposal to build on greenfield sites Tower Farm and Black Rock is an ecological disaster. Both of these sites were added to the Green Belt in the 1980s to protect Weston Big Wood(SSSI) and retain a green corridor in the Gordano valley. If building any closer to Weson big Wood were to go ahead the woods would become "sterile" as per Eastwood in Portishead. Access to Tower Road and The Downs is already difficult, unsafe and over utilised due to the proximity of Highdown School. I am not convinced that enough effort has been made to adopt brown field sites in the area. National planning policies allows Green Belt changes only in exceptional circumstances and these have not been demonstrated.			
Black Rock, north of Clevedon Road					The proposal to build on greenfield sites Tower Farm and Black Rock is an ecological disaster. Both of these sites were added to the Green Belt in the 1980s to protect Weston Big Wood(SSSI) and retain a green corridor in the Gordano valley. If building any closer to Weson big Wood were to go ahead the woods would become "sterile" as per Eastwood in Portishead. Access to Tower Road and The Downs is already difficult, unsafe and over utilised due to the proximity of Highdown School. I am not convinced that enough effort has been made to adopt brown field sites in the area. National planning policies allows Green Belt changes only in exceptional circumstances and these have not been demonstrated.			

Name: Anthony Young **I.D:** 62832257

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared	Unsure	Unsure	1. The additional numbers would amount to unjustifiable overdevelopment of the village. There are already 800 new homes approved – a 40% increase. 2. The proposed road is inadequate for its purpose. It would not be sufficient to meet traffic needs in Nailsea, and			

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		• Justified • Effective • Consistent with national policy			Station Road, and Backwell Common and Chapel Hill. The railway must be crossed, and whether this is an underpass or bridge, it is expensive, complex and almost certain not feasible. 3. There is a deficit in school places and no plan for health services or leisure facilities. The existing infrastructure will not support c.1000 new homes. 4. There is an unjustified weighting on Backwell for new housing. More than any other North Somerset village, and more than many towns. In numbers, that's 7% of the district housing allocation. Clevedon is taking 2%. 5. No needs or viability analysis has been provided for 1000 homes. 6. If Backwell was an employment hub it may be justifiable. It is not. 7. This land is Grade 1 agricultural land – only 7% of this is left in North Somerset. Other areas in the district which are not Grade 1 can be used for housing. This contradicts government policy's focus on protecting the best and most versatile land for food security. In addition, it impacts on bio-diversity and natural habits. 8. A number of SSSIs are threatened by this proposal – bats, maternity roosts etc. 9. The road is integral to the new housing development but it has not been costed, no funding guarantee provided or detailed analysis. It must be considered as a condition to any development, including critically, how the railway is to be traversed. 10. The area floods – how is that suitable for new housing. It is likely to result in significant problems. 11. The plan probably identifies the railway station as a key driver in substantial development. However it has many limitations as a railway station, particularly disabled access and for families with young children. There are more suitable stations further along the line, where land is also available for development. 12. The overall plan is disproportionate in is impact on Backwell. The village has more than played its part in the housing needs. The additional development will overwhelm the school, health, leisure and environmental balance. It is an ill-though scheme.			

Name: Antony Paynter **I.D:** 62771713

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Churchill Avenue	No		No	No	Penny Field must be protected and made a Local Green Space. Under local planning policy, Penny Field is the perfect candidate for Local Green Space designation because it'd be in the top 24% of sites based on policy alignment. Clevedon Town Council, two petitions (2022 and 2025) of 600+ signatures and the consultation for Clevedon's placemaking strategy all called to protect Penny Field. Penny Field is a prime candidate for Local Nature Recovery, as identified by WECA, due to the presence of three priority species. Penny Field is also located on a Green Infrastructure Corridor under NSC's own policy. Under any Equalities Impact Assessment the reduction of green space would adversely affect lower income households --- Local Plan Consultation As a foot note i had a call from an anonymous councillor from NSC who confirmed to me the Penny field does not belong to North Somerset Council it belongs to the people of Clevedon, the deeds proving this are held in you council offices in Weston super mare and have been hidden to allow the sale of this land			

Name: Arthur Matthews **I.D:** 62740353

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	1. Near doubling the size of the village will require substantial infrastructure improvements before starting house building; roads; medical centre; schools,parking must be fully funded to the necessary levels to sustain this plan, before proceeding. It is my understanding that only houses are costed and no serious funding has been made available. What has been developed so far is putting a huge strain on the existing narrow roads e.g. Station Road and accidents are becoming more frequent. 2 The land proposed is genuine grade 1 farmland. This is reducing the countrys ability to feed itelf, madness.	Prerequisite: Funding for required infrastructure before accepting any proposals. Leave greenbelt farmland for food.		

Name: Ashley James **I.D:** 21226113

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell has already had 800 new houses approved (40% increase for the village). These proposed numbers will be complete overdevelopment, for sure. There is already a deficit in local school places for those developments approved; a further 1000 homes will exacerbate this issue. There is already a deficit in medical infrastructure for those developments approved; a further 1000 homes will exacerbate this issue. There has been no Needs or Viability Analysis for an extra 1000 houses. Backwell is not where its inhabitants work, the vast majority commute with a need for transport infrastructure which is already under resourced. Government policy states "we must protect our best and most versatile land" to safeguard food security. These proposals contradict this policy as the land being talked about here is Grade 1 Agricultural Land currently used for crops and livestock grazing. Backwell Common and surrounding areas are prone to flooding which can only be more aggravated by new housing. This will impact badly on other housing with floods becoming more often. Backwell Lake is a reservoir where adjacent fields are subject to regular flooding as a floodplain. The Infrastructure Delivery Plan lacks analysis and costings. There are no funding guarantees for new roads nor essential services. Past housing plans approved have NOT delivered their associated infrastructure commitments and NSC have a poor track record in enforcing such. Government policy requires 50% of new homes on Green Belt to be affordable and this is not aligned with developers financial viability to deliver the ancillary services required. The proposed development cuts across valuable wildlife habitats and will harm biodiversity. KIV the Brockley Maternity Roost and SSSI with rare bats are in this area of proposed development.			

Name: Aston & Co **I.D:** 20338913

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Strategic Policies							We support the final spatial strategy which was created following an iterative process, backed by evidence and with good public and wider interested party engagement.	
SP3: Spatial strategy							We support SP3: Spatial Strategy which was developed in line with NPPF using an iterative process with good public and wider interested party engagement. The Reg19 plan is well balanced and evidence based.	
SP5: Towns							We support SP5: Towns which was developed in line with NPPF using an iterative process with good public and wider interested party engagement. The Reg19 plan is well balanced and evidence based. Housing development should be located at the existing primary settlements as they are the most sustainable locations. Portishead will benefit from the new Metro West rail link and strategic active travel routes such as the Gordano Greenway, the final link of the coastal towns.	
SP7: Green Belt	No	• Positively prepared • Justified • Consistent with national policy	No	Unsure	We support the release of Green Belt which has been a misunderstood and misused constraint to development promoting jumping of the GB and unsustainable development across North Somerset and other authority areas. In accordance with NPPF24, updated PPG, the replacement plan included a comprehensive Green Belt review by Arup (Oct 25) and updated Stage 2, GB report by NSC. It is important that the replacement plan follows the evidence and Arup's report concludes for the promoted land at Black Rock, North of Clevedon Road (HE20124) makes a 'weak contribution' overall to the GB purposes (P002, page 72). Of all the other four relevant grey belt tests (a, b, d & e) there is no 'strong' contribution. NSC's, Stage 2 Green Belt Assessment , Oct 25 defines the promoted land at	Move the proposed Green Belt west of Portishead to include all the promoted land HE20124.		3_BlackRock_HE18124_CULTURE AND HERITAGE.pdf

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					Black Rock as ‘Cell 4’. This cell includes the entire promoted land parcel (HE20124). Based on grey belt policy test and NPPF guidance, NSC’s replacement plan evidence, and TLPs Grey belt report submitted to the council in March 2025, ALL support defining the promoted land as ‘Grey Belt’. NPPF replacement plan preparation policy requires (NPPF24, para 155): Protecting Green Belt land — drawing and reviewing boundaries: "When drawing up or reviewing Green Belt boundaries, local planning authorities should define boundaries clearly, using physical features that are permanent and likely to be permanent so they will be capable of enduring beyond the plan period and remain defensible in perpetuity; where necessary, define boundaries to accommodate development needs and ensure that any changes will not need to be altered at the end of the plan period." (National Planning Policy Framework). Given the need to find sustainable development land close to the major settlements, near transport links (Metro West and Gordano Greenway), then the clear defensible barrier for GB amendment is using the B3124, the FZ2/3 beyond (the Gordano Valley, Article 4 land), the natural limestone hillside (Black Rock Quarry), and SSSI should be utilised. This is particularly relevant given the connection between Black Rock villas and the former mineral and industrial heritage of the west of Portishead as evidenced in the Cultural & Heritage Report, 20.11.18 by Aston & Co. This document been submitted to NSC on several occasions during evolution of this plan and the Neighbourhood Plan. For placemaking and heritage purposes it is material, important and relevant.			
Policy LP20: Wyndham Way	Unsure	• Positively prepared • Effective • Consistent with national policy	Unsure	Unsure	Aston & Co is promoting land at Portishead with Bloor and Turleys. We reserve opportunity to participate in relevant specific topic areas. In particular: 1. Green Belt(GB)/Grey Belt - based on The Landmark Practice's Grey Belt report submitted to NSC in March 2025, the Strategic Green Belt Assessment Interim Report: Assessment of Green	1. Relocate the GB west of Portishead to the west to include the former horticultural nursery making use of clear defensible barriers (Weston Big Wood, the hillside, the B3124, the natural flood plain of the valley). 2. Remove the Wyndham Way housing allocation (785 No), or safeguard this land, and allocate	Having attended the Joint Spatial Plan examination in 2019 and followed closely all NPPF, PPG and local plan challenges since that affecting all LPAs, we note the quality of the NSC Reg19 plan and its evidence. We are supportive of the approach, consultation engagement, and the near final product.	2995 Grey Belt Assessment Statement _AJC_EBH_GM_060325_Fv1.pdf

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					Belt land in North Somerset, Oct25 by Arup, NPPF24, and PPG, the entire promoted land (Black Rock, north of Clevedon Road, HE20124) is 'grey belt', and the proposed revised GB should therefore be moved west making use of clear defensible barriers in accordance with policy. This land could deliver housing in the near term, or as a minimum should be safeguarded for housing, and other community benefit (Avon Wildlife Trust, education centre & volunteer tool store). 2. The Wyndham Way Study Area should not be treated as an allocation for 785 units when the evidence presented does not support its delivery within the plan period. This is 'aspirational' and is land that could be safeguarded, but that should not be counted for meeting statutory need. Alternative land at Portishead that can be delivered should make up the shortfall. 3. Viability will affect housing delivery under all plans. Increased construction costs since Covid and Brexit have created a national delivery issue. This is mentioned in the NSC DSP viability report and has been raised by RICS, HBF, and others, with MHCLG. Getting this right in the replacement plan is essential to achieve delivery, that meets housing need.	additional deliverable housing land to meet statutory need, such as Black Rock. 3. Viability - important to set appropriate deliverable affordable housing %, affordable housing tenure mix (which affects viability), and test these scenarios fully before baking into a front loaded planning system, or delivery will not be achieved. This includes the need to front load and standardise s106 legal agreements reducing time for a resolution to grant consent to become actionable.		
Black Rock, north of Clevedon Road						To achieve a sound Local Plan, the following modifications are required: Modification 1 – Full Release of HE20124 (Grey Belt) - Amend the Green Belt boundary to the western defensible edge (B3124 / escarpment / valley floor), releasing the entire parcel HE20124. Modification 2 – Deletion or Reduction of Wyndham Way Allocation - Remove or significantly reduce Wyndham Way allocation due to non-deliverability. Replace capacity through full allocation of HE20124.	The Black Rock (HE20124) site assists North Somerset Council in demonstrating compliance with the replacement plan legal tests: Positively prepared — meets objectively assessed need Justified — supported by proportionate, robust multi-year evidence and EIA screening Effective — deliverable within plan period Consistent with national policy — especially NPPF paras 31, 35, 36, 104–110, 155[8]	APPENDIX 4 - Wyndham Way Deliverability.pdf Document 4_EIA Screening Appeal_Decision_22.05.18.pdf APPENDIX 3 - Soundness_Consequences_of_Wyndham_Way_HE20124.pdf APPENDIX 2 - Grey_Belt_Legal_Tests_Consequences.pdf Document 5A_RAF Aerial Image Black Rock (HE20124) Industrial Scale Quarrying.jpg Document 5B_AERIAL IMAGE AND HISTORIC MAPPING PACK.pdf

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						Modification 3 – Allocate HE20124 in Full for Residential Development - Allocate HE20124 for approximately up to 1251 dwellings with integrated buffers, green infrastructure, sustainable movement corridors, and heritage-led placemaking. Modification 4 – Affordable Housing Flexibility - Apply a viability-led AH policy to ensure deliverability, reflecting DSP evidence and local market conditions. This Representation is submitted by Aston & Co UK Ltd in respect of the North Somerset Local Plan 2041 (Pre-Submission Plan) and concerns the promoted allocation at Black Rock, Portishead (HE20124). The case advanced is structured, proportionate and founded on a multi-year, multi-disciplinary evidence base (2017–2025), including material already submitted to NSC, and independent technical work by Turley, Landmark Practice, Connect Consultants and other specialists. This representation relates to the full extent of site HE20124 as defined in NSC's published Proposals Map and described within the Green Belt and Strategy Evidence Base. References to 'the promoted land' are synonymous with HE20124 and encompass both component land parcels, which NSC consistently treat as a single spatial unit within the evidence base. This representation is submitted on behalf of the landowners, the Aston and Crook families. The land is subject to a promotion agreement with Bloor Homes, whose planning advisors Turley are submitting a separate Regulation 19 representation.		

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						This Aston & Co submission complements — and does not duplicate — the promoter's technical case; it focuses specifically on matters of soundness, Green Belt justification, and the legal and evidential basis for the full allocation of HE20124. Aston & Co UK Ltd acts for the landowners in the promotion of HE20124, and a director holds a declared land interest within the promoted land. 2.1 Grey Belt – Evidence, Legal Tests & Consequences All components of NSC's own Green Belt evidence base independently and consistently identify the entire HE20124 parcel as grey belt. This is not contested in any NSC document (Background Paper; Arup Stage 1; Stage 2 Assessment). Weak performance is recorded across all determining purposes. The implications are legally and policy significant: • The Very Special Circumstances (VSC) test does not apply • The correct tests are NPPF 2024 paragraphs 31, 35, 36 and 155 • Partial release of a single parcel treated as a whole in the evidence base would risk irrationality • Ecology cannot redefine Green Belt boundaries • Full allocation is required for soundness given housing need and deliverability This is set out in Appendix 1 (Grey Belt One-Page Evidence Summary) and Appendix 2 (Grey Belt Legal Tests & Consequences). The promoted site is: • Available • Suitable • Achievable • Supported by comprehensive		

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						technical evidence (EIA screening; ecology; LVIA; heritage; transport; drainage; deliverability; viability) It delivers: • Early housing • Clear enduring Green Belt boundaries • Biodiversity mitigation and enhancement • Active travel connections and sustainable movement • Heritage-led placemaking • Appropriate scale and form The site therefore meets all four soundness tests. 2.4 Historic Landscape & Industrial Setting (RAF Imagery) Document 5A/5B contains the full 1945 RAF aerial survey of Portishead's western fringe. The imagery shows: • The land immediately north of the western parcel formed part of an active limestone quarry complex with extraction benches visible in 1945 • The current woodland in this location is post-1950s regrowth, not ancient or semi-ancient • The small copse to the north-west of the arable field sits on quarry overburden, with no continuous woodland cover prior to the mid-20th century (see pp.9–11 of Aston & Co Cultural & Heritage Report, 2018) • The light railway connected directly into the Black Rock and Nightingale quarries, with a loading terminus to the south-west and Black Rock Villas constructed for quarry workers (see pp.25–29 of the same report) This confirms: • A historically industrial landscape, • statements of 'semi-ancient woodland' relating to the woodland blocks adjoining the		

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						site are factually incorrect, • And that Purpose (c) (encroachment) is not strengthened by the existing woodland, which is neither ancient nor reflective of pre-industrial naturalness.We respect the habitat value present today. EIA screening (2018), Ecological surveys (2019 & 2025), and iterative site assessment work have addressed woodland interface issues responsibly, balancing much-needed housing with robust mitigation, a 50m buffer, and opportunities for nature enhancement. See Turley's separate submission. The evidence demonstrates that: • HE20124 is grey belt, • Its release is policy compliant, • It is a deliverable, sustainable strategic growth opportunity, • Wyndham Way is not deliverable, • NSC's evidence necessitates full allocation of HE20124, and • The Plan is unsound without these modifications. These modifications ensure a lawful, rational and sound Local Plan for Portishead and North Somerset		

Name: Autograph Homes **I.D:** 31144865

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SP1: Sustainable Development	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Yes	Yes			Our client supports the broad objectives set out in policy SP1 as positive indicators of sustainability and aspirational considerations for a broad range of development types. We are supportive of the use of the term 'should' in the policy's opening wording, recognising that in some circumstances it may not be realistic to satisfy every point and that a balanced judgement will be required in every case.	R002v4 NSLP Reg19 Reps AH Dec25.pdf
SP2: Climate Change	No	‣ Positively	Yes	Yes		Our client supports the general themes cited within policy SP2 but		R002v4 NSLP Reg19 Reps

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		prepared • Justified • Effective • Consistent with national policy				has significant concerns that certain expectations – such as the achieving of carbon net zero in all new buildings – are realistic or reasonable in the context of an electrical grid still in the process of decarbonisation. While the policy's objectives are laudable, the measures and standards set out must be introduced in a proportionate manner to ensure the pursuit of the highest standards does not unduly delay or disrupt the delivery of the housing and other growth the area requires. This policy should therefore be modified to reflect the reality and establish suitable parameters so that development can be assessed at a reasonable point in time to ensure the promotion of climate change resilience and minimising adverse environmental impacts of development.		AH Dec25.pdf
SP3: Spatial strategy	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes			Our client is supportive of the broad spatial strategy outlined at policy SP3, in particular the presumption that residential development should be focused on those areas that are the most sustainably located in relation to employment, services and transport, including taking account of likely future scenarios, in respect of which Weston-super-Mare sits as the most sustainable and principal settlement. This does not however presuppose that residential development in other locations may not be suitable, based on the facts of each case.	R002v4 NSLP Reg19 Reps AH Dec25.pdf
SP4: Placemaking	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes		Our client is broadly supportive of the general principles of good placemaking outlined within this policy, which are clear and which align with current national policy. The presumption that community consultation is undertaken for major development proposals is generally sound in principle, however the wording of this part of the policy should be amended to reflect that in certain circumstances widespread consultation may be disproportionate to the		R002v4 NSLP Reg19 Reps AH Dec25.pdf

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						development proposal in question. The policy should entertain flexibility in this respect. We are concerned that the final component of the policy, relating to design review, is imprecise and leaves considerable uncertainty as to the circumstances in which design review will be expected or required. While recognising the role performed by the design review process, and the value it can add, there should be no binding requirement on applicants to undertake this exercise and it instead remain at their own discretion, based on the circumstances of the case. In instances such as at Bridge Farm, the well established design principles approved by the Council in relation to nearby Mead Fields, for example, A modification in this respect would continue to promote design review while ensuring that panels continue to ensure they offer value to applicants and the wider planning process, rather than becoming		
SP5: Towns	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Yes	Yes		Our client is supportive of this policy, which reflects the proposed settlement hierarchy and the presumption that the greatest levels of growth should be focused on the most sustainable settlements alongside the strategic new allocations. In particular, our client supports the third draft policy criterion requiring that developments: “Optimise housing densities and the use of other land, particularly at town centres and at accessible locations such as transport hubs. This criterion reinforces the focus on maximising residential efficiency at the most accessible locations, such as those in close proximity to bus and rail stops and those within convenient walking and cycling distance of a range of day-to-day services and facilities.		R002v4 NSLP Reg19 Reps AH Dec25.pdf
SP8: Housing	No	‣ Positively prepared	Yes	Yes		Our client is supportive of this policy, which inter alia recognises the inherent sustainability of Weston-super-Mare as the area’s		R002v4 NSLP Reg19 Reps AH Dec25.pdf

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		• Justified • Effective • Consistent with national policy				principal settlement and a suitable location for development at a strategic scale. We note that nearly one third of the Council's housing is expected to come forward at Weston, at least 7,730 homes over the plan period. Our client is supportive of the identification of Weston as a focus for growth, and supportive of the objective of providing a range of house sizes, tenures and affordable units. We agree that the Council will be reliant on a mix of urban extensions, smaller urban sites, new strategic development locations such as Banwell and Woodspring, together with generally smaller village and rural sites to create a diversified and resilient source of housing that provides the varied accommodation required across North Somerset. Alongside this strategy, it is critical that the Local Plan supports the bringing forward of urban land where available, maximising the efficient use of land for new homes given the challenges for securing a sufficient supply of housing and the fact that such sites, in requiring less additional infrastructure by keying into existing provision, are often quicker to deliver and may come forward sooner in the plan period.		
SP11: Historic and natural environment	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes		We would observe that this policy captures a broad range of objectives, including landscape, heritage, ecology, green and blue infrastructure together with settlement identity and strategic gaps. In respect of the latter, it is noted that this is, in its own terms, 'strategic' in nature and, like the Green Belt, not for the purposes of highlighting or assessing landscape or other character or quality; it is simply a tool for resisting development. This should therefore be omitted from the policy as it unduly conflates specific characteristics with spatial planning initiatives. It is noted that the policy seeks to 'protect the best and most versatile		R002v4 NSLP Reg19 Reps AH Dec25.pdf

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						agricultural land' and this objective is supported as consistent with national planning policy. It would not be reasonable or appropriate to go beyond this in terms of unduly restricting development in areas of higher agricultural quality, however, given the need to balance the objective of protecting BMV land with securing the right development in the right places, with associated technical requirements.		
Policy LP5: Housing, employment and mixed use allocations	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Yes	Yes		Given the identification of Weston-super-Mare as the authority area's most sustainable settlement and a focus for growth, together with the evidenced deliverability at scale of our client's site, we consider the site should be included as a housing allocation notwithstanding its location within the settlement boundary for Weston. Doing so would secure greater certainty as to its intended use, as well as an indicative number of dwellings which could be factored into the Council's housing land supply. It is noted that 87no. dwellings is well above the Council's minimum of 10no. units for residential allocation, and therefore would make a meaningful contribution in this respect.		R002v4 NSLP Reg19 Reps AH Dec25.pdf
Policy LP7: Settlement boundaries	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy				Our client supports the principle of draft policy LP7 insomuch as it provides clarity the development will be deemed acceptable as a matter of principle within the settlement boundaries. This must however be read alongside our representations in respect of other proposed land use policies, including safeguarding, which suffers from significant shortcomings prejudicial to the objectives of LP7.		R002v4 NSLP Reg19 Reps AH Dec25.pdf
Policy LP11: Transport infrastructure, allocations and safeguarding	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national	Yes	Yes	Emerging policy supports the transport initiatives listed at Schedule 7 of the draft plan, including inter alia: "Worle railway station – including Transport Hub and railway station car park expansion". Draft Policy LP11 states in this regard: "Land is allocated or safeguarded and defined on the Policies Map and set out in Schedule 7, which forms part of this policy, for the delivery of transport schemes, the improvement of existing services or the creation of sustainable transport links and facilities."	In order to remedy this deficiency, we therefore recommend that reference to safeguarding for car park expansion is omitted from Schedule 7 and from the associated Proposals Map.		R002v4 NSLP Reg19 Reps AH Dec25.pdf

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		policy			Our client wishes to reiterate our continued resistance to draft policy LP11 insofar as it relates to the renewal of a safeguarding designation for railway parking for Worle station within the south western part of our client's site. We have set out in our previous representations the reasons for this, but in summary: There appears to be no direct evidence or justification to support the retention of the safeguarded area; There has been no evidence of any attempt to secure the land for such purposes throughout the entirety of the current plan period; and There is no evidence of the consideration of alternative provision, including the intensification of parking within the area already occupied by such. Although the supporting text cites the West of England Joint Local Transport Plan (JLTP) 4 as the source of the justification for the initiatives listed, itself a document over five years old, as highlighted in our previous recommendations there is no express recommendation from that report that additional car parking at Worle is necessary or desirable, with its focus being on platform lengthening and increased active travel connectivity. The Local Plan Transport Assessment (LPTA) of October 2025 is the principal evidence base document supporting the Transport policies of the emerging Local Plan, and sets out both the Council's justification and key aspirations for this element of the plan. It appears that nowhere in this document is there further evidence of any pronounced need a) for additional rail parking at Worle station, or b) that this must or should be accommodated within the south western part of our client's site. Notably, the section 'LP8: Transport infrastructure, allocations and safeguarding and Schedule 7' from para. 1.16 onwards focused on Nailsea & Backwell station and does not mention Worle station at all. Notably, the LPTA states at paragraph 4.13 the aspiration in relation to the Wolvershill strategic development location for "A network of active travel routes is proposed throughout the development, connecting Wolvershill with existing communities and key facilities such as the rail station at Worle, Banwell village and the various community facilities at Parklands Village such as the district centre and the Winterstoke Hundred Academy." The clear implication of the Council's intention, quite rightly, is to ensure that strategic development is provided with a properly integrated active travel strategy, linking with the continued development of Parklands Village, as the principal means of facilitating connectivity with onward rail services included from Worle. Similarly, paragraph 4.22 states "Bus connectivity between Wolvershill and Worle rail station would provide an access to rail services on the Bristol to Taunton line. Timetables would need to be co-ordinated to reduce interchange penalties (i.e. waiting times between services) and maximise patronage. Providing bus			

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					connectivity between Wolvershill and Parklands Village would provide an alternative, no-car based option for travel between the two communities, ensuring each can benefit from the range of amenities and facilities provided." 4.13. To prioritise vehicular journeys to and from Worle station would clearly be a retrograde step in sustainability terms, and risks undermining the Council's laudable ambitions for the promotion of active travel and public transport, particular for its new communities. Taken relative to the prospect of residential development on our client's land, this would also mean perhaps 150 likely single-occupancy car journeys per day as opposed to c.25 homes located in as close proximity as possible to this transport node. In practice, it is also questionable how desirable such provision would be in the minds of the future occupiers of developments such as Parklands Village, who if accessing Worle Station by private car would face the running costs of their initial journey, the cost of a day's parking, then the cost of their rail fare, when the prospects of utilising the public transport and active travel connections delivered in connection with the strategic development are more likely. Those intent on using the private car would likewise be more likely to proceed directly to their destination. The Council is reminded of the content of Paragraph 001 Reference ID: 66-001-20190722 of the PPG: 'What evidence can be used to help determine whether land should be reallocated for a more deliverable use?', which states in full: "When considering whether there is a realistic prospect of an allocated site being developed for its intended use, it may be relevant to take into account factors such as: the length of time since the site was allocated in the development plan; the planning history of the site including any planning applications or pre-application enquiries; whether there is evidence that the site has been actively marketed for its intended use for a reasonable period, and at a realistic price; and whether there are any changes of circumstance that mean that take-up of the site for its intended use is now unlikely. Where an alternative use for the allocated site is proposed, it will also be relevant to consider the extent to which evidence suggests the alternative use would address an unmet need, as well as the implications for the wider planning strategy for the area and other development plan policies." 4.16. The sentiment of the PPG could not be clearer in this respect; essentially, authorities should not resist the reallocation of land where there is plainly no realistic prospect of the site being developed for its intended use. In this instance, the proposed retention of safeguarding in the absence of any sound justification represents the simple rolling forward of an existing unfulfilled policy at the expense of development that would both: Address an unmet need, namely the acute need for new housing; Conform to the wider planning strategy for the area, namely Weston's being a principal target for growth and self-containment; and Comply with all other development plan policies, considered in the context of national policy. The PPG thus points directly to the consideration of alternative			

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					uses of, in this case, safeguarded land, and we would endorse residential development as that alternative use in the circumstances. In the light of the above, we are firmly of the view that the Policy LP11, in this specific respect, is unsound it is not positively prepared, effective or justified.			

Name: Ava Bates **I.D:** 62850817

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I am 14 and I moved to Backwell from Bristol when I was 7. Having green fields around me and woods and nature instead of concrete made me feel calmer straight away. I am happier here than in the city and I love Backwell. I am passionate about animals and the environment. If we keep building more and more houses on green fields there will be nowhere left for nature and animals, and nowhere for us to grow food to eat. There is already so many new houses being built or planned in Backwell. Its just not right to plan even more. It will ruin our village.			

Name: Avon Wildlife Trust **I.D:** 58448865

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SP3: Spatial strategy	Yes		No	Yes	Avon Wildlife Trust’s priorities are to maintain and improve recognised nature-rich places and to strengthen the networks between these sites to help nature recover. Maintaining, creating, connecting and restoring a diverse range of habitats to create thriving nature recovery networks across the region is a key part of our vision. Ensuring that cohesive areas around sensitive and ecologically important sites (buffer or impact risk zones) are protected is a key part of this. North Somerset is facing unprecedented development pressures from housing development and associated major infrastructure such as upgrading of the A38, the Banwell bypass, Bristol Airport expansion, and the installation of Hinkley Point C power lines. Avon Wildlife Trust acknowledges the government housing requirement for North Somerset of 23,895 dwellings over the 15-year plan period (an increase in 8,620 dwellings above the proposed target within the 2024 Regulation 19 Pre-submission Draft) presents the council with significant challenges. According to data set out in the Spatial Strategy Site Selection and Capacity Paper (Oct 2025), 27% of the 24,495 housing capacity identified is located within Green Belt with the potential to resulting in significant impacts to habitat connectivity and nature recovery. This significant number and the associated impact on Green Belt are of concern. Releasing land from Green Belt, is likely to threaten the integrity and connectivity of both designated sites and non-designated sites, across this area and beyond, which are critically important for biodiversity. We believe the current proposals ignore the cumulative effects of development and feel that assessments undertaken to date consider the impacts of allocation areas and loss of Green Belt in isolation; this risks undermining our collective ability to protect nature now and in the future. Within Policy SP7 – Green Belt, twelve sites have been identified for release from the Green Belt to support residential development - amounting to over 6,600 dwellings. However, the draft plan is not transparent on the maximum area of land that could potentially be released under SP7 and how this compares to the areas of new green belt being created. Avon Wildlife Trust is concerned that this plan will directly contribute to the cumulative erosion of local biodiversity networks. We believe the scale and location of the losses likely to result are in direct contravention of the National Planning Policy Framework (NPPF) Section 13 Protecting Green Belt Land which identifies one of the five key objectives of Green Belt “to assist in safeguarding the countryside from encroachment;” Furthermore NPPF Section 15 Conserving and Enhancing the Natural Environment sets out the requirement for planning policies and decisions to contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes and sites of biodiversity value and by establishing coherent ecological networks that are more resilient to current and future pressures. Again, we feel this			

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					requirement is not currently being met by the draft plan Section 40 of Natural Environment and Rural Communities Act 2006 places a duty on public bodies to contribute to the coherence and resilient ecological networks. There is concern that some of the allocations currently set out in the draft plan will adversely affect this coherence and resilience of valuable ecological networks in North Somerset. We also believe some of the proposals undermine the principles of the North Somerset Local Nature Recovery Strategy (LNRS), which establishes priorities and specific actions to drive nature's recovery and provide wider environmental benefits within the region- requirements set out by Government in the Environment Act 2021. Under Section 102 of the Act, public authorities are obligated to conserve and enhance biodiversity, and in turn, have regard to the relevant local nature strategies, particularly when making planning policies. LNRS can serve to integrate local nature recovery strategies into the planning system, so areas of greatest potential for nature recovery can be better reflected in planning decisions. We believe that where land has been identified as having particular potential for habitat creation or nature recovery within the LNRS, the Local Plan should contribute towards the identified outcomes. This is not currently the case.			
SP7: Green Belt	Yes		No	Yes	Within Policy SP7 – Green Belt, twelve sites have been identified for release from the Green Belt to support residential development - amounting to over 6,600 dwellings. However, the draft plan is not transparent on the maximum area of land that could potentially be released under SP7 and how this compares to the areas of new green belt being created. Avon Wildlife Trust is concerned that this plan will directly contribute to the cumulative erosion of local biodiversity networks. We believe the scale and location of the losses likely to result are in direct contravention of the National Planning Policy Framework (NPPF) Section 13 Protecting Green Belt Land which identifies one of the five key objectives of Green Belt "to assist in safeguarding the countryside from encroachment;" Furthermore NPPF Section 15 Conserving and Enhancing the Natural Environment sets out the requirement for planning policies and decisions to contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes and sites of biodiversity value and by establishing coherent ecological networks that are more resilient to current and future pressures. Again, we feel this requirement is not currently being met by the draft plan			
Policy LP3: Strategic location: Nailsea and Backwell	Yes		No	Yes	The current proposal for this allocation breaches sections 124, 188, and 192 of the NPPF. The additional housing allocations sites identified on the periphery of Nailsea and Blackwell will result in the loss of Green Belt land and, along with the development of the Station Road to A370 Cross Rail Link, will reduce the extent of the undeveloped east-west corridor between Nailsea and Blackwell. Whilst we welcome the creation of new Green Belt land to the southwest and northwest of Nailsea, we believe there will be an overall net loss of greenspace across the plan area. Housing allocation to the south of Nailsea will also result in the increased isolation of Youngwood Lane SNCI, reducing connectivity of habitats and species and resulting in lost opportunities to create larger habitat corridors in the future. In addition, land in this area is near the Somerset Levels and Moors, a sensitive internationally designated area; additional development around Nailsea and Blackwell will increase pressure on these sites particularly resulting from urban runoff and poor water quality. The delivery of Nature Parks is mentioned within the Plan, as a requirement to offset impacts on bat habitats. Insufficient information is provided about Nature Parks to ascertain whether this is appropriate mitigation for impacts on the Bats Special Area of Conservation (SAC).			
Policy LP4: Strategic location: Pill and Easton-in-Gordano	Yes		No	Yes	This allocation threatens a suite of sites of local conservation interest including Ox House Bottom and Markham Brook SNCI, Fields west of Blackmoor Road SNCI, St Georges Flower Bank SNCI and the Pill Paddock site; these sites are all located within an area currently designated as Green Belt and they provide valuable habitat corridors between the River Avon and habitats to the south of Pill. In addition, several areas of land within and adjacent these sites are identified as either areas of importance for biodiversity or focus areas for nature's recovery within the LNRS. The strategic allocation at it currently stands will reduce the buffer zones between these sites, increasing their isolation, reducing biological connectivity and threatening their long-term viability, as well as the potential for them to support wider nature recovery. The scale of the loss of Green Belt within the proposal is of significant concern. The current proposal for this allocation breaches sections 124, 188, and 192 of the NPPF.			
Land at Bridgwater Road	Yes		No	Yes	There are a number of local, national and international nature conservation designations within 500m of the allocation sites. Development in these two areas has the potential to disrupt the connectivity between these sites which currently provide a corridor between habitats to the east and those in the west, the latter including protected areas such as the Mendips NNR, the Severn Estuary SPA/SAC/SSSI complex and the Avon Wildlife Trust reserve of Walborough Nature Reserve. The current proposal for this allocation breaches sections 124, 188, and 192 of the NPPF.			

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Uphill Grange, Uphill	Yes		No	Yes	There are a number of local, national and international nature conservation designations within 500m of the allocation sites. Development in these two areas has the potential to disrupt the connectivity between these sites which currently provide a corridor between habitats to the east and those in the west, the latter including protected areas such as the Mendips NNR, the Severn Estuary SPA/SAC/SSSI complex and the Avon Wildlife Trust reserve of Walborough Nature Reserve. The current proposal for this allocation breaches sections 124, 188, and 192 of the NPPF.			
Land at Tower Farm	Yes		No	Yes	The current proposal for this allocation breaches sections 124, 188, and 192 of the NPPF, and Section 40 of Natural Environment and Rural Communities Act 2006. Both Tower and Black Rock allocation sites will result in the loss of Green Belt land and significantly reduce the buffer area around Weston Big Wood SSSI, considered to be one of the most important biodiversity sites in North Somerset. The ancient woodlands at Weston Big Wood have developed over centuries and are now amongst the most fragile and rare of all landscapes in the country. Once damaged they cannot be restored. Under DP35 of this draft Plan (Nature Conservation), it is clearly stated that “development within or in proximity to a Site of Special Scientific Interest (SSSI) or National Nature Reserve that is likely to have a direct or indirect adverse effect on its biodiversity or geological interest will not normally be permitted”. The SSSI is currently in unfavourable declining condition, due to the existing level of footfall, with biodiversity in the wood land and surrounding area already having been significantly reduced. Weston Big Wood is an integral part of the Gordano Vally nature reserve stretching from the Severn estuary, through Portbury Wharf Nature reserve, along the Gordano Valley to the Somerset Levels and Mendips and is of national strategic environmental importance. Degrading it further by additional development will result in the loss of a key part of the Gordano Valley environment and impact negatively on the wildlife, flora and ecology of the whole Gordano Valley. The wood requires a substantial buffer zone and a wildlife corridor in and out of the site in order to survive and regenerate. Any allocations in the area should be planned to take account of the integrated nature and value of the Gordano valley as a whole. In conclusion NPPF Section 15, para 192 states that plans should safeguard the components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity wildlife corridors and stepping stones that connect them as well as promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species. At present there are elements of the plan as outlined above that threaten existing ecological networks, including the loss of Green Belt, and through damaging connections between international, national and locally designated sites and significant loss of the corridors and stepping stones that connect these sites. Specific proposals also undermine the North Somerset Local Nature Recovery Strategy (LNRS) which sets out priorities and actions to drive nature’s recovery, as well as identifying specific locations where nature’s recovery should be prioritised.			
Black Rock, north of Clevedon Road	Yes		No	Yes	Both Tower and Black Rock allocation sites will result in the loss of Green Belt land and significantly reduce the buffer area around Weston Big Wood SSSI, considered to be one of the most important biodiversity sites in North Somerset. The ancient woodlands at Weston Big Wood have developed over centuries and are now amongst the most fragile and rare of all landscapes in the country. Once damaged they cannot be restored. Under DP35 of this draft Plan (Nature Conservation), it is clearly stated that “development within or in proximity to a Site of Special Scientific Interest (SSSI) or National Nature Reserve that is likely to have a direct or indirect adverse effect on its biodiversity or geological interest will not normally be permitted”. The SSSI is currently in unfavourable declining condition, due to the existing level of footfall, with biodiversity in the wood land and surrounding area already having been significantly reduced. Weston Big Wood is an integral part of the Gordano Vally nature reserve stretching from the Severn estuary, through Portbury Wharf Nature reserve, along the Gordano Valley to the Somerset Levels and Mendips and is of national strategic environmental importance. Degrading it further by additional development will result in the loss of a key part of the Gordano Valley environment and impact negatively on the wildlife, flora and ecology of the whole Gordano Valley. The wood requires a substantial buffer zone and a wildlife corridor in and out of the site in order to survive and regenerate. Any allocations in the area should be planned to take account of the integrated nature and value of the Gordano valley as a			

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					whole. In conclusion NPPF Section 15, para 192 states that plans should safeguard the components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity wildlife corridors and stepping stones that connect them as well as promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species. At present there are elements of the plan as outlined above that threaten existing ecological networks, including the loss of Green Belt, and through damaging connections between international, national and locally designated sites and significant loss of the corridors and stepping stones that connect these sites. Specific proposals also undermine the North Somerset Local Nature Recovery Strategy (LNRS) which sets out priorities and actions to drive nature's recovery, as well as identifying specific locations where nature's recovery should be prioritised. The current proposal for this allocation breaches sections 124, 188, and 192 of the NPPF and Section 40 of Natural Environment and Rural Communities Act 2006.			
Land north of Colliter's Way, Long Ashton	Yes		No	Yes	This Green belt land currently provides connectivity between a number of SNCIs including Barrow Tanks, Hanging Hill Wood and Dawsons Walk and Lye Brook SNCIs. Several watercourse corridors crossing the allocation site, as well as land to the north, south and west of the allocation have been identified as focus areas for natures recovery within the LNRS. We believe connectivity between these sites and wider areas of undeveloped land will be threatened by development in this location and the overarching objective of the LNRS in this area will be undermined should this allocation be taken forward. The current proposal for this allocation breaches sections 124, 188, and 192 of the NPPF.			

Name: Avon and Somerset Constabulary **I.D:** 62877633

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Policy LP7: Settlement boundaries	No	• Effective • Consistent with national policy	Unsure	Unsure	ASP welcomes the terms of Policy SP1 (Sustainable Development) which requires new development to contribute towards the creation of healthy, safe and cohesive communities, tackling inequalities and the Spatial Strategy (Policy SP3) to give priority to directing growth in the most sustainable locations with a focus at the towns and urban areas, maximising the use of previously developed land. However, the plan does not go far enough to meet the requirements of paragraph 101 of the National Planning Policy Framework to work proactively with statutory bodies to plan for required facilities. Significant weight should be placed on the importance of new, expanded or upgraded public service infrastructure. Policy LP7 – Settlement Boundaries and Policy LP9 – Extent of Green Belt (and associated Appendix 5 and Policies Map): The Council has sought to remove land from the Green Belt at the most sustainable locations to meet housing needs (page 20), however, it has not sought to revise the Green Belt boundaries to support the expansion of Avon and Somerset Police Headquarters at Portishead, as illustrated by the accompanying Policies Map (see attached document). With an anticipated population growth across North Somerset of around 55,000 people over the plan period, it is vital that ASP has sufficient space within its Headquarters to develop new facilities to resource policing of the expanded population. The Police Headquarters lies largely within the settlement boundary of Portishead, however two fields to the south of the estate are washed over by the Green Belt. The Green Belt extends further south and protects the Gordano valley. These fields lie outside the defined settlement boundary of Portishead. For clarity, the fields are identified in the attached document by the red boundary line. The Green Belt status of these land parcels, combined with their location outside the settlement boundary,	Appendix 5 should be amended to accompany Policy LP7, referring to amendments to the settlement boundary at Portishead around Portishead Police Headquarters. The wording of Policy LP9 should be amended to refer to removal of land from the Green Belt at the Avon and Somerset Police Headquarters at Portishead. The Policies Map should be amended accordingly to identify the full extent of the Headquarters within the settlement boundary and outside the Green Belt. The southern boundary of the Headquarters is clearly		251118 Local Plan Reg 19 reps FINAL.pdf Representation form Part B LP7.docx

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					limits their purpose within the headquarters estate. As a result, ASP already rent additional accommodation off-site to accommodate some facilities which could otherwise be delivered at the headquarters. Avon and Somerset Police objects to the extent of Green Belt retained through Policy LP9 and the associated failure to amend the settlement boundary under Policy LP7. Removal of the full extent of the headquarters from the Green Belt and inclusion within the settlement boundary of Portishead would enable the headquarters estate to be used more efficiently and effectively to meet the operational needs of the police service, to consolidate key policing functions, which are currently accommodated elsewhere, to enable colocation of facilities, where appropriate, and to accommodate other related regional and national functions in response to government policy in a central police facility in a sustainable, accessible location. Retention of the Green Belt across the southern portion of the Headquarters presents significant limitations on the future development and operation of the Headquarters. The existing facilities within the Headquarters require upgrading to meet current and anticipated operational needs. A significant amount of the existing building floorspace is used for storage of evidence and seized goods. However, there remains insufficient space within the permanent buildings and there are numerous shipping containers on-site, occupying areas of hardstanding, which provide further storage facilities for seized goods. This is suboptimal and should be replaced with permanent, purpose-built facilities. Due to the nature of the police operations, there is a high demand for car parking at the HQ. Although current provision is adequate, it limits scope for further development on the land within the settlement boundary as any new development would likely involve the loss of car parking and/or a need for further car parking provision within the estate to meet the needs of additional officers and staff. There is a network of ecologically sensitive sites within the estate which are identified in the Adopted Local Plan. Whilst these designations are removed from the emerging Local Plan, the land is likely to have a relatively high ecological value which may prove to be prohibitive to new development or at least limit the extent to which this land can be developed. In addition, these areas of open space are a valuable wellbeing resource for officers and staff, who can be faced with traumatising, distressing situations in their work and need quiet space, in nature, to decompress. As a result, the loss of these areas is unlikely to be compatible with the Constabulary's pastoral care responsibilities to its people. As a result, the existing areas of hardstanding within the HQ are likely to be required to enable redevelopment of existing buildings and development of permanent facilities to replace existing temporary storage units. The existing green spaces, due to their ecological value are likely to have limited scope for development. Accordingly, there is limited capacity within the settlement boundary of the HQ to accommodate new development beyond the replacement and enhancement of the existing facilities. In the context of the Local Plan serving to meet the development requirements of the area up to 2041, there is unlikely to be sufficient land available to meet the growing operational requirements of the constabulary or any current or future regional or national policing operational needs, unless the full extent of the headquarters estate is removed from the Green Belt and placed within the settlement boundary of Portishead. There are exceptional circumstances to justify the removal of the land from the Green Belt, namely: - the benefits of a colocation of wider policing functions within the Headquarters, such as greater collaboration and more effective joint working across the force and reductions in the need to travel between police facilities. - The intensification of the Headquarters, providing value to the public purse in avoiding the need to purchase land elsewhere or incur other capital and revenue cost, particularly given the funding constraints for public services currently. - Limiting development to the Headquarters outside of the Green Belt, could hamper the ability to benefit from greater consolidation of the crown estate dedicated for criminal justice and policing agencies. In addition, policing continually evolves in response to changes in demand, crime patterns and societal shifts. It operates within a volatile, uncertain, complex and ambiguous environment requiring changes to its model of operation in response. The flexible deployment of the estate assets owned by the Police and	defined by mature tree planting and demarcates a clear boundary between the built form of the police estate and the open fields beyond. This boundary provides a clear and defensible boundary for the revised Green Belt.		

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					Crime Commissioner is a key enabler, alongside coherent strategic planning. The Police Efficiencies and Collaboration Programme launched earlier this year, will bring renewed vigour to achieving efficiencies and savings through business change and transformation, freeing up funds to invest in the Safer Streets initiative. Avon and Somerset is one of the largest forces in the southwest. It is anticipated that over the timeframe of this Local Plan period there will be: 1. opportunities for the Constabulary to release revenue costs from other commercial rental properties which continue to accommodate various policing functions; 2. a potential requirement to address unmet need for operational training facilities, and the need to share, regionalise or merge policing and other public service functions (see above). There will be a continued need for a helicopter landing pad within the estate. This is currently provided on the field in the south-east corner of the estate (within the Green Belt). ASP also own land to the south of the existing Headquarters which might meet this purpose in the future. In addition, sufficient open space will need to be retained for officer and staff wellness, of particular importance given the stresses and strains of policing, operational training including dogs, student police officer training and major incident operations. Removal of the existing HQ site from the Green Belt and inclusion within the settlement boundary will provide maximum flexibility for the Constabulary to develop the estate in a manner which is optimal to meet its operational needs now, and in the future, whilst retaining or creating open spaces to meet a range of needs. The Council accepts that land at Tower Farm, immediately south-east of the Police HQ qualifies as Grey Belt on the basis that the land does not strongly contribute to Green Belt purposes a, b or d, there are no Footnote 7 constraints to provide a strong reason for refusal and the release of the site from the Green Belt would not fundamentally undermine the five purposes of the remaining Green Belt. In light of the Council's conclusions in respect of the extensive tract of Green Belt land at Tower Farm and the commonality between the attributes of the Green Belt on Tower Farm and the Police HQ, it can only be concluded that the Green Belt land in the Police HQ must also be regarded as Grey Belt and that the release of this land would not fundamentally undermine the purposes of the remaining Green Belt. Its location on the edge of Portishead, one of the main towns in the District and its relationship with the established Police Headquarters would promote a sustainable pattern of development in accordance with the Framework. As drafted, Policies LP7 and LP9 and the associated extent of Green Belt and defined settlement boundary shown on the Policies Map at Portishead are unsound and contrary to national planning policy (the Framework). The plan does not provide adequate provisions for development of the Portishead Headquarters to meet the operational needs of the police service to manage an expanded population over the plan period and beyond, contrary to the following provisions of the Framework: 1. Paragraph 96 which requires planning policies to achieve healthy, inclusive and safe places. 2. Section 8 which requires planning policies to achieve healthy, inclusive and safe places, in particular paragraph 101 which requires local planning authorities to work proactively and positively with statutory bodies to plan for required facilities. 3. Significant weight should be placed on the importance of new, expanded or upgraded public service infrastructure when considering proposals for development (paragraph 101). 4. Planning policies should promote public safety and take into account wider security and defence requirements including for operational defence and security purposes (paragraph 102b). 5. Paragraph 135 which requires planning policies to ensure that developments create places that are safe, where crime and disorder and the fear of crime do not undermine the quality of life or community cohesion and resilience. The removal of the Green Belt designation on the Portishead Police Headquarters, coupled with the extension of the Portishead settlement boundary to include the full extent of the Headquarters would enable the plan to comply with the Framework and ensure the police service can meet its operational needs within the existing headquarter estate			

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Policy LP9: Extent of the Green Belt	No	• Effective • Consistent with national policy	Unsure	Unsure	ASP welcomes the terms of Policy SP1 (Sustainable Development) which requires new development to contribute towards the creation of healthy, safe and cohesive communities, tackling inequalities and the Spatial Strategy (Policy SP3) to give priority to directing growth in the most sustainable locations with a focus at the towns and urban areas, maximising the use of previously developed land. However, the plan does not go far enough to meet the requirements of paragraph 101 of the National Planning Policy Framework to work proactively with statutory bodies to plan for required facilities. Significant weight should be placed on the importance of new, expanded or upgraded public service infrastructure. Policy LP7 – Settlement Boundaries and Policy LP9 – Extent of Green Belt (and associated Appendix 5 and Policies Map): The Council has sought to remove land from the Green Belt at the most sustainable locations to meet housing needs (page 20), however, it has not sought to revise the Green Belt boundaries to support the expansion of Avon and Somerset Police Headquarters at Portishead, as illustrated by the accompanying Policies Map (see attached document). With an anticipated population growth across North Somerset of around 55,000 people over the plan period, it is vital that ASP has sufficient space within its Headquarters to develop new facilities to resource policing of the expanded population. The Police Headquarters lies largely within the settlement boundary of Portishead, however two fields to the south of the estate are washed over by the Green Belt. The Green Belt extends further south and protects the Gordano valley. These fields lie outside the defined settlement boundary of Portishead. For clarity, the fields are identified in the attached document by the red boundary line. The Green Belt status of these land parcels, combined with their location outside the settlement boundary, limits their purpose within the headquarters estate. As a result, ASP already rent additional accommodation off-site to accommodate some facilities which could otherwise be delivered at the headquarters. Avon and Somerset Police objects to the extent of Green Belt retained through Policy LP9 and the associated failure to amend the settlement boundary under Policy LP7. Removal of the full extent of the headquarters from the Green Belt and inclusion within the settlement boundary of Portishead would enable the headquarters estate to be used more efficiently and effectively to meet the operational needs of the police service, to consolidate key policing functions, which are currently accommodated elsewhere, to enable colocation of facilities, where appropriate, and to accommodate other related regional and national functions in response to government policy in a central police facility in a sustainable, accessible location. Retention of the Green Belt across the southern portion of the Headquarters presents significant limitations on the future development and operation of the Headquarters. The existing facilities within the Headquarters require upgrading to meet current and anticipated operational needs. A significant amount of the existing building floorspace is used for storage of evidence and seized goods. However, there remains insufficient space within the permanent buildings and there are numerous shipping containers on-site, occupying areas of hardstanding, which provide further storage facilities for seized goods. This is suboptimal and should be replaced with permanent, purpose-built facilities. Due to the nature of the police operations, there is a high demand for car parking at the HQ. Although current provision is adequate, it limits scope for further development on the land within the settlement boundary as any new development would likely involve the loss of car parking and/or a need for further car parking provision within the estate to meet the needs of additional officers and staff. There is a network of ecologically sensitive sites within the estate which are identified in the Adopted Local Plan. Whilst these designations are removed from the emerging Local Plan, the land is likely to have a relatively high ecological value which may prove to be prohibitive to new development or at least limit the extent to which this land can be developed. In addition, these areas of open space are a valuable wellbeing resource for officers and staff, who can be faced with traumatising, distressing situations in their work and need quiet space, in nature, to decompress. As a result, the loss of these areas is unlikely to be compatible	Appendix 5 should be amended to accompany Policy LP7, referring to amendments to the settlement boundary at Portishead around Portishead Police Headquarters. The wording of Policy LP9 should be amended to refer to removal of land from the Green Belt at the Avon and Somerset Police Headquarters at Portishead. The Policies Map should be amended accordingly to identify the full extent of the Headquarters within the settlement boundary and outside the Green Belt. The southern boundary of the Headquarters is clearly defined by mature tree planting and demarcates a clear boundary between the built form of the police estate and the open fields beyond. This boundary provides a clear and defensible boundary for the revised Green Belt.		251118 Local Plan Reg 19 reps FINAL.pdf Representation form Part B LP9.docx

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					Portishead, one of the main towns in the District and its relationship with the established Police Headquarters would promote a sustainable pattern of development in accordance with the Framework. As drafted, Policies LP7 and LP9 and the associated extent of Green Belt and defined settlement boundary shown on the Policies Map at Portishead are unsound and contrary to national planning policy (the Framework). The plan does not provide adequate provisions for development of the Portishead Headquarters to meet the operational needs of the police service to manage an expanded population over the plan period and beyond, contrary to the following provisions of the Framework: 1. Paragraph 96 which requires planning policies to achieve healthy, inclusive and safe places. 2. Section 8 which requires planning policies to achieve healthy, inclusive and safe places, in particular paragraph 101 which requires local planning authorities to work proactively and positively with statutory bodies to plan for required facilities. 3. Significant weight should be placed on the importance of new, expanded or upgraded public service infrastructure when considering proposals for development (paragraph 101). 4. Planning policies should promote public safety and take into account wider security and defence requirements including for operational defence and security purposes (paragraph 102b). 5. Paragraph 135 which requires planning policies to ensure that developments create places that are safe, where crime and disorder and the fear of crime do not undermine the quality of life or community cohesion and resilience. The removal of the Green Belt designation on the Portishead Police Headquarters, coupled with the extension of the Portishead settlement boundary to include the full extent of the Headquarters would enable the plan to comply with the Framework and ensure the police service can meet its operational needs within the existing headquarter estate			
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Name: Ayalvadi Ganesh **I.D:** 62842913

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I have the following concerns about the North Somerset Local Plan in relation to this proposed development: 1. The development uses up a significant amount of top-grade agricultural land. It is unclear to me whether alternatives have been adequately considered, either in terms of brownfield development, or higher density development at the proposed site in order to minimise the use of agricultural land, or densification elsewhere in the region. 2. The impact on transport demand will be substantial. There is already significant congestion during peak hours on the A370, and at all times on Station Road. While the proposed link road to the train station is welcomed, it is far from clear that it will be adequate to handle the additional demand generated by the development. It also seems that it will not relieve congestion on Station Road. 3. The development plan appears to disproportionately target Backwell for new development, when considered as a fraction of the existing population/ housing. For example, the proposal will increase the population of Backwell by around 80%, of Nailsea by around 55%, and of Clevedon by around 6%. The rationale behind such disproportional impacts needs to be justified more transparently. 4. The Infrastructure Delivery Plan lacks analysis and costings, and there are no funding guarantees for the proposed road or other services. 5. It seems that the development is on a flood plain. Have flood risks been adequately considered in the development plan?	Has thought been giving to the development of a cycling "superhighway", well separated from pedestrians, to run continuously from the proposed development to Bristol on one side and Nailsea on the other? Given that Backwell is mostly a commuter town, and the likely pricing of houses at the development will mostly attract those working in Bristol, transport needs to be considered more fully than it has in the current plan. Higher-density housing also needs to be considered, in order to minimise the use of Grade 1 agricultural land.		

Name: B Colston **I.D:** 58508097

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Black Rock, north of Clevedon Road	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	NATIONAL PLANNING POLICY ONLY ALLOWS GREEN BELT CHANGES IN EXCEPTIONAL CIRCUMSTANCES THESE HAVE NOT BEEN DEMONSTRATED BY NSC - ALTERNATIVE BROWNFIELD OR GREENFIELD SITES WITH FAR LOWER ECOLOGICAL IMPACT IN PORTISHEAD HAVE NOT BEEN CONSIDERED BY NSC BROWN FIELD SITES WOULD REMOVE THE NEED TO DEVELOP BLACKROCK AND TOWER FARM NSC HAS NOT CONSIDERED THE STRATEGIC ECOLOGICAL IMPORTANCE OF THESE SITES IN PROTECTING WESTON BIG WOOD (SSSI) AND THE GORDANO VALLEY CORRIDOR BOTH THESE SITES WERE ADDED TO THE GREEN BELT IN THE LATE 80S DUE TO THEIR HIGH ECOLOGICAL VALUE. BOTH SITES CAN NOT PROVIDE SAFE OR SUITABLE ACCESS THE CLEVEDON ROAD (BLACKROCK SITE) HAS MAJOR TRAFFIC PROBLEMS WHEN JUNCTIONS 19/20 OF THE M5 HAS TRAFFIC FLOW PROBLEMS (ACCIDENTS OR SUMMER CONGESTION) TRAFFIC USE THIS SMALL COUNTRY ROAD AS A DETOUR FROM THE MOTORWAY TRYING TO AVOID THE STATIONARY QUEUES BLACKROCK SITE HAS VERY LIMITED ACCESS TO A BUS ROUTE AND IS OVER A MILE AWAY FROM GP SURGERY OR SHOPS WHICH WILL CAUSE MORE TRAFFIC TO USE AN ALREADY CONGESTED ROAD INTO PORTISHEAD DEVELOPMENT OF BOTH THESE SITES WOULD CREATE UNACCEPTABLE TRANSPORT IMPACTS FAILING NATIONAL SOUNDNESS TESTS NSC ARE FAILING TO CONSIDER THE IMPACT ON THE ENVIRONMENT/ WESTON BIG WOOD AND ALL THE ANIMALS/WILDLIFE THAT LIVE IN IT	REMOVE BLACKROCK AND TOWER FARM FROM THE PLAN		

Name: B Forgham & J Charters **I.D:** 62857601

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Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Tower Farm Major disadvantages to the proposal are the access and egress considerations to established residents. This is already a no go area between 8am to 9 am and 3pm to 4pm due to traffic volume and double parking. The proposed plans do not resolve this. A brand new road out of the proposed estate leading onto Down Road on the other side of the school would need to be installed in order to cope with increased volume. Disrupting the existing road as shown on the plans will not achieve satisfactory regular and emergency traffic flows. The proposed area is already designated green belt due to them strategic importance of Weston Big Wood and the Gordano Valley corridor. Brownfield sites in Portishead and environs should be considered before attempts to rape the green belt by yet another grubby gold digging developer. Reduction in current resident council tax will be demanded due to the increased inconvenience to current residents, effect on property values in a select and sought after area, and the general degradation of an established green belt.			

Name: B Harland **I.D:** 29187873

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SP4: Placemaking	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Unsound because this is fantasy land The transport policy does not have enough information or adequate modelling. I am a lay person but there are huge assumptions being made upon which theories not evidence is compiled. This is certainly relevant to Backwell and Nailsea LP3 No understanding is shown of the traffic flows or local pressures, it feels like this has been put together to fit a site rather than genuine viability. Viability and feasibility studies Must be done before sites are allocated, not to do so undermines placemaking The IDP is a part finished unsatisfactory document that I am surprised pasted internal controls, it lacks substantive information on times scales, phasing and funding, It is therefore unsound and undermines any commitment to placemaking.	Create a proper needs analysis with feasibility and viability statements which are evidenced and costed, with time frames and actual cashflow projections rather than an unachievable undeliverable wish list Write an IDP rather than produce a box to be completed later		
Policy LP3: Strategic location: Nailsea and Backwell								
Policy LP16: Preferred Area for mineral working – land at Hyatts Wood Farm, south of Stancombe Quarry	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Due to the tip and the nearby Stancombe Quarry in Backwell suffer from a disproportionate number of HGVs, NSC know all of this and do nothing. Our nights are increasingly disturbed by all night jobs - this needs to stop and night time work limited to 6 times a year As it is sleep is disturbed by the airport - both affect our well being STOP There is too much strain on the N of NSC Hyatts wood area is being destroyed NSC are being disingenuous - NSC allows expansion - NSC allows pumping of excess what UP the hill to the Hyatts wood area - because the quarry has a big hole in the ground - it then runs down Backwell Hill, on to the A370 in Backwell and Flax, silting up our drains which are ignored and flooding Backwell Common which in the end gets into the River Kenn system	This Quarry is DONE Both the Quarries in this area are done STOP and look elsewhere Because the owner want to expand it does not mean that you say YES Where are the environmental risk assessments, the ecology assessments, this must all be done first but this feels pre determined.		
Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national	No	No	Backwell Lake (Surface Water Reservoir) and adjacent fields, where the new roads and housing is planned and are on a floodplain, which floods regularly. The NNPF Clearly states that you cannot build on a flood plain. The lake regularly overtops putting birdlife in this sanctuary at risk as well as the conservation This is an important strategic gap outside of the settlement boundary on a floodplain. Further building of 582 houses and the necessary bridge/new road infrastructure would require so much mitigation that the sites ae untenable.	The sheer volume of growth with the required investment infrastructure and services over such a short period is destabilising, unsustainable and undeliverable within the lifetime of the plan. The only sensible, fair and honest way forward is to remove this allocation. Reallocating some houses to each of the new villages, then to		

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		policy			This is the only site which would benefit from the new road across Backwell common, This road will never happen, there is no funding and the embankment is unstable. There is NO comment from network rail or GWR for addition rolling stock, the site itself is too far away for the average person to walk to the railway station or nearest bus stop. The transport plans are thin to say the least, full of assumptions, do not reflect reality. Yes we have a railway, but it is well documented in its inaccessibility, it is one of the most inaccessible in the country. Network rail and GWR have continually refused to address this as it is too expensive. The platform is short because the embankment is sensitive and unstable. This is the main line from Paddington to Penzance, these through trains are given priority. They do not all stop at Backwell, when they do you must be in the correct carriages to get off otherwise you are taken to Yatton and must make your way back. Cancellations are frequent, if a mainline train is late the smaller local trains are pulled or the larger trains fail to stop at Backwell. There is a good reason why we don't use the railway more, trains get pulled, cancelled, you book at seat, but it does not exist! Railway staff tell us that the rolling stock is at capacity, they do not have enough trains or staff OR line. There is no intention of investing in rail services on this line. Indeed, the highspeed rail link was stopped at Swindon, it did not even go as far as Bristol. If you are wheelchair bound, you must travel from Yatton. If you are elderly, have mobility issues, pushchairs or more than one child with you, the gap is so large you cannot get on or off. Even my husband who is fit said the other day as he arrived back from London that the gap was so intimidating to look down at he was not sure it was possible. We would appreciate the Inspector visiting the station and getting off at Backwell.	some of the larger villages which do not seem to have anything, like Wrington and finally give more to the urban areas that already have infrastructure and services. It is reasonable that each area takes some. Backwell would have been willing to take its fair share, 40% over 10 years we are told, will be tough, there is no support, NSC are close to another £10m deficit to cover – so there is no chance of the extra amenities we require to thrive.		
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	This plan is unsound and no justified for the following reasons. Nor do I think it is compliant, as the NPPF states that infrastructure and services must be planned accordingly. Residents and the Parish Council have repeatedly in planning application as well as previous iterations said that these schemes require support, yet people have been ignored. The numbers are disproportionate for Nailsea and Backwell, as a village we are set for a 7% allocation, the same as Portishead, which is a 26.5k population. The impact on Portishead with its ready facilities, new roads, accessibility to the M5 and soon to have a funded reinstated accessible railway. Ironically Portishead get a 14% population increase which they can easily absorb compared to Backwell's 80% population growth whereupon it will be swamped; left to our own devices without the necessary support. Clevedon another town gets 2% of the allocation. Backwell already has 800 new houses approved, a 40% increase for the village which we will have to absorb. Community halls and voluntary organisations are at capacity. Out thriving junior football club has to go out of the village to find facilities. These additional numbers would lead to complete overdevelopment. As yet we have 40% growth with no money for a new primary school, no money for infrastructure improvement, the NHS, early years provision etc. We have over 200 social housing coming which is brilliant except that no provision has been worked in to provide the support which we need. Backwell is not an employment centre, most people commute out of the village, this will continue. The employment area highlighted in the last Local Plan and Neighbourhood plan has still yet to be realised. There are currently retail units empty in Backwell. The previous consultation agreed on a urban centric model. The NHS does not have the resources to cope with 40% increase in population let alone 80% growth as highlighted in the Local Plan. In their submission to a recent planning application NHS said that further unsupported growth would put lives at risk. Due to the shortage in 5YLS the consent was given but no provision for the NHS made, only land for a new primary school. Two sites now give money for SEND children to be transported out of the village due to projected shortage in school places, this puts more traffic on the road and disenfranchises the most vulnerable. Parents of non-SEND children will have to get in a car and go to another school elsewhere. Land of Dark Lane and Grove Fam show these shortfalls. The Leisure Centre needs a huge injection	The sheer volume of growth with the required investment infrastructure and services over such a short period is destabilising, unsustainable and undeliverable within the lifetime of the plan. The only sensible, fair and honest way forward is to remove this allocation. Reallocating some houses to each of the new villages, then to some of the larger villages which do not seem to have anything, like Wrington and finally give more to the urban areas that already have infrastructure and services. It is reasonable that each area takes some. Backwell would have been willing to take its fair share, 40% over 10 years we are told, will be tough, there is no support, NSC are close to another £10m deficit to cover – so there is no chance of the extra amenities we require to thrive.		

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					of case, as it has never been renovated in the past 45 years, this is not factored into the IDP either. The IDP as evidenced for Backwell and Nailsea is a series of blanks and TBC's, totally disgraceful. No commitment to placemaking. The lack of infrastructure and services cannot support another 1,000 houses. This is a plan done on a wing and a prayer. Banwell bypass took over 50 years to delivery, this is the wrong place for more housing for a multitude of reasons. The proposed road would not effectively serve Nailsea's traffic or relieve congestion on Station Road, Backwell Common, or Chapel Hill. Engineering the road under or over the railway would be highly expensive and possibly unfeasible. This plan does not relieve station road of the local traffic or the Dark Lane, Cheston Coombe etc which has tiny roads through a conservation area as a rat run to the A38 and Airport, there are NO plans to sort this very issue. When there is an accident on the M5 we are gridlocked, unable to move from a to b as we are the alternative route, this includes congested rural lanes accessed by Satnavs, this happens every few weeks - or has done for months, we cannot cope with more traffic volume. The Airport which borders our Parish takes 28% of its 11mppa from Wales, much of that traffic coming from the west comes to our village of on the edge of it. The transport plans are thin to say the least, full of assumptions, do not reflect reality. Yes we have a railway, but it is well documented in its inaccessibility, it is one of the most inaccessible in the country. Network rail and GWR have continually refused to address this as it is too expensive. The platform is short because the embankment is sensitive and unstable. This is the main line from Paddington to Penzance, these through trains are given priority. They do not all stop at Backwell, when they do you must be in the correct carriages to get off otherwise you are taken to Yatton and must make your way back. Cancellations are frequent, if a mainline train is late the smaller local trains are pulled or the larger trains fail to stop at Backwell. There is a good reason why we don't use the railway more, trains get pulled, cancelled, you book at seat, but it does not exist! Railway staff tell us that the rolling stock is at capacity, they do not have enough trains or staff OR line. There is no intention of investing in rail services on this line. Indeed, the highspeed rail link was stopped at Swindon, it did not even go as far as Bristol. If you are wheelchair bound, you must travel from Yatton. If you are elderly, have mobility issues, pushchairs or more than one child with you, the gap is so large you cannot get on or off. Even my husband who is fit said the other day as he arrived back from London that the gap was so intimidating to look down at he was not sure it was possible. We would appreciate the Inspector visiting the station and getting off at Backwell. The Sustainability appraisal and needs analysis is lacking. There is no needs or viability analysis for an extra 1,000 houses. NSC only has 7% of grade Grade 1 Agricultural Land currently used for food crops and grazing. Backwell land being taken for 1683 houses is ALL grade one. This does not make sense for food security and biodiversity. Nailsea's housing land is all grade 2. Yet some grade 3 sites are ignored as are 23 Brown sites. Why? Government policy states that "we must protect our best and most versatile land" to safeguard food security. The proposals contradict this policy and undermine food security. Development would destroy valuable wildlife habitats and further harm biodiversity in one of the world's most nature-depleted countries. There are a range of birds including many endangered species, little owls, barn owls, song thrushes, starlings, I could go on. The proposals threaten the Brockley Maternity Roost and SSSI, with rare Lesser and Greater Horseshoe Bats relying on the land for food. Development and airport expansion has already put this roose at risk. Natural England insist on Bat mitigation but at least one developer in Backwell is ignoring their HRA commitments and being allowed to get away with it by NSC, despite the fact that it was reported in a public Inquiry and forum East Backwell is in an important heritage area, in sight of the crown of National Trust Jewels, it lies within a valley in front of Tyntesfield, indeed much of the East Backwell			

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					land was once part of the wider Tyntesfield estate of Lord Wraxall. East Backwell which lies adjacent to and extends into Backwell Common and surrounding areas are prone to flooding, which would be aggravated by more housing. The farmer selling this land will admit that his crops are underwater for several months of the year. There are some popular walks across this land which regularly become uncrossable during the wet months. NSC have not included a hydraulic model for East Backwell, it is so wet it is ridiculous to expect to allocate housing and kick mitigation down the road. NSC do not recognise the Backwell's surface water issues, streams and springs. The clue is in the name – there is a well at the back. The Back is up the hill, about halfway up, this exists alongside some steams and several surface water paths. An underbridge with a gravity scheme is a non-starter Development has been consented on Farleigh fields, but NSC did not insist that Persimmon homes use up to date rainfall figures or insist on permeability testing. The first winter of the build a house nearby flooded in a way that it would never have been at risk before. After the third drainage plan, it was signed off by NSC however there are still issues and they will come to light given time. Another model MUST be completed which takes into consideration the effect of these houses on the surface water off Backwell hill as well as East Backwell, and key facilities like the secondary school and Leisure centre. Concerns regarding the strategic growth location designation include the impact on the area's character, the loss of Greenbelt and high-quality agricultural land, the risk of flooding, and uncertainty over whether the road can be funded and delivered on time to support the proposed housing. Backwell Lake (Surface Water Reservoir) and adjacent fields, where the new roads and housing is planned and are on a floodplain, which floods regularly. Government policy requires 50% affordable housing on Greenbelt Land, but this reduces the funds developers contribute towards infrastructure. The sheer volume of growth with the required investment infrastructure and services over such a short period is destabilising, unsustainable and undeliverable within the lifetime of the plan.			

Name: B Lawrence **I.D:** 62855169

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Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	This plan is unsound and ill thought out for the following reasons: The effects of the number of new houses on Nailsea and Backwell would cause unsustainable over development. Backwell is a large village. Nailsea is a small commuter town, with limited within town work opportunities and many working residents commuting to nearby larger centres such as Bristol and Weston super Mare to work. Backwell and Nailsea should therefore not be considered a 'Strategic Location' as they do not meet North Somersets Council's (NSC) Policy SP1 for a variety of reasons, including: • Most of the proposed sites will fall outside the usual catchment for walking distances (town centres, school, bus stops and train station) and will therefore not prioritise walking and cycling and the use of public transport. • The plan does not support the delivery of economic growth and job creation in Nailsea as the location is not easily accessible, (B roads in and out) and there are no plans to improve existing highways network (see below). Nailsea and Backwell are unlikely to be a site for local employment so most new residents will end up commuting elsewhere. • More development in and around Backwell and Nailsea is will have negative environmental impacts regarding water, pollution, flooding risk and safety of residents, congestion on roads and rat running down rural lanes with increased accident risk. • Nailsea Railway station is not an appropriate major transport hub. It is small, with short platforms, and difficult to access for those with mobility issues. This especially applies to access to the Down Platform (for trains from Bristol or towards the Weston) which is non-existent for wheelchair users. Currently the populations of Nailsea and Backwell are, according to the Census in 2021: Nailsea 15,917 Backwell 4,589 The Local Plan housing allocation is for 3,728 new dwellings across these sites. Based on 2.3 persons per	Proposed new housing should be significantly reduced or reconsidered altogether as an expansion of population of the extent suggested is never going to be sustainable and represents an overdevelopment of Nailsea and Backwell without any realistic likelihood of local employment increasing to match the population increase or of local infrastructure being able to increase to accomodate this. A maximum 10% increase in population over Nailsea and Backwell would be a far more realistic target to aim for. • Before any new housing is proposed there should be a clear policy led, not developer led,		

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					household (the average household in North Somerset according to the 2021 Census), that means an additional 8,574 persons across the two towns, an overall increase of 42%. For each town, the growth would be: Nailsea - an extra 4,179 persons or an additional 26% Backwell - an extra 3,870 persons or an additional 84% This is a huge increase in population which is completely unsustainable with the current local infrastructure and will ruin the lives of current and future residents of Nailsea and Backwell. This degree of expansion would have a detrimental impact on the character and nature of Backwell and Nailsea and their communities. • Nailsea has already had significant development with over 350 homes already built and several hundred more granted planning permission, this all in addition to the above proposed expansion. No new infrastructure has attended any of this. Effects on local infrastructure This further population increase will overload local infrastructure including healthcare, schools, leisure facilities and town centre parking. The Local Plan suggests developer-led delivery of infrastructure to support this, rather than a policy driven approach. This will inevitably mean that the infrastructure to support this increased population, in terms of schools, healthcare, leisure facilities and travel and transport is not guaranteed, may not happen and at best would be delayed long after it is needed. This means that access to these facilities, particularly healthcare and schools, will be badly affected, for current and new residents. Effects on travel and highways There is no A road directly into and out of Nailsea, only B roads which are narrow and already heavily congested with traffic. Access to Nailsea from the A 370, which passes between Nailsea and Backwell, is only via the busy and congested Backwell crossroads and Station Road. Station Road is an accident black spot with both pedestrians and cyclists coming into conflict with the vehicles when passing under the railway line bridge on the single track, traffic lights controlled junction. Backwell School creates a significant amount of traffic. • The policy states that to accommodate the additional housing transport infrastructure development is needed. NSC proposes that an East Backwell Link Road is built. The road would go under the London to Penzance mainline rail track from Station Road to the A370. • However this link road would be extremely hard to build from an engineering perspective and very expensive because it is close to the river Kenn. The road would require a water pumping solution as it will go through an area susceptible to flooding. It will need cutting through the railway embankment. Developers will be expected to contribute to the funding for the road, however developer contributions will not cover the whole cost of the road. The developer Rubix has stated that it will only connect the road through their site once the housing has been built, this statement does not align with NSC statement on linking proposed development to infrastructure provision in a phased plan. • The East Backwell Link Road will only assist the Nailsea developments to the south of Nailsea. Developments to the north of Nailsea will use existing B roads out towards Wraxall and Clevedon and Portbury Lane. Developments east of Backwell wishing to get to the M5 will travel through Nailsea. It will not reduce traffic to and from Backwell and Bristol and junctions 19 and 20 of the M5. • NSC has failed to address the junctions to the north of Nailsea along the B3138 and B3130 which are already at capacity and are known accident black spots. There is no mitigation suggested meaning an even greater volume of traffic and more accidents. • NSC has placed a lot of emphasis on Active Travel (walking, cycling, horse riding) however many development sites are too far from the town of village centre to make walking a viable solution. • Rural "Quiet" Lanes. NSC has failed to address how they will protect the rural lanes around Nailsea and Backwell from rat-running. Traffic volumes on the lanes have steadily increased in recent years as developments to the west of Nailsea have been built. This is noticeable on The Causeway to the north and West End Lane and Netherton Wood Lane to the west and Chelvey Lane to the south west. This also happens on Chapel Hill leading into Backwell Bow, with people attempting to bypass queues on the a70 at Backwell Crossroads. This rat-running down rural lanes will only get worse with the proposed developments. All these lanes are single track with no pavements. • Backwell and Nailsea Train Station has not been identified within Policy LP3 for improvements. The station is currently not accessible for many and the platforms too short for intercity services. No funding has been identified for this work. Effects on environment and ecology There will be loss of green space and local countryside. Access to nature and countryside for walking etc is very important for the physical and mental health of residents and should not just be built over without consideration of this. On Backwell Common there will be a significant loss of Grade 1 and 2 agricultural land, particularly with the proposed East Backwell New Road and housing developments in this area. Other development areas will cause similar loss. Farmland of this quality is essential for growing food, for food resilience for the local population, reducing reliance on imported food and future proofing the population against climate and political changes that may make imported food more expensive and difficult to obtain in the future. The	plan for all the necessary infrastructure improvements, including healthcare, GP surgeries, leisure facilities, schools and transport modifications. These should be planned prior to any new development. In particular the new road between Nailsea and Blackwell avoiding Station Road should be in place before more houses add more congestion and danger to Station Road.		

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					development off Pound Lane will have a bad impact on Moor End Spout Nature Reserve. Development south of Nailsea is too close to Backwell Lake which is a designated reservoir and an important area for wildlife particularly birds. Much of this area is a flood plain and dwellings here will be liable to flooding. Most areas around Nailsea are low lying and in areas at risk of flooding, which will become an increasing problem with climate change. There will be adverse effects on wildlife and biodiversity, e.g. with wildlife corridors being cut off.			

Name: B Mill **I.D:** 30909409

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SP1: Sustainable Development	Yes		Yes	Yes			The Council has had a very large housing target imposed upon it by the Government. This has led to it having to make some very difficult decisions about where to allow sustainable development in the limited land available which isn't impacted by flooding restraints or the Mendips (as an area of outstanding natural beauty). As a resident of Wrington I agree with, and support, the Council's rejection of each of the five sites in Wrington which were submitted for inclusion in the Local Plan. Each of them were rigorously assessed against multiple sustainability criteria and each were ultimately not judged to be sustainable/suitable to be taken forward in the Local Plan. This reflects the fact that Wrington is not a sustainable location for housing development, judged against each of the relevant criteria. I agree with the Council's analysis that housing development in Wrington is not sustainable, and there would likely be a significant negative effect on the village, due to the fact that (1) there is no access to jobs as the village is not within 5 of WSM, Centre of Bristol, Clevedon, Nailsea or Portishead; (2) in terms of economic wellbeing, the village lacks reasonable or good access to jobs, training and education; (3) two of the sites put forward in the Local Plan would have resulted in significant harm to heritage assets with little chance of mitigation (Butts Batch and the Alburys); (4) some of the sites put forward in the Local Plan would have resulted in significant harm to land classed as greenfield and with an agricultural value of Grade 1-2; (5) some of the sites would have resulted in significant harm to landscape and they were recorded as having medium to high or high landscape sensitivity. I particularly support the decision of the Council not to put forward the Alburys (HE208052), West of Butts Batch (HE20198) and Cox's Green (HE203004) due to the above factors and in addition, in the case of the Alburys, the significant negative impact on biodiversity that development of the site would have, in light of it being within the North Somerset and Mendip Bats SAC Greater Horseshoe Bat Juvenile Sustenance Zone / consultation zone A for the SAC.	

Name: B Norris **I.D:** 62558273

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure		The single track under the railway arch is currently an issue and will be made worse by this proposal.It is dangerous for pedestrians using the pathways not least he 100's of school children daily. The parking charges levied in Nailsea is causing havoc with drivers parking day long on all the approach roads. Another c1000+ cars will further cause even more traffic safety concerns around the local roads. The overstretched health facilities ,schools and leisure currently well under funded will potentially collapse with the extra burden and no more funding commensurate with the new demands.			

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					Government policy is to protect our best and versatile land but the proposal takes away Grade1 agricultural land and destroys valuable wildlife habitats. Backwell Lake will be affected and so too the floodplain. The infrastructure Delivery Plan lacks analysis and costings and not able to give any guarantees for the funding of the new roads and services.Such rapid additional growth on top of the already agreed development plans can only be destabilising and unsustainable. The general location is not an employment area thereby causing the new homeowners to commute daily thereby adding to the congested roads as above. The plan needs to be revoked as the plan is not sustainable in this particular location			

Name: B Northover **I.D:** 30945217

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP6: Villages and rural areas	Yes		Yes	Yes			Although it is disappointing that so many houses are required by Central Government to be built in our area, I am pleased that much of the feedback in relation to proposals for Long Ashton given at the previous consultation stage has been taken into account.	
Policy LP2: Strategic location: Woodspring (south west of Bristol)	Yes		Yes	Yes			Although it is regrettable that it is necessary to build on the Greenbelt, I consider that a separate and distinct settlement is the best solution. It must be recognised that much employment is available within Bristol and the proximity of this site to the City makes sense, provided there are appropriate public transport links and cycle paths.	

Name: B Paige **I.D:** 62810945

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land south of Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Until very recently I lived in Backwell, and my concern is that building to the south of Nailsea as proposed would cause extra water to run down to Backwell Lake. This then would very probably overtop and cause major flooding problems in Station Road. This would have a negative knock-on effect to the proposed building at Backwell east. Additionally, the lake is a wildlife sanctuary with otters, frogs, swans, and geese who would all be displaced or badly affected by the building.			
Land east of Backwell		‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	The schools are full to capacity, so where will the children go to school? There are no funds to build new schools. And where will the children play? The gardens will be too small for proper play. There’s only one doctors’ surgery and they are fully subscribed. The dentist is a private dentist. There is no other supporting infrastructure. For example, opticians are all in Nailsea or Weston-super-Mare as are simple things like DIY shops. The fields are soaking wet in winter so I can’t see how they can build houses or a road there. The fields are all Grade 1 Agricultural land. If we use all of the fields, where will the Country get its food from? The back gardens will be too small for anything like vegetable beds. The sense of community would disappear if the village grows by 80%. At present we are a very supportive, happy place because we are not too large. All community cohesion would disappear if this many new houses were built.			

Name: B Stokes **I.D:** 62838689

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	If 800 new houses were to be approved this would lead to a significant overdevelopment of the village with lack of consideration for social cohesion and detriment to local wildlife.	A significant reduction in number houses		

Name: B Wilson **I.D:** 58471489

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP11: Historic and natural environment	No	• Justified	Unsure	Unsure	Using green belt land next to an ancient woodland is irresponsible. Places like Weston big wood are precious and to encroach on the land around it would be detrimental to the flora and fauna of the area.	No building next to ancient woodland		

Name: BJ Stephens **I.D:** 63005025

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land to the west of Elborough					These comments are provided in relation to the Pre-submission Plan (PsP) on behalf of the owners of land west of Elborough Farm, Elborough, Weston super Mare. The identification of land west of Elborough for residential development, as set out at page 292 of Schedule 1 is supported. Schedule 1 of the SHLAA 2025 refers to the site (Shlaa ref: HE201040) as 22.86 hectares of land. However, the policies map identifies approximately 4 hectares of land including the existing farmhouse, commercial and agricultural buildings (see attachment for image). It is understood that the Council has assumed a yield of 70 dwellings from the site based on a net site area of approximately 2.2 hectares as shown on the plan below. This assumes that all existing buildings and properties would be retained. In reality the site may be able to accommodate more than 70 dwellings depending on how much land is developed. There are no known constraints that would prevent the site from being developed and at this stage it is anticipated that the site could be delivered earlier in the plan period, subject to planning permission. It is noted that the specific entry for the site contained at page 293 of the PsP states			North Somerset Local Plan Pre-submission Plan - Representation form Part B - BJ Stephens & Sons 12.12.25.pdf

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					that the development is required to fund an upgrade to the Banwell Road junction with the A371. The Infrastructure Delivery Plan schedule refers to signalisation of the A371/Banwell Road under entry TR24 at a developer cost of £800,000 which is required prior to development of the Elborough scheme, and likely required after Phase 2 of Wolvershill Development. It is not clear how the cost of the work has been arrived at and this should be clarified. In addition the Council should provide further justification to explain why the financial burden of these works is expected to fall entirely on the 70 new dwellings proposed at Elborough Farm. It seems more likely that the need for these works is due to the highway impact of other developments. As such proportionate contributions should be sought.			

Name: BNSSG ICB **I.D:** 51572577

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP5: Towns	Yes						The ICB strongly supports the Policy SP5's recognition of the need for new developments within the settlement boundaries of Weston-Super-Mare, Clevedon, Nailsea and Portishead to be (our emphasis added) "successfully served by infrastructure such as transport, education and health facilities". We therefore consider this policy to be sound on the grounds that health infrastructure requirements have been proactively considered.	NSC Reg 19 Local Plan - NHS BNSSG ICB Response 101225.pdf
Policy LP1: Strategic location: Wolvershill (north of Banwell)						Health infrastructure capacity will need to be significantly increased to support the demand from the proposed Wolvershill allocation in Banwell and neighbouring Weston-super-Mare.We note that a key development principle of Policy LP1 is to provide "healthcare provision" as part of "the creation of a mixed-use local centre focused on Wolvershill Road to form the heart of a new community […]". Policy LP1 later adds that "subject to confirming needs generated by the development, the development must ensure suitable land provision is made available to facilitate the provision of appropriate healthcare infrastructure onsite or appropriate financial contributions towards healthcare for new and/or improved facilities off-site". BNSSG ICB generally supports the inclusion of the above policy wording as it provides a degree of certainty that healthcare requirements will be met either on- or off-site. We are however concerned			NSC Reg 19 Local Plan - NHS BNSSG ICB Response 101225.pdf

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						that the policy only makes reference to securing “land provision” on-site. To ensure the Plan is positively prepared and effective, we propose the following modification to Policy LP1: Proposed Amendments to Policy LP1 (remove...Subject to confirming needs generated by the development, the development must ensure suitable land provision is made available to facilitate the provision of appropriate healthcare infrastructure onsite or appropriate financial contributions towards healthcare for new and/or improved facilities off-site) (insert...Development will ensure the provision of appropriate primary care infrastructure on-site or through appropriate financial contributions towards primary care for new and/or improved facilities off-site to support new development. On-site healthcare provision should be provided as a turnkey, fully fitted out facility (ready for occupation) constructed at developer cost to NHS specification provided leased at a peppercorn rent for the entirety of occupation) We acknowledge that there has been constructive joint-working between ourselves and North Somerset Council regarding primary care provision on this site to date. We recommend that the Council continues to engage with BNSSG ICB on this matter to ensure that adequate primary care provision can be secured. This will ensure compliance with paragraphs 20c and 35 of the NPPF.		
Policy LP2: Strategic location: Woodspring (south west of Bristol)						This strategic development location, with an indicative capacity of up to 3,500 dwellings, would create a significant population uplift, which, in turn, would create very significant pressures on local primary care facilities. The delivery of this strategic development would require a significant increase in primary care infrastructure in South West Bristol and Long Ashton to support demand from the growth earmarked in Policy LP2. Policy LP2 makes the following reference to healthcare: “provision for healthcare, community, recreation and leisure facilities must be provided to meet the needs generated by the new development”. To ensure the Plan is positively prepared and effective, we propose the following modification to Policy LP2: Proposed Amendments to Policy LP2 Subject to confirming needs generated by the development, the development must ensure suitable land provision is made available to facilitate the provision of appropriate healthcare infrastructure onsite or appropriate financial contributions		NSC Reg 19 Local Plan - NHS BNSSG ICB Response 101225.pdf

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						towards healthcare for new and/or improved facilities off-site (insert...Development will ensure the provision of appropriate primary care infrastructure on-site or through appropriate financial contributions towards primary care for new and/or improved facilities off-site to support new development. On-site healthcare provision should be provided as a turnkey, fully fitted out facility (ready foroccupation) constructed at developer cost to NHS specification provided leased at a peppercorn rent for the entirety of occupation.) We recommend that the Council engages with BNSSG ICB on this proposed development to ensure that adequate primary care provision can be secured. This will ensure compliance with paragraphs 20c and 35 of the NPPF.		
Policy LP3: Strategic location: Nailsea and Backwell							Policy LP3 states that “improvements to local infrastructure including transport, recreation and leisure, health and social, and environmental infrastructure as set out in the Infrastructure Delivery Plan” will be required. The Policy adds that “all housing proposals will be required to positively contribute to the delivery of infrastructure, including transport, and other measures through either direct delivery and/or development contributions as part of an agreed phasing strategy linking the delivery of proposed growth to infrastructure provision. A phasing strategy must be provided with all planning applications detailing how the development proposed will support the delivery of infrastructure in line with the Infrastructure Delivery Plan. Development proposals will require specific phasing conditions and/or obligations to be secured to ensure any required supporting infrastructure is delivered at the appropriate time”. BNSSG ICB generally supports Policy LP3 and considers that this policy wording provides sufficient flexibility in order for the ICB to establish the preferred primary care mitigation approach in Nailsea and Backwell. The policy is justified as it is founded on robust evidence presented in the Infrastructure Delivery Plan.	
Policy LP4: Strategic location: Pill and Easton-in-Gordano							Policy LP4 stipulates that “all new development will be required to contribute to the delivery of necessary infrastructure through either direct delivery as part of the scheme or through development contributions”. BNSSG ICB considers that this policy has been positively prepared as it provides infrastructure providers including the NHS with certainty that developer contributions may be required to provide supporting infrastructure on schemes in Pill and Easton-in Gordano.	

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Policy LP5: Housing, employment and mixed use allocations					Policy LP5 states that sites of more than 10 units included in Schedules 1 must take account of site-specific requirements set out in the schedules. Policy LP6 states that sites for educational, sporting, leisure, and community facilities are set out in Schedule 4. We note that Schedule 1 provides site-specific requirements and Schedule 4 provides site-specific community facility requirements. The majority of our comments below are in relation to Policy LP5 and Schedule 1, however we note that these comments may also be applicable in circumstances where healthcare infrastructure is proposed under Policy LP6 (as set out in Schedule 4). We emphasise the importance of effective implementation mechanisms so that healthcare infrastructure is delivered alongside new development, especially for primary healthcare services as these are the most directly impacted by population growth associated with new development. The NHS, Council and other partners must work together to forecast the health infrastructure and related delivery costs required to support the projected growth across the Local Plan area. BNSSG ICB have reviewed the contents of those schedules and are very concerned that both Schedules fail to make reference to the need for supporting primary care infrastructure and indeed wider healthcare infrastructure, with the exception of sites mentioned above (Policies LP1, LP2, LP3 and Weston Rugby Club). Existing primary care infrastructure is experiencing significant capacity challenges across North Somerset, with many primary care premises having significant floorspace deficits. Schedules 1 and 4 in their current form fail to recognise the need for additional primary care infrastructure in order to accommodate the growth needs of the proposed allocations. This raises concerns that Policy LP5 and Schedules 1 and 4 are unsound on the grounds that evidence provided by the ICB to inform both Local Plan policies and the Infrastructure Delivery Plan have not been considered and reflected within Schedules 1 and 4. These requirements were	We urge the Council to state that ‘financial contributions towards primary care’ is referenced under each of the proposed allocations included in Schedule 1. This will ensure that the Local Plan has been positively prepared and has proactively considered the need for additional healthcare to support the quantum of growth proposed across North Somerset over the Plan period.		NSC Reg 19 Local Plan - NHS BNSSG ICB Response 101225.pdf

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					previously set out in our earlier responses submitted to the Council by BNSSG ICB as part of the 'Additional Sites consultation'.			
Policy LP19: University of Bristol site in Langford						We acknowledge that student accommodation and new homes are proposed under Policy LP19 and Policies LP20 and LP23 respectively. BNSSG ICB have not been engaged with by the Council on any of these sites to date, therefore there is concern that primary care infrastructure requirements have not yet been established on those sites. We strongly encourage further dialogue between ourselves and the Council on this matter. It is essential that identified healthcare infrastructure needs are reflected in each of these policies to ensure that the Local Plan has been positively prepared and is effective in capturing and communicating localised infrastructure needs.		NSC Reg 19 Local Plan - NHS BNSSG ICB Response 101225.pdf
Policy LP20: Wyndham Way						We acknowledge that student accommodation and new homes are proposed under Policy LP19 and Policies LP20 and LP23 respectively. BNSSG ICB have not been engaged with by the Council on any of these sites to date, therefore there is concern that primary care infrastructure requirements have not yet been established on those sites. We strongly encourage further dialogue between ourselves and the Council on this matter. It is essential that identified healthcare infrastructure needs are reflected in each of these policies to ensure that the Local Plan has been positively prepared and is effective in capturing and communicating localised infrastructure needs.		NSC Reg 19 Local Plan - NHS BNSSG ICB Response 101225.pdf
Policy LP23: Monaghan Mushrooms, Stock Lane Langford Broad Location						We acknowledge that student accommodation and new homes are proposed under Policy LP19 and Policies LP20 and LP23 respectively. BNSSG ICB have not been engaged with by the Council on any of these sites to date, therefore there is concern that primary care infrastructure requirements have not yet been established on those sites. We strongly encourage further dialogue between ourselves and the Council on this matter. It is essential that identified healthcare infrastructure needs are reflected in each of these policies to ensure that the Local Plan has been positively prepared and is effective in capturing and communicating localised infrastructure needs.		NSC Reg 19 Local Plan - NHS BNSSG ICB Response 101225.pdf
Policy DP49: Healthy Places							We support the requirement in for Health Impact Assessment (HIA) on significant residential developments of 50 units or more. There is a well-established connection between planning and health, and the planning system has an important role in creating healthy communities. The planning system is critical not only to the provision of improved health services and infrastructure by enabling health providers to meet changing healthcare needs, but also to addressing the wider	NSC Reg 19 Local Plan - NHS BNSSG ICB Response 101225.pdf

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							determinants of health. Identifying and addressing the health requirements of existing and new development is a critical way of ensuring the delivery of healthy, safe, and inclusive communities.	
Policy DP50: New community facilities, open space and sports pitches							We generally support this policy as it promotes the provision of new community facilities within settlement boundaries. We too support policy wording which encourages the co-location of complementary community uses. The ICB considers that this policy is suitably flexible to encourage maximum utilisation of future community assets. In instances where new community facilities are proposed, we welcome further engagement with the Council to ensure that opportunities for additional provision of primary care and wider community and voluntary services provided by both BNSSG ICB and Integrated Care Partnership (ICP) partners can be realised.	NSC Reg 19 Local Plan - NHS BNSSG ICB Response 101225.pdf
Policy DP51: Protection of built community facilities						We acknowledge that Policy DP51 may allow for existing healthcare uses/facilities to be redeveloped for other uses in instances where it is considered that the “building is genuinely redundant/surplus to requirements for its uses”. Policy DP51 goes on to provide a number of criteria in which a facility may be deemed “genuinely surplus”. The ICB is generally content with this approach, as it enables the NHS to dispose of assets in circumstances where it can be proven that there is no longer a purpose for them. However, in our earlier response to the Regulation 18 Local Plan consultation, we also noted that there may be circumstances whereby the NHS seeks to dispose of an asset where it has been identified as part of an estate strategy or service transformation plan where investment is needed towards modern, fit for purpose infrastructure and facilities. Our current interpretation of Policy DP51 is that the existing policy wording precludes the NHS from disposing of an asset for this reason. Where it can be demonstrated that health facilities are surplus to requirements or will be changed as part of wider NHS estate reorganisation and service transformation programmes, it should be accepted that a facility is neither needed nor viable for its current use, and policies within the Local Plan should support the principle of alternative uses for NHS sites with no requirement for retention of a community facility use on the land. To ensure the Plan is positively prepared and effective, we propose the following modification to Policy DP51:...Where the site or building is genuinely redundant/surplus to requirements for its uses. A site will be deemed genuinely redundant/surplus if any of the following circumstances apply: (insert....		NSC Reg 19 Local Plan - NHS BNSSG ICB Response 101225.pdf

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						Where healthcare facilities are declared surplus or identified as part of an estate strategy or service transformation plan where investment is needed towards modern, fit for purpose infrastructure and facilities, there will be no requirement to retain any part of the site in an alternative community use.) We consider that the above modification is necessary to ensure that the Local Plan is flexibly worded to ensure that the NHS can deliver its estates transformation programmes across North Somerset.		
Policy DP63: Infrastructure delivery and development contributions						We support Policy DP63, as it requires development proposals to provide financial contributions towards the cost of infrastructure to accommodate growth, including health facilities. We also emphasise the importance of effective implementation mechanisms so that healthcare infrastructure is delivered alongside new development, especially for primary healthcare services as these are the most directly impacted by population growth associated with new development. We welcome the inclusion of the following: “The council may also seek non-financial contributions and obligations where appropriate, such as Local Labour Agreements or works-in-kind”. Policy DP63 provides the NHS with flexibility when determining the most appropriate means of meeting the relevant healthcare needs arising from a new development. Where new developments create a demand for health services that cannot be supported by incremental extension and/or internal modification of existing primary care facilities, the provision of new purpose-built healthcare facility will be required. BNSSG ICB considers that Policy DP63 will enable the NHS to deliver the most appropriate form of mitigation. We note also that Policy DP63 makes reference to the supporting IDP. Our specific comments on this matter are detailed below. Evidence Base: Infrastructure Delivery Plan The provision of adequate healthcare infrastructure is in our view critical to the delivery of sustainable development. BNSSG ICB is pleased to have been proactively engaged with during the preparation of the Infrastructure Delivery Plan. We are concerned that the IDP in its current form is lacking in evidence and could therefore be made more effective by including information regarding current primary care infrastructure challenges and opportunities, including capacity issues. The Draft IDP references healthcare under the umbrella of ‘Social Infrastructure’ and fails to set out baseline evidence on each respective infrastructure sub-type. We trust that future iterations of the IDP will provide more comprehensive baseline evidence and		NSC Reg 19 Local Plan - NHS BNSSG ICB Response 101225.pdf

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						will include a rationale to justify the approach taken to establishing future primary care health infrastructure requirements. These additions will help ensure that the Local Plan and IDP's Project Schedule has been informed by sound local evidence. We welcome further opportunities to engage with and inform the IDP. We note that the IDP Schedules October 2025 includes the following three healthcare projects: • Healthcare provision at Nailsea and Backwell Strategic Location - new or enhanced • Healthcare provision at Wolvershill/ Banwell Parish - scope to deliver facility as part of the Wolvershill Local Centre and/or enhancement of existing facilities. • Healthcare provision at Woodspring Strategic Location BNSSG ICB strongly supports the inclusion of these projects. The ICB requests that the above IDP Schedule entries are amended as follows (remove..Healthcare) (insert..Primary care-led) provision at Nailsea and Backwell Strategic Location – (insert..to be delivered via extension and/ or remodelling of impacted Primary Care Networks. • (remove..Healthcare) (insert..Primary care-led) provision at Wolvershill/ Banwell Parish - scope to deliver facility as part of the Wolvershill Local Centre and/or enhancement of existing facilities. (insert...Should an on-site primary care provision be pursued by the developer(s), the resultant mitigation should meet the NHS's minimum requirements regarding commercial terms, scale and design of the primary care facility. Where on-site provision is deemed unsuitable by BNSSG ICB, off-site financial contributions will be necessary. These funds will provide appropriate and proportionate funding in order to mitigate the impacts of the proposed development off-site. • (remove..Healthcare) (insert.. Primary care-led) provision at Woodspring Strategic Location - (insert..safeguard potential for on-site provision if required by BNSSG ICB, otherwise off-site financial contribution will be sought. Should an on-site primary care provision be pursued by the developer(s), the resultant mitigation should meet the NHS's minimum requirements regarding commercial terms, scale and design of the primary care facility. Where on-site provision is deemed unsuitable by BNSSG ICB, off-site financial contributions will be necessary. These funds will provide appropriate and proportionate funding in order to mitigate the impacts of the proposed development off-site) BNSSG ICB consider that the above amendments are necessary to ensure that the Local Plan is sound by providing clarity on how primary care mitigation will be delivered. We are also content with 'developer contributions'		

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						being recognised as the main funding source for the aforementioned projects. We do note that 'other' is also referenced as a funding source within the Schedules. We would like to reiterate that NHS Capital Guidance 2025/26 states that "capital allocations do not cover additional facilities required due to housing developments. NHS organisations should work with local authorities to secure developer contributions for extra capacity". We therefore expect capital costs associated with each of the healthcare projects listed above are to be met by developer contributions. In addition to the above amendments, we kindly request that the IDP Schedule includes an entry to state that "additional provision of primary care infrastructure" will be necessary for each proposed allocation, and the associated funding source should be referenced as "financial contributions (S106/ CIL)". These proposed amendments are essential, as, as current, there is concern that the IDP fails to recognise the cumulative impact of the proposed allocations on the existing primary care estate, which, in turn, would result in unsustainable pressures on the existing local primary care system. These proposed amendments directly relate to our suggested changes to Policy LP5 and Schedule 1.		

Name: BackwellPC NailseaTC Flax BourtonPC BrockleyPC BackwellRA Nailsea Action Group **I.D:** 63213025

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Strategic Priorities	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure		BPC and NTC broadly support the strategic priorities set out at page 11 of the Local Plan, particularly the priority to locate new development close to places with a "wide range of services, facilities and job opportunities".		251118 Local Plan Reg 19 2025 reps FINAL.pdf R01 - Transport Statement - Rev 3 FINAL.pdf Hydrology LP3 BPC_NTC Appendix_2.2-compressed.pdf Hydrology LP3 BPC_NTC Appendix_2.1-compressed.pdf Hydrology LP3 BPC_NTC Appendix_9-compressed.pdf Hydrology LP3 BPC_NTC Appendix_7-compressed.pdf Hydrology LP3 Summary BPC_NTC Part 2 (1).pdf Hydrology LP3 Summary BPC_NTC Part 1 (1).pdf
Strategic Policies	No	• Positively prepared • Justified • Effective • Consistent with	Unsure	Unsure	BPC and NTC support identification of Backwell as a village with a settlement boundary under Policy SP6. However, strong objection is raised to the proposed designation of Nailsea and Backwell as a strategic location for growth under Policy LP3. The SA provides no evidence that the spatial strategy, including the identification of the strategic growth locations represents a sustainable approach to meeting identified needs. Indeed, the SA findings direct development towards the main towns, the east of the District,			251118 Local Plan Reg 19 2025 reps FINAL.pdf R01 - Transport Statement - Rev 3 FINAL.pdf Hydrology LP3 BPC_NTC Appendix_2.2-compressed.pdf Hydrology LP3 BPC_NTC

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		national policy			closest to Bristol, where there is the greatest range of facilities and employment and the highest levels of housing need. For the reasons set out within our representations to Policy LP3, LP5 and Schedule 1, the concept of Nailsea and Backwell as a strategic location for growth is unsound. It is not justified as an appropriate strategy, having regard to the evidence base and the reasonable alternatives available; nor would it not be effective in terms of delivery of housing, employment and infrastructure over the plan period. The identification of Portishead, Nailsea, Clevedon and Weston-Super-Mare as the main towns and focus for sustainable development (Policy SP5) is endorsed as a sustainable approach to development, however the capacity at Nailsea to accommodate development sustainably is limited by existing transport infrastructure.			Appendix_2.1-compressed.pdf Hydrology LP3 BPC_NTC Appendix_9-compressed.pdf Hydrology LP3 BPC_NTC Appendix_7-compressed.pdf Hydrology LP3 Summary BPC_NTC Part 2 (1).pdf Hydrology LP3 Summary BPC_NTC Part 1 (1).pdf
SP1: Sustainable Development	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure		BPC and NTC support the terms of Policy SP1 to deliver new development in a sustainable manner throughout North Somerset. The policy's representation of the plan's vision and strategic priorities is supported as an overall framework for the other policies in the plan. However, there is a clear disconnect between this policy framework and the terms of other policies in the plan which lead BPC and NTC to find the plan unsound in its current form.		251118 Local Plan Reg 19 2025 reps FINAL.pdf R01 - Transport Statement - Rev 3 FINAL.pdf Hydrology LP3 BPC_NTC Appendix_2.2-compressed.pdf Hydrology LP3 BPC_NTC Appendix_2.1-compressed.pdf Hydrology LP3 BPC_NTC Appendix_9-compressed.pdf Hydrology LP3 BPC_NTC Appendix_7-compressed.pdf Hydrology LP3 Summary BPC_NTC Part 2 (1).pdf Hydrology LP3 Summary BPC_NTC Part 1 (1).pdf
SP3: Spatial strategy	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	BPC and NTC strongly object to the spatial strategy which fails to respond directly to the findings of the Pre-Submission Sustainability Appraisal (SA) which recommends a strategy based on urban focus (Approach 2). The SA is explicit in its findings that Approach 2, which directs development towards Weston, SW Bristol and other main towns and sustainable locations would perform best in meeting the economic, social and environmental objectives of sustainable development. It advises that a strategy based on urban focus would best meet housing needs, direct housing to major employment locations and therefore address the current imbalance of employment and housing and reduce commuting. The approach would also maximise the benefit of new infrastructure for the wider communities and minimise flood risk, loss of high value agricultural land and impacts on sensitive habitats. The spatial strategy is in fact closer to Approach 3 (Transport Corridors) which focussed development at locations including Weston-Super-Mare, Backwell, SW Bristol, as illustrated in the Choices for the Future consultation in 2020 (see extract in attached document): The Transport Corridors Approach (Approach 3) performs notably less well than Approach 2 (Urban Focus). For example: - Approach 3 performs less well than approach 2 where development is located in smaller settlements, which are not judged to have the demand for new employment; - Approach 2 performs best by concentrating development at Weston-Super-Mare and Bristol, exceeding Approach 3; - Approach 3 includes places with a high probability of Best and Most Versatile agricultural land quality and therefore performs less well than Approach 2; - Approach 2 performs best in terms of promoting development which requires deliverable levels of high quality and sustainable infrastructure;	Amendment sought: Spatial strategy to be amended to align the findings of the SA, including Approach 2 and to reflect the evidence available which does not support Nailsea and Backwell as a strategic development location.		251118 Local Plan Reg 19 2025 reps FINAL.pdf R01 - Transport Statement - Rev 3 FINAL.pdf Hydrology LP3 BPC_NTC Appendix_2.2-compressed.pdf Hydrology LP3 BPC_NTC Appendix_2.1-compressed.pdf Hydrology LP3 BPC_NTC Appendix_9-compressed.pdf Hydrology LP3 BPC_NTC Appendix_7-compressed.pdf Hydrology LP3 Summary BPC_NTC Part 2 (1).pdf Hydrology LP3 Summary BPC_NTC Part 1 (1).pdf

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					- Approach 2 performs best where development is concentrated at Weston-Super-Mare and SW Bristol for meeting housing need. - Approach 2 performs best in terms of delivery of renewable energy networks; - Approach 3 contains large-scale development at Nailsea which contains areas of Flood Zone 3. - Approach 2, concentrating development in existing towns and near Bristol has the lower potential to impact biodiversity, habitats and species. Approach 3 is identified as having greater potential for adverse impacts on bats and designated sites. (SA, October 2025 paragraphs 4.9 – 4.31). The Spatial Strategy and Capacity Paper (October 2025) provides no justification for the selection of a spatial strategy which aligns most closely with Approach 3, when there is clear evidence that Approach 2 offers the most sustainable development strategy for the local plan area. The Preferred Options to the Local Plan 2038 (published 2022) first mooted proposals for strategic scale development at Nailsea and Backwell (Policy LP3). The proposals were broadly the same as those proposed through this Pre-Submission version of the plan. The policy was justified by the Council on the basis of Backwell's relative proximity to Nailsea and the train station. "Nailsea is a main town within North Somerset and a focus for growth as part of the preferred spatial strategy for development. Given its proximity to Nailsea and the train station, growth opportunities at nearby Backwell have also been considered and form part of the draft proposals" (page 26, Preferred Options) The Preferred Options recognised that "very significant transport interventions would be required to support growth and avoid adverse impacts upon the existing transport network." (page 26, Preferred Options) Key transport issues were raised regarding connectivity across the railway between Nailsea and Backwell. The Preferred Options acknowledged that "Ongoing evidence around deliverability of this infrastructure will be important in setting the framework for growth." This consultation was supported by an earlier iteration of the Spatial Strategy and Capacity Paper (February 2022). At this point in the plan-making process NSC was exploring the potential to identify Yatton and Backwell separately from other villages, as larger villages with a "wider range of services, facilities and jobs" (paragraph 35, Spatial Strategy and Capacity Paper) and perceived opportunities to encourage active travel and access to public transport. Accordingly, these villages were considered capable of accommodating a higher level of development than other villages. The Paper sought to justify the separate identity of Backwell describing it as: "A large village with a smaller range of shops and facilities, but it does have a secondary school and leisure centre and is adjacent to Nailsea with its higher order facilities. It has a main line station and is on the A370 bus corridor. There is potential to improve bus access from Backwell to Bristol." (paragraph 36). However, following public consultation NSC took the decision to remove the separate identification of Yatton and Backwell within the settlement hierarchy and reinstate the settlements as villages within the rural areas. It is noteworthy that through this process the Council acknowledged that: 1. Backwell does not have a wide range of shops and facilities and is reliant on Nailsea for higher order facilities; 2. Backwell (in combination with Nailsea) is unsuitable as a strategic growth location due to the need for substantial new highway infrastructure which has proven to be unviable and undeliverable within the plan period. In support of the Pre-Submission Local Plan published in November 2023, the Spatial Strategy and Capacity Paper advised that "further technical work has concluded that the scale of growth at Nailsea/Backwell is constrained by the lack of deliverability of essential strategic transport mitigations." (paragraph 3.1).			

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					It elaborates further “The Preferred Options proposed Nailsea/Backwell as a strategic growth location subject to, in particular, deliverable strategic transport mitigations being identified. This related to a potential new road crossing of the railway to alleviate capacity issues at Backwell crossroads and Station Road. The transport evidence at the time indicated that the rail crossing could be either to the west or east of Backwell and could be a bridge or a tunnel. None of these options are straightforward given flooding issues which could affect any crossing under the railway and the visual impact of a bridge crossing a railway on an embankment. Further technical assessment following Preferred Options resulted in a preference being for a bridge crossing to the East of Backwell. However, taking account of potential development contributions and other sources of funding, the costs of delivery were prohibitive which meant that delivery was highly unlikely over the plan period.” Paragraph 3.12, Spatial Strategy and Capacity Paper, November 2023). The conclusions drawn at the time of the 2023 Pre-Submission Local Plan were that the scale of development at Nailsea and Backwell were not sustainable and the settlements should no longer be proposed as a strategic growth location in the plan (paragraph 3.14). These factors remain entirely relevant. There has been no material change in circumstances since the 2023 Local Plan and no significant change to the development proposals other than confirmation that a new rail crossing would be sited to the east of Backwell. 1.23 The Spatial Strategy and Capacity Paper (October 2025) offers no explanation for the selection of the strategic growth locations and very limited justification for the reversal of previous decisions to direct substantial development to the village of Backwell. Neither the Pre-Submission Local Plan 2025 or the accompanying Spatial Strategy and capacity Paper (October 2025) justify the reversal of previous decisions made through the Local Plan preparation process. The spatial strategy as presented through Policy SP3 is not supported by the evidence presented through the Sustainability Appraisal and fails to justify, through appropriate evidence that Nailsea and Backwell represents a sustainable location as a strategic development location. Accordingly, the policy is unjustified and therefore unsound.			
SP6: Villages and rural areas	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure		BPC object to the proposed amendments to the settlement boundary of Backwell, which are vastly extended to include the strategic allocations of Grove Farm and Land East of Backwell, but which also incorporate other undeveloped land which lies between those allocations and the existing built-up areas of the village. This approach is contrary to the methodology for settlement boundary review1 The inclusion of these extra parcels of land could place additional pressure on undeveloped land for further residential development, which would result in denser development, a loss of important open spaces, visual breaks and recreational amenity spaces, to the detriment of the rural character of the village. Notwithstanding the concerns regarding the proposed limits of the settlement boundary, BPC strongly		251118 Local Plan Reg 19 2025 reps FINAL.pdf R01 - Transport Statement - Rev 3 FINAL.pdf Hydrology LP3 BPC_NTC Appendix_2.2-compressed.pdf Hydrology LP3 BPC_NTC Appendix_2.1-compressed.pdf Hydrology LP3 BPC_NTC Appendix_9-compressed.pdf Hydrology LP3 BPC_NTC Appendix_7-compressed.pdf Hydrology LP3 Summary BPC_NTC Part 2 (1).pdf Hydrology LP3 Summary BPC_NTC Part 1 (1).pdf

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						support the categorisation of Backwell as a Village under Policy SP6 and broadly support the wording of Policy SP6 to limit new development to land within the settlement boundary, subject to compliance with all policy criteria. The limitations imposed on development outside the settlement boundary are also supported to control the settlement from further outward expansion. Amendment Sought – Settlement boundary for Backwell to be amended to include site allocations (if found sound) but exclude any adjoining land which is not currently within the settlement boundary.		
SP7: Green Belt	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure		BPC and NTC raise strong objection to the proposed removal of Green Belt around Nailsea and Backwell, in particular the claimed status of land East of Backwell as Grey Belt in the accompanying Green Belt Background Paper (2025). In determining whether sites can be identified as Grey Belt, the Council has considered whether the site would strongly contribute to Green Belt purposes a, b or d and whether a Footnote 7 constraint would justify refusal. Assuming that there is a demonstrable housing need to be met, the development must comply with the additional requirements of paragraph 155 of the National Planning Policy Framework (the Framework) to be Grey Belt. This includes that the development must be in a sustainable location, with particular reference to paragraphs 110 and 115 of the Framework. 1.32 Paragraph 110 requires the planning system to actively manage patterns of growth in support of a vision-led approach to identifying transport solutions that deliver well-designed, sustainable and popular places. Significant development should be focussed on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. Paragraph 115 of the Framework most notably requires the allocation of sites or specific applications for development to ensure that		251118 Local Plan Reg 19 2025 reps FINAL.pdf R01 - Transport Statement - Rev 3 FINAL.pdf Hydrology LP3 BPC_NTC Appendix_2.2-compressed.pdf Hydrology LP3 BPC_NTC Appendix_2.1-compressed.pdf Hydrology LP3 BPC_NTC Appendix_9-compressed.pdf Hydrology LP3 BPC_NTC Appendix_7-compressed.pdf Hydrology LP3 Summary BPC_NTC Part 2 (1).pdf Hydrology LP3 Summary BPC_NTC Part 1 (1).pdf

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						sustainable transport modes are prioritised and any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach. The Council acknowledges that the strategic development proposals for Nailsea and Backwell are reliant upon significant investment in transport infrastructure, including the delivery of a “strategic rail crossing” from the A370 in Backwell to Nailsea. The evidence prepared by John Russell Transport Planning (appended) demonstrates that allocation of land East of Backwell for 889 dwellings does not represent a sustainable location and would result in significant impacts on the transport network which would not be cost effectively mitigated through the proposed strategic rail crossing. Accordingly, contrary to the findings of the Green Belt Background Paper, the land East of Backwell does not qualify as Grey Belt. Furthermore, paragraph 5.4 of the Green Belt Background Paper states that wider planning factors have been a key consideration in the selection of these Green Belt sites, including conformity with the spatial strategy, focussing development at the large urban areas, towns and more sustainable villages, deliverability of the sites over the plan period as well as the provision of infrastructure and benefits the release of land in these locations can provided particular in light of the NPPF ‘Golden Rules’. In response, BPC and NTC comment as follows: 1. As demonstrated in our response to Policy SP3, the concept of a strategic development location at Nailsea and Backwell has previously been rejected by the Council on the basis that it is not viable or deliverable. No evidence has been provided in support of this Regulation 19 version of the plan to justify this U-turn in the Council’s position. 2. The Council has failed to produce a Housing Trajectory in this Local Plan to demonstrate that the sites are deliverable over the plan period. 3. The Council seeks to justify the		

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						allocation of land East of Backwell on the basis of the strategic rail crossing to mitigate the transport impacts of the strategic development at Nailsea. However, the evidence produced by John Russell Transport Planning seriously questions the deliverability of and mitigation achieved by the strategic rail crossing. For these reasons, BPC and NTC find Policy SP7 to be unjustified in the absence of an appropriate evidence base to support the removal of land East of Backwell from the Green Belt. Accordingly, the policy is unsound. Notwithstanding the above, BPC and NTC support Policy SP7 in respect of the extension of the Green Belt to the south of Nailsea to maintain the separation of Nailsea and Backwell and prevent further encroachment into the countryside. The Landscape Sensitivity Assessment carried out by Wardell Armstrong (March 2018) concluded that the land between Nailsea and Backwell (either side of Station Road) including land south of Nailsea is of high sensitivity. The land to the south of the gap, south of Youngwood Lane, is of medium/high susceptibility to change due to its increased openness, distinct low-lying topography and its degree of separation from the southern edge of Nailsea. The assessment finds that the development south of Nailsea and north of Backwell has visually coalesced and the remaining land between the settlements has an important role in preventing the physical coalescence of the two settlements and further visual coalescence (paragraph 6.2.59). The Green Belt Review Part 3 explored several options for the potential extension of the Green Belt between Nailsea and Backwell. Option 1 sought to replace the land designated as strategic gap with Green Belt. However, this failed to provide a defensible boundary to the western extent of the Green Belt. Option 2 extended the Green Belt further west beyond the current limits of both settlements. The boundaries are defined by Youngwood Lane and Chelvey Road, providing clear and defensible boundaries. A		

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						final option sought to create a major extension to the Green Belt extending to the east of Clevedon. However, this was not considered necessary in the absence of any development threat to coalescence between Clevedon and Nailsea. In light of the scale of development proposed at Nailsea and Backwell, including Grove Farm which already benefits from a resolution to grant outline planning permission and land to the south west of Nailsea at Netherton Grange which is under-construction, there are exceptional circumstances to justify the extension of the Green Belt on the basis of the existing visual coalescence of the settlements and the need to protect against the physical merger of the settlements. For these reasons, regardless of the scale of development planned through this Local Plan, an extension to the Green Belt between Nailsea and Backwell, as defined on the Policies Map, is justified.		
SP8: Housing	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure		BPC and NTC express the strongest objection to the proposed distribution of development defined under Policy SP8, in particular, the direction of 3,728 dwellings to Nailsea and Backwell (15% of the total housing supply). Nailsea Town Council accepts that as a town it should be a focus for growth, as supported by the Urban Focus approach in the early iterations of the spatial strategy. However, objection is raised to the identification of Nailsea and Backwell as a strategic development location, which is expected to accommodate the highest level of housing growth outside Weston-Super-Mare. To put these figures into context, the population of Nailsea in 2021 was 15,917 and Backwell had a population of c. 4,800 in 2021. This equates to an approximate combined population of c. 20,700. Policy SP8 proposes to direct 3,728 dwellings to these settlements over the plan period to 2041. This equates to an additional 8,574 persons (based		251118 Local Plan Reg 19 2025 reps FINAL.pdf R01 - Transport Statement - Rev 3 FINAL.pdf Hydrology LP3 BPC_NTC Appendix_2.2-compressed.pdf Hydrology LP3 BPC_NTC Appendix_2.1-compressed.pdf Hydrology LP3 BPC_NTC Appendix_9-compressed.pdf Hydrology LP3 BPC_NTC Appendix_7-compressed.pdf Hydrology LP3 Summary BPC_NTC Part 2 (1).pdf Hydrology LP3 Summary BPC_NTC Part 1 (1).pdf

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						on 2.3 persons per household). This represents a 41% increase in the combined population of Nailsea and Backwell. The figures are even more stark when the scale of growth proposed for Backwell is extrapolated. Schedule 1 of the Local Plan identifies allocations totalling 1,683 dwellings at Backwell. Using the same formula to calculate population generated by this scale of development, the population of Backwell would increase by 3,871 persons over the plan period, representing a 81% increase in the population of Backwell village. By comparison the proposed population growth at the other locations is as follows: (see attached document) It is acknowledged that the relative scale of growth north of Banwell is considerable and far in excess of Backwell. However, the proposed scale of growth here is justified to support the delivery of the Banwell bypass. The scale of growth directed to the main towns represents less than half (circa 48%) of the total housing requirement. Policy SP8 is reliant upon four strategic development locations to deliver 47% of its housing requirement. 2 North Somerset average household size, Census 2021 The substantial scale of population growth directed to Backwell through this Local Plan, which is more than that proposed for the town of Portishead, is wholly disproportionate to the existing settlement and coupled with the significant growth proposed for Nailsea, will place undue pressure on existing facilities, services and infrastructure and have a significant, detrimental impact on the character and nature of the area and its communities. The Infrastructure Delivery Plan (Main Report) recognises that the large-scale development planned for Nailsea and Backwell will have		

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						significant infrastructure requirements, reflecting the scale and complexity of the developments, including transport infrastructure, education, environmental infrastructure, social infrastructure and utilities (paragraph 6.9). The IDP is expected to provide the framework for bringing forward that infrastructure, ensuring it is phased appropriately alongside the development (paragraph 6.10). However, the IDP Schedule includes scant information on the nature of the infrastructure required, the infrastructure cost and the timing of delivery. For example, access improvements to Nailsea and Backwell Station (TR31) has no indication of cost, funding is expected to require grant funding, although it is unclear whether the project would qualify and timescales are unknown. Similarly, ED1, School playing fields at Church Lane, has no indication of cost, or timing of delivery. The relocation of the waste transfer station at Backwell is also identified (UT2) to meet additional capacity requirements, yet there are no costs, funding or timescales attributed to the project. The existing facility is close to the Junior School and the HGVs serving the recycling centre use the same route as pupils, along Dark Lane, a steep, narrow residential road, posing a significant risk to pedestrian safety. The relocation of the waste transfer is critical during this plan period to improve highway safety in the village. As currently drafted the IDP is unsound, providing no evidence that the relocation of the waste transfer station can be delivered within the plan period. In addition, the direction of such significant growth to Nailsea and Backwell, as proposed would bring substantial adverse transport and environmental impacts, including: 1. Severe impacts upon the capacity of the existing highway network, which would not be adequately mitigated; 2. Significant loss of best and most versatile agricultural land;		

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						3. Significant impacts on the setting of heritage assets; and 4. Significant erosion of the foraging habitat supporting the Brockley Hall Stables SSSI to the detriment of this important population of Greater and Lesser Horseshoe bats. Impacts on the Highway Network John Russell Transport Planning has prepared the attached note to demonstrate the adverse impacts of the proposed Nailsea and Backwell strategic development location on the existing highway network and the shortcomings of the proposed transport strategy to mitigate the development impacts following their reinstatement in the latest Pre-Submission Local Plan 2025. Impacts on Best and Most Versatile Agricultural Land In preparing local plans, local planning authorities should distinguish between the hierarchy of international, national and locally designated sites, allocate land with the least environmental or amenity value, where consistent with other policies in this Framework (paragraph 188, the Framework). In doing so, footnote 65 advises that where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The Best and Most Versatile Agricultural Land Background Paper (October 2025) acknowledges that only 7% (2,522ha) of all agricultural land within North Somerset is Grade 1, with a further 10% (3,842ha) Grade 2. 60% (22,469ha) falls into Grade 3. In response, the Local Plan includes policy DP53 which, in accordance with the Framework, serves to safeguard Grade 1 and 2 land, directing significant development to poorer quality soils. However, the Local Plan has failed to take this approach in establishing its spatial strategy and identifying suitable land for residential development.		

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						Based on the HELAA (Appendix 1) Site Data and Assessments, the total area of sites allocated in Nailsea and Backwell which occupy best and most versatile land is 269.83 hectares, of which up to 95 hectares is Grade 1 and at least 92 hectares is Grade 23. With a total of circa 187 hectares of Grade 1 and 2 agricultural land to be lost as a consequence of the strategic development location at Nailsea and Backwell, this represents about 4% of the entire Grade 1 and 2 land within North Somerset. It is acknowledged that some of these sites already benefit from planning permission, a resolution to grant or are under construction, however, most notably, land at East Backwell (circa 52 hectares) is Grade 1 and all land allocated at Backwell is Grade 1 or 2, whilst 50% of the sites in Nailsea are also Grade 1 or 2. No other location within the plan area occupies such high levels of Grade 1 and 2 land, as illustrated by the table below. (3 Grove Farm (Grade 1 and 2) is included in full as Grade 1 (hence the figure is referred as “up to”). Some of this would be Grade 2 which would increase this figure (hence this is referred to as “at least”). ANNEX 1 (see attached) — The Best and Most Versatile Agricultural Land Background Paper states that land East of Backwell is “part of a wider package of strategic allocations around Nailsea and Backwell is considered justified on the basis that without it the development of key infrastructure in the form of a new link road connecting Nailsea and Backwell would not be deliverable. This wider sustainability benefit outweighs the loss of BMV land in this location.” This justification is also applied to land south of Nailsea (Grade 2). However, as evidenced through the accompanying submissions by John Russell Transport Planning on behalf of BPC and NTC, the proposed new link road does not represent suitable mitigation for development at Nailsea or Backwell. The proposed road link		

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						would not mitigate the adverse impacts of the development proposed at Nailsea and Backwell and the viability and deliverability of the infrastructure, crossing the railway line from Bristol Temple Meads to Weston-Super-Mare on an embankment, affected by flood risk, will be extremely challenging and uncertain. In the absence of the road link providing proven, deliverable mitigation, the loss of Grade 1 and 2 agricultural land is not justified. Loss of Bat Habitat The North Somerset and Mendip Bats Special Area of Conservation is an internationally importance designation under the European Habitats Directive centred around Sites of Special Scientific Interest including the Brockley Hall Stables, a summer maternity roost for the Greater Horseshoe Bats. The roost lies approximately 1 kilometre from the western boundary of Backwell and approximately 2 kilometres from the south-western extent of Nailsea with tracts of farmland separating the roost from the settlements. The latest draft of the North Somerset and Mendip Bats SAC Supplementary Planning Document (October 2025) records a peak population at the roost of 757 bats in 2020, however since then there has been a rapid decline in the population, with only 180 adults recorded in 2025. (See attached). This evidence raises serious concerns regarding the health and long-term sustainability of the Greater Horseshoe Bat (GHB) population at the SSSI which is not reflected in roosts elsewhere in North Somerset. The fall in population is believed to be symptomatic of the bats needing to travel further to new foraging sites and therefore relocating to sites closer to new foraging locations. The expansion of the airport to 12mppa and the recent development of the West End of Nailsea are likely to be contributing factors. Although further evidence is required it is of deep concern that the numbers are falling		

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						so dramatically in this primary maternity roost. The increased pressure of house building, well-lit developments, the continuing decline in the local cattle population and changes to local farming practices poses an existential threat to the internationally important GHB population. Although the Local Plan refers to the potential for Nature Parks to provide bat mitigation, no certainty is provided in terms of the location, scale or mechanisms for delivery of these proposals or to ensure their protection in perpetuity. In the absence of adequate and effective mitigation, the identification of a strategic development location in close proximity to the Bat SAC and a SSSI which is evidently under threat, is likely to place this internationally important designation at further risk of demonstrable harm, contrary to the Habitat Regulations. For the above reasons, Policy SP8 and specifically the housing allocation to Nailsea and Backwell is unjustified, ineffective and contrary to the national planning policy framework. Amendment sought: The policy should be amended to extrapolate the housing requirements for Nailsea and Backwell as two separate figures, reduce the figures to reflect the deletion of allocations on land south of Nailsea, land east of Backwell, land at Pound Lane and Land at Poplar Farm.		
SP11: Historic and natural environment	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure		BPC and NTC support the overarching principles of Policy SP11 to protect and enhance the historic and natural environment. However, the policy should go further to protect these environments. Amendment Sought: The policy states that “New development will, where appropriate, be expected to:…”. The words “where appropriate” should be removed from the policy and replaced with “where applicable” to avoid any misinterpretation of the policy intention and ensure development proposals comply with all relevant		251118 Local Plan Reg 19 2025 reps FINAL.pdf R01 - Transport Statement - Rev 3 FINAL.pdf Hydrology LP3 BPC_NTC Appendix_2.2-compressed.pdf Hydrology LP3 BPC_NTC Appendix_2.1-compressed.pdf Hydrology LP3 BPC_NTC Appendix_9-compressed.pdf Hydrology LP3 BPC_NTC Appendix_7-compressed.pdf Hydrology LP3 Summary BPC_NTC Part 2 (1).pdf Hydrology LP3 Summary

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						aspects of the policy. The policy includes an expectation to protect the best and most versatile (BMV) agricultural land. This provision is fully supported by BPC and NTC. However, the local plan spatial strategy allocates substantial areas of the highest quality agricultural land at Nailsea and Backwell for residential development. The expectations of Policy SP11 could not reasonably be met through development of these allocations which will result in the inevitable loss of BMV agricultural land and are therefore ineffective in respect of these development proposals which are central to the overall strategy for housing delivery. The policy includes an expectation to support the establishment and delivery of Nature Parks to protect and enhance internally important bat habitats. Policy DP35 states that Nature Parks will be identified to protect and enhance greater and lesser horseshoe bat habitat at the strategic development locations including Nailsea and Backwell. However, the policy provides no details of the required extent, nature or location of the Nature Parks, how they would be delivered and secured in perpetuity. The provisions within Policy SP11 are therefore The policy justification states that Nature Parks should be unlit and not impacted by light spill from adjacent land to make it suitable for light-intolerant horseshoe bats. However, the policy makes no provision for safeguarding dark skies or protecting Nature Parks or bat habitat/green corridors from light spill. The policy should include a specific requirement for development proposals to include sufficient measures to safeguard dark skies and such potential measures should be explicitly referenced within the local plan. The provision of street lighting on new developments would be entirely out of keeping with Backwell, which is largely unlit on public highways. BPC is aware that other councils have adopted measures such as red street lighting (Oxfordshire, Worcestershire, Birmingham) to safeguard dark skies in areas within 2 kilometres of bat		BPC_NTC Part 1 (1).pdf

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						SSSIs. In addition, conditions to require street lighting to be set on timers to turn off at midnight are already in place in Backwell and should apply to new developments. The policy as drafted is ineffective in securing sufficient safeguards and enhancements of the natural environment to achieve the objectives of the policy and the plan as a whole and to comply with the Framework. Accordingly, the policy is ineffective, contrary to the Framework and therefore unsound. Amendments sought: The policy should be amended to require compliance with all relevant policy criteria. The policy should cross-reference to an enhanced version of Policy DP35 to ensure the effective delivery of Nature Parks. The policy should include additional provisions to safeguard dark skies and Nature Parks against light-spill.		
Policy LP3: Strategic location: Nailsea and Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure		1.77 BPC and NTC express strong objections to the proposed designation of Nailsea and Backwell as a Strategic Location for development under Policy LP3 and the associated residential and employment allocations, as identified on the Policies Map and Schedule 1 of the Local Plan. 1.78 BPC and NTC's objections are broadly based on the following fundamental concerns: 1. The scale of development proposed at Backwell village which represents an 81% increase in the village population and the associated harmful impacts this scale of development would have on the character and community of Backwell; 2. The proposals direct substantial housing to locations with limited employment opportunities (existing or proposed), contrary to the local plan's sustainable development objectives. 3. The strategic location is wholly dependent on delivery of a strategic rail crossing which is a complex and challenging project which fails to offer appropriate mitigation for growth at Nailsea or Backwell. The proposed crossing brings significant		251118 Local Plan Reg 19 2025 reps FINAL.pdf R01 - Transport Statement - Rev 3 FINAL.pdf Hydrology LP3 BPC_NTC Appendix_2.2-compressed.pdf Hydrology LP3 BPC_NTC Appendix_2.1-compressed.pdf Hydrology LP3 BPC_NTC Appendix_9-compressed.pdf Hydrology LP3 BPC_NTC Appendix_7-compressed.pdf Hydrology LP3 Summary BPC_NTC Part 2 (1).pdf Hydrology LP3 Summary BPC_NTC Part 1 (1).pdf

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						impacts and engineering challenges which are reliant on the full agreement and cooperation of Network Rail. However, the Pre-Submission Local Plan provides no certainty of costs or funding, no evidence that a viable design solution can be achieved with the agreement of Network Rail and no certainty that the road would be completed in a timely manner. 4. The deficiencies of the Strategic Flood Risk Assessment (October 2025) which fail to evidence the extent of flood risk at Nailsea and Backwell, particularly in association with land East of Backwell, land south of Nailsea and the strategic rail crossing, which are affected by surface water and fluvial flooding and the need to apply the sequential approach to these and other sites allocated under Policy LP3; 5. The substantive loss of best and most versatile agricultural land around Nailsea and Backwell; the strategic development location is 100% reliant on development of grade 1 and 2 agricultural land. Contrary to the Framework, no consideration has been given to poorer quality alternative locations; 6. The loss of important bat foraging grounds, closely associated with the Brockley Hall Stables SSSI and the impact of the population of greater and lesser Horseshoe Bats. Population Growth 1.79 Nailsea Town Council accepts that as a town it should be a focus for growth, as supported by the Urban Focus approach in the early iterations of the spatial strategy. However, objection is raised to the identification of Nailsea and Backwell as a strategic development location, which is expected to accommodate the highest level of growth outside Weston-Super-Mare. 1.80 As detailed in response to Policy SP8, the population of Nailsea in 2021 was 15,917 and Backwell had a population of c4,800 in 2021. This equates to an approximate combined population of c.20,700.		

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						1.81 Policy LP3 proposes to direct 3,728 dwellings to Nailsea and Backwell, of which 1,683 are allocated to Backwell. This equates to an additional 8,574 persons (based on 2.3 persons per household)4 and a 42% increase in the combined population of Nailsea and Backwell. 1.82 The figures are even more stark when the scale of growth proposed for Backwell is extrapolated. Using the same formula to calculate population generated by this scale of development, the population of Backwell would increase by 3,871 persons over the plan period, representing an 81% increase in the population of Backwell village. 1.83 The substantial scale of population growth directed to Backwell through this Local Plan is wholly disproportionate to the existing settlement and coupled with the significant growth proposed for Nailsea, will place undue pressure on existing facilities, services and infrastructure and it will have a significant, detrimental impact on the character and nature of the area and its communities. Employment 1.84 Backwell is a commuter village around 7 miles from Bristol. There are limited employment opportunities in the village; the village has a small number of shops and other services and facilities in the village centre, along with health services, schools and leisure facilities and a petrol station. An extant planning permission exists at Coles Quarry for the construction of industrial units. However, it is evident that the majority of employed residents travel to work outside the village or work from home. 1.85 The proposals to direct 1,684 dwellings to Backwell is wholly unsustainable, having regard to the limited availability of employment in the village and the wider area. The Sustainability Appraisal acknowledges that the majority of employment opportunities are in		

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						Bristol and Weston-Super-Mare (paragraph 5.4) and this is reflected in the travel to work data. Accordingly, the SA recommends directing development to these parts of the District (paragraph 5.5) on the basis of the significant positive effects arising from development in these locations. SA objective 1.2 further supports this position. Paragraph 5.7 of the SA advises that Weston and Bristol provide access to the highest concentration of existing businesses and residents will have good access to a wide variety of jobs. Importantly, it is acknowledged that residential site options well-related to Clevedon, Nailsea and Portishead provide access to a more limited concentration of businesses which would provide “some access” to employment and training (paragraph 5.7, SA). 1.86 The SA Employment Proformas highlight an anomaly in the assessment of sites. The SA assessment of SA_ID_54 (Land East of Backwell) for employment uses, gives the site a (4 North Somerset average household size, Census 2021) significant positive score against objective 1.1 (ensuring a range of job opportunities are easily accessible without having to use a car. This is based on the site being within 1.8km of the Settlement boundary of Weston-Super-Mare, Clevedon, Nailsea or Portishead. SA_ID_56 (Woodspring Strategic Location) is assessed for the same employment use. This major urban extension to Bristol performs more poorly against objective 1.1 than East Backwell because it is up to 2.7km away from one of the main towns in North Somerset, despite its close proximity to the City of Bristol. This highlights a clear flaw in the SA methodology which skews the findings in favour of employment at the village of Backwell over an urban extension to a major city. 1.87 It is evident that employment opportunities should be directed to locations which are well⧫related to Bristol or Weston-Super-Mare, and		

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						housing should be planned accordingly to maximise accessibility to new employment. The Bristol conurbation and approved Epic employment campus provide excellent job opportunities over the plan period and beyond and the Local Plan should maximise housing delivery in this area to achieve sustainable patterns of development. The allocation of land for housing and employment on land East of Backwell is contrary to the evidence presented through the SA and therefore unsound. Transport Mitigation Strategy 1.88 The Preferred Options to the Local Plan 2038 first mooted proposals for strategic scale development at Nailsea and Backwell (Policy LP3). The proposals were broadly the same as those proposed through this Pre-Submission version of the plan. 1.89 The policy was justified by the Council purely based on Backwell's relative proximity to Nailsea and the train station. "Nailsea is a main town within North Somerset and a focus for growth as part of the preferred spatial strategy for development. Given its proximity to Nailsea and the train station, growth opportunities at nearby Backwell have also been considered and form part of the draft proposals" (page 26, Preferred Options) 1.90 The Preferred Options recognised that "very significant transport interventions would be required to support growth and avoid adverse impacts upon the existing transport network." (page 26, Preferred Options) 1.91 The Nailsea and Backwell Transport Position Statement, prepared by NSC, dated September 2023, (see attached) advised that "the housing numbers proposed at Nailsea Backwell in the Reg 18 draft Local Plan were such that their combined impacts upon Backwell Crossroads would have been severe. Therefore we investigated a strategic mitigation		

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						that would have provided a “Backwell Crossroads Bypass”…This would be a major investment which would require external funding of which there is no certainty. It would also have had notable environmental, visual and heritage impacts, with technical and stakeholder delivery challenges.” For these reasons the proposed strategic scale of development at Nailsea and Backwell and the associated rail crossing were removed from the Pre-Submission Local Plan 2023. 1.92 In support of the Pre-Submission Local Plan published in November 2023, the Spatial Strategy and Capacity Paper advised that “further technical work has concluded that the scale of growth at Nailsea/Backwell is constrained by the lack of deliverability of essential strategic transport mitigations.” (paragraph 3.1). It elaborates further “The Preferred Options proposed Nailsea/ Backwell as a strategic growth location subject to, in particular, deliverable strategic transport mitigations being identified. This related to a potential new road crossing of the railway to alleviate capacity issues at Backwell crossroads and Station Road. The transport evidence at the time indicated that the rail crossing could be either to the west or east of Backwell and could be a bridge or a tunnel. None of these options are straightforward given flooding issues which could affect any crossing under the railway and the visual impact of a bridge crossing a railway on an embankment. Further technical assessment following Preferred Options resulted in a preference being for a bridge crossing to the East of Backwell. However, taking account of potential development contributions and other sources of funding, the costs of delivery were prohibitive which meant that delivery was highly unlikely over the plan period.” Paragraph 3.12, Spatial Strategy and Capacity Paper, November 2023). 1.93 The conclusions drawn at the time of the 2023 Pre-Submission		

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						Local Plan were that the scale of development in the area and Nailsea and Backwell were no longer proposed as a strategic growth location in the plan (paragraph 3.14). 1.94 These factors remain entirely relevant. There has been no material change in circumstances since the 2023 Local Plan and no significant change to the development proposals other than confirmation that a new rail crossing would be sited to the east of Backwell. 1.95 The Spatial Strategy and Capacity Paper (October 2025) offers no explanation for the selection of the strategic growth locations and very limited justification for the reversal of previous decisions to direct substantial development to the village of Backwell. 1.96 Neither the Pre-Submission Local Plan 2025 or the accompanying Spatial Strategy and Capacity Paper (October 2025) justify the reversal of previous decisions made through the Local Plan preparation process. The spatial strategy as presented through Policy SP3 fails to justify, through appropriate evidence that Nailsea and Backwell represents a sustainable location as a strategic development location. 1.97 BPC and NTC has commissioned John Russell Transport Planning to review the Nailsea and Backwell strategic location in the context of the Transport Mitigation Strategy. The accompanying technical report identifies serious flaws in the transport evidence to support the identification of Nailsea and Backwell as a strategic location for development, the mitigation achieved through the strategic rail crossing and the deliverability of this infrastructure. Crucially, the Local Plan has failed to recognise that the two settlements are served by different parts of the highway network and as a result the proposed strategic rail crossing would not mitigate the transport impacts of growth at Nailsea and therefore it does not justify the allocation of land		

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						East of Backwell for 889 homes. 1.98 John Russell Transport Planning recommends an alternative approach is adopted which would support growth at Nailsea, as one of the main towns in North Somerset and deliver appropriate transport mitigation through improvements to the B3130 and B3128 which carry most trips from Nailsea. 1.99 Please refer to the accompanying report by JR Transport Planning for full details of BPC and NTC's objections to Policy LP3 on transport grounds. Flooding 1.100 The Local Plan Pre-Submission has failed to acknowledge the nature and extent of flood risk within and around Nailsea and Backwell when identifying the area as a strategic development location. 1.101 Nailsea is an island surrounded by land in flood zone 3. The flood zone aligns with the River Kenn to the south, the flood plain of which has historically maintained the town's physical separation from Backwell. Backwell Lake has recently been designated as a surface water reservoir which brings with it a duty to safeguard the reservoir from flooding and overtopping. 1.102 Backwell has a large surface water catchment area which incapsulates the fast-moving surface water flow paths from Backwell Hill, directing water onto and over the A370, onto land East of Backwell and north to the River Kenn, north of the railway line. The flood risk around Nailsea and Backwell is further complicated by ground conditions, with the Yanley fault line extending across land East of Backwell and south of Nailsea. 1.103 NTC and BPC are aware that the Council has commissioned a Local Flood Risk Management Strategy – Scheme Opportunities Assessment (March 2025), prepared by Wallingford HydroSolutions Ltd. The		

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						report assessed 24 communities in North Somerset at risk of surface water flooding and identified mitigation options. Backwell is identified as one such community and is ranked within the top 10 of communities to potentially benefit from SuDS interventions. 1.104 Despite the evidence of surface water and fluvial flood risk and the presence of Backwell Lake (reservoir), the Council has failed to demonstrate that it has adequately assessed the impact of strategic development at Nailsea and Backwell on flood risk, or undertaken the sequential pproach (and exception test, where appropriate) in determining whether this represents a a suitable location for development, at lowest risk of flooding. 1.105 BPC and NTC has commissioned Chris Whitlow and Associates Ltd to review the Local Plan and Strategic Flood Risk Assessment in respect of flood risk. The accompanying technical note highlights the deficiencies within the Council's Strategic Flood Risk Assessment, provides additional evidence and modelling to explain the likely extent of flood risk within the area and the flood risks associated with the proposed identification of Nailsea and Backwell as a strategic development location. 1.106 The Council has failed to take account of the flood risks associated with development at Nailsea or Backwell, particularly in respect of land west of Nailsea (Poplar Farm), land East of Backwell, land south of Nailsea, and the road infrastructure proposed to access these allocations and has therefore failed to appropriately apply the sequential test and exception test. Accordingly, Policy LP3 is unsound. Best and Most Versatile Agricultural Land 1.107 In preparing local plans, local planning authorities should distinguish between the hierarchy of international, national and locally		

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						designated sites, allocate land with the least environmental or amenity value, where consistent with other policies in this Framework (paragraph 188, the Framework). In doing so, footnote 65 advises that where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. 1.108 The proposed designation of Nailsea and Backwell as a strategic location for development runs contrary to footnote 65 of the Framework. 1.109 The Agricultural Land Classification Map for the Southwest (Natural England) illustrates the concentration of grade 1 and 2 agricultural land around Nailsea and Backwell, with limited availability elsewhere in North Somerset. See below. Key: Dark Blue (Grade 1); Light Blue (Grade 2), Green (Grade 3), Yellow (Grade 4); Brown (Grade 5). Orange and Red – non-agricultural uses. 1.110 The Best and Most Versatile Agricultural Land Background Paper (October 2025) acknowledges that only 7% (2,522ha) of all agricultural land within North Somerset is Grade 1, with a further 10% (3,842ha) Grade 2. 60% (22,469ha) falls into Grade 3. In response, the Local Plan includes a policy DP53 which, in accordance with the Framework, serves to safeguard Grade 1 and 2 land, directing significant development to poorer quality soils. 1.111 However, the Local Plan has failed to take this approach in establishing its spatial strategy and identifying suitable land for residential development. Based on the HELAA (Appendix 1) Site Data and Assessments, the total area of sites allocated in Nailsea and Backwell which occupy best and most versatile land is 269.83 hectares, of which up to 95 hectares is Grade 1 and at least 92 hectares is Grade 25. With a total of circa 187 hectares of		

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						Grade 1 and 2 agricultural land to be lost as a consequence of the strategic development location at Nailsea and Backwell, this represents about 4% of the entire Grade 1 and 2 land within North Somerset and almost 4% of the Grade 1 land. 1.113 It is acknowledged that some of these sites already benefit from planning permission, a resolution to grant or are under construction, however, most notably, land at East Backwell (circa 52 hectares) is wholly Grade 1 and all land allocated at Backwell is Grade 1 or 2, whilst 50% of the sites in Nailsea are also Grade 2. 1.114 The Best and Most Versatile Agricultural Land Background Paper states that land East of Backwell is “part of a wider package of strategic allocations around Nailsea and Backwell is considered justified on the basis that without it the development of key infrastructure in the form of a new link road connecting Nailsea and Backwell would not be deliverable. This wider sustainability benefit outweighs the loss of BMV land in this location.” 1.115 This justification is also applied to land south of Nailsea (Grade 2). 1.116 However, as evidenced through the submissions by John Russell Transport Planning on behalf of BPC and NTC, the proposed new link road does not represent suitable mitigation for development at Nailsea or Backwell. The proposed road link would not mitigate the adverse impacts of the development proposed at Nailsea and Backwell and the viability and deliverability of the infrastructure, crossing the railway line from Bristol Temple Meads to Weston-Super-Mare on an embankment, affected by flood risk, will be extremely challenging and uncertain. In the absence of evidence that the Council has appraised all other reasonable alternatives for delivery of housing on poorer quality soils and on the basis that the proposed strategic rail crossing does not provide convincing justification		

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						for the loss of Grade 1 agricultural land at East of Backwell, the Local Plan has failed to comply with the Framework (footnote 65). The proposed strategic location for development would result in an irreversible loss of best and most versatile agricultural land, of the highest quality. The Council has provided no compelling evidence to justify the departure from national policy and accordingly, Policy LP3 is unsound. North Somerset and Mendip Bats SAC 1.117 The North Somerset and Mendip Bats Special Area of Conservation is an internationally importance designation under the European Habitats Directive centred around Sites of Special (5 Grove Farm (Grade 1 and 2) is included in full as Grade 1 (hence the figure is referred as “up to”). Some of this would be Grade 2 which would increase this figure (hence this is referred to as “at least”). Scientific Interest including the Brockley Hall Stables, a summer maternity roost for the Greater Horseshoe Bats. The roost lies approximately 1 kilometre from the western boundary of Backwell and approximately 2 kilometres from the south-western extent of Nailsea with tracts of farmland separating the roost from the settlements. 1.118 The latest draft of the North Somerset and Mendip Bats SAC Supplementary Planning Document (October 2025) records a peak population at the roost of 757 bats in 2020, however sincethen there has been a rapid decline in the population, with only 180 adults recorded in 2025. See below. This is likely to be attributed to the recent expansion of Bristol Airport and the development of housing to the West End of Nailsea, although further evidence is required to confirm this. 1.119 This evidence raises serious concerns regarding the health and long-term sustainability of the Greater Horseshoe Bat (GHB) population at the SSSI which is not		

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						reflected in roosts elsewhere in North Somerset. The fall in population is believed to be symptomatic of the bats needing to travel further to new foraging sites and therefore relocating to sites closer to new foraging locations, although further evidence is required and it is of deep concern that the numbers are falling so dramatically in this primary maternity roost. 1.120 There is likely to be a strong correlation between the location of the Brockley Hall Stables SSSI and the prevalence of cattle-grazed pasture and semi-natural woodland around Brockley, Backwell and Nailsea. The Habitat Regulations Assessment prepared by AECOM to support the Local Plan recognises that the Greater horseshoe bats preferentially forage in permanent pastures that are interspersed with deciduous woodland and hedgerows. Of the top five feeding areas for GHB, 38.6% is cattle-grazed pasture. Substantial on-site compensatory habitat will be required, as illustrated through Table 7 of the HRA. Paragraph 6.80 of the HRA refers to the identification of a Nature Park in the Nailsea/Backwell area. This is referenced in policy LP3, however, the policy wording indicates that the Nature Park would form part of any development proposals at Nailsea and Backwell, secured by condition or planning application. The policy draws no differentiation between Nature Park provision or any standard HEP compensatory habitat provision on individual sites. In the absence of a strategic approach or ouncil control of Nature Parks, the proposals would not provide a contiguous area of enhanced bat habitat, nor would there be any standardised management regime. The provision of cattle grazed pasture will be eroded by the development proposals and the viability of introducing cattle grazing into Nature Parks would be undetermined by the relatively small scale of the parks, limiting their suitability for farming tenants and their proximity to new residential development.		

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						1.121 The identification of a strategic development area in close proximity to the Bat SAC and a SSSI which is evidently under threat, with disparate mitigation land, is likely to place this internationally important designation at further risk of demonstrable harm, contrary to the Habitat Regulations. Other matters 1.122 BPC and NTC are concerned that the success of the strategic location is reliant on a package of new transport infrastructure, including the strategic rail crossing, estimated by the Council to cost around £30million. The policy is worded to require “a strategic and coordinated approach to mitigation, particularly the provision of a package of new transport infrastructure”. This places the emphasis on transport infrastructure, which given the costs involved, could place a significant burden on the developments at the expense of other infrastructure, such as community facilities and services. Although the importance of timely delivery of infrastructure is recognised in the Infrastructure Delivery Plan, there is limited information provided in the Infrastructure Delivery Plan Schedules of the nature of the proposals, the likely costs, the availability of funds and the timing of delivery. 1.123 In addition, the East Backwell and North Nailsea proposals occupy land which is currently located within the Green Belt. Accordingly, the policy requires delivery of 50% affordable housing to comply with the Framework, placing a further developer obligation and cost upon the developers, further reducing funds available for other new or improved local infrastructure. As a result, BPC and NTC are concerned that the strategic development location’s reliance on expensive road infrastructure and the increased affordable housing obligation will result in the delivery of housing with very limited provision of infrastructure to assimilate the development into the existing		

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						community and mitigate the adverse impacts on the existing residents and their access to local services and facilities. 1.124 The policy requires a phasing strategy to be provided with all planning applications detailing how the development proposed will support the delivery of infrastructure in line with the Infrastructure Delivery Plan. This should include details of infrastructure to be provided on site or through off-site contributions. 1.125 As drafted the policy proposes a developer-led approach to the delivery of infrastructure, rather than a policy driven approach. Further clarity is required through the policy to establish the nature and scale of contributions which should be secured from the constituent allocations. 1.126 With reference to the IDP schedule, item SO4 identifies health care, but fails to specify the scale or nature of infrastructure required to support this scale of development. This must be clarified through the IDP to ensure adequate provision is secured from developments to meet the identified needs. 1.127 In respect of education, the IDP provides for 3 primary schools in the Nailsea and Backwell area (ED7 Grove Farm, ED13 East Backwell and ED14 South Nailsea). However, ED7 states hat only land to accommodate a primary school would be provided (despite Schedule 1 requiring provision of a primary school on site). This is reflected in the Council's decision on planning application 23/P2618/OU2. ED7 states that the school would be funded by developer contributions on other strategic sites in Backwell, i.e. East Backwell. No justification is provided or why the Council has not sought funding for the school from the developer of Grove Farm and why it relies upon the allocation of East Backwell to be confirmed through this Local Plan in order to secure such funding.		

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						1.128 Land at East Backwell is also required to fund another primary school on-site (ED13), alongside a 50% affordable housing requirement due to its location in the Green Belt and the strategic transport mitigation package, which includes the on-site provision of the strategic rail crossing. This places a significant burden upon the allocation, which could undermine its viability and therefore its ability to meet the infrastructure requirements within policies LP3 and LP5 in full. 1.129 For the reasons set out above, Policy LP3 is unjustified, ineffective and conflicts with he Framework. The policy is therefore unsound. Proposed Allocations 1.130 BPC and NTC do not oppose proportionate growth at Nailsea, recognising its role as one of the main towns in North Somerset. It also acknowledges that several allocations are based on extant planning permissions. However, objection is raised to the proposed allocations of Pound Lane (100 dwellings), Poplar Farm (130 dwellings) and land South of Nailsea (582 dwellings). All three sites are relatively remote from the town centre and would not encourage residents to use active travel to access services. In addition, Poplar Farm and land South of Nailsea sites are highly constrained by flood risk and drainage issues. 1.131 The Government flood maps for planning show that land at Poplar Farm is almost entirely at risk of flooding when climate change is taken into account for the period 2070-2125. See screenshot of Government mapping (see attached) 1.132 It is also noted that this also applies to land North-West of Nailsea, however NTC acknowledges that this site benefits from partial consent and is carried forward from the allocated in the Adopted Site Allocations DPD. With the extent of flooding forecast to increase from the west of Nailsea, it is ill-advised to allocate Poplar Farm, which would put further residents at		

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						risk of flooding within the life of these properties. The site allocation should therefore be deleted. 1.133 A live planning application for land south of Nailsea 23/P/1145/OUT has been sat with the Council since 2023. The proposed vehicular access to the residential development relies upon a connection from Station Road (south of Backwell Lake), which crosses through Flood Zone 3, within the flood plain associated with the River Kenn, and crossing the River Kenn itself. The applicant has submitted three hydraulic models to the Environment Agency to model the impact of the proposed access. Most recently, the Environment Agency has commented on the third model (letter dated 14 November 2025) and advised that they maintain their objection to the proposed development as the model is not suitable for use within a Flood Risk Assessment. 1.134 Given the repeated attempts to agree a hydraulic model, it is highly questionable whether land south of Nailsea can be modelled to demonstrate that it would not result in increased flood risk on-site or to properties downstream of the proposals. In the absence of evidence of an alternative vehicular access to the allocation, within the applicant's control, which would avoid development in the flood plain, the allocation of land South of Nailsea is unsound and should be deleted. 1.135 Land at Pound Lane lies adjacent to the Moor Sprout Nature Reserve and Local Green Space. Moor End Spout Nature Reserve. NTC is concerned that the development of the site, adjacent to this nature reserve which is linked via rhynes to the Tickenham and Nailsea Moors SSSI and UK Priority Habitat could have an adverse impact on the reserve. It is acknowledged that additional land is included in the Pound Lane allocation to provide environmental and ecological mitigations between the proposed development and the nature reserve. There is no evidence within the local		

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						plan that the impact of the allocation on the SSSI has been taken into account. The SA residential proforma for Land at Pound Lane HE20225 identifies a ignificant negative/uncertain impact due to the site's close proximity to a nationally designated biodiversity site. The site is also considered to have a significant negative impact on Objective 3.4 due to the site's high landscape sensitivity. 1.136 This is a relatively small site which would deliver limited benefits for the town beyond housing, in a location which is environmentally sensitive and respect of landscape and ecology. In addition, the site lies in close proximity to areas at risk of flooding, now and in the long term. 1.137 For these reasons NTC objects to the allocation of the site and requests its deletion. 1.138 Backwell has been subject to several planning applications for residential development which have been approved or, in the case of Grove Farm, benefit from a resolution to grant outline planning permission. The committed development proposals already deliver 795 dwellings over the plan period in Backwell. With the exception of Grove Farm, all sites will be under construction over the next 12 months. These schemes have been approved on the basis of residual capacity within the Backwell Crossroads, with some mitigation measures to enhance capacity. No major transport mitigation measures are required. With the exception of land provided for a primary school and new public open space, the extant planning permissions fail provide funding or on-site provision of additional community infrastructure and therefore place additional strain on the existing, limited village services which support the residents of Backwell and its rural hinterlands, including Brockley and Flax Bourton parishes. 1.139 The delivery of 795 dwellings continues to represent a 40%		

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						increase in the population of Backwell, a substantial increase over the plan period. However, BPC recognises that this scale of development has been assessed through the decision-making process and is committed and therefore deliverable. However, this scale of development alone will place significant pressure on existing services. In the absence of adequate employment opportunities within a reasonable walking/cycling distance and without any realistic prospect of increased public transport services, this scale of development is at the upper limit of what the village can sustain over this plan period. 1.140 The delivery of a further 889 dwellings on land East of Backwell would more than double the allocation of houses to Backwell over the plan period and would require substantial new road infrastructure which would have significant harmful impacts on the natural and built environment. Depending on the design solution to cross the railway line, impacts could include landscape visual impacts, flood risk and likelihood of increased flood risk downstream of the rail crossing and adverse impacts on the setting of Grade 1 and 2 listed buildings, including The National Trust's Tyntesfield House (Grade 1) and the associated Registered Park and Gardens. The adverse impacts of an 80% increase in the village population , including the substantial additional pressure placed on the local community's services and facilities, would not be outweighed by the benefit of delivering 889 additional homes to meet North Somerset's housing needs and are not justified on the basis that the rail crossing would mitigate trips generated by the development proposed in Nailsea. Accordingly, the allocation of land East of Backwell should be deleted. 1.141 The Council has failed to demonstrate that it has considered alternative locations to accommodate development outside Nailsea and Backwell.		

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						Summary of Objection 1.142 NTC and BPC object strongly to the scale of development proposed on the basis that it is not positively prepared, unjustified, ineffective and contrary to the Framework and therefore unsound, in particular: - The Sustainability Appraisal strongly favoured the Urban Approach to the spatial strategy, which directed development to the main towns, but not the village of Backwell; - The Council has failed to provide sufficient evidence to overturn its decision in 2023 to remove Nailsea and Backwell as a strategic location for development and its fundamental concerns regarding the deliverability of the strategic rail crossing. - The Council has failed to include hydraulic flood modelling of the Nailsea and Backwell area and take into account all evidence of flood risks in the preparation of the SFRA, or taking into account the development constraints imposed by the water aquifer affecting sites at Nailsea and Backwell. - There is no evidence that the Council considered alternative locations which would involve development of lower quality agricultural land, or which are further away from the North Somerset and Mendip Bat SAC and which could be delivered without the need for substantial new road infrastructure. Policy Amendments Sought 1.143 To achieve a sound plan, Policy LP3 should be deleted and the status of Nailsea and Backwell should be returned to that of “town” and “village” and dealt with under the terms of Policies SP5 and SP6 respectively. 1.144 The proposed allocations of Poplar Farm (130 dwellings), Land at Pound Lane (100 dwellings), Land South of Nailsea (582 dwellings) and Land East of Backwell (889 dwellings) should be deleted from the Local Plan. Accordingly, Nailsea would be required to deliver 1,005		

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						dwellings and Backwell would deliver 794 dwellings over the plan period. This would equate to a population growth of c.16% and 38% in Nailsea and Backwell respectively. The transport mitigation strategy for Nailsea should be revised to include improvements to the B3130 and B3128. The proposed strategic rail crossing should be deleted from the plan. 1.145 Through these amendments, the scale of growth proposed at Nailsea and Backwell and the nature of the mitigation required would be justified, aligning with the findings of the Sustainability Appraisal. The removal of the need for the strategic rail crossing and the uncertainties and challenges regarding its deliverability and funding would remove a significant obstacle to the delivery of housing in Nailsea and Backwell, therefore providing greater confidence that the housing is deliverable within the plan period. The removal of land south of Nailsea and Land East of Backwell, in addition to the strategic rail crossing would substantially reduce the risk of flooding to these communities, maintain a good degree of physical separation between the two settlements and minimise the impact of development on the setting of The National Trust's Grade 1 Tyntesfield House. 1.146 BPC and NTC therefore strongly urge the Council to make these changes to the Plan to achieve a sustainable scale of development for Nailsea and Backwell which could be deliverable over the plan period. 1.147 Alternative locations should be re-examined to accommodate the residual c1,600 removed through the deletion of the Nailsea and Backwell strategic location. 1.148 The Sustainability Appraisal recognises that land to the east of the District, closer to Bristol represents some of the most sustainable locations for development, with access to a wide range of employment, education, services and		

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						higher order facilities. It also performs best in respect of maximising opportunities for active travel, use of public transport and minimising the need to travel by car. The agricultural land is generally lower in quality and flood risk is generally low. 1.149 Land South of Long Ashton (HE20139) is 71.76 hectares of land sited between Long Ashton nd the A370, close to the junction with the A4174 Bristol ring road. The SHLAA Appendix 1 Site Data and Assessment notes that the site has no hard constraints and lies inside broad location boundaries which are suitable for development. The site passed the baseline assessment and further assessment, with an assessed capacity of 1,394 dwellings. The site is identified as one of several sites at Long Ashton which have potential for further consideration, with a total capacity of 2,403 dwellings (See Table 19, SHLAA, October 2025). 1.150 The site is further assessed through the Sustainability Appraisal: Reasonable Alternatives Residential Proformas. A comparison of the SA findings for this site against Land East of Backwell is provided below. (see attached) 2 COMPARISON OF SA_ID_150 LAND EAST OF BACKWELL AND HE20139 LAND SOUTH OF LONG ASHTON SA Objective SA_ID_150 HE20139 (see attached) 2.1 It is evident that the two sites perform relatively similarly, with matching scores against 7 of the 15 objectives. The Long Ashton site outperforms Land East of Backwell on a further 3 objectives. Land East of Backwell records a better score and appears to perform better in respect of objectives 2.3 (access to facilities), 2.4 (community cohesion), 3.3 (sustainable travel access), 3.5 (heritage setting) and 3.6 (biodiversity impact). 2.2 However, there are evident flaws in this appraisal.		

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						- Objective 2.3 - The SHLAA finds both sites are within 720m of a local centre but not a town or district centre. However, it assigns a negligible effect to Backwell and a significant negative effect to Long Ashton. This is despite the Long Ashton site's close proximity to Bristol, a major employment centre and the availability of a wide range of shops and services within 2.5 kilometres of the site, in the vicinity of Winterstoke Road, Ashton, Bristol. - Objective 2.4 – The SHLAA finds both sites are "of a scale (at least medium, see Table D.3 in the main SA Report) which supports existing and potentially some new services and facilities." However, the SA assigns a minor positive (0) to Long Ashton and a minor positive (+) to Backwell. - Objective 3.3 – The SHLAA assigns a major positive to Land East of Backwell on the basis of its proximity to a railway station, and only a minor positive to Long Ashton due to the train station despite the significantly closer relationship the site has with Bristol, the opportunity for a railway station to be opened adjacent to the site to serve Long Ashton and the proximity to the Park and Ride facility on the A370, within 1.6km of the site. - Objective 3.5 – The SHLAA assigns a significant negative to Long Ashton and a minor negative effect to Backwell in respect of the impact of development on heritage assets and thei setting. Although the land South of Long Ashton was not assessed through the Historic Environment Assessments (Avalon), the adjoining land to the south (HEA1: Woodspring) was assessed. Although there are some heritage assets recorded in the vicinity of both sites which are of high sensitivity to change, the overall conclusions of the assessment were that, with mitigation the impact of the proposed development of 3,500 homes on heritage assets would be medium to low. It is reasonable to apply similar conclusions to the proposals for land South of Long Ashton. - Objective 3.6 – The SHLAA records a significant negative/uncertain score		

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						for Long Ashton due to the site's proximity to internationally or nationally designated biodiversity or geodiversity sites, compared with a minor negative for Backwell. However, the Habitat Regulations Assessment accompanying the plan demonstrates that the impacts of development of 3,500 homes on the adjoining land at Woodspring is capable of being mitigated to a level which would not cause harm to these designated sites. It is therefore reasonable to assume that a similar approach could be adopted for land South of Long Ashton. 2.3 If these flaws and anomalies are removed the findings for both sites are broadly the same. NTC and BPC are concerned that the Council has applied a degree of bias in reaching its conclusions on these sites to support the pre-determined allocation of land East of Backwell, Without firstly considering reasonable alternatives. This is endorsed by the findings of the Sustainability Appraisal. 2.4 Land South of Long Ashton occupies land of a poorer agricultural quality and should be considered ahead of land east of Backwell, in accordance with footnote 65 of the Framework. The site occupies a highly sustainable location, in close proximity to Bristol and the proposed urban extension to the SW of Bristol (Woodspring) which would deliver 3,500 homes over the plan period. In addition, the site lies adjacent to the £400 million approved EPIC employment campus (Policy LP22), which forms the anchor to the West of England Growth Strategy (2025) (See North Somerset Growth Gateway strategy) and therefore aligns with the SA in respect of the delivery of housing alongside major employment centres, minimising the distance for residents to travel to work and maximising the opportunity to travel by active travel modes 2.5 The allocation of land South of Long Ashton would almost entirely compensate for the deletion of the		

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						Nailsea and Backwell strategic location for development. A modest further allocation of land would be required to deliver the residual housing requirement, of circa 100 dwellings. This could be achieved through revisiting the Council's sequential approach to site identification (Spatial Strategy Site Selection and Capacity Paper (October 2025), page 9), in particular, step 4, to identify further opportunities for development at sustainable villages outside the Green Belt (excluding Backwell). BPC and NTC consider there are further opportunities for development in the other sustainable villages which are more proportionate in scale, with less environmental harm and strain on services/ infrastructure. The Local Plan proposes to allocate only 268 dwellings to the villages (outside the strategic locations). Notwithstanding the spatial strategy to focus growth at the urban areas, the rural areas must receive adequate housing to meet local needs, and the local plan should specify a neighbourhood designated area figure for each area.		
Policy LP5: Housing, employment and mixed use allocations	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure		For the reasons set out in response to Policies SP3 and LP3, NTC and BPC object to the following allocations in Schedule 1 and request the removal of these allocations on the basis that they are unsound and reasonable alternatives are available to meet the residual shortfall in housing need: 1. Poplar Farm, Nailsea – 130 dwellings 2. Pound Lane – 100 dwellings 3. Land South of Nailsea – 582 dwellings 4. Land East of Backwell – 889 dwellings. Objection is also raised to the extent of the allocation shown for Grove Farm, Backwell. The allocation is for 515 dwellings. The Council has resolved to grant outline planning permission for up to 515 dwellings under planning application 23/P/ 2618/OU2. However, the policies map includes an additional, physically separate parcel of land within the		251118 Local Plan Reg 19 2025 reps FINAL.pdf R01 - Transport Statement - Rev 3 FINAL.pdf Hydrology LP3 BPC_NTC Appendix_2.2-compressed.pdf Hydrology LP3 BPC_NTC Appendix_9-compressed.pdf Hydrology LP3 BPC_NTC Appendix_2.1-compressed (4).pdf Hydrology LP3 BPC_NTC Appendix_7-compressed.pdf Hydrology LP3 Summary BPC_NTC Part 2 (1).pdf Hydrology LP3 Summary BPC_NTC Part 1 (1).pdf

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						Grove Farm allocation, which sits immediately adjacent to the Rodney Road site (60 dwellings). See extract from Sustainability Appraisal (attached). The Council has failed to explain the reason for including this parcel of land within the Grove Farm allocation. To BPC and NTC's knowledge it is owned by North Somerset Council and has historically been safeguarded for educational use in association with the adjoining West Leigh Infants School. The land's inclusion within the Pre-Submission Plan was wholly unexpected by BPC. Discussions have taken place over the past twelve months with NSC's Assess Management Team regarding the transfer of ownership from NSC to BPC to enable the use as an outdoor educational space. The allocation of the site for residential use is superfluous to requirements; no housing allocation is given to this parcel of land which forms part of the Grove Farm allocation. The allocation as a whole is designated to support 515 dwellings which equates to the description of the outline planning application 23/P/2618/OU2. This additional, separate parcel of land should be deleted from the Grove Farm allocation and the land designated as Local Green Space, as an important area of green space, providing public rights of way to West Leigh Infants School and the opportunity for educational/ recreational use in association with the school, to help to meet the needs of the growing village population. BPC and NTC request the deletion of this parcel of land from the Grove Farm allocation and the identification of the site for educational purposes with LGS status. BPC and NTC support the policy requirement for the housing allocation at Grove Farm to include provision of a primary school. However, the Council resolution to grant planning permission was subject to a developer obligation to provide 2 hectares of land for a primary school only. No financial contributions have been sought by the Council from the applicant to pay for delivery of the primary school,		

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						putting delivery of this essential infrastructure at risk, contrary to the provisions of the Local Plan and IDP. The Council's strategy for education to support development at Nailsea and Backwell must be explained to ensure the policy is effective in delivery of necessary infrastructure.		
Policy LP6: Educational, sporting, leisure and community use allocations	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	In accordance with representations to Policy LP5, this policy should identify land adjoining West Leigh Infants School as an allocation for educational use. The Council has failed to explain the reason for including this parcel of land within the Grove Farm allocation. To BPC and NTC's knowledge it is owned by North Somerset Council and has historically been safeguarded for educational use in association with the adjoining West Leigh Infants School. The land's inclusion within the Pre-Submission Plan was wholly unexpected by BPC. Discussions have taken place over the past twelve months with NSC's Assess Management Team regarding the transfer of ownership from NSC to BPC to enable the use as an outdoor educational space. The allocation of the site for residential use is superfluous to requirements; no housing allocation is given to this parcel of land which forms part of the Grove Farm allocation. The allocation as a whole is designated to support 515 dwellings which equates to the description of the outline planning application 23/P/2618/OU2. This additional, separate parcel of land should be deleted from the Grove Farm allocation and the land designated as Local Green Space, as an important area of green space, providing public rights of way to West Leigh Infants School and the opportunity for educational/recreational use in association with the school, to help to meet the needs of the growing village population. BPC and NTC request the deletion of this parcel of land from the Grove Farm allocation and the identification of the site for educational purposes with LGS status.	BPC and NTC request the deletion of this parcel of land from the Grove Farm allocation and the identification of the site for educational purposes with LGS status.		251118 Local Plan Reg 19 2025 reps FINAL.pdf R01 - Transport Statement - Rev 3 FINAL.pdf Hydrology LP3 BPC_NTC Appendix_2.2-compressed.pdf Hydrology LP3 BPC_NTC Appendix_2.1-compressed.pdf Hydrology LP3 BPC_NTC Appendix_9-compressed.pdf Hydrology LP3 BPC_NTC Appendix_7-compressed.pdf Hydrology LP3 Summary BPC_NTC Part 2 (1).pdf Hydrology LP3 Summary BPC_NTC Part 1 (1).pdf
Policy LP9: Extent of the Green Belt	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure		For the reasons set out in response to Policy SP3 and LP3, BPC and NTC object to the proposed release of land from the Green Belt to accommodate residential development at Land East of Backwell. Backwell Parish Council (BPC) acknowledges the release of Green Belt land at Bristol Airport under the 12 mppa planning consent but considers the new Green Belt proposed south of Nailsea and west of Backwell is insufficient to offset the Green Belt lost as a consequence of changes at the Airport and from planned housing developments. While Felton Common is protected as Green Belt, a local Nature Reserve, and Site of Nature Conservation Interest, the Local Plan omits its status as a federally protected Common. Felton Common requires protection within the Local Plan and the BPC requires an amendment that a specific policy is written to safeguard the Common.		251118 Local Plan Reg 19 2025 reps FINAL.pdf R01 - Transport Statement - Rev 3 FINAL.pdf Hydrology LP3 BPC_NTC Appendix_2.2-compressed.pdf Hydrology LP3 BPC_NTC Appendix_2.1-compressed.pdf Hydrology LP3 BPC_NTC Appendix_9-compressed.pdf Hydrology LP3 BPC_NTC Appendix_7-compressed.pdf Hydrology LP3 Summary BPC_NTC Part 2 (1).pdf Hydrology LP3 Summary BPC_NTC Part 1 (1).pdf

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						Amendments Sought: Reinstatement of Green Belt at East Backwell and further extension of Green Belt to offset loss of Green Belt at Bristol Airport. Policy provision should include safeguards for Felton Common.		
Policy LP10: Strategic gaps	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure		BPC and NTC note the removal of the Strategic Gap between Nailsea and Backwell due to the proposed introduction of Green Belt. However, should the Inspector not support the extension of the Green Belt, the strategic gap should be reinstated to safeguard the settlements from coalescence.		251118 Local Plan Reg 19 2025 reps FINAL.pdf R01 - Transport Statement - Rev 3 FINAL.pdf Hydrology LP3 BPC_NTC Appendix_2.2-compressed.pdf Hydrology LP3 BPC_NTC Appendix_2.1-compressed.pdf Hydrology LP3 BPC_NTC Appendix_9-compressed.pdf Hydrology LP3 BPC_NTC Appendix_7-compressed.pdf Hydrology LP3 Summary BPC_NTC Part 2 (1).pdf Hydrology LP3 Summary BPC_NTC Part 1 (1).pdf
Policy LP11: Transport infrastructure, allocations and safeguarding	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure		BPC and NTC expect further consultation on the route of the Mass Transit to Bristol Airport. It is not currently possible to comment on the route and the potential impacts on residents and the environment. A mass transit should be considered from Worle to Bristol Airport. 2.12 In addition, further work must be undertaken to allocate suitable park and rides to accommodate airport passengers arriving from the south and west. Consultation with residents is vital for all aspects of proposed airport transport infrastructure. 2.13 BPC and NTC raise strong objections to the proposed safeguarding of land to the east of Backwell to deliver a strategic rail crossing from the A370 to Station Road, Nailsea. For the reasons set out in the accompanying technical report prepared by JR Transport Planning the proposals are wholly unsound and would not provide appropriate mitigation for development proposals at Nailsea and Backwell.		251118 Local Plan Reg 19 2025 reps FINAL.pdf R01 - Transport Statement - Rev 3 FINAL.pdf Hydrology LP3 BPC_NTC Appendix_2.2-compressed.pdf Hydrology LP3 BPC_NTC Appendix_2.1-compressed.pdf Hydrology LP3 BPC_NTC Appendix_9-compressed.pdf Hydrology LP3 BPC_NTC Appendix_7-compressed.pdf Hydrology LP3 Summary BPC_NTC Part 2 (1).pdf Hydrology LP3 Summary BPC_NTC Part 1 (1).pdf
Policy LP12: Bristol Airport	No	‣ Positively	Unsure	Unsure		BPC and NTC support a mass transit link for the airport, recommending its implementation when passenger		251118 Local Plan Reg 19 2025 reps FINAL.pdf R01 - Transport Statement -

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		prepared • Justified • Effective • Consistent with national policy				numbers exceed 12 million annually. While Bristol Airport plans to expand to 15 million passengers by the mid-2030s and potentially 20 million, BPC opposes further growth but insists on mass transit if expansion occurs. The Airport's traffic is having an adverse effect on local communities including Backwell. The paragraph on the impacts of airport operations and of any new airport development on the living conditions of residents should include the word REDUCE as well as mitigation. BPC and NTC recommends that the term 'reduce', regarding nighttime flights, be included in Policy LP12 itself. The Environmental Audit Select Committee advised the Government (25 October 2025) to assess cumulative emissions from all airport expansions and evaluate their impact on Net Zero targets. The Government needs also to review evidence of overall economic benefits which includes taking account of the tourist deficit. Bristol Airport's business model does more to support the Mediterranean economy that the UK's and this requires a full assessment. We expect NSC to require all planning decisions for airport expansion to take into account a cumulative assessment of emissions and economic benefits, include the tourist deficit. The spatial strategy should recognise the influence of Bristol Airport as a key employer and the benefits derived from investment in the A38 corridor which could be serve to support housing allocations in its vicinity. NSC must ensure that Bristol Airport comply with their current planning conditions and put more resourced into supporting villages impacted by the airports operation, Backwell is still waiting for parking restrictions and reduction in a speed limit at Downside road and Hyatt's Wood road, there is still no safe zone and		Rev 3 FINAL.pdf Hydrology LP3 BPC_NTC Appendix_2.2-compressed.pdf Hydrology LP3 BPC_NTC Appendix_2.1-compressed.pdf Hydrology LP3 BPC_NTC Appendix_9-compressed.pdf Hydrology LP3 BPC_NTC Appendix_7-compressed.pdf Hydrology LP3 Summary BPC_NTC Part 2 (1).pdf Hydrology LP3 Summary BPC_NTC Part 1 (1).pdf

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						bus stop for children wating for school transport, vehicles drive at speed along an pavemented rural road. The absence of these initiatives first mooted over 5 years ago is unacceptable to the airport's immediate neighbours. BPC and NTC recognise the role of the Airport, the committed development to expand capacity to 12mmpa and the Airport's proposals to expand further to 15mmpa in the plan period. The airport has a significant impact on the local communities of Nailsea and Backwell, with a significant proportion of vehicular trips passing through Backwell and Nailsea to access the rural lanes to the west end of Nailsea, through Chelvey and Brockley and via Dark Lane (Backwell) to Hyatts Wood Road, which lead to Bristol Airport. These routes are frequently used by taxis and passengers driving to the airport via junctions 20 and 19 of the M5. This 'rat running' of passenger vehicles and taxis places significant pressure on the rural lanes between Nailsea, Backwell and the A38, raising significant safety concerns for the local community. In addition, Backwell and Downside experience significant issues with illegal and inconsiderate parking of passenger vehicles, which further impact highway safety and residential amenity. NSC's Highway Team recognises that Dark Lane, Backwell takes as much traffic as Brockley Coombe and BPC has requested measures to reduce traffic volumes from the airport through Backwell, however, no measures are specified through this Local Plan. BPC and NTC welcome the criteria for consideration of any future planning applications for expansion of the airport, however criterion 3 should explicitly require development proposals to include measures to actively discourage and prohibit the use of the rural lanes and direct vehicles to use the A38 corridor. In addition, criteria 2 should include		

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						reference to the impact of lighting and light pollution		
Policy LP13: Air safety	No		Unsure	Unsure		Bristol Airport's Vision 2040 includes a runway extension and a current consultation on proposed approach lighting for Felton Common, an open space within the Air Safety Zone. NTC and BPC question whether Felton Common and the replacement land—closer to the airport perimeter—will face increased risk from the extended runway, lower approach altitudes, and new lighting, possibly requiring re-categorization under CAA regulations. NTC and BPC consider the replacement land, owned by the airport is unsafe for recreation according to Air Safety Policy LP13 and unsuitable as mitigation for the lighting proposal.		251118 Local Plan Reg 19 2025 reps FINAL.pdf R01 - Transport Statement - Rev 3 FINAL.pdf Hydrology LP3 BPC_NTC Appendix_2.2-compressed.pdf Hydrology LP3 BPC_NTC Appendix_2.1-compressed.pdf Hydrology LP3 BPC_NTC Appendix_9-compressed.pdf Hydrology LP3 BPC_NTC Appendix_7-compressed.pdf Hydrology LP3 Summary BPC_NTC Part 2 (1).pdf Hydrology LP3 Summary BPC_NTC Part 1 (1).pdf
Policy LP15: Local Green Space	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure		NTC and BPC support the identification of Local Green Space in Nailsea and Backwell. BPC requests that the Land adjacent to West Leigh Infants School is renamed as Land adjacent to Longthorn. 2.27 BPC objects to the failure to identify Backwell Playing Fields as Local Green Space. In accordance with paragraph 107 of the Framework, the Playing Fields are an important green space at the heart of the village community. The playing fields are reasonably close to the community it serves and hold a particular local significance as they were donated to the village in 1929 by Theodore and Isabel Robinson to be a space for community recreation and have been held in Trust ever since. The playing fields are local in character and do not represent an extensive tract of land. The fields are largely surrounded by existing and proposed development. 2.28 BPC also objects to the omission of land between Church Town and Hillside Road from Policy LP15. The land represents an important, well used recreational route and public right of way, forming part of the Backwell Round Walking Route. The green space also represents an		251118 Local Plan Reg 19 2025 reps FINAL.pdf R01 - Transport Statement - Rev 3 FINAL.pdf Hydrology LP3 BPC_NTC Appendix_2.2-compressed.pdf Hydrology LP3 BPC_NTC Appendix_2.1-compressed.pdf Hydrology LP3 BPC_NTC Appendix_9-compressed.pdf Hydrology LP3 BPC_NTC Appendix_7-compressed.pdf Hydrology LP3 Summary BPC_NTC Part 2 (1).pdf Hydrology LP3 Summary BPC_NTC Part 1 (1).pdf

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						important rural backdrop to the south-western part of the village. 2.29 Amendments Sought: For the reasons set out in response to Policy SP8, the separate parcel of land identified under the Grove Farm allocation (adjacent to West Leigh School) should be removed from Policy SP8 and designated as Local Green Space under Policy LP15. 2.30 The Policies Map should be amended accordingly to identify the Backwell Playing Fields, land between Church Town and Hillside Road and land adjacent to West Leigh School as Local Green Space.		
Policy DP35: Nature conservation	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy		Unsure	Policy DP35 is intended to ensure development proposals identify appropriate mitigation measures to safeguard or enhance attributes of ecological importance and deliver biodiversity net gain. The policy deals specifically with sites of international and national importance including the Special Areas of Conservation for bats. It states that Nature Parks will be identified to protect and enhance greater and lesser horseshoe bat habitat at the strategic development locations including Nailsea and Backwell. However, the policies map does not identify land for Nature Parks at these locations. The justification for the policy states at page 191 that where a development requires off-site mitigation for horseshoe bats “it is expected that developers will consider the use of the North Somerset Nature Parks strategic mitigation sites as a preferred means of achieving that mitigation.” The Habitat Regulations Assessment (AECOM, October 2025) relies upon a commitment to strategic Nature Parks in order to ensure a sufficient policy framework to protect functionally linked land associated with North Somerset and Mendip Bats SAC and thus ensure no adverse effect on the integrity of the SAC6. In the absence of a commitment through Policy DP35, with no specific sites identified and no absolute requirement to deliver or contribute towards Nature Parks, applying the precautionary principle, it cannot be concluded that there would be no adverse effect on the integrity of the North Somerset and Mendip Bats SAC. Accordingly, the plan is not legally compliant.	Amendment Sought: Policy DP53 should be amended to provide full details of where the Nature Parks would be delivered, with reference to the Policies Map, how they would be secured, delivered and maintained in perpetuity.		251118 Local Plan Reg 19 2025 reps FINAL.pdf R01 - Transport Statement - Rev 3 FINAL.pdf Hydrology LP3 BPC_NTC Appendix_2.2-compressed.pdf Hydrology LP3 BPC_NTC Appendix_2.1-compressed.pdf Hydrology LP3 BPC_NTC Appendix_9-compressed.pdf Hydrology LP3 BPC_NTC Appendix_7-compressed.pdf Hydrology LP3 Summary BPC_NTC Part 2 (1).pdf Hydrology LP3 Summary BPC_NTC Part 1 (1).pdf
Policy DP53: Best and most versatile land	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure		The proportion of Grade 1 land in North Somerset is approximately 7% and 10% for Grade 2. 60% falls in Grade 3. The policy approach recognises the benefits of all best and most versatile land (BMV) and provides stricter safeguards for the more limited amount of grade 1 and 2 in North Somerset. BPC and NTC support the inclusion of this policy in the plan. However, they query why the policy only applies to non-allocated sites. As evidenced in response to Policy SP8, the proposed designation of Nailsea and Backwell		251118 Local Plan Reg 19 2025 reps FINAL.pdf R01 - Transport Statement - Rev 3 FINAL.pdf Hydrology LP3 BPC_NTC Appendix_2.2-compressed.pdf Hydrology LP3 BPC_NTC Appendix_2.1-compressed.pdf Hydrology LP3 BPC_NTC Appendix_9-compressed.pdf Hydrology LP3 BPC_NTC Appendix_7-compressed.pdf Hydrology LP3 Summary BPC_NTC Part 2 (1).pdf Hydrology LP3 Summary

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						as a strategic development location would sterilise around 270 hectares of best and most versatile agricultural land (BMV), of which almost 200 hectares are Grade 1 and 2. In accordance with the Framework the Local Plan should guide development to areas of poorer quality agricultural land before considering these 6 Paragraph 6.81, Habitat Regulations Assessment, AECOM October 2025 43 locations. The justification provided for allocating BMV at Nailsea and Backwell is based solely on the flawed transport mitigation strategy to deliver a strategic rail crossing from the A370 to Nailsea. If the allocation of BMV land is deemed necessary to make the plan sound, the terms of Policy DP53 should apply to the development proposals for the allocation, to ensure the loss of BMV agricultural land is minimised.		BPC_NTC Part 1 (1).pdf
Grove Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Objection is raised to the extent of the allocation shown for Grove Farm, Backwell. The allocation is for 515 dwellings. The Council has resolved to grant outline planning permission for up to 515 dwellings under planning application 23/P/2618/OU2. However, the policies map includes an additional, physically separate parcel of land within the Grove Farm allocation, which sits immediately adjacent to the Rodney Road site (60 dwellings). See extract from Sustainability Appraisal (attached). The Council has failed to explain the reason for including this parcel of land within the Grove Farm allocation. To BPC and NTC's knowledge it is owned by North Somerset Council and has historically been safeguarded for educational use in association with the adjoining West Leigh Infants School. The land's inclusion within the Pre-Submission Plan was wholly unexpected by BPC. Discussions have taken place over the past twelve months with NSC's Assess Management Team regarding the transfer of ownership from NSC to BPC to enable the use as an outdoor educational space. The allocation of the site for residential use is superfluous to requirements; no housing allocation is given to this parcel of land which forms part of the Grove Farm allocation. The allocation as a whole is designated to support 515 dwellings which equates to the description of the outline planning application 23/P/2618/OU2. This additional, separate parcel of land should be deleted from the Grove Farm allocation and the land designated as Local Green Space, as an important area of green space, providing public rights of way to West Leigh Infants School and the opportunity for educational/recreational use in association with the school, to help to meet the needs of the growing village population. BPC and NTC request the deletion of this parcel of land from the Grove Farm allocation and the identification of the site for educational purposes with LGS status. BPC and NTC support the policy requirement for the housing allocation at Grove Farm to include provision of a primary school. However, the Council resolution to grant planning permission was subject to a developer obligation to provide 2 hectares of land for a primary school only. No financial contributions have been sought by the Council from the applicant to pay for delivery of the primary school, putting delivery of this essential infrastructure at risk, contrary to the provisions of the Local Plan and IDP. The Council's strategy for			

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					education to support development at Nailsea and Backwell must be explained to ensure the policy is effective in delivery of necessary infrastructure.			
Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	BPC object to the proposed amendments to the settlement boundary of Backwell, which are vastly extended to include the strategic allocations of Grove Farm and Land East of Backwell, but which also incorporate other undeveloped land which lies between those allocations and the existing built-up areas of the village. This approach is contrary to the methodology for settlement boundary review1 The inclusion of these extra parcels of land could place additional pressure on undeveloped land for further residential development, which would result in denser development, a loss of important open spaces, visual breaks and recreational amenity spaces, to the detriment of the rural character of the village. Notwithstanding the concerns regarding the proposed limits of the settlement boundary, BPC strongly support the categorisation of Backwell as a Village under Policy SP6 and broadly support the wording of Policy SP6 to limit new development to land within the settlement boundary, subject to compliance with all policy criteria. The limitations imposed on development outside the settlement boundary are also supported to control the settlement from further outward expansion.	Amendment Sought – Settlement boundary for Backwell to be amended to include site allocations (if found sound) but exclude any adjoining land which is not currently within the settlement boundary.		251118 Local Plan Reg 19 2025 reps FINAL.pdf

Name: Barbara Poole **I.D:** 62814497

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Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	1100 new homes make a 44% increase on the village of Pill - the inspector decision found that allocating more than10% made the increase unsound. Green belt exceptional circumstances not evidenced for the Pill Green site. Dual carriageway would have to be built to carry traffic into Bristol on A369 but this would not be possible due to narrowing at TheGeorge Pub - junction19 of M5 already running at present at near full capacity - the proposed Trainline is single track only and won't meet the needs of commuters. These 1100 houses might be two car families. The traffic on A369 is very heavy and still increasing since Portishead developments. There has been no assessment of brownfield alternatives to Pill Green - Markham Brook which runs from Failand through to Pill on the land by St Katherine's School where 100 homes are allocated on the plan is an ancient protected woodland with all the planning restrictions this would entail.	Delete Pill Green Site. Some single storey homes could be built to accommodate Pill's growing elderly population thereby releasing their larger homes to new families.		

Name: Barratt Bristol **I.D:** 51207009

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SP3: Spatial strategy	Yes		Yes	No			Policy SP3 sets out the spatial strategy for development in North Somerset. It introduces the four strategic development options and one of these is Pill and Easton-in-Gordano. Policy SP8 then notes that 1,100 dwellings (4% of the proportion of housing supply) is to be directed to Pill and Easton-in-Gordano. Barratt Homes welcome the identification of Pill and Easton in Gordano as a strategic location for growth in North Somerset. Whilst the settlement is currently surrounded by Green Belt designation, it is a sustainable and logical location to accommodate growth. The settlement is well located in proximity to the Bristol urban area, it is located	

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							within 500m of Junction 19 of the M5 and is bound to the south by the A369 which has a frequent direct bus service to Bristol. Soon, the village will benefit from the Portishead-Pill-Bristol railway line, which is due to open by 2028 - the station will be located approximately 750m from Barratt's site at Lodway Farm. Pill and Easton in Gordano also benefit from existing active travel routes. In addition, there are ample services and facilities available within the village including a primary school, medical centre, library, convenience store, allotments and playing fields all of which are within 1km of the Land at Lodway Farm. Not only is the village well placed to absorb future strategic scale growth, but the Barratt site is also ideally located in respect of major employment hubs, facilities and services which are all accessible via a range of active travel modes. We therefore agree with NSC's assessment that Pill and Easton in Gordano is one of the larger more sustainable villages in NSC with a wide range of services and facilities and should therefore accommodate a substantial amount of growth. We agree that land should be removed from the green belt to achieve this. Barratt Homes controls part of the land at Lodway Farm which is proposed to be allocated for 160 homes. We consider that land at Lodway Farm is the most logical of all of the sites proposed for allocation in Pill and Easton in Gordano given its central location and proximity to existing facilities and services including the new railway station. Land at Lodway Farm is completely enclosed by long term defensible boundaries on all sides and presents a logical in-fill/rounding off opportunity. Importantly the site has a house builder (Barratt Homes) on board and the site has no constraints that would curtail delivery in the short term. Whilst we support the allocation of Lodway Farm and the strategic location of Pill and Easton in Gordano in principle, we object to some of the requirements outlined in Policy LP4. These are addressed in separate representations.	
SP7: Green Belt	No	• Justified • Effective	Yes	No	Barratt Homes supports Policy SP7's proposal to remove 'Land at Lodway Farm, Pill and Easton-in-Gordano' from the Green Belt. Barratt considers that Land at Lodway Farm is grey belt land as it does not strongly contribute to Green Belt purposes (a), (b) or (d) outlined in paragraph 144 of the NPPF. We note that the recent PPG states that Green Belt purposes a), b) or d) do not apply to villages. Notwithstanding this, we have previously demonstrated (in representations to the additional sites consultation) that Land at Lodway Farm (HE20491) does not strongly contribute to Green Belt purposes a), b) and d) and therefore should be considered grey belt and given priority for release to assist the Council in meeting its local housing need on sustainable sites. 1 Purpose a) - The Site comprises land between the settlement edge of Easton-in-Gordano and the M5	Policy SP7 should therefore be updated to make reference to meeting Golden Rules subject to viability, as per the NPPF. Otherwise these sites will not be able to come forward. Policy SP7 should also be amended to refer to 175 dwellings rather than 160 dwellings for Land at Lodway Farm, Pill and Easton-in-		

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					motorway to the north west and Portishead railway line to the north east. It is fully enclosed by physical long-term defensible boundaries. It is therefore clear that development of the site could not lead to the unrestricted sprawl of development. 2 Purpose b) - Pill/Easton-in-Gordano is not a town and the Green Belt in this location does not form a gap between two towns. The proposed development of the Site would enclose the built form of Easton/ Pill to within physical long term defensible boundaries in the form of a motorway and railway line and the proposed development therefore would not result in neighbouring towns merging into one another. Even beyond the physical barrier of the motorway and railway there is no town that this development would merge into. 3 Purpose d) - Pill/Easton-in-Gordano is not considered a historic town, therefore purpose d) is not considered applicable. In accordance with paragraph 146 of the NPPF, it is clear that due to the enclosed nature of the site that its release would not fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan. Land at Lodway Farm (HE20491) is free from footnote 7 constraints identified in NPPF (apart from Green Belt). We therefore concur that it should be released from the Green Belt. However, Barratt Homes objects to the draft policy because it fails to qualify that the requirement to provide 50% affordable homes on sites is subject to viability as set out in paragraph 67 of the NPPF. As set out in our response to Policy DP43 (affordable housing) development at 50% affordable housing is unviable as confirmed by the Council's own viability evidence. A review of the Additional Sites Viability Addendum for North Somerset Local Plan 2041 prepared by Dixton Searle shows (Table 7) that at 50% affordable housing development schemes in Easton in Gordano are unlikely to be viable, taking account of all the costs and policy requirements. Policy SP7 should therefore be updated to make reference to meeting Golden Rules subject to viability, as per the NPPF. Otherwise, these sites will not be able to come forward. Policy SP7 should also be amended to refer to 175 dwellings rather than 160 dwellings for Land at Lodway Farm, Pill and Easton-in-Gordano. Policy SP7 is unsound as the policy conflicts with	Gordano.		

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					the Local Plan's evidence base which notes that 50% affordable housing is unviable for development in Easton-in-Gordano. The policy is therefore not effective (test of soundness 36.c) or justified (test of soundness 36.b).			
SP8: Housing	No	‣ Positively prepared ‣ Justified	Yes	No	Policy SP8 explains that the Local Plan is to provide 24,495 homes to meet the requirement of 23,700 homes. This only provides a flexibility allowance of 795 homes (3.35%). This is a very low percentage and does not provide sufficient flexibility to meet the local housing need figure of 23,700 should any of the allocations run into delivery issues or if the windfall allowance is lower than anticipated. By way of comparison the emerging South Gloucestershire Local Plan includes a flexibility allowance of 10.5%. In our view this is a far more sensible figure that will assist the Council in meeting its local housing need figure as calculated by the standard method. There is a longstanding issue of poor housing delivery in North Somerset and it is therefore vital that there is sufficient flexibility in the number of sites to meet the requirement figure acknowledging that some sites will deliver slower or not at all. The total supply number should be increased to at least 26,945 to provide a 10% flexibility allowance. Bristol's Unmet Need It is important to note Bristol's unmet housing needs in the context of NSC's approach to meeting housing need in the draft Plan. NSC's Duty to Co-operate Statement of Compliance recognises unmet need from neighbouring authorities to be important strategic matters. It, however, concludes that Bristol's request for neighbouring authorities (including North Somerset) to accommodate some of its unmet need cannot be addressed as "…the evidence supporting the local plan demonstrates that North Somerset does not have capacity to meet some of Bristol's needs at this time" (pg. 20). Bristol City Council's (BCC) draft Local Plan is currently at Examination; the hearings have concluded and the 'Final Advice and Actions' letter from the Inspectors was issued on 21 November 2025. This includes some key conclusions on housing: 1 We acknowledge that there is insufficient capacity to meet the Council's objectively assessed housing need, as calculated by the standard method. Nevertheless, we do not consider the figure of 34,650 dwellings over the Plan period to be positively prepared or justified. Given the significant	The total supply number should be increased to at least 26,945 to provide a 10% flexibility allowance. Bristol's unmet need should be properly considered.		

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					shortfall in meeting overall needs, and the current lack of agreement between Bristol and any neighbouring authorities to provide assistance, we consider it imperative that the Council seeks to maximise housing delivery. Inherent uncertainties in housing delivery in the longer period do not justify setting a housing requirement substantially below the overall housing capacity figure identified at submission; 2 The Council should draft MMs which set the housing requirement to be the 39,915 dwellings' capacity that was identified at submission [we note this is an additional 5,265 homes, adding to unmet need]; and 3 The Council must also set out what the level of unmet housing need is. While the objectively assessed housing need may change over time, we consider it necessary for this Plan to be clear about the situation at the time of adoption. This may, for example, be important in continuing work being done on other Plans. This is highly relevant, as Bristol has a significant remaining unmet need and this must be accounted for by neighbouring authorities including North Somerset, South Gloucestershire and Bath & North East Somerset, who are all preparing new local plans. To date no other local authority has positively responded to BCC's request confirming their inability to accommodate any unmet need, which further amplifies the issue. The various plans are deferring their obligations to deal with these important cross boundary issues which will only serve to increase affordability pressures within North Somerset and Bristol. NSC's availability of other sustainable opportunities to accommodate some additional growth for BCC's unmet need will require further consideration at the Examination. Policy SP8 is unsound as it is not based on proportionate evidence as required by the 36b) test of soundness (justified). SP8 does not provide a strategy to meet the area's objectively assessed needs as a minimum. Effective joint working with neighbouring authorities (i.e. Bristol) has not been properly evidenced. It is clear that the supply identified through the emerging Plan will not deliver the required number of houses during the Plan period. The strategy also fails the 'effective' test of soundness as the strategy put forward is not effective in delivering the growth that is required.			
Policy LP4: Strategic location: Pill	No	• Justified	Yes	No	Heritage Policy LP4 requires the Land at Lodway Farm to	Schedule 1 notes the need to site residential		Heritage Technical Note(34046790.1).pdf P25-235-TN01v1 Lodway

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and Easton-in-Gordano					follow a heritage-led masterplan which preserves key views from heritage assets and provides buffer zones to maintain a sense of rural setting to the Grade II* Listed Church of St George. Barratt has no objection to this requirement and notes that as stated in the enclosed Technical Note – Heritage, prepared by TCMS Heritage, submitted with the pre-application request, the proposed development would include mitigation measures targeted at minimising, in so far as possible the direct and/or indirect impacts on the significance of built heritage assets. However, we question the requirement in Schedule 1 for the land and Lodway Farm to retain a 'generous buffer' around non-designated heritage assets and St George's Lane to maintain a sense of rural setting. We do not consider that this requirement is justified by the background evidential work and it is unclear what is meant by 'generous'. The Councils Historic Environment Assessments prepared by Avalon Planning and Heritage explains that the setting has already been compromised by development to the south and east. The residual harm to the urbanisation of the semi-rural setting of non-designated heritage assets at Lodway Farm is considered to be 'low impact'. The Councils HEA considers the significance of the non-designated heritage assets at Lodway Farm and St Georges Lane. 'Avalon Planning and Heritage' conclude that these non-designated assets have some architectural and historic value, but their setting has been compromised by nearby modern development. Avalon Planning and Heritage do not suggest the need for the retention of a generous buffer around these non-designated assets. There is therefore no evidence to suggest the need to retain a buffer around the non-designated assets, and we therefore consider that this element of the draft Plan is unsound as it has not been justified. It is important to highlight that the non-designated heritage assets are neither listed nor locally listed, highlighting their limited significance from a heritage perspective. Schedule 1 also notes the need to site residential development away from Lodway Farm. We object to this requirement as again it has not been justified for the reasons outlined above. It should be deleted form the plan. The site is enclosed to the north by the M5 which presents a long-term defensible boundary, albeit it is a constraint to development from a noise perspective. It is therefore vitally important that requirements for buffers are fully justified i.e. non-designated assets so as not to stifle the viable development of the site.	development away from Lodway Farm. We object to this requirement as it has not been justified for the reasons outlined above. It should be deleted form the plan. There is therefore no evidence to suggest the need to retain a buffer around the non-designated assets at Lodway Farm. The capacity of Land at Lodway Farm should be increased to 175. The policy should make it clear that obligations should be proportionate to the need generated by the development.		Farm, Easton-in-Gordano(40085877.1).pdf IL61014-03-003 REVB Lodway Farm Draft Framework Plan 30.07.25(34046792.1).pdf

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					Transport Matters Whilst we do not object to the requirement to provide planning obligations in relation to transport, we consider that further clarification is necessary. We consider that the obligations should be proportionate to the scale and location of the site. The land at Lodway Farm is a relatively small development in comparison to other proposed allocations in and around Pill and Easton in Gordano. One such example is the proposed Pill Green allocation which has an indicative capacity of 600 dwellings, therefore the obligations should be relative to the site's scale and need for obligations to make the development acceptable from a planning perspective. The Land at Lodway Farm is by far the most sustainably located proposed allocation in Pill and Easton in Gordano. The site is served by a comprehensive collection of existing services and facilities. This includes a primary school, medical centre, library, convenience store, allotments and playing fields all within 1km of the site. A secondary school is 2.2km from the site which is also within walking/cycling distance. In terms of active travel and public transport, the site is well positioned to allow future residents to travel to the services and facilities mentioned above. The closest bus stop is located on Lodway Road, approximately 400m away from the entrance to The Site. This is served by X4 every 20 minutes between Bristol (27mins) and Portishead (30 mins). The proposed Pill Train Station is located 500m from the site and is due to open in 2027/28. The Avon Way Cycle Route is also 350m away. It is unreasonable to require this sustainable site to make up for the sustainability shortfalls of other sites in Pill and Easton in Gordano. For example, LP4 requires a new transport hub in the centre of Pill in close proximity to the new railway station location. The nature of this hub should be clarified so that it is clear what is proposed and how it will be funded. Barratt is committed to delivering sustainable homes nationally and specifically at Land at Lodway Farm as reflected in the recently submitted pre-application request and through the previous representations submitted. Barratt and Strongvox are committed to working collaboratively to ensure alignment between the two emerging applications and to deliver the site as soon as possible. Barratt is intending to submit an outline planning application in early 2026. However, Barratt is keen to ensure that the various planning obligations sought			

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					(including the 50% affordable housing as set out in policy DP43) do not render the site unviable and therefore undeliverable. Barratt Homes supports the note in Schedule 1 of the Local Plan that explains that Land at Lodway Farm requires two access points. This is essential given that two separate developers are in control of the land. Education We also note that policy LP4 requires all new development to contribute towards the delivery of necessary infrastructure either through direct delivery or through contributions. This includes a new 420 place primary school, contributions towards post 16, special educational needs provision and family centre services. We consider that further clarification is needed regarding these obligations so that it is clear what is expected from each allocation. Again, we note that these obligations should be proportionate to the scale of the development and the need being generated. We suggest that the word proportionate is included within the policy: “All new development will be required to contribute to the delivery of necessary infrastructure through either direct delivery as part of the scheme or through proportionate development contributions. A new 420 place primary school (including early years provision in line with government requirements), along with financial contributions towards post 16, special educational needs provision and family centre services will be required to meet the needs of the expanding community.” Unit Numbers (Schedule 1: Large sites for residential development) The North Somerset Local Plan 2041 Pre-submission Plan states that the site has an indicative capacity of 160 dwellings, we consider it may be possible to deliver more than this figure between the Barratt and Strongvox sites. Barratt and Strongvox Homes are in joint control of Land at Lodway Farm. Barrat controls the land to the east, whilst Strongvox Homes control the adjoining fields to the west. We are aware that Strongvox is preparing to submit a full planning application for approximately 60 dwellings, whilst the Barratt controlled land has capacity to deliver up to 115 dwellings. We therefore request that the indicative capacity of this site is increased to 175 dwellings to reflect this. Amending the indicative capacity of the site is in line with the plans			

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					objectives, including policy DP8 as it would ensure the most efficient use of land. Therefore, we consider that policy LP4 and associated Schedule 1 is currently unsound. The policy is not justified (test of soundness 36.b) based on the evidence base. The policy should be amended so that it is more precise which will assist in the delivery of the site. Noise Policy LP4 states that sites located on the western edge of Pill and Easton in Gordano, adjacent to the M5, including Lodway Farm, would need to provide appropriate buffers and sound mitigation measures to protect the living conditions of future residents. Schedule 1 of the North Somerset Local Plan 2041 Pre-submission Plan specifically states that detailed noise modelling is required to assess the noise from the M5, appropriate master planning and other mitigation methods may necessitate a reduction in the indicative capacity of the site. Hepworth Acoustics were appointed by Barratt to prepare an initial overview of the potential noise implications to help inform pre-application discussions for the Land at Lodway Farm. This Technical Note is enclosed. Hepworth Acoustics note that there is no realistic scope for the use of an acoustic bund/barrier to control motorway noise as it would not be effective. However, noise mitigation measures will be achieved through façade mitigation measures and through the careful orientation of the development buildings. As a result, we do not anticipate that these measures would reduce the capacity of the site in Barratt's ownership and confirm that noise concerns can be addressed satisfactorily. We support that the policy does not require a bund to mitigate noise impacts as noise can be satisfactorily addressed via different means. Hepworth Acoustics do not anticipate that the reopening of the railway will present any significant constraints. Modest further acoustic upgrades to bedroom windows overlooking the railway may be necessary for additional control of peak night time noise levels, however in terms of overall LAEQ,T noise levels, it is not expected the railway noise will lead to a significant increase upon the baseline motorway noise levels.			
Policy DP6: Net zero construction	No	‣ Justified ‣ Consistent with national policy	Yes	No	Barratt Homes is committed to achieving net zero by 2040 and to have zero carbon homes from 2030 (subject to future homes standard implementation and grid decarbonisation). However, delivering entirely on-site net zero now (in the absence of grid decarbonisation) results in significant cost increases and pressure on development viability when taking	The policy should be amended to: Ensure consistency with the future homes standard.		

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					into account a variety of other requirements such as complying with national SUDS guidance, biodiversity net gain, habitat evaluation procedure as well as other costs such as s106/CIL and affordable housing which all need to be considered together. This is especially the case for sites that are to be removed from green belt that will need to provide at least 50% affordable housing (unless this would make the development unviable). A review of the Additional Sites Viability Addendum for North Somerset Local Plan 2041 prepared by Dixton Searle shows (Table 7) that at 50% affordable housing development schemes are unlikely to be viable, taking account of all the costs and policy requirements. “Given the relatively positive results [25% and 35%], further testing was undertaken at 50% affordable housing as requested by NSC. The results indicate poor viability across the values range thought to be typically relevant for the area (in terms of likely new build values) suggesting that a target of 50% affordable housing may be challenging unless higher values can be evidenced. This is notwithstanding our comments regarding the Government’s ‘Golden Rules’ discussed above.” The viability evidence uses a cost assumption of 9% of the base build cost for sustainable design/climate change/carbon reduction. Flats are 4% and a mix of houses and flats 7%. The assumption notes that cost uplift is based on a range of evidence provided by NSC and this then references “evidence based on range of sources including Cornwall Council - Etude with Currie & Brown, 2021”. Whilst we have not been able to have sight of this document it is clear that it is several years old now and may not provide a robust evidence base for the cost assumption. We note that the viability assessment for the South Gloucestershire Local Plan (also undertaken by Dixton Searle) uses an 8% assumption which suggests that North Somerset’s sustainability policies are more onerous. Paragraph 32 of the NPPF requires that the preparation of policies should be underpinned by relevant and up-to-date evidence. Without this we consider that the Local Plan fails test of soundness 36.d) as the evidence base is not up to date as required by paragraph 32 of NPPF and therefore there is inconsistency with the NPPF. The Local Plan also fails the 36.b) test of soundness as the plan is not based on proportionate evidence. This has the potential to have significant ramifications for the Local Plan given that the viability evidence indicates that viability is marginal at 35% and unviable at 50% in Easton-in-Gordano.	That the definition of the ‘up front’ stage (in relation to embodied carbon) is made clear so that there is a clear framework for assessment (i.e. BS EN 15978:2011 stages A1-A5). The policy should be updated to reference operational net zero as regulated energy only That the need to achieve an overall operational energy use of less than 35kWh/m2/year should be removed from the Local Plan. During operation, the eliminating fossil fuel use depends on the assumptions within the upcoming Future Homes Standard as well as the decarbonisation of the grid – both of which are out of the control of developers. Policy DP6 should not be setting out requirements that are impossible for the developer to achieve.		

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					Written Ministerial Statement (WMS) – December 13th - Local Energy Efficiency Standards Update – In December 2023 the Government released a WMS1 which sets out clarity on the development and application of local energy efficiency standards in the context of advancing national policy. The WMS notes that the introduction of Part L 2021 supersedes the 2015 WMS which set guidance for Local Authorities to not set energy efficiency standards beyond Code for Sustainable Homes Level 4. The WMS goes onto note that the 2025 Future Homes Standard (FHS) will mean, 'that homes built to that standard will be net zero ready and should need no significant work to ensure that they have zero carbon emissions as the grid continue to decarbonise. Compared to varied local standards, these nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes'. The WMS goes onto state, 'the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well reasoned and robustly costed rationale.' We query whether the Council's policy on net zero goes beyond national guidance on setting local energy efficiency targets. We request that the policy is amended to accord with the guidance of the WMS and the forthcoming 2025 Future Homes Standard. If not then the Council should provide adequate evidence to justify that the costs associated with the additional standards can be absorbed by developments. Barratt is of the view that moving to full net zero without the Future Homes standard being in place will place undue pressure on the viability of housing projects and in our view any policy that would create this issue should not be pursued. Embodied Carbon Policy DP6 requires an embodied carbon assessment which demonstrate that up front embodied carbon does not exceed 750kg CO2e/m2. Barratt considers this to be acceptable for up front embodied carbon but would be concerned if further stages were to be added. Barratt request that the definition of the 'up front' stage is made clear so			

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					that there is a clear framework for assessment (i.e. BS EN 15978:2011 stages A1-A5). We also note that the embodied carbon figure has reduced from 900kg CO2e/m2 to 750kg CO2e/m2 from the previous Reg 19 consultation. We cannot see evidence from the Council as to why this has reduced and the resultant impact on financial viability of schemes. This is especially the case given that building regulations do not set a specific requirement for embodied carbon. Net Zero Operational Developers such as Barratt Homes only have the ability to influence the regulated energy demand through design and specification of materials and systems and renewable energy technologies. The unregulated energy consumption cannot be influenced by the developer because it depends on the resident's use of the building. The Governments Future Homes and Buildings Standard Consultation published in December 2023 states in reference to setting energy intensity targets, 'We consider that metrics which include unregulated loads are not a suitable because designers and housebuilders have little or no control over these end uses of energy.' Whilst we recognise that other LPAs have been progressing similar policies, it is only now where the build specifications of these standards are being delivered in practice that the implications of these policies are being fully realised. This includes, for example: • Upgraded U values for Walls, Floor, Roof with bespoke psi values • Enhanced spec lintels • Triple Glazing • Air tightness below 3 (as close to 1 as achievable) • MVHR • ASHP • Additional PV provision with efficient pv systems Whilst the academic studies underpinning the local plan policies indicated the potential additional costs associated with these variations, it has become clear in practice that these are an under-estimate. In Barratt's experience, delivery of these standards (with the onsite renewable energy generation balance) is between £15,000-£22,000 per plot above			

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					current Building Regulations which makes deliverability challenging. In Barratt Homes' aspirations to lead the industry, BDW are currently testing new technologies to meet Future Homes Standard (which is lower than the Council's proposed standards) on sites across the country in partnership with landowners (Homes England and Welsh Government). All evidence to date points to the fact that earlier studies upon which LPAs are relying upon as part of their evidence base have underestimated the cost of these policies by a significant margin. In this context it is recommended that the policy is updated to reference operational net zero as regulated energy only and that the need to achieve an overall operational energy use of less than 35kWh/m2/year should be removed from the Local Plan. No on-site use of fossil fuels Barratt is committed to the transition towards not using fossil fuels. However, pragmatism is required as the industry moves towards phasing out fossil fuels during construction. During operation, the none use of fossil fuels depends on the assumptions within the upcoming Future Homes Standard as well as the decarbonisation of the grid – both of which are out of the control of developers. Policy DP6 should not be setting out requirements that are impossible for the developer to achieve. Barratt considers that Policy DP6 is unsound as it is inconstant with national policy (36.d) as it requires standards that are beyond measures that are to be set out in the Future Homes Standard. This creates a risk in terms of the delivery of the plan given the additional costs that developments will need to absorb in order to meet the standards. As a result, the Local Plan will not be effective (test of soundness 36.c) in delivering if the policy remains as drafted.			
Policy DP43: Affordable housing (including rural exception schemes)	No	• Positively prepared • Justified • Effective	Yes	No	Paragraph 67 of the NPPF sets out that development of sites in the green belt will need to adhere to golden rules as set out in paragraph 157 of the NPPF. This requires at least 50% of the housing to be affordable, unless this would make the development of these sites unviable (when tested in accordance with national planning practice guidance on viability). A review of the Additional Sites Viability Addendum for North Somerset Local Plan 2041 prepared by Dixton Searle shows (Table 7) that at 50% affordable housing development schemes in Easton in Gordano are unlikely to be viable, taking account of all the costs and policy requirements:	In accordance with the NPPF, the policy approach to affordable housing in the green belt should be evidence based to ensure the delivery of sustainable development in North Somerset as is required as part of Policy SP1, SP3 and SP8. This could mean an		

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					“Given the relatively positive results [25% and 35%], further testing was undertaken at 50% affordable housing as requested by NSC. The results indicate poor viability across the values range thought to be typically relevant for the area (in terms of likely new build values) suggesting that a target of 50% affordable housing may be challenging unless higher values can be evidenced. This is notwithstanding our comments regarding the Government’s ‘Golden Rules’ discussed above.” Dixton Searle also notes that development is only marginally viable at 35% affordable housing, highlighting a fundamental concern in the delivery of these sites in line with the Council’s policy aspirations to provide education and transport improvements. Barratt therefore objects to this policy because it is clear through independent viability testing (as is advocated by policy 67 of the NPPF) that all development requiring 50% affordable housing in Easton in Gordano would be unequivocally unviable. This policy is therefore unsound and would fail the ‘effective’ test of soundness because necessary housing sites to meet the objectively assessed need would not be deliverable over the plan period. Easton-in-Gordano is a key strategic growth area for North Somerset and therefore the inclusion of an unsound policy risks the delivery of this strategic development area which could have wider repercussions on the soundness of the whole plan. This issue is not just specific to Easton-in-Gordano, as the Viability Assessment also notes that ‘South West Bristol’ is also unviable at 50% and for Nailsea/Backwell the viability assessment hasn’t even tested 50% even though 889 dwellings in Nailsea/Backwell is in the green belt and would need to adhere to the golden rules. In accordance with the NPPF, the policy approach to affordable housing in the green belt should be evidence based to ensure the delivery of sustainable development in North Somerset as is required as part of Policy SP1, SP3 and SP8. This could mean an affordable housing requirement that is higher than 30% but at a level that can be absorbed by the sites without making them unviable. Other elements of the golden rules could still be secured. Sites released from green belts total 6,685 dwellings (28.2% of the total supply). Therefore, the non-delivery of these sites on viability grounds, as demonstrated in the evidence base would be highly problematic for the soundness of the Local Plan. Policy SP7 is unsound as the policy conflicts with the Local Plan’s evidence base which notes that	affordable housing requirement that is higher than 30% but at a level that can be absorbed by the sites without making them unviable.		

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					50% affordable housing is unviable for development in Easton-in-Gordano. The policy is therefore not effective (test of soundness 36.c) or justified (test of soundness 36.b). In addition, if these sites are undeliverable then that raises a real question as to the deliverability of the plan which means that it is not positively prepared (test of soundness 36.a) as the strategy would not provide for the area's objectively assessed needs.			
Policy DP46: Housing Type and Mix	No	• Justified	Yes	No	Policy DP46 seeks to ensure that new residential development provides an appropriate mix of housing types and sizes to meet a range of accommodation needs as set out in the latest LHNA. Barratt has no issue in principle with this but nots that development viability should be considered on a case-by-case basis when considering housing mix – the policy should make reference to this. Self-build and custom build plots Another element of this policy is the requirement to make appropriate provision for self-build and custom build plots. However, we consider that this element of the policy is unprecise and does not meet the test of soundness due to vague evidence for its inclusion and a lack of clarity in terms of what percentage is expected. The North Somerset Local Housing Need Assessment (LHNA) (September 2025) which the policy references does not provide sufficient evidence to justify the need for this element of the policy. Figure 57: Self-build and Custom Housebuilding Register and Plot Provision of the LHNA only provides data up to 2022-23 and fails to provide the data relating to 2023 onwards. Based on the data available, it seems that there is demand for self-build and custom housebuilding and that demand has historically exceeded supply. However, it is clear that the demand, in no way justifies the policy requirement that states that all development proposals for 10 dwellings or more are required to make an appropriate provision for self-build and custom build plots. If all of the allocations in the Local Plan were to provide these types of plots there would be a significant oversupply. In our view it would be better to make specific allocations for self-build and custom build plots rather than requiring all sites to include an unknown proportion. In addition, the register's evidence is insufficient as it does not take into account the location or type of self-build/ custom house required. It would be entirely inappropriate to require developers to provide self-build/ custom house building plots in locations where there is little demand. In our experience self-builders seldom want to be located	An up to date evidence base should be provided and the policy updated based on that evidence base.		

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					within a large estate developed by a national house builder. We therefore request that the evidence base for this policy be revisited and if required, the draft policy wording revised so that it is based on more robust and up to date evidence. We also consider that a different approach to self-build provision would be better suited to deliver the Council's aspirations. This is especially true for sites removed from the green belt that are required to provide 50% affordable housing. Providing a proportion of self-build and custom build plots will further harm the viability of these sites, making their delivery more difficult. This should be properly accounted for in the viability evidence so that its impact on viability is fully understood. The policy is unsound as it is based on out-of-date evidence. The policy is therefore not justified (test of soundness 36.b). Accessible and Adaptable Homes We note that the policy in relation to accessible and adaptable homes reflects Building Regulations and therefore we support this policy. However, we would note that requiring accessible homes above this policy target could have ramifications for development viability given that the viability assumptions use £15.50/sqm and £155 sqm as a cost assumption for M4(2) and M4(3) respectively.			
Policy DP63: Infrastructure delivery and development contributions	No	‣ Justified ‣ Effective		No	As the largest housebuilder in the country, Barratt Redrow has considerable experience of the real world costs of these policy requirements across a wide range of development sites and sizes. Throughout our representations we have commented on the wide range of development inputs required by the emerging draft Local Plan and the consequential impacts on development viability and what this means for the deliverability and therefore soundness of the plan. It is critical that the policy requirements are properly understood and backed up by robust and up to date evidence. In this context, we question therefore why the Council are relying on out-of-date evidence to substantiate the viability appraisal. An example of this is that the BNG cost assumption is based on a very high-level DEFRA publication 'Biodiversity net gain and local nature recovery strategies: impact assessment' from 2019, the costings of which are from 2017. BNG has been a statutory requirement for major developments since November 2023 and there is therefore now a good degree of understanding of the cost implications of this policy requirement. We	The evidence base should be updated so that the Plan is justified (test of soundness 36.b) which requires plans to be based on proportionate evidence.		

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					consider that NSC should revisit this cost assumption as we feel that the real-life costs of providing BNG is significantly higher, especially when there is a need to buy off site credits. We also query the use of £500 per dwelling for SPA/SAC costs. The notes in the viability assessment notes that this is “Based on a range of data, pending further NSC specific data”. Given that a large part of North Somerset is within the bat SAC consultation zone, providing replacement bat habitat is a common occurrence. Based on our experience the cost of providing SAC mitigation is significantly more than £500 per home. Another example is that the build costs used in assessing the additional sites are from July 2023. By the time the examination commences the build costs will be over 3 years old and out of date. We query why the build costs used to assess the new sites are from 2023. We also query why the viability testing for the remaining sites have not been re-run given the time that has passed since the consultation on the first reg 19 plan. We also note that the adopted CIL rates have been applied using 2025 indexed rates for the ‘additional sites’. However, viability testing for the other sites has not been updated and relies on 2023 figures. The new sites also have more onerous water efficiency standards (100 lpppd compared to 110 lpppd) although we note that this cost difference would be nominal. The viability evidence uses a cost assumption of 9% of the base build cost for sustainable design/climate change/carbon reduction. Flats are 4% and a mix of houses and flats 7%. The assumption notes that cost uplift is based on a range of evidence provided by NSC and this then references “evidence based on range of sources including Cornwall Council - Etude with Currie & Brown, 2021”. Whilst we have not been able to have sight of this document it is clear that it is several years old now and may not provide a robust evidence base for the cost assumption especially given that the net zero technologies are advancing rapidly. We note that the viability assessment for the South Gloucestershire Local Plan (also undertaken by Dixton Searle) uses an 8% assumption which suggests that North Somerset’s sustainability policies are more onerous. The general development cost assumptions in the 2025 additional sites assessment does not include a residual s106 cost whereas the 2023 Development Cost Assumptions & Key Sensitivity Testing Parameters includes a residual s.106 contribution of £3,000 per unit and £5,000 per unit respectively. It is unclear why this is the case but we note that this is another flaw and inconsistency within the			

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					viability work that should be rectified for consistency so that the true viability of development is known. To summarise we feel that the evidence base behind the policies and their costs need to be more up to date and based on real and robust evidence. The out of datedness of the evidence base could be as a result of the protracted length of the plan preparation process. However, there is no reason why this cannot be rectified so that the policy asks are more realistic and therefore more deliverable. The evidence base should be updated so that the Plan is justified (test of soundness 36.b) which requires plans to be based on proportionate evidence.			

Name: Barratt Bristol (Land at Colliters Way) **I.D:** 51556641

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SP7: Green Belt	No	• Positively prepared • Justified • Effective • Consistent with national policy			Our client supports the proposed changes to the Green Belt in relation to land at Colliters Way. For the avoidance of any doubt our client also supports the proposed release of land north of Colliters Way referred to within Policy LP9. However, objection is raised to Policy SP7 where it states that “New residential development will only be permitted on land released from the Green Belt, as defined on the Policies Map, where it is demonstrated how the development meets the ‘Golden Rules’ requirements as set out in the NPPF.” In accordance with paragraph 67 of the NPPF the wording should be amended to refer to viability as follows: “New residential development will only be permitted on land released from the Green Belt, as defined on the Policies Map, where it is demonstrated how the development meets the ‘Golden Rules’ requirements as set out in the NPPF unless this would make the development of these sites unviable (when tested in accordance with national planning practice guidance on viability).”	The wording should be amended to refer to viability as follows: “New residential development will only be permtted on land released from the Green Belt, as defined on the Policies Map, where it is demonstrated how the development meets the ‘Golden Rules’ requirements as set out in the NPPF unless this would make the development of these sites unviable (when tested in accordance with national planning practice guidance on viability).”		Local Plan Representations North Somerset December 2025 Final 12.12.25 with appendices.pdf
SP8: Housing	No	• Positively prepared • Justified • Effective • Consistent with national policy			Earlier representations to the previous PsP on behalf of our client raised concerns in relation to the Plan Period, Housing Requirement, Distribution and Supply. As discussed at section 2 (see attached document) the plan period, which is now expressed as 2026-2041 is still of concern. Our client is also still concerned about the proposed housing requirement despite it now being significantly higher than proposed previously. The increased minimum housing requirement from 14,902 in the 2024 PsP to 23,700 is generally welcomed. However, due to the very acute need for market and affordable housing in North Somerset, and the Council’s poor track record of delivery the plan does not go far enough. Based on the Council’s evidence base it is also not clear whether the proposed housing requirement will meet the housing needs of all housing types (such as affordable) or sufficiently support the economy as set out at paragraph 85 of the NPPF. The Council should therefore test other housing requirements which go beyond the standard method housing requirement. Paragraph 11b of the NPPF requires that local plans provide for the objectively assessed needs for housing as well as any needs that cannot be met within	Modifications required: In order for the local plan to be found sound it will be necessary to amend the plan period to 2027-42 as a minimum, and adjust the housing requirement and trajectory accordingly. In addition the housing requirement should be increased or as an alternative the policy should make it clear how flexibility has been imbedded to allow for more houses in excess of the minimum, over the plan period. In addition the Council should publish a housing trajectory and reduce the reliance on supply arising from the small site windfall.		Local Plan Representations North Somerset December 2025 Final 12.12.25 with appendices.pdf

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					neighbouring areas, as a minimum, unless either the application of footnote 7 policies provides a strong reason for restricting the scale of growth or any adverse impacts of meeting housing needs would significantly and demonstrably outweigh the benefits. Paragraph 61 states that “To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed…” and that “The overall aim should be to meet an area’s identified housing need, including with an appropriate mix of housing types for the local community.” Paragraph 62 requires that the minimum number of homes needed should be informed by a local housing needs assessment conducted using the standard method. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for. Paragraph 35a of the NPPF identifies that in order to be ‘positively prepared’ and therefore found sound, local plans will need to be informed by agreements with other LPAs to ensure that unmet needs are accommodated where it is practical to do so and consistent with achieving sustainable development. Paragraph 35c also states that to be ‘effective’ the plan must be based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred in order for a Local Plan to be found sound. Policy SP8 seeks to deliver a ‘minimum’ of 23,700 dwellings over the plan period. However, even if it is reached it is difficult to see how this figure could ever be exceeded based on the restrictive nature of the policies contained within the plan. For consistency the table contained within policy SP8 should also include the word ‘minimum’ dwellings. The table also sets out a broad distribution of new dwellings although the table includes percentages relating to the proportion of housing supply. This should also be amended to state ‘broad’ proportion. Taking the above into account Policy SP8 is considered unsound as it is contrary to national policy, unjustified, not positively prepared or effective. It is not clear how the proposed allocation at Colliters Way Bristol has been accounted for in the table contained within Policy SP8. This should be clarified by including a separate source of supply for this site. It also appears that the Council has not included a housing trajectory in the evidence base which is critical to understand whether housing policies in the plan will be effective. This should also be addressed before the plan is submitted for examination. The justification for Policy SP8 states that the figures include windfall assumptions which are ‘set out in full’ in the SHLAA (2025). The SHLAA (2025) appears to suggest at Table 6 that over the plan period a total of 4,000 dwellings will be delivered as windfall. This is a significant proportion of the overall housing requirement and confirms that much of the housing growth for North Somerset over the next plan period is expected to be unallocated and unplanned. To ensure flexibility in the plan and address the fact that the housing requirement is expressed as a minimum the windfall allowance should be excluded from and treated as additional to the housing figures set out in policy SP8. It is worth noting the changes that have been made to Policy SP8 since the Autumn 2023 PsP was published. This is summarised in the table in the attached document. This demonstates the greater burden expected on delivery from Wolvershill (north of Banwell) and the reduction in growth at the villages and rural areas.			

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					It is clear from the findings of the recent Bristol City Council local plan examination that Bristol will struggle to meet the housing needs of the area over the plan period. The need for cross boundary working across the area is obvious and has been recognised for some time. North Somerset Council has previously attempted to work collaboratively with Bristol City, Bath and NE Somerset and South Gloucestershire Councils to prepare a West of England Joint Spatial Plan (JSP) although this was subsequently abandoned. The JSP recognised that there was insufficient capacity in Bristol City to meet its needs and this was to be addressed across the remainder of the plan area including in North Somerset. It is logical that the same approach should be applied now. Page 18 of the North Somerset 'Duty to Co-operate Statement of Compliance' confirms that Bristol City Council has requested that North Somerset accommodate some of its unmet needs, but "The evidence supporting the local plan demonstrates that North Somerset does not have capacity to meet some of Bristol's needs at this time." Overall, this seems to be a missed opportunity. Even if no specific provision is made to address the unmet needs of Bristol City, given the very strong inter relationship between the two LPAs, this unmet need will place a significant additional demand for housing in North Somerset and could both compromise the affordability of housing in North Somerset and increase the rates of commuting from North Somerset to Bristol. In summary policy SP8 is considered to be unsound as it will not provide for a fifteen-year period post-adoption period contrary to paragraph 22 of the NPPF. It is also not clear whether the policy will sufficiently support the economy and provide sufficient housing for all types including affordable housing. It also doesn't take into account of or respond to the substantial unmet needs of neighbouring Bristol City and is therefore contrary to the requirements of paragraphs 35a and 35c of the NPPF. Overall the policy is not positively prepared or effective and does not include a housing requirement which is robust enough to meet needs over the plan period.			
Policy LP5: Housing, employment and mixed use allocations	No	• Positively prepared • Justified • Effective • Consistent with national policy			Our client supports the identification of land at Colliters Way for residential development as set out in Policy SP8 and Schedule 1 of the PsP. The Council's stipulation that the site is brought forward comprehensively with other adjoining land is also welcomed. This approach is consistent with the adjoining policy requirements of land allocated for residential development at Elsbert Way in the Bristol Local Plan. This site is considered a sustainable site, closely related to the urban area of Bristol. It's release from the green belt for residential use is logical and would have a low impact upon the Green Belt. As currently drafted, no access to the site is permitted from Colliters Way. This requirement is not justified by evidence and makes the plan unsound. It will also have the effect of potentially limiting or delaying the development of the site. This requirement should therefore be deleted. When allocating the site for development consideration must also be given to viability to ensure it can be delivered. Policy SP7 should therefore be modified accordingly. Through these representations our client has also raised concerns about the Council's approach to housing supply, which are considered to make the plan unsound. The matters raised are important to how successful the plan is in meeting housing need across the plan period. However, they appear to be matters that can be addressed through amendments to the Policy SP8 and the evidence base.	As currently drafted, no access to the site is permitted from Colliters Way. This requirement is not justified by evidence and makes the plan unsound. It will also have the effect of potentially limiting or delaying the development of the site. This requirement should therefore be deleted. Through these representations our client has also raised concerns about the Council's approach to housing supply, which are considered to make the plan unsound. The matters raised are important to how successful the plan is in meeting housing need across the plan period. However, they appear to be matters that can be addressed through amendments to the Policy SP8 and the evidence base.		Local Plan Representations North Somerset December 2025 Final 12.12.25 with appendices.pdf
Policy LP9: Extent of the Green Belt	No	• Positively prepared			The identification of Land north of Colliters Way as a release from the Green Belt is supported. In the supporting text to draft policy SP7 ('Green Belt') the Council makes clear that			Local Plan Representations North Somerset December 2025

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		• Justified • Effective • Consistent with national policy			Land north of Colliters Way has been identified as being appropriate for release from the Green Belt for residential use. As previously explained our client's site forms part of a larger proposed allocation along with site HE20286 in addition to an adjacent proposed site in the Bristol local plan (Land off Elsbert Drive) and is proposed to be developed comprehensively with this development. The site was assessed as part of the Green Belt Review, Part 1 (Jan 2022) which included this site within sub-area '12' for the purposes of a comparative analysis across the area. The overall conclusion was that this area scored 'moderate/ low' in terms of harm to the Green Belt, the least harmful of all areas assessed. As set out in earlier representations our client agrees with the Council's rational for releasing the land from the Green Belt. Even if the site was not identified for release from the Green Belt, which it is, the land is considered to be Grey Belt land as defined by the NPPF. In accordance with NPPF paragraph 148 the site should therefore be given priority.			Final 12.12.25 with appendices.pdf
Land north of Colliter's Way, Long Ashton	No	• Positively prepared • Justified • Effective • Consistent with national policy			The identification of Land north of Colliters Way, Long Ashton (as defined on the policies map) for 215 new dwellings is supported. The site adjoins the proposed allocation of land at Elsbert Drive within the Bristol City Council administrative area on land also released from the Green Belt. Earlier representations to the 2024 PsP highlighted that the site assessment through the Council's Sustainability Appraisal (SA) appeared to have significantly under-valued the site. A copy of our clients site specific assessment is attached at Appendix 3 for reference. Whether or not this is the case there is clear justification for the site's proposed allocation which lies in a highly sustainable location. The site specific reference for the site which appears at page 310 of the PsP refers to the need for coordinated masterplanning and delivery. This is consistent with Policy DS11 (see extract at Appendix 4) of the Bristol Local Plan which requires: "Development at Elsbert Drive should be in accordance with a detailed cross-boundary development framework or master plan prepared in consultation with the local community which addresses the layout and form of development, access and the relationship with surrounding areas." This is a logical policy requirement which will ensure that design and technical considerations can achieve a coordinated approach to housing delivery at the site. As highlighted earlier in these representations Taylor Wimpey has submitted an outline planning application on their land at Elsbert Way which fails to address these policy aspirations and could either limit the dwelling yield from the site or frustrate development altogether. Our client is committed to pursuing an integrated approach to bringing forward the land at Colliters Way. A preliminary draft Masterplan has been prepared and is enclosed in Appendix 5 of the attached document. This shows how the wider scheme can come forward in an integrated manner. Our client intends to undertake pre-application engagement with both North Somerset and Bristol simultaneously in anticipation of a formal planning submission, to ensure appropriate cross-boundary engagement to inform the final submission detail, which would again be subject of consultation with both authorities. The site criteria for land at Colliters Way states that there shall be no vehicular access off Colliters Way. However, it is unclear why this requirement is necessary or justified or what technical highways/transport evidence has led to this approach. A hybrid planning application (23/P/2185/FU2) for a new office campus to the	Modifications required: The reference to "No vehicular access off Colliters Way." Should be deleted.		Local Plan Representations North Somerset December 2025 Final 12.12.25 with appendices.pdf

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					southwest of Long Ashton Park & Ride was approved by North Somerset Council on the 6th March 2025 and included improved accesses from Colliters Way at both the Gurney Roundabout and Brook Gate junction together with a new access directly from Colliters Way at the south-western side of the site. The principle of providing new vehicular access directly onto Colliters Way has therefore already been accepted. In addition the local plan evidence base does not appear to provide any justification for ruling out a similar approach on our client's land, subject to appropriate modelling and technical design. The provision of a connection onto Colliters Way would increase choice and convenience for users, disperse traffic more effectively and, in the event that our client's should come forward for development ahead of neighbouring parcels, avert unnecessary delays in the delivery of the draft allocation. In relation to this our client supports the second and third site requirement of providing "Active travel links to all local roads and public rights of way" and "Active travel provision improvements to link into local facilities" respectively. It is anticipate that an emerging detailed scheme will be capable of providing appropriate active travel links, including to Colliters Way, the local Public Rights of Way network, and adjoining parcels as part of a comprehensive active travel strategy.			

Name: Barratt Bristol - Land at Park Farm, Congresbury **I.D:** 58635297

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP5: Housing, employment and mixed use allocations	No	Positively prepared	Yes	Yes	Land at Park Farm, Congresbury – Site Specific Representation: • In the context of North Somerset, Congresbury is well placed to accommodate further residential development, over and above the quantum allocated through the North Somerset 2041 Pre-submission Plan (Regulation 19). • Congresbury contains a variety of services and facilities including education, healthcare, retail and leisure provision. This range of facilities enables a good degree of self-containment, offering residents an opportunity to meet their day to day needs within the village or in nearby settlements accessible by sustainable travel options. • Land at Park Farm, Congresbury represents a suitable, sustainable and deliverable opportunity to increase the number of homes at Congresbury by circa 90 dwellings. The evidence base appended to this representation confirms that the land is sustainably located and complies with the wide ranging requirements of the National Planning Policy Framework (the 'Framework'). Indeed, the land: o does not fall within restrictive policy designations; o could be developed avoiding land which falls within areas of flood risk; o is adjacent to existing residential development and the proposed settlement boundary; o is within walking and cycling distance of the services and facilities available within Congresbury; o could be developed with appropriate mitigation which addresses the potential impacts on the setting of nearby heritage assets; o is not constrained by noise considerations and utilities infrastructure capacity; and o has potential to contribute positively to green infrastructure and provide a net gain in bio-diversity through provision of public open space aside an existing public right of way. • Feasibility work undertaken to date indicates that the land can be developed in a manner that addresses and mitigates the identified potential constraints. • In the context of comments made in response of housing supply, Barratt Bristol is of the strong view that the Land at Park Farm, Congresbury represents a site that is available, developable and	The site at Park Farm, Congresbury could be introduced as an further allocation to boost housing delivery.		Land at Park Farm, Congresbury - Appendix 2 - Framework Plan.pdf Land at Park Farm, Congresbury - Appendix 1 - SLP.pdf Land at Park Farm, Congresbury - Representations (submitted 11.12.25).pdf Land at Park Farm, Congresbury - Appendix 6 - Archaeology and Heritage.pdf Land at Park Farm, Congresbury - Appendix 4 - Landscape.pdf Land at Park Farm, Congresbury - Appendix 3 - Highways.pdf Land at Park Farm, Congresbury - Appendix 5 - Drainage & Flood

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					deliverable for housing, and which could therefore be introduced as an further allocation to boost housing delivery. See attached Documents for full representation.			Risk.pdf

Name: Barrow Gurney Parish Council **I.D:** 4618561

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP2: Strategic location: Woodspring (south west of Bristol)	No				Barrow Gurney Parish Council is particularly concerned about the combined effects of 3 pro-posed new developments in the north of the district: at Woodspring (to provide circa 3,500 new homes, 10ha employment, one senior school to cater for c1,600 students, 2 or 3 primary schools and a new neighbourhood centre); the proposed further expansion of Bristol Airport from the present 12mmpa limit to 15mppa, and the EPIC campus between Colliters Way and the A38 - for which planning permission has already been granted. Taken together these developments will have an enormous impact on the already congested road network, in particular on Colliters Way and the A38. Colliters Way is already heavily congest-ed during peak traffic flows in the morning and evening, and will be to a much greater extent once the EPIC development becomes operational. The Woodspring development will span large areas of countryside on either side of the A38, which is also regularly congested between Lime Kiln roundabout and the airport owing to the large volume of passengers travelling to or from the air-port by car or taxi. It is no secret that car parking revenue is Bristol Airport's primary source of funding. The proportion of passengers arriving by public transport however is, we understand, the lowest of any airport in Britain at around 15%. It is inevitable that access to and from Woodspring will generate an enormous increase in traffic along the A38 and smaller rural roads in the vicinity. Taken individually, there is an incoherence in the thinking behind each proposal: NSC is putting forward a sustainable community at Woodspring, but does nothing to link it to the city by rapid transit, surely a "must". Bristol Airport informs of its intention to expand its passenger throughput to 15mppa, a 50% in-crease on its current throughput. Any expansion should similarly be preceded by a rapid transit route between the City centre and the airport. Putting the two expansion proposals together provides an overwhelmingly powerful case for a mass rapid transit route between the City centre and the airport to be defined at the outset as the primary action so that the development of each can move forward with certainty and new development at Woodspring can be built around the route. The impact of the EPIC proposals (a new European HQ for the US Tech Giant, including new office buildings, a 3,000 seater auditorium and training facilities on a 90ha site, which together could create 2,150 jobs) can only compound pressure on the highway network in this part of the city and adds further weight to the crying need for an integrated mass rapid transit system from which employees at EPIC can also benefit. From the Parish Council's own perspective the impact of these developments on Barrow Gurney village will be very significant, largely owing to the increased volume of traffic on these three roads. When either the A38 or A370 is congested, usually as a result of congestion on Colliters Way, a great deal of traffic re-routes along the B3130 which, like Colliters Way, provides a link be-tween the two. This road is, however, demonstrably unsuitable for increased traffic, with 3 sections of road passing through the village conservation area being restricted to single file, one-way at a time only traffic and a 7.5 ton weight limit. Despite these limitations it is designated as the recommended satnav route between Portbury on the M5 and Bristol Airport. We do not consider the Local Plan (2041) Pre-submission Plan to be sound for the reasons out-lined above and embellished in our comments on Policies LP2, LP11 and LP12. Policy LP2: Strategic location: Woodspring (south west of Bristol) (Page 58) Developers must work together to produce a single masterplan and design code for the al-located area. The development will deliver a new standalone sustainable community with a distinct character and identity. Proposals must demonstrate			Local Plan response 12.25 NT final.pdf

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					how the development will function as a cohesive and independent community, with a strong sense of place and clearly de-fined boundaries that prevent coalescence with surrounding communities, including the Bristol urban edge. A high standard of design will be required to reflect the site's unique landscape and heritage context, incorporating a mix of uses, high quality green and blue infrastructure, and active travel connections internally and to surrounding areas. The development must ensure that walking, cycling, and public transport are the most convenient and attractive ways to move into, out of and around the site, with safe and legible routes providing easy access to key services and facilities. The layout and strategic phasing of infrastructure must be guided by a comprehensive masterplan and design framework to shape a well-integrated and vibrant new community. Whilst we accept that NSC is being required by government to release land within the Green Belt in order to be able to fulfil its housing allocation during the plan period, and are in agreement that this being the case it should comprise a standalone sustainable community, we strongly disagree with the proposal that developers should work together to produce a single masterplan and de-sign code for the allocated area. Any masterplan should be prepared by North Somerset Council itself, or if necessary by an independent body appointed by North Somerset to supervise production of a cohesive masterplan on the Council's behalf utilising the extensive variety of skills re-quired. Under the sub-heading Transport (pages 59/60, bullets 3 and 4) the policy states: • Development proposals must demonstrate that they do not prejudice the future delivery of a high-quality, segregated mass transit route between Bristol City Centre and Bristol Airport, in line with Policy LP11. Opportunities for the route to pass through or alongside the site should be safeguarded where appropriate, and development layouts should sup-port integration with the future mass transit network. • Development proposals must ensure that they do not prejudice the future delivery of transport hubs. In any planning application consideration should be given to how these elements could be integrated into the future development. This may require significant parking provision to support transport hub access for residents from North Somerset and beyond. As the mass transit route and its infrastructure are further defined, development layouts should retain flexibility to accommodate this, ensuring seamless integration with emerging transport proposals. It is our strongly held view that the new development at Woodspring should be infrastructure-led and that a mass transit corridor route alignment should be identified prior to commencement of development. Built development should be designed to fit around the infrastructure that will pro-vide the means of public transport by which residents will travel to and from their destinations, notably Bristol city centre and the Airport. Construction of the rapid transit route should preferably take place in conjunction with development as the settlement grows. It is not sufficient to state that "opportunities for the route to pass through or alongside the site should be safeguarded where appropriate." With 3,500 new dwellings to be built predominantly between the A38, A370 and Colliters Way, together with 10ha of employment land, 3 or 4 schools and a new neighbourhood centre, it is in-evitable that these roads will become very much more congested than at present unless and until a new rapid transit link to the city is available. The A38 in particular, as the principal corridor be-tween Bristol and the Airport, is particularly vulnerable because it is almost exclusively single carriageway only. It is entirely unsuitable for upgrading to a mass transit corridor for public transport because it cannot realistically be converted to a dual carriageway by virtue of the Barrow Tanks reservoirs on either side along a substantial proportion of its length. In which case it is logical that an alternative mass transit route through the Woodspring development should be considered and that this would provide the spine of the development by which access to the north (Bristol) and south (airport) could be obtained. It could (and should) determine where the core neighbourhoods should be located and help to shape the vision for the entire new settlement. CONCLUSIONS Woodspring BGPC believes that the Master Plan for Woodspring cannot be left to developers as proposed, but should, indeed MUST be led by NSC and/or suitably qualified, independent and experienced planning consultants. Woodspring, Transport and the Airport We also do not believe the proposed development of a new settlement comprising 3,500 dwellings, 10ha employment land, 3 or 4 new schools, a new neighbourhood centre and much more besides, at Woodspring is a sound planning proposition until and unless a firm route alignment for a rapid transit connection between Bristol and the new settlement has been established. Logically it would be sensible to define a continuous mass rapid transit route between the City			

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					centre and the airport as a priority, so that development at Woodspring can be planned with greater certainty based upon an established route alignment, and reliance on using private trans-port to get to the city or the airport would be significantly diminished. It would also ensure that if the airport were ever permitted to expand to 15mppa over time (which we as a Parish Council would prefer not to be the case) it could encourage greater use of public transport to enable it to do so. To suggest that developers should make allowances for a route to be threaded through the Woodspring development in the future, once development is well underway, gives a strong indication that the plan has not been positively or effectively prepared. Until an alignment for a new, high quality, segregated, mass transit route between Bristol City Centre and the airport is defined as a principal policy requirement, we consider proposals for the development at Woodspring and the future expansion of Bristol Airport would have an unacceptable impact on the existing transport network to the south west of Bristol, and in this regard we consider the Local Plan (2041) Pre-submission Plan (Reg 19) to be unsound. Please see full comments attached.			
Policy LP11: Transport infrastructure, allocations and safeguarding	No				Policy LP11: Transport infrastructure, allocations and safeguarding states: (Page 80) Land is allocated or safeguarded and defined on the Policies Map and set out in Schedule 7, which forms part of this policy, for the delivery of transport schemes, the improvement of existing services or the creation of sustainable transport links and facilities. In addition to the specific schemes identified in Schedule 7 the following are proposed for delivery during the plan period: (Inter-alia): • Mass Transit Scheme between Bristol Airport and Bristol City Centre In the sub-text below the policy the first paragraph states This policy provides for safeguarding routes for potential transport improvements, including active travel routes, road, rail and bus infrastructure. The approach to existing and proposed active travel routes is set out in Policy DP16. The fourth sub-text paragraph states Transport schemes included in the JLTP4 enhance connectivity and road safety and promote the use of public transport. The major transport schemes proposed to be delivered over the plan period are the re-opening of Portishead Branch Line and the Banwell Bypass which are at an advanced stage of planning and delivery, and the potential for mass transit corridors from Bristol along the A38 to the Airport. The JLTP4 also identifies other longer-term aspirations such as a potential new motorway junction south of J21 of the M5. It seems clear from the highlighted words that the schemes listed in addition to those in Schedule 7 are still only potential schemes. There is no certainty that they will be constructed. Whilst the Portishead Branch Line and Banwell Bypass are at an advanced stage of planning and delivery, the potential for “mass transit corridors” along the A38 have no such status. Yet it is absolutely essential that a mass transit corridor is constructed between the City and the Airport if the Woodspring development and the airport expansion to 15mppa (in addition to the EPIC campus - al-ready approved) are to go ahead without causing transport mayhem, particularly on the A38. Two further questions also arise: • Why is it that the paragraph refers to the potential for mass transit corridors (plural) “along the A38,” when it is clear that this corridor is not capable of being upgraded as a mass transit route along its entire length because of the impediment of the Barrow Tanks? • Why are developers being asked to make provision for potential alignments through the Wood-spring site if the intention is to have a mass transit corridor along the A38 to the airport? Given the uncertainty raised by both these questions it is surely imperative that a route alignment is identified through the Woodspring site as a precursor to development, so that there is no ambivalence about where it might eventually run, or worse still there is no potential for the route to be implemented once development has stymied potential options. The 5th and 6th sub-text paragraphs state			Local Plan response 12.25 NT final.pdf

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					In tandem with the Local Plan, North Somerset is preparing an Infrastructure Delivery Plan setting out the key infrastructure requirements, including transport infrastructure, needed to implement the Local Plan proposals, and how it is to be delivered and monitored. The schemes listed in this policy are within the IDP and are described as longer term schemes proposed during the plan period. Specific alignments or scheme details have not yet been confirmed. They include: (inter alia) • Mass Transit Scheme between Bristol Airport and Bristol City Centre – to deliver a frequent, reliable, high quality public transport route between Bristol Airport and Bristol city centre. Once again this suggests that there is no urgent requirement for the mass transit scheme, when there absolutely is now, let alone at some point in the future when the development of Wood-spring has been half-completed (with circa 1,750 new homes, 5ha employment land, two schools, town centre) bringing with it an enormous increase in private transport usage which will, in significant numbers, inevitably be trying to gain access via the A38 and Colliters Way until there is a mass transit route capable of transporting them into Bristol or out to the airport by a regular public transport service. The EPIC campus is also on record as saying that it was imperative it located to its chosen site because of its proximity to the airport in order that its headquarters staff in the US, European and Middle East locations could have easy access to its new campus. The route options between EPIC and the airport are A38 / Colliters Way, or A38 / B3130 through Barrow Gurney / A370 / Colliters way. Again, given the size and projected importance of the campus, this will generate considerably more traffic. CONCLUSIONS Transport Repeated use of the word “potential” in policies relating to provision of a mass transit route be-tween the City and Airport does not inspire confidence that it will ever be delivered, yet it is absolutely essential to alleviate existing congestion that frequently occurs on the A38 in particular, but also Colliters Way and the A370 in the vicinity of Gurney roundabout. We believe that the further expansion of the airport to accommodate 15mppa passenger throughput should only be permitted provided that the new mass transit route has been constructed in advance. In this regard we do not feel the plan has been positively prepared. We are not sure to what extent discussion has taken place with Bristol City Council and The West of England Combined Authorities on potential routes, or whether the Duty to Co-operate has been observed. Woodspring, Transport and the Airport We also do not believe the proposed development of a new settlement comprising 3,500 dwellings, 10ha employment land, 3 or 4 new schools, a new neighbourhood centre and much more besides, at Woodspring is a sound planning proposition until and unless a firm route alignment for a rapid transit connection between Bristol and the new settlement has been established. Logically it would be sensible to define a continuous mass rapid transit route between the City centre and the airport as a priority, so that development at Woodspring can be planned with greater certainty based upon an established route alignment, and reliance on using private transport to get to the city or the airport would be significantly diminished. It would also ensure that if the airport were ever permitted to expand to 15mppa over time (which we as a Parish Council would prefer not to be the case) it could encourage greater use of public transport to enable it to do so. To suggest that developers should make allowances for a route to be threaded through the Woodspring development in the future, once development is well underway, gives a strong indication that the plan has not been positively or effectively prepared. Until an alignment for a new, high quality, segregated, mass transit route between Bristol City Centre and the airport is defined as a principal policy requirement, we consider proposals for the development at Woodspring and the future expansion of Bristol Airport would have an unacceptable impact on the existing transport network to the south west of Bristol, and in this regard we consider the Local Plan (2041) Pre-submission Plan (Reg 19) to be unsound. Please see full comment attached, with further observations on the cumulative transport implications of the plan on Barrow Gurney.			

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Policy LP12: Bristol Airport	No				Policy LP12: Bristol Airport Paragraph 2 of the policy on P.82 states Within the Bristol Airport Green Belt inset as defined on the Policies Map, the development of facilities and infrastructure which contribute to and support sustainable improvements to operational efficiency and passenger safety at the airport and its role as a regional transport facility and major employer will be supported provided that: (inter alia, bullet 3) • Appropriate surface access improvements including major public transport infrastructure and services and support to develop a mass transit link, as well as long distance regional coach services integrating with transport interchanges and long stay parking provisions are provided in step with development to mitigate the adverse impact of airport traffic on local communities and the highway network and facilitate a sustained modal shift to public transport; We agree with this statement that reinforces the need for surface access improvements, services and support to develop a mass transit link, but would emphasise that an increase to 15mppa from the current level of circa 10mppa represents a 50% increase on current traffic movements between Bristol and the airport along the principal corridor between the two - the A38 which is already heavily congested at various times during the day, mainly related to aircraft arrival and departure times. This will also have a detrimental knock-on effect on traffic movements along the B3130 through Barrow Gurney. Once again this points to the urgent necessity of introducing a mass transit route at the earliest possible opportunity. We are firmly of the view that the further expansion of the airport should be dependent upon construction of a segregated, high quality mass transit route being constructed between Bristol and the Airport. CONCLUSIONS Woodspring, Transport and the Airport We also do not believe the proposed development of a new settlement comprising 3,500 dwellings, 10ha employment land, 3 or 4 new schools, a new neighbourhood centre and much more besides, at Woodspring is a sound planning proposition until and unless a firm route alignment for a rapid transit connection between Bristol and the new settlement has been established. Logically it would be sensible to define a continuous mass rapid transit route between the City centre and the airport as a priority, so that development at Woodspring can be planned with greater certainty based upon an established route alignment, and reliance on using private trans-port to get to the city or the airport would be significantly diminished. It would also ensure that if the airport were ever permitted to expand to 15mppa over time (which we as a Parish Council would prefer not to be the case) it could encourage greater use of public transport to enable it to do so. To suggest that developers should make allowances for a route to be threaded through the Woodspring development in the future, once development is well underway, gives a strong indication that the plan has not been positively or effectively prepared. Until an alignment for a new, high quality, segregated, mass transit route between Bristol City Centre and the airport is defined as a principal policy requirement, we consider proposals for the development at Woodspring and the future expansion of Bristol Airport would have an unacceptable impact on the existing transport network to the south west of Bristol, and in this regard we consider the Local Plan (2041) Pre-submission Plan (Reg 19) to be unsound.			Local Plan response 12.25 NT final.pdf

Name: Barry Moss **I.D:** 62777217

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Land south of Nailsea	Unsure	• Positively prepared • Justified	Unsure	Unsure	Backwell has already had 800 houses approved increasing the village size by some 40% - any additional houses would make the infrastructure for the village and surrounding areas completely unsustainable. Despite this increase, there is already a lack of school places and no investment in health services. The lack of infrastructure cannot sustain the proposed further houses.			

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		• Effective • Consistent with national policy			Backwell is not an employment hub and most residents commute on roads that get very congested at peak times already; further traffic will make the congestion and pollution even worse. Backwell Common and surrounding areas are prone to flooding which would be aggravated by further housing development. Further, Backwell Lake and adjacent fields where the new road and housing as planned are on a regularly flooding floodplain. Backwell alone has seen a population growth of some 80% and the wider Nailsea/Backwell are an even greater increase in population and associated road traffic impacts.			
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell has already had 800 houses approved increasing the village size by some 40% - any additional houses would make the infrastructure for the village and surrounding areas completely unsustainable. Despite this increase, there is already a lack of school places and no investment in health services. The lack of infrastructure cannot sustain the proposed further 1000 houses. Backwell is not an employment hub and most residents commute on roads that get very congested at peak times already; further traffic will make the congestion and pollution even worse. Backwell Common and surrounding areas are prone to flooding which would be aggravated by further housing development. Further, Backwell Lake and adjacent fields (where the new road and housing as planned) are on a regularly flooding floodplain. As well as not protecting our best and most versitile land to safeguard food security (a Government policy), the development would destroy valuable wildlife and habitat, not least for residents of Backwell to enjoy a rural setting and walks. Backwell alone has seen a population growth of some 80% and the wider Nailsea/Backwell are an even greater increase in population and associated road traffic impacts.			

Name: Barry Stirling **I.D:** 39037377

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Policy LP3: Strategic location: Nailsea and Backwell	Unsure		Unsure	Unsure	The proposal would be yet more ‘bolt on’, developments on the edge of Nailsea (and Backwell) which bring nothing positive, just more strain on the already overstretched infrastructure, particularly the Nailsea access roads which are virtually unchanged from over 125 years ago when the population was less than two thousand people and motor transport rare, yet are expected by North Somerset Council to cope with huge volumes of traffic for which they are totally inadequate in terms of width, strength, visibility, and this high volume of traffic passes at speed very close to residential properties thus and creating a noise, safety and health hazard. As regards Nailsea, the proposed development sites are all too far away from Nailsea centre and bus stops to expect that access to and from the development site would be by anything other than car (particularly if doing a sizeable amount of shopping) , resulting in more traffic, noise and parking issues, exacerbated by the introduction of parking charges. This is not consistent with a number of the Strategic Priorities above and in contravention of the Council’s intent and policy to reduce car use and promote active transport.			
Policy LP3: Strategic location: Nailsea and Backwell	Unsure		Unsure	Unsure	The proposal would be yet more ‘bolt on’, developments on the edge of Nailsea (and Backwell) which bring nothing positive, just more strain on the already overstretched infrastructure, particularly the Nailsea access roads which are virtually unchanged from over 125 years ago when the population was less than two thousand people and motor transport rare, yet are expected by North Somerset Council to cope with huge volumes of traffic for which they are totally inadequate in terms of width, strength, visibility, and this high volume of traffic passes at speed very close to residential properties thus and creating a noise, safety and health hazard. As regards Nailsea, the proposed development sites are all too far away from Nailsea centre and bus stops to expect that access to and from the development site would be by anything other than car (particularly if			

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					doing a sizeable amount of shopping) , resulting in more traffic, noise and parking issues, exacerbated by the introduction of parking charges. This seems to be in contravention of many of the Sustainable Development Objectives above and the Council's intent and policy to promote active transport.			
Policy LP3: Strategic location: Nailsea and Backwell	Unsure		Unsure	No	I have communicated with the Highways Dept, local councillors, town council, MP's Liam Fox and Sadik Al-Hassan and council leader Mike Bell about the traffic issue on Hanham Way/The Causeway/Washing Pound Lane. My highlighting the ever worsening problems with this route already and suggestions and requests for improvements made previously have all been rejected by the Council Highways dept. who subsequently (about 18-24 months ago) refused to respond to any further communication from me. Not a very proactive decision, as residents who live in the areas where traffic problems occur can highlight them and being 'on the spot' continuously assess and report them far more accurately than the council can remotely. Building on any of the proposed development/building sites would add additional traffic to Hanham Way and The Causeway as a shortcut/rat-run to and from TIckenham, Clevedon, M5, Portishead. The Causeway to which Hanham Way is linked is subject to the same high volume of traffic. It is narrow, weak, and dangerous. Excessive use is already evident by subsidence, many damaged areas and repairs and visible slip of the road into the rhynes. The ongoing cost of continuous maintenance and repair to NSC must already be huge, yet the road gets progressively worse and towards unrepairable and unusable. The repairs are frequent but do not keep pace with the rate of damaged so the road is always in unsatisfactory condition. The observable rate of subsidence and slip into the rhynes alongside indicate pothole repairs are totally insufficient for a weak road that is being destroyed with its current level of traffic, let alone with additinal traffic. If restrictions are not placed on traffic today to limit use of The Causeway I honestly believe the road will be destroyed and unusable well before 2041 comes around, which in itself renders the plan invalid. What Hanham Way and The Causeway need is less traffic not more that the proposed developments will create. At the public meeting held some 12 months or so ago at the United Reform Church Nailsea the NSC Traffic Officer present stated that there is an intention to try and reduce traffic using The Causeway, but no suggestion or plan as to how that would be achieved now, let alone after further proposed development. So it seems certain that in the absence of any council road building to better serve access to and from Nailsea, particularly from the North, that traffic will be even more excessive, roads even more excessively overloaded, even more damaged and more accidents inevitable. What is needed is a ink road from the A370 (near Brockley to also serve the airport) to link with Junction 20 of the M5 to provide access from North Somerset to/from the M5 bypassing Nailsea and Tickenham. Aspur from this link road into Nailsea West End trading estate would provide access into Nailsea and mean HGVs not having to travel through Nailsea. Why is this not in the plan to ease traffic, noise, pollution, congestion an make neighbourhoods liveable? Hanham Way is a residential road and neighbourhood that has already been made an unliveable neighbourhood by excessive traffic and its associated noise and pollution. The health and mental health and stress impact of this traffic on residents is already severe. Approval of any development that adds additional traffic to this route would show complete disregard or consideration for the welfare and negative impacts on the residents whose lives are already blighted. It would be a case of knowingly and consciously sacrificing the health, welfare, peace and lives of the residents living on and near it just to build more houses. Which is more important?. Just because the Council has the power to ruin people's lives by approving yet more development it doesn't have to do so.			
Policy LP11: Transport infrastructure, allocations and safeguarding	Unsure		No	Unsure	North Somerset Council champions Liveable Neighbourhoods to alleviate areas whose residents are blighted by traffic. Yet, today the heavy traffic has already made Hanham Way an unliveable neighbourhood, contrary to North Somerset Council policy. Yet in the plan North Somerset Council propose developments that will produce much additional traffic that will be a further nuisance making residents lives even more unliveable. This imposition of significantly more traffic to an already badly affected area is completely at variance to the proposal VISION on Page 11 of the document which states 'Regeneration will transform and breathe new life into existing towns and valued areas will be protected. People's well-being, a strong sense of community, opportunity and fairness will be at the heart of all development in North Somerset'. The traffic from the proposals would be detrimental to many people's well-being and certainly would not represent fairness, particualry on the Hanham Way/Causeway/Washing Pound Lane route which is overused already.	Traffic assessments, road capability, safety and robustness assessment and noise measurements/ assessments required to be carried out and published to determine capability and acceptability of use of Hanham and The Causeway as a route to take current traffic plus		

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					Originally a cul-de-sac, Hanham Way was opened up as a through road and linked to The Causeway by the Council in the 1990's and ever since the route has become ever busier, being used as a 'rat run' to/from Nailsea and Backwell to Clevedon/ M5/Portishead, avoiding Nailsea town centre. A 'Nailsea Site Allocations Plan Transport Mitigations Report' produced by NSC Highway Dept in 2017 estimated the proposed developments in the report would mean 40% additional traffic using Hanham Way and The Causeway but offered NO mitigations. So even though many of those developments are not yet complete Hanham Way already has approx 6000 vehicle movements per day (which is higher than the traffic level forecast in the report for 2026) and increasing as further homes are completed. It will increase further have more as those developments are progressively completed and also by the further 600/day from the recently approved Vistry building proposal behind Causeway View (which I and local councillors spoke against for this reason). All this traffic overload is before any of the large and extensive 2041 plan developments are even built. I do not understand how the Council can even table a proposal like the local plan 2041 when there is such an obvious deficiency in the road links through and to/from Nailsea. Surely a traffic forecast and mitigation study /assessment should have been conducted and included in the Local Plan2041 proposal to show it was even feasible as regards traffic. Such an assessment should be carried out immediately and it will show that the existing roads (particularly The Causeway/Hanham Way route, but also the B3130) do not support the proposed development. I do not believe the Council has carried out CD13:02 Noise assessments for: - The opening up of Hanham Way to The Causeway for through traffic in the 1990's - The road changes for the Vistry planning proposal for Causeway View - The massive increase of traffic and associated noise that exists now on Hanham Way due to this through traffic. I believe the traffic noise levels measured today (and its duration) would be unacceptable for any new proposed development. No new plan would permit or consider it acceptable to build properties adjacent to and so close to residential roads and or allow so much traffic to pass through such a development at such a high speed. So why do North Somerset Planning department consider it acceptable to apply exactly those conditions retrospectively to Hanham Way/The Causeway? It is clearly not acceptable and reason alone to not approve the 2041 plan that relies on this being used a through route. Noise impact inside properties such as mine is bad today even with insulation and all double glazed windows closed. In better weather opening windows or using the garden for leisure are impossible as the noise is even more excessive. Such noise impact assessments for all the 2041 plan developments should be performed for each proposed development and may well indicate the unsuitability and inability to develop due to the creation of excessive noise hazards. To not do so is surely out-of-process and not legal.	that generated by the 2041 proposal.		
Policy DP15: Active and sustainable transport	Unsure		Unsure	Unsure	One of the statements above in Policy DP14 states 'In addition, the effect of additional traffic on the surrounding road system must be taken into account such as where development introduces traffic of excessive volume, size or weight into a network of country lanes, or residential areas. Where there is a detrimental impact and no acceptable countermeasures are possible, planning permission will be refused.' Yet: Building on any of the proposed development/building sites would add a large amount additional traffic to Hanham Way and The Causeway as a shortcut/rat-run to and from TIckenham , Clevedon, M5, Portishead. The Causeway to which Hanham Way is linked is subject to the same high volume of traffic. It is narrow, weak, and dangerous. Excessive use is already evident by subsidence, many damaged areas and repairs and visible slip of the road into the rhynes. The ongoing cost of continuous maintenance and repair to NSC must already be huge, yet the road gets progressively worse and towards unrepairable and unusable. The repairs are frequent but do not keep pace with the rate of damaged so the road is always in unsatisfactory condition. The observable rate of subsidence and slip into the rhynes alongside indicate pothole repairs are totally insufficient for a weak road that is being destroyed with its current level of traffic, let alone with additinal traffic. If restrictions are not placed on traffic today to limit use of The Causeway I honestly believe the road will be destroyed and unusable well before 2041 comes around, which in itself renders the plan invalid. What Hanham Way and The Causeway need is less traffic not more that the proposed developments will create. At the public meeting held some 12 months or so ago at the United Reform Church Nailsea the NSC Traffic Officer present stated that there is an intention to try and reduce traffic using The Causeway, but no			

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					suggestion or plan as to how that would be achieved now, let alone after further proposed development. So it seems certain that in the absence of any council road building to better serve access to and from Nailsea, particularly from the North, that traffic will be even more excessive, roads even more excessively overloaded, even more damaged and more accidents inevitable. What is needed is a ink road from the A370 (near Brockley to also serve the airport) to link with Junction 20 of the M5 to provide access from North Somerset to/from the M5 bypassing Nailsea and Tickenham. Aspur from this link road into Nailsea West End trading estate would provide access into Nailsea and mean HGVs not having to travel through Nailsea. Why is this not in the plan to ease traffic, noise, pollution, congestion an make neighbourhoods liveable? Hanham Way is a residential road and neighbourhood that has already been made an unliveable neighbourhood by excessive traffic and its associated noise and pollution. The health and mental health and stress impact of this traffic on residents is already severe. Approval of any development that adds additional traffic to this route would show complete disregard or consideration for the welfare and negative impacts on the residents whose lives are already blighted. It would be a case of knowingly and consciously sacrificing the health, welfare, peace and lives of the residents living on and near it just to build more houses. Based on the statement highlighted above from DP14 the inevitable large traffic impact on already busy Hanham Way, The Causeway and Washing Pound Lane will be a large detrimental impact and with no countermeasures planned, planning permission should be be refused. To not refuse it would mean the Council not complying with their own stated policy.			
Land at North West Nailsea	Unsure		Unsure	Unsure	Some of the areas proposed to be built on may not been on land actually defined as a currently mapped flood plain area, but are adjacent to them and are areas that may flood. Building would mean hard impermeable surface areas, resulting in water runoff and less land to absorb water. Thus sites would be even more prone to flooding than current flood plain definitions would suggest. It would be a big risk to build in such areas and potnetially non-compliant with council policy to avoid development on areas that flood.			

Name: Bartek Banasiak **I.D:** 62865921

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Unfair Housing Allocation – Backwell is being asked to take more homes than any other village in North Somerset and even a higher growth rate than towns. It represents 7% of the district's housing allocation compared to Clevedon's 2%, which is disproportionate and unjustified. Excessive Development – The village already has approval for 800 new homes—a 40% increase. Adding another 1,000 properties would overwhelm Backwell and permanently change its character. No Justification or Viability – There is no evidence of need or viability for these additional homes, which raises serious concerns about the plan's soundness. Insufficient Infrastructure – There are already shortages in school places and no planned investment in healthcare or leisure facilities. The existing infrastructure cannot cope with such a large population increase. Infrastructure Delivery Uncertain – The delivery plan lacks proper costings and funding guarantees for roads and essential services, making the proposals undeliverable. Road Proposal Is Unworkable – The suggested road will not ease congestion on Station Road, Backwell Common, or Chapel Hill, nor will it effectively handle Nailsea's traffic. Building a crossing under or over the railway would be extremely costly and may not even be practical. Transport Hub Not Fit for Purpose – Backwell station is inaccessible for people with mobility issues and difficult for families with young children, undermining its role as a strategic transport hub. Limited Local Employment – Backwell is not a job center; most residents commute. More housing without local employment will worsen traffic and emissions. Social Impact Ignored – No assessment has been made on how such rapid growth will affect community cohesion. Flooding Risks – Backwell Common and nearby areas already flood, and the proposed sites include floodplains around Backwell Lake, which regularly floods. Affordable Housing Policy Creates Shortfall – Requiring 50% affordable housing on Greenbelt land reduces developer contributions for infrastructure, making delivery even less viable.			

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					Loss of Prime Agricultural Land – The development would destroy Grade 1 farmland used for crops and grazing. Only 7% of this land remains in North Somerset. Government policy says we must protect this land to ensure food security—this plan does the opposite. Damage to Wildlife and Biodiversity – The proposals would wipe out habitats and harm biodiversity. They threaten the Brockley Maternity Roost and SSSI, home to rare Lesser and Greater Horseshoe Bats. Growth Pace Is Unsustainable – The scale and speed of development, combined with infrastructure gaps, make this plan destabilizing and unrealistic.			

Name: Bath and North East Somerset Council **I.D:** 32925633

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SP7: Green Belt							The plan sets out to release 12 sites from the Green Belt to accommodate development. Of greatest relevance to B&NES, land at Woodspring, south west of Bristol (situated directly adjacent to the boundary with Bristol to the east and north west to the boundary with B&NES – capacity for 3,500 dwellings) and land at Colliter's Way (situated directly adjacent to the boundary with Bristol to the east and north west to the boundary of B&NES – capacity for 215 dwellings) are identified for removal from the Green Belt and allocation for development. Major residential development involving the provision of housing in the Green Belt will be subject to policy DP12 and should meet the 'Golden Rules' as set out in the NPPF, relating to affordable housing, necessary improvements to local or national infrastructure, and publicly accessible green spaces. The plan also sets out the removal of Green Belt land at Bristol Airport (see section above), plus an area of additional land proposed to be designated as Green Belt. A new area of Green Belt is proposed south of Nailsea and west of Backwell to maintain the separation of the settlements and protect the countryside in this area from encroachment. Given the Green Belt review and proposed changes to the Green Belt in the areas identified above B&NES would welcome ongoing dialogue and engagement on the approach to the Green Belt to ensure, as necessary, consistency of approach with work in the WECA area and through the B&NES Local Plan 2025-2043.	North Somerset Local Plan Reg 19 Consultation 2025 FINAL.pdf
SP8: Housing							The North Somerset Housing Requirement is now identified as 1,580 dwellings pa or 23,700 dwellings over the plan period. Housing provision will be focussed primarily on strategic development locations and on sites within and close to the towns within North Somerset. Weston-Super-Mare is the primary town within the district and as such is identified for significant growth. To the south west of Bristol a strategic location for further growth has been identified and is referred to as the Woodspring development. This area is expected to accommodate a total of 3,500 homes across one large area that will be comprehensively masterplanned. Across the villages and rural areas sites have been identified to accommodate 2,948 dwellings, predominantly at the larger more sustainable villages that have a range of services and facilities to support an appropriate amount of new development over the plan period. B&NES council is broadly supportive of this spatial strategy. The housing supply identified in the Reg 19 plan is 24,495 dwellings, so there is no unmet need identified. Therefore, North Somerset Council considers that it can meet in full its housing need identified through the LHNA and that as such no request has been made of B&NES Council to respond to any unmet need. It is noted that the North Somerset pre-submission plan does not explicitly seek to address unmet need in neighbouring authorities. B&NES council will continue to work with North Somerset Council and other authorities in the West of England in considering solutions to addressing unmet need arising in Bristol City Council, including through the WECA Spatial Development Strategy.	North Somerset Local Plan Reg 19 Consultation 2025 FINAL.pdf

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SP9: Employment							Weston-Super-Mare is the principal settlement and remains the focus for new employment growth, continuing the objective of encouraging greater self-containment and reducing out-commuting. Over the period 2023-2043 Cambridge Econometrics forecast economic growth equating to growth of 10,300 jobs, with Oxford Economics forecasting growth of 7,100 jobs. A strategically significant allocation of 10ha of business land is also proposed in the focussed in Woodspring area (adjacent to south west Bristol). The strategy for employment land provision within the North Somerset Local Plan is broadly supported. Ongoing dialogue on the implications for B&NES communities, including through commuting patterns, as well as on the longer-term strategy would be welcomed.	North Somerset Local Plan Reg 19 Consultation 2025 FINAL.pdf
SP10: Transport							Transport B&NES Council would welcome further clarity on the anticipated impact of North Somerset Local Plan growth on the B&NES highway network. While we note that a significant proportion of trips will occur within North Somerset and Bristol City, there is potential for impacts on strategic and rural routes within B&NES, particularly through the Chew Valley and corridors connecting to the A37. Clarification is sought through ongoing engagement on how cumulative impacts in B&NES communities and on key corridors will be mitigated.	North Somerset Local Plan Reg 19 Consultation 2025 FINAL.pdf
SP12: Minerals							A minerals safeguarding area is identified on the policy maps north of Nempnett Thrubwell (identified as Freemans Quarry off the A38 near Bristol Airport within the Local Plan Policy LP14). Within this area a preferred minerals working area and areas of search for minerals have been identified. The policy incorporates measures including adherence with existing development management policies relating to such things as air quality, noise, transport, biodiversity and also requires that 'The amount of mineral extracted per year and the level of vehicle movements to and from the quarry must not exceed existing permitted levels at the quarry.' The above policy approach appears to be reasonable and justified. Given the proximity to the shared boundary B&NES would request further dialogue and engagement on the approach to minerals working, including on relevant planning applications.	North Somerset Local Plan Reg 19 Consultation 2025 FINAL.pdf
Policy LP2: Strategic location: Woodspring (south west of Bristol)							Development Site Allocations With regards to the sites proposed to be allocated for housing development there does not appear to be cross boundary strategic issues of relevance to B&NES. As referenced above, Woodspring (adjacent to south west Bristol) has been identified as a strategic development location and is expected to accommodate a total of 3,500 homes. Additionally, land at Colliter's Way (situated directly adjacent to the boundary with Bristol to the east, and north-east of the B&NES boundary) is identified for allocation to accommodate residential development providing 215 dwellings. It is noted that Bristol has also identified land adjacent to Elsbert Drive, Bishopsworth within their boundary for residential development in their Publication Draft Local Plan. Ongoing dialogue and consideration of any potential impacts of individual development sites and cumulatively on communities within B&NES e.g. in terms of transportation and on the highway network would be welcomed both through plan-making and at the planning application stage.	North Somerset Local Plan Reg 19 Consultation 2025 FINAL.pdf
Policy LP12: Bristol Airport							B&NES would welcome working closely with North Somerset to manage the impacts of Bristol Airport on the local highway network, particularly within the Chew Valley. We would encourage the inclusion of commitments to deliver cross-boundary sustainable transport interventions, such as enhanced bus services, demand management measures, and active travel links, to reduce reliance on private car trips and mitigate congestion on rural routes. Also, while the plan references a Mass Transit Scheme linking Bristol Airport and Bristol City Centre, there is limited detail on improving cross-boundary public transport links to Bath and North East Somerset. We would welcome further clarification regarding the planned integration with the West of England Combined Authority (WECA) mass transit proposals. Any approach should be consistent with the Joint Local Transport Plan and West of England Growth Strategy objectives for modal shift.	North Somerset Local Plan Reg 19 Consultation 2025 FINAL.pdf

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							Bristol Airport: Green Belt and Policy Approach The Draft Local Plan sets out the intention to remove land from the Green Belt at Bristol Airport. The land proposed to be removed reflects and is no greater than the area of land covered by planning permission (18/P/5118/OUT allowed on appeal) for expansion of the airport. In effect NSC are reflecting the reality of airport expansion that will be delivered over future years. B&NES council supports the approach that development will still be subject to policies (including Policy DP20) ensuring uses are only those directly related to airport expansion and that environmental impact will be mitigated and sustainability criteria are met.	
Policy DP7: Large scale renewable and low carbon renewable energy							Renewable Energy B&NES is broadly supportive of North Somerset's intention to facilitate renewable energy development within its area through the Local Plan. This is compatible with this council's climate emergency declared in 2019. The plan notes North Somerset Wind Energy and Solar PV Supplementary Planning Documents will be updated to highlight potential locations identified as most technically suitable areas for renewable energy schemes. B&NES would welcome further dialogue on this matter should the approach change and given the sub-regional importance of renewable energy provision within the context of each authority's climate emergency declaration, in addition to the context of the landscape sensitivity/potential.	North Somerset Local Plan Reg 19 Consultation 2025 FINAL.pdf
Policy DP16: Active travel routes							B&NES would welcome the opportunity to work collaboratively on active travel infrastructure, particularly in linking the proposed Strawberry Line extension with B&NES' Active Travel Masterplan. This connection would provide a strategic, high-quality route for walking and cycling between communities, supporting both leisure and utility trips.	North Somerset Local Plan Reg 19 Consultation 2025 FINAL.pdf
Policy DP20: Airport related car parking							B&NES strongly supports the principle that airport related parking must not undermine modal shift objectives. We consider that priority should be given to measures that enhance sustainable access such as improved bus and mass transit connectivity and active travel infrastructure for staff rather than expanding car parking provision. Any parking proposals should be conditional on delivering long-term commercially viable improvements to public transport in line with the Airport Surface Access Strategy and the Joint Local Transport Plan. We would welcome robust monitoring and enforceable targets to ensure compliance with these objectives.	North Somerset Local Plan Reg 19 Consultation 2025 FINAL.pdf
Policy DP44: Gypsies, Travellers and Travelling Showpeople.							The North Somerset Gypsy and Traveller Accommodation Assessment (GTAA) (2025) identified the need for 129 additional residential pitches for Gypsies and Travellers and four additional plots for Travelling Showpeople within North Somerset up to 2041. The GTAA identifies a need for 80 pitches over the first five years of the plan. The plan identifies a supply of deliverable sites sufficient to provide 80 pitches to meet this locally identified need, as such no request has been made of B&NES Council to respond to any unmet need.	North Somerset Local Plan Reg 19 Consultation 2025 FINAL.pdf

Name: Bellway Homes Ltd **I.D:** 51524513

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Sustainable development objectives	No	• Positively prepared	Unsure	Unsure	Sustainability Appraisal In relation to Draft Policy LP1 (Wolvershill), the Sustainability Appraisal (SA) demonstrates that:	Given the strategic significance of the housing uplift, and the requirements of the Regulations in respect of reasonable alternatives, Bellway considers that it will be important for the Council,		20251212 504317 JE - North Somerset

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		‣ Justified ‣ Effective ‣ Consistent with national policy			• The allocation performs strongly positive against key economic and social objectives – including: access to employment; delivery of affordable housing; community infrastructure; and health and wellbeing; • Potential environmental sensitivities, including landscape setting and agricultural land quality, are transparently acknowledged rather than understated; and • The improvement in infrastructure and transport performance from neutral to significantly positive is directly attributable to the delivery of infrastructure already emerging as well as policy-secured mitigation, in particular the Banwell Bypass and associated active travel and community infrastructure. On this basis, Bellway consider that the SA provides a sound basis for the allocation of Wolvershill. Bellway support the clear distinction made within the SA between baseline 'policy-off' and mitigated 'policy on' outcomes. Given the scale of strategic infrastructure, it will be important at Examination for the Council to demonstrate that the key mitigation measures assumed within the policy-on appraisal are realistic, fully funded and capable of being secured within the relevant development phases. It is acknowledged that this is likely to be detailed in the forthcoming Wolvershill Masterplan Framework SPD. Therefore, Bellway would like to reserve the right to comment on its detail as soon as a draft version can be shared. Bellway understand the document is due to be considered by Cabinet in February 2026 and as a key stakeholder, would welcome any engagement with the Council prior to its publication. The housing requirement underpinning the submitted Local Plan is higher than that which informed earlier iterations of the Local Plan, reflecting the revised NPPF and updated Standard Methodology (SM). Bellway support the Council's approach in re-examining the spatial strategy and its supporting SA to reflect this uplift, with Wolvershill continuing to perform a central and coherent role within the overall spatial framework. However, given the strategic significance of this uplift, and the requirements of the Regulations in respect of reasonable alternatives, Bellway considers that it will be +important for the Council, in addition to the higher growth option point already mentioned, to clearly demonstrate that:	in addition to the higher growth option point already mentioned, to clearly demonstrate that: • the reasonable spatial strategy alternatives at the uplifted level of housing growth have been proportionately and transparently tested through the SA; and • the reasons for selecting the submitted strategy over other reasonable alternatives are clearly articulated in comparative terms. The publication of the draft Wolvershill SPD.		Reg 19 (Reps obo Bellway Homes).pdf

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					• the reasonable spatial strategy alternatives at the uplifted level of housing growth have been proportionately and transparently tested through the SA; and • the reasons for selecting the submitted strategy over other reasonable alternatives are clearly articulated in comparative terms. In addition, whilst the SA is clear that it tests the SM LHN and tests difference spatial options to meet that need (e.g. see SA para 2.28), what it doesn't appear to do is test a higher growth option. Given the concerns already raised through this representation regarding meeting unmet need, affordability issues and extended plan period, this will need to be considered to ensure it is positively prepared and justified / effective in meeting overall housing requirements.			
SP1: Sustainable Development	No	‣ Justified ‣ Effective ‣ Consistent with national policy			Draft Policy SP1 (Sustainable Development) details a list of requirements that development in North Somerset should demonstrate to be "sustainable". Whilst Bellway understand why the Council has included this policy to communicate the importance of achieving sustainable development at the forefront of the plan, a specific strategic policy addressing it is considered unnecessary. Paragraph 21 of the NPPF states strategic policies "should be limited to those necessary to address the strategic priorities of the area" and that they "should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other nonstrategic policies". In addition, Paragraph 16(f) states plans should "serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)." Achieving sustainable development is already at the heart of national policy and its provisions to which Local Plans and their policies should already have regard. Accordingly, much of what Draft Policy SP1 is trying to achieve can be better (and indeed is already) covered by other policies – including other strategic policies and supporting text to the Local Plan (including Section 2). Its inclusion therefore does not serve a necessary and clear purpose, resulting in unnecessary duplication of policies. Indeed, many of the requirements are not specific to North Somerset.	In light of the above, Bellway suggest this policy is deleted.		20251212 504317 JE - North Somerset Reg 19 (Reps obo Bellway Homes).pdf
SP2: Climate Change	No	‣ Justified ‣ Effective ‣ Consistent			Draft Policy SP2 (Climate Change) lists overarching principles that development should address regarding the issue of climate change – including those related to resource use, energy generation, transport and	We suggest the best course of action is to emphasise this in supporting text or the Vision section – deleting this policy. Should the policy be retained, modification is required to ensure the policy is effective. We suggest the following		20251212 504317 JE - North Somerset Reg 19 (Reps

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		with national policy			green infrastructure. Bellway recognise the importance of this issue and the intent of this policy to establish the importance of action on behalf of the Council – including its own adoption of a climate emergency. However, similar to our comments on Draft Policy SP1 (Sustainable Development), a specific strategic policy addressing it is considered unnecessary, in accordance with Paragraph 21 and 16(f) of the NPPF. Bellway consider policies related to climate change are better placed in detailed development management policies. Indeed, this is already the case in other policies – including Policy DP5 (Climate change adaptation and resilience) and Policy DP6 (Net zero construction). Please see our specific comments on these policies below. However, should the policy be retained, it is inappropriate to require every development proposal to meet every criterion, simply because some of the criteria just won't apply, and some will be superseded in time by other national policy and regulations. For example, it would be inappropriate for the development of a greenfield site (which meets the definition of sustainable development) to demonstrate how it can "encourage the reuse of existing buildings and structures". Hence the policy should be amended to acknowledge this.	amendments: "In order to reduce the overall environmental impact of development, where relevant, proposals will be expected to demonstrate how they: […]" and then, "Minimise energy use and deliver a low carbon energy standard in new buildings." (See attached document for specific changes)		obo Bellway Homes).pdf
SP3: Spatial strategy	No	• Effective • Consistent with national policy			Draft Policy SP3 includes a written statement for the spatial strategy, as follows: "Priority will be given to locating new residential and mixed-use development in or close to urban areas where there is an existing or proposed wide range of facilities, services and jobs, and there are opportunities to encourage active and sustainable travel, particularly at locations which are currently, or have the potential to be, well served by public transport. Employment opportunities will be encouraged at accessible locations well-related to the urban areas and where sustainable transport opportunities can be maximised. Residential development in areas at risk of flooding now or in the future will be minimised outside the towns. Beyond strategic development areas the amount of development at villages and in the countryside will relate to local community needs." Bellway is generally supportive of this statement and the strategy outlined. Indeed, the strategic allocation at Wolvershill represents a long promoted and suitable growth option that accords with the above strategy and will make a	Draft Policy SP3 would benefit from revisions to add additional clarity and detail to help the overall readability and effectiveness of this policy and the plan as a whole. This may include combination with Draft Policy SP5 (Towns) and Draft Policy SP6 (Villages and rural areas). Draft Policy SP3 should also be amended to read, "[…] "Beyond strategic development areas, the amount of development at villages and in the countryside will reflect the settlement hierarchy." (see attached document for specific amendments)		20251212 504317 JE - North Somerset Reg 19 (Reps obo Bellway Homes).pdf

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					significant contribution to the needs of the principal settlement of Weston-super-Mare and the North Somerset district at large. Specific detail regarding this allocation is included at Draft Policy LP1 – upon which we have commented separately. Bellway would observe the spatial strategy is stated only in general terms, with no detail of any settlement hierarchy, or areas where new development will be encouraged (or conversely restricted). Draft Policy SP3 would benefit from revisions to add additional clarity and detail to help the overall readability and effectiveness of this policy and the plan as a whole. A significant proportion of which is contained within the key evidence base documents related to the spatial strategy (e.g. 'Spatial Strategy and Capacity Paper' (November 2023). Bellway would also note that more generally, whilst the policy intention to restrict development in the countryside is understood, this is not entirely consistent with the NPPF. Whilst it may be appropriate to limit development at a small village to that associated with meeting local community needs, development beyond the settlement boundaries of the main settlements and larger villages may be appropriate to meet district-wide needs, particularly in circumstances where there is a five-year housing land supply. In this respect, the policy should reflect the settlement hierarchy.			
SP4: Placemaking	No	‣ Justified ‣ Effective ‣ Consistent with national policy			Bellway generally supports the aspiration of Draft Policy SP4 (Placemaking) – the creation of high-quality places that respond appropriately to their local context in order to create safe, attractive and desirable buildings and spaces is something it prioritises in all its schemes. However, similar to our previous comments under Draft Policy SP1 (Sustainable Development) and Draft Policy SP2 (Climate Change), the inclusion of this as a strategic policy is considered unnecessary, in accordance with paragraph 21 and 16(f) of the NPPF. Good placemaking is already underpinned by provisions in the NPPF, as well as the National Design Guide and National Model Design Guide. The concept of good placemaking is underpinned by good design, which should be inherently viewed as contextual and subject to some interpretation. As such, this is better detailed through a development management policy. Indeed, many of its requirements are already (and more specifically) communicated through development management	To avoid unnecessary duplication, it is suggested that this policy is deleted. Should this be retained (or otherwise located elsewhere in the plan), see below suggested amendments: • Firstly, it would be inappropriate to require every development proposal to meet every criterion as this may be prohibitively restrictive to development and / or conflict with national policy direction. For example, the allowance for public benefits to outweigh less than substantial harm to heritage assets. In this specific regard, in order to be consistent with national policy, this part of the policy should be amended to: "Reflect, protect or enhance local character, including local heritage, subject to the balance of public benefits to be derived…" • In the policy text, we suggest the word 'collaboration' should be replaced with 'consultation' to be consistent with the NPPF (para 137), which instead expects community engagement and for designs to 'take account of the view of the community." Collaboration is		20251212504317 JE - North Somerset Reg 19 (Reps obo Bellway Homes).pdf

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					policies. However, should this be retained (or otherwise located elsewhere in the plan), modifications to the policy requirements/text will be required to make them effective and consistent with national policy.	defined as the action of two or more people, entities or organisations working in partnership to produce something together. Collaboration with local communities is therefore unlikely to be fully achievable in practice as there will often be differences of opinion regarding the principle of development and its detail / implementation. The word 'consultation' is more appropriate and should be used in this instance, as follows: "Applicants must demonstrate that a robust design process has been carried out, including, collaboration consultation with local communities where appropriate […]. • Reflecting already the text above, we also suggest the text regarding Community Engagement Statements is reflected as follows – noting that it will not always be necessary or appropriate to undertake engagement: • "A Community Engagement Statement must be submitted for major planning applications (10 or more dwellings or 1,000 square metres of floorspace), where relevant and appropriate, which sets out the local engagement that has been undertaken and any amendments to the scheme which have been made in response to it." (see attached document for specific amendments)		
SP5: Towns	No	‣ Effective ‣ Consistent with national policy			Draft Policy SP5 (Towns) indicates that proposals for new development within the settlement boundaries of the four locations identified as towns (Weston-super- Mare, Clevedon, Nailsea and Portishead) be supported providing a set of criteria are met. However, this infers a perception that other development, such as proposed site allocations or development on the edge of the urban areas, where sustainable / supported under the presumption in favour of sustainable development, would not be appropriate.	Accordingly, we consider the policy wording should be amended to provide clarity: "Proposals for new development within, or adjacent to, the settlement boundaries of the four towns of Weston-super-Mare, Clevedon, Nailsea and Portishead (including the strategic allocations) as defined on the Policies Map will be supported provided that they: […]" (see attached document for specific amendments)		20251212 504317 JE - North Somerset Reg 19 (Reps obo Bellway Homes).pdf
SP7: Green Belt	Unsure				Bellway agree with the Council that exceptional circumstances exist, as set out, which justify the review and revision of Green Belt boundaries to help meet their needs in full, in accordance with Paragraph 145 of the NPPF. This, however, may need to be considered further in line with observations regarding the overall housing requirement.	See above		20251212 504317 JE - North Somerset Reg 19 (Reps obo Bellway Homes).pdf
SP8: Housing	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with	Unsure	Unsure	Relevant NPPF: The current revision of the National Planning Policy Framework (NPPF) was published by the Government on 12 December 20241 – superseding the previous version from December 2023. Upon its publication, transitional arrangements were established at Annex 1 of the	To achieve consistency with national policy, the plan period should be extended to February/ March 2042 as a minimum. Clearly a longer extension would assist in providing greater certainty going forward as well as enabling the local plan to comply with the minimum expectation of national policy in the event that an Examination is more protracted.		20251212 504317 JE - North Somerset Reg 19 (Reps obo Bellway Homes).pdf

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		national policy			Framework. Paragraph 234 at Annex 1 states (as relevant to this context): “For the purpose of preparing local plans, the policies in this version of the Framework will apply from 12 March 2025 other than where one or more of the following apply: a) the plan has reached Regulation 19 (pre-submission stage) on or before 12 March 2025, and its draft housing requirement meets at least 80% of local housing need; b) the plan has been submitted for examination under Regulation 22 on or before 12 March 2025; […]” In the context of the present Regulation 19 consultation, neither a) nor b) apply. The previous Regulation 19 plan (consulted in 2024) only met 74% of the need (based on the lower standard method need figure at that time) and as a result failed to meet at least 80% of the latest increased standard method published 12 December 2024, as the NPPF sets out. Accordingly, references to the NPPF in these representations and subsequent Examination of the Local Plan) are made with regard to the current (2024) version of the Framework. Plan Period: The proposed plan period outlined in the Local Plan and informing subsequent strategic policies such as housing, is confirmed as being from 2026-2041 (over a 15-year plan period). Paragraph 22 of the NPPF requires strategic policies to look ahead over a minimum 15-year period from the date of adoption. The latest Local Development Scheme (LDS) was published in February 2025. Principally, we observe this LDS is out-of-date, with the current consultation scheduled for June 2025 and therefore 4 months behind schedule. The LDS anticipated Local Plan submission is in October 2025, with Examinations commencing in February 2026, before adoption in November 2026. Should the timescales to adoption be achieved, taking into account the current delay, adoption of the Local Plan should not be expected until February/March 2027. Housing Need: Draft Policy SP8 (Housing) identifies a minimum housing requirement of 23,700 across the	In any event, this should be carefully considered by the Council, with necessary amendments (including housing and economic need) amended accordingly. Confirmation of correct plan period and associated requirements, necessary clarifications on higher growth options in the SA (and if necessary additional allocations) and publication of a housing trajectory.		

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					proposed 15-year plan period of 2026-2041 (equivalent to 1,580 dwellings per annum), with 24,495 dwellings identified through a broad distribution. Principally, Bellway welcome the Council's decision to retract its approach in the previous Regulation 19 consultation published in December 2023, in favour of pursuing the Government's new standard method (SM) as a minimum requirement. Notwithstanding the above, there are additional factors that suggest the figure should be even higher to accommodate the following: • Plan Period: In accordance with our general comments on the plan (see above), there is a need to extend the Plan Period to ensure it covers at least a minimum 15 years from the date of adoption, and consequently, the overall housing requirement would need to be reviewed to accommodate this. • Duty to Cooperate: North Somerset is part of the wider Bristol Housing Market Area (alongside Bristol City and South Gloucestershire). The Bristol Local Plan itself is currently at Examination and the Inspector has raised concerns that it is still not addressing and will subsequently need to set out the level of unmet need, which continues to be a key discussion point within the current Examination. In terms of unmet need, whilst the Duty to Cooperate is not being 'saved' under transitional arrangements moving to the new plan-making system, the Government and national policy continues to expect collaboration and effective cooperation over unmet need. The Council need to address these points and review the housing requirement, to also assist further with affordability / support infrastructure provision. Boosting the supply of homes will ensure the policy is positively prepared and justified and the plan can be found sound. Further, the SA is clear that it tests the SM LHN and tests difference spatial options to meet that need (e.g. see SA para 2.28). What it doesn't do is test a higher growth option which renders the plan unsound, it is not positively prepared and not justified or effective in meeting overall housing requirements. The knock-on effect of failing to assist in meeting the unmet need will be to increase affordability issues, as pressure for housing is increased. An uplift in the housing requirement should be considered and tested through the SA.			

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					Housing Trajectory: Paragraph 72 of the NPPF requires planning policies to identify a supply of “specific, deliverable sites for five years following the intended date of adoption; and specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period”. Paragraph 78 then goes onto require, under the ‘Maintaining supply and delivery’, that this “include a trajectory illustrating the expected rate of housing over the plan period”. The Council has not published a housing trajectory with the Regulation 19 plan, which is a significant and fundamental flaw. There is no detail regarding the delivery of existing commitments or proposed allocations, nor the confirmation of the existence of a five-year housing land supply, which should be published on adoption. Without this information for review, the Local Plan cannot be deemed justified, effective or consistent with the NPPF through its failure to include a housing trajectory and confirm a five-year housing land supply.			
SP11: Historic and natural environment	No • Justified • Effective • Consistent with national policy				Draft Policy SP11 (Historic and natural environment) lists overarching principles related to green infrastructure and the historic environment. However, the policy covers a lot of ground and is considerably lengthy. Bellway consider these matters referred are better placed in detailed development management policies. Indeed, this is already the case in other policies.	Bellway suggest the best course of action is emphasise this in supporting text or the Vision section – deleting this policy, in accordance with Paragraph 21 and 16(f) of the NPPF.		20251212 504317 JE - North Somerset Reg 19 (Reps obo Bellway Homes).pdf
Policy LP1: Strategic location: Wolvershill (north of Banwell)	Unsure					Bellway note that a Wolvershill Masterplan Framework SPD will be prepared for the proposed strategic allocation, as referred to within the policy. Bellway wish to reserve the right to comment on its detail as soon as a draft version can be shared. Only then can the bulleted requirements of the allocation be sufficiently justified, refined and/or clarified – such as 17, 19 and 22. Bellway understand the document is due to be considered by Cabinet in February 2026 and as a key stakeholder, would welcome any engagement with the Council prior to its publication.	Bellway strongly support the identification of the strategic location at Wolvershill (north of Banwell) to accommodate around 3,300 homes under Draft Policy LP1. The allocation forms a critical part of the solution to meeting North Somerset's local housing need and will provide a mix of much needed market and affordable homes, with new infrastructure, in one of the most highly sustainable and suitable locations within the district, being well related to the principal settlement of Weston-super- Mare and in line with the council's proposed spatial strategy for new residential development. Given the increase in the housing target, there will be a need to boost the supply of homes and seek to increase density and site capacity at strategic growth locations where appropriate, including at the proposed Wolvershill site allocation. In this context, Bellway would highlight that it has	20251212 504317 JE - North Somerset Reg 19 (Reps obo Bellway Homes).pdf

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							an option over a small parcel of land referred to as 'Land east of Summer Lane' within the allocation. This Site is suitable and available for development in the immediate term, expected to accommodate circa 130 new homes with public open space, play areas and a green/dark corridor for linking habitats. The Site can help address local housing need as part of the overall draft strategic growth location and wider masterplanning for this site. Initial technical work has been undertaken to explore the feasibility of development, in line with the wider strategic allocation and masterplan for Wolvershill, which has informed the Framework Masterplan attached at Appendix 2. This demonstrates that the whole Bellway Site, as shown as part of the draft strategic allocation, represents a suitable site for development. The technical work progressed to date has not identified any fundamental constraints that would prevent the delivery of housing on the site. The site is available now and would meet the definition of deliverable and developable in the NPPF. Bellway is in liaison with the adjoining landowners that make up the strategic allocation to ensure that the proposals align with the wider comprehensive proposals for the proposed allocation. Bellway is aware of and supports the principle of the emerging proposals to date informing the three live outline planning applications (ref. 24/P/2446/OU2; 24/P/2690/OU2; 25/P/0046/OU2). The Site and wider strategic allocation offer the opportunity to secure sustainable, plan-led development, delivering a significant portion of housing across the plan period to help provide resilience for the district in terms of its housing land supply. Further, the site itself can deliver homes early in the plan period, to assist with the Council's 5-year housing land supply position. Bellway note that a Wolvershill Masterplan Framework SPD will be prepared for the proposed strategic allocation, as referred to within the policy. Bellway wish to reserve the right to comment on its detail as soon as a draft version can be shared. Only then can the bulleted requirements of the allocation be sufficiently justified,	

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							refined and/or clarified – such as 17, 19 and 22. Bellway understand the document is due to be considered by Cabinet in February 2026 and as a key stakeholder, would welcome any engagement with the Council prior to its publication. Please note, we have provided more specific points regarding the affordable housing requirement under Draft Policy DP43 (Affordable Housing) and suggested Gypsy, Traveller and Travelling Showpeople requirement under Draft Policy DP44 (Gypsies, Travellers and Travelling Showpeople).	
Policy LP5: Housing, employment and mixed use allocations	Unsure					Further allocations may be necessary in light of our comments regarding overall housing levels.	Draft Policy LP5 (Housing and employment allocations) cross refers to Schedule 1 and Schedule 2 of the Local Plan, listing the site allocations for residential and employment development. This includes the strategic location at Wolvershill (north of Banwell), covered in detail under Draft Policy LP1. Bellway strongly support the identification of Wolvershill as a housing and employment allocation. Please see further comments under Draft Policy LP1. Further allocations may be necessary in light of our comments regarding overall housing levels.	20251212 504317 JE - North Somerset Reg 19 (Reps obo Bellway Homes).pdf
Policy LP7: Settlement boundaries	Yes						Draft Policy LP7 (Settlement boundaries) confirms settlement boundaries for the towns and villages are defined on the Policies Map. It states new development within these boundaries will be acceptable in principle, subject to relevant policies within the plan. Bellway support the inclusion of the Wolvershill strategic allocation site within settlement boundaries. This reflects its identity as an extension to Weston-super-Mare and importance in delivering the ambitions of the plan. Furthermore, it is noted that the justification text sets out that settlement boundaries can be reviewed and adjusted via Local Plan reviews and/or Neighbourhood Development Plans, which is welcomed. This allows future Development Plan Documents to respond to changes in circumstance/requirements as necessary.	20251212 504317 JE - North Somerset Reg 19 (Reps obo Bellway Homes).pdf
Policy LP9: Extent of the	Unsure				As stated in response to Draft Policy SP7 (Green Belt), Bellway agree that exceptional	In light of our comments on housing need, it may be necessary for the Council to further review		20251212 504317 JE -

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Green Belt					circumstances exist to review and amend the Green Belt boundary to ensure North Somerset can meet its housing need in full.	boundaries in this policy, as suitable / necessary.		North Somerset Reg 19 (Reps obo Bellway Homes).pdf
Policy LP10: Strategic gaps	No	‣ Effective ‣ Consistent with national policy			Bellway acknowledge the principle of identifying strategic gaps where there is clear evidence that maintaining separation between settlements (existing and proposed) is necessary to protect local character and prevent harmful coalescence. However, Draft Policy LP10 (Strategic Gaps) is too rigid and does not recognise that some forms of development can occur within a Strategic Gap without undermining its essential purpose. In many locations, land may serve as a functional interface between existing and new communities. In such cases, there is genuine potential for well designed community infrastructure, education provision, or active Green Infrastructure to be accommodated while still preserving settlement identity. The supporting text draws comparisons with Green Belt policy, yet the policy itself is restrictive and does not offer the clarity that Green Belt policy provides on categories of appropriate development (e.g. outdoor sport and recreation and associated buildings). Strategic Gaps should not be treated as de facto Green Belt, and the policy should explicitly allow for beneficial uses that meet local needs and support the masterplanning and delivery of adjacent development.	Bellway consider that Draft Policy LP10 should be amended to introduce clear and proportionate flexibility, confirming that development serving legitimate community, education or Green Infrastructure functions may be appropriate where it is compatible with the role and function of the Strategic Gap and does not harm settlement separation.		20251212 504317 JE - North Somerset Reg 19 (Reps obo Bellway Homes).pdf
Policy LP11: Transport infrastructure, allocations and safeguarding	No	‣ Justified			Draft Policy LP11 (Transport infrastructure, allocations and safeguarding) – with regard to Schedule 7 and the Policies Map – identifies land safeguarded for the delivery of major transport schemes. This includes land for the delivery of the Banwell Bypass and the M5 J21 Bypass Scheme. The Banwell Bypass received consent in 2023 and has secured funding from the Homes England Housing Infrastructure Fund. In addition to assisting delivery of the Wolvershill allocation, it will remove traffic congestion from a pinch point on a key route between the A38 and Weston-super-Mare. It will improve the local road network by dealing with existing congestion issues, as well as improving and enhancing the village by reducing traffic and improving the public realm, whilst also providing infrastructure and a defensible boundary to the north of the village. Whilst now a committed scheme, its continued safeguarding is appropriate.	Due to the absence of evidence to justify the J21 Bypass Scheme and information demonstrating its deliverability, we suggest it be removed from Schedule 7 and the Policies Map at this time. If considered, this will need careful evidence to justify inclusion or policy requirements.		20251212 504317 JE - North Somerset Reg 19 (Reps obo Bellway Homes).pdf

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					The M5 J21 Bypass Scheme is understood as a historical and long-term infrastructure ambition identified in the Joint Local Transport Plan 4, to reduce congestion at M5 J21 from traffic that does not access or egress the Strategic Road Network. Whilst not specifically safeguarded by this policy, this includes the provision of a new J21A to the M5 (referenced at Draft Policy LP1). Whilst acknowledging such a scheme might provide some benefit, there are no detailed or active proposals for it to be brought forward (including, despite reference in the supporting text to the allocation under Draft Policy LP1, anything in the Transport Assessment prepared by AECOM or Infrastructure Delivery Plan).			
Policy LP13: Air safety	No	• Effective			Draft Policy LP13 (Air safety) sets development managements standards in relation to development that may affect aerodromes – including the Helicopter Museum at Weston-super-Mare. Whilst Bellway support the principle of ensuring the safety of flights to and from the Helicopter Museum are not adversely affected, the policy test as written is currently too imprecise – requiring proposals “Within, and in the vicinity of, the helicopter safeguarded corridor as shown on the Policies Map”. The policy gives no indication of what is considered to be “in the vicinity” – leading it to be ineffective.	Further clarification should be provided to ensure it is clear and precise.		20251212 504317 JE - North Somerset Reg 19 (Repsobo Bellway Homes).pdf
Policy DP1: High quality design	No	• Justified • Effective • Consistent with national policy			Bellway is thoroughly committed to delivering schemes demonstrating high-quality design. It has a proven track record of delivering attractive, safe and inclusive schemes. That being said, Bellway suggest that Draft Policy DP1 (High-quality Design) is reviewed to be more concise and focused on the key aspects of successful high-quality design for North Somerset specifically, including referencing other national design guidance or policy as necessary, with further detail placed in supporting text or other supplementary documents. It is important that the policy provides flexibility to ensure that the principles outlined are relevant / applicable to all sites and schemes. This should include provisions such as “as applicable” or “where appropriate”, as well as allowing for innovation that can give unique responses to site conditions rather than a holistic and overly prescriptive approach. It is unnecessary for the policy to address matters better dealt with by other policies (e.g. lighting). Finally, beneath the initial list, the following is	The policy should be reviewed as outlined to ensure it does not hinder sustainable sites from coming forward, and is justified, effective and consistent with national policy.		20251212 504317 JE - North Somerset Reg 19 (Repsobo Bellway Homes).pdf

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					stated: “Major development proposals should be accompanied by Design and Access Statements, parameter plans and Community Engagement Statements, providing evidence of effective community involvement in the development of the design. These do not need to be included with policy, as they are already covered within national and local validation requirements. Moreover, parameter plans may not be appropriate for full planning applications.			
Policy DP2: Residential development within settlement boundaries	No	‣ Justified ‣ Effective ‣ Consistent with national policy			Draft Policy DP2 (Residential Development within Settlement Boundaries) establishes specific and conditional design requirements for proposals involving new dwellings within predominantly residential areas within settlement boundaries. Whilst Bellway recognise the intention of the policy, its inclusion is considered unnecessary. Draft Policy DP1 already includes a substantial list of design requirements which address the requirements of this policy, resulting in unnecessary duplication of policies, in conflict with the NPPF. Moreover, the requirements are too vague and without quantification, leading to ineffectiveness in interpretation.	The policy should be deleted.		20251212 504317 JE - North Somerset Reg 19 (Repsobo Bellway Homes).pdf
Policy DP5: Climate change adaptation and resilience	No	‣ Justified ‣ Effective ‣ Consistent with national policy			Draft Policy DP5 (Climate Change Adaptation and Resilience) requires all development to address climate adaptation and resilience, ensuring that proposals recognise climate-related risks and vulnerabilities and incorporate measures to reduce these risks. Bellway supports the principle of Draft Policy DP5 and its overall objective and is committed to tackling climate change, supporting the promotion of low carbon ways of living. Nevertheless, there are a few amendments that should be considered to improve the effectiveness and overall soundness of the policy: • Greater clarity on expectations for minor vs major development is required in relation to the climate change adaptation statement and its content. The policy begins that “All developments” should demonstrate compliance through such a statement, yet only sets out detailed expectations for major development, despite several items potentially being relevant to minor schemes. An alternative approach would be to list the requirements applicable to all development, with the caveat “as relevant”, and require a specific, standalone climate change adaptation statement only for major	Draft Policy DP5 (Climate Change Adaptation and Resilience) requires all development to address climate adaptation and resilience, ensuring that proposals recognise climate-related risks and vulnerabilities and incorporate measures to reduce these risks. Bellway supports the principle of Draft Policy DP5 and its overall objective and is committed to tackling climate change, supporting the promotion of low carbon ways of living. Nevertheless, there are a few amendments that should be considered to improve the effectiveness and overall soundness of the policy: • Greater clarity on expectations for minor vs major development is required in relation to the climate change adaptation statement and its content. The policy begins that “All developments” should demonstrate compliance through such a statement, yet only sets out detailed expectations for major development, despite several items potentially being relevant to minor schemes. An alternative approach would be to list the requirements applicable to all development, with the caveat “as relevant”, and require a specific, standalone climate change adaptation statement only for major		20251212 504317 JE - North Somerset Reg 19 (Repsobo Bellway Homes).pdf

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					development, thereby reducing unnecessary burden on smaller applications. • The opening paragraph could be simplified by removing the phrase “which can form part of the sustainability/energy or the design and access statement.” This explanatory detail is better placed within supporting text. Furthermore, we suggest the location this is detailed could be broadened – as it may not be necessary for every application to include a sustainability/energy statement or Design and Access Statement (noting our earlier point that a specific adaptation statement should only be mandatory for major development). The sentence referring to species selection for new trees and green infrastructure – “When incorporating new trees and other green infrastructure into new development, species should be selected which will be suitable in a changing climate.” – could be removed to streamline the policy. This guidance would be more appropriately located within Draft Policy DP43, or better still, the proposed Trees and Woodland SPD.	development, thereby reducing unnecessary burden on smaller applications. • The opening paragraph could be simplified by removing the phrase “which can form part of the sustainability/energy or the design and access statement.” This explanatory detail is better placed within supporting text. Furthermore, we suggest the location this is detailed could be broadened – as it may not be necessary for every application to include a sustainability/energy statement or Design and Access Statement (noting our earlier point that a specific adaptation statement should only be mandatory for major development). The sentence referring to species selection for new trees and green infrastructure – “When incorporating new trees and other green infrastructure into new development, species should be selected which will be suitable in a changing climate.” – could be removed to streamline the policy. This guidance would be more appropriately located within Draft Policy DP43, or better still, the proposed Trees and Woodland SPD.		
Policy DP6: Net zero construction	No › Justified › Effective › Consistent with national policy				Draft Policy DP6 (Net Zero Construction) seeks to introduce minimum standards for new residential and non-residential development in respect of embodied carbon, operational energy performance (including both regulated and unregulated energy), on-site and off-site renewable energy generation, water efficiency, overheating and district heating. At a company level, Bellway is committed to ensure the business plays its role in delivering carbon reductions and planning for a sustainable future. Through collaboration and test trials, Bellway is working on a variety of technologies to help reduce carbon emissions from their homes. This includes working with Salford University on the Energy House 2.0 project testing new technology and Future Homes Standard (FHS) conditions with real occupants and are committed to the FHS. However, it is not supportive of meeting standards that exceed the FHS / Part L1 2025.The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. The statement also sets out that any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed	Overall, while Bellway supports the overarching objective of improving environmental performance and reducing carbon emissions, Draft Policy DP6 is not justified, effective and consistent with national policy. Bellway appreciates that local plans are future facing due to their timeframes. However, it is suggested that at least in the interim, current expectations are aligned to the FHS and Written Ministerial Statement and include flexibility and viability considerations in order that it does not hinder the development of suitable sites. Given the strong national direction that Building Regulations are the primary mechanism for delivering energy-efficiency improvements, Bellway consider that DP6 should be deleted. This approach has already been adopted by Bristol City Council, who are relying on the same evidence base as North Somerset.		20251212 504317 JE - North Somerset Reg 19 (Reps obo Bellway Homes).pdf

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					rationale that ensures that development remains viable, and the impact on housing supply and affordability is considered in accordance with the NPPF. It is further noted from the Written Ministerial Statement that any increase on Part L required by local authorities should be expressed as a percentage uplift to the Target Emission Rate, which is not the case in Draft Policy DP6. Therefore, while Bellway understand the importance of these aspirations, it does not consider the policy to be sound. As the Council is no doubt aware, the Government published a Written Ministerial Statement (WMS) in December 2023. The WMS set clear expectations that: • local energy efficiency standards should not normally go beyond current or planned Building Regulations; • any such policies must have a well-reasoned and robustly costed rationale, with impacts on viability, housing supply and affordability assessed; and • any uplift should be expressed as a percentage improvement on the Target Emissions Rate (TER) rather than through separate, absolute performance metrics. The Government has confirmed – through the Future Homes and Building Standard (FHBS) – that Building Regulations will be updated to secure “zero-carbon ready” buildings through a combination of high-quality fabric and low-carbon heat, and that further tightening of fabric standards beyond Part L 2021. This is expected to be installed by the end of 2025. Despite legal judgements in the High Court and Court of Appeal confirming that local planning authorities can legally seek their own standards, they have concurrently concluded that the WMS remains a lawful and weighty statement of national policy and that LPAs should set higher local standards only where they provide a clear, robust, and costed justification. Draft Policy DP6 is not sufficiently justified and does not meet this requirement. It introduces standards that go materially beyond current and planned Building Regulations, adopts metrics which the Government itself has indicated are unsuitable. Problematic issues include: Operational energy:			

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					DP6 defines net zero operational energy to include both regulated and unregulated energy. This is neither reasonable nor achievable. Developers can only influence regulated loads; unregulated energy use (appliances, EV charging, refrigeration, process loads) is driven by occupier behaviour and lies outside development control. The FHS/FBS consultation is explicit that metrics including unregulated loads are not suitable, and the RCA judgments do not alter the technical reality that developers cannot design for, or offset, these uses. All references to unregulated energy should therefore be removed, and any operational energy requirement should be aligned with the FHS. Residential performance standards: The policy's specific targets – 15-20kWh/m²/yr space heating and 35kWh/m²/yr total energy use – derive from voluntary guidance and are significantly more onerous than those put forward in the forthcoming FHBS. The Government has stated that further fabric tightening beyond 2021 levels is not cost-effective, and metrics including unregulated energy are inappropriate. They all represent a departure from the Government's preferred TER-based approach in the WMS. These targets therefore cannot be considered justified or achievable across a local plan area and should be removed. If the Council wishes to pursue any uplift, it should follow the WMS by expressing it as a % improvement against TER, supported by viability evidence. Embodied carbon: Embodied carbon, the carbon emissions generated from the production and transportation of building materials, construction process and maintenance of a building is currently beyond the scope of the building regulations. The government is proposing to take steps to address this factor and intends to consult on its approach to measuring and reducing embodied carbon in new buildings in due course. Bellway recognise and support the need for development to reduce its carbon emissions, however, rather than placing additional requirements that are considered unnecessary and unjustified, it is considered that the most effective way of achieving this is through strict adherence to building regulations as they are updated. The policy should be amended accordingly. Conclusion			

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					Overall, while Bellway supports the overarching objective of improving environmental performance and reducing carbon emissions, Draft Policy DP6 is not justified, effective and consistent with national policy. Bellway appreciates that local plans are future facing due to their timeframes. However, it is suggested that at least in the interim, current expectations are aligned to the FHS and Written Ministerial Statement and include flexibility and viability considerations in order that it does not hinder the development of suitable sites. Given the strong national direction that Building Regulations are the primary mechanism for delivering energy-efficiency improvements, Bellway consider that DP6 should be deleted. This approach has already been adopted by Bristol City Council, who are relying on the same evidence base as North Somerset.			
Policy DP15: Active and sustainable transport	No	‣ Justified ‣ Effective			Bellway generally support objectives and requirements of Draft Policy DP15 (Active and sustainable transport), however, it is noted the policy wording includes the following requirement: “Residential development will be expected to ensure that safe and appropriate pedestrian/ cycling links to local facilities, including schools, are designed to the required standard. Fully completed active travel infrastructure (providing complete connectivity to the existing settlement and within the new development) and EV charging points are expected to be available prior to first occupation of each development or phase". Whilst understanding the broad basis for this policy provision, the drafting is felt unhelpfully onerous in relation to active travel infrastructure – particularly in relation to development that may form part of a large phase of development. Sites adjacent to a settlement, for example, may not require such a full requirement.	To ensure effectiveness, we suggest greater flexibility be incorporated, whilst not removing the basics of the policy: “[…] Active travel infrastructure which provides appropriate (an existing settlement and/or within the new development) and EV charging points are expected to be available prior to first occupation of each relevant development or phase”.		20251212 504317 JE - North Somerset Reg 19 (Reps obo Bellway Homes).pdf
Policy DP17: Public transport accessibility	No	‣ Justified ‣ Effective ‣ Consistent with national policy			Bellway support the aspiration of Draft Policy DP17 (Public transport accessibility), though to make it more effective and responsive to site-specific circumstances, we suggest the guidance in the supporting text that refers to ‘reasonable distance’ and ‘appropriate bus service frequency’ should be referred to as ‘typical distance’ or ‘typical bus service frequency’ in order to account for the site specific circumstances.	The guidance in the supporting text that refers to ‘reasonable distance’ and ‘appropriate bus service frequency’ should be referred to as ‘typical distance’ or ‘typical bus service frequency’ in order to account for the site specific circumstances.		20251212 504317 JE - North Somerset Reg 19 (Reps obo Bellway Homes).pdf
Policy DP34: Green infrastructure	No	‣ Justified ‣ Effective ‣ Consistent			Bellway acknowledge and accept that new developments should make proportionate and related improvements to green infrastructure. As noted in the policy wording, this should be dependent on both the nature and scale of the	The policy should be reworded to make it more explicit that large scale developments shouldn’t need to make additional provision for existing shortfalls in Green Infrastructure but rather ensure that the proposed provision accommodates		20251212 504317 JE - North Somerset Reg 19 (Reps

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		with national policy			development, as well as the existing quantity and quality of provision in the locality. However, Draft Policy DP34 (Green Infrastructure) goes onto note that requirements will be higher for large-scale proposals of 10 dwellings or more, particularly where this is a lack of green infrastructure. The policy and its justification text do not sufficiently justify the requirement that development should make up for the lack of existing green infrastructure in the area, which the policy due to its wording implies.	the needs of the development itself.		obo Bellway Homes).pdf
Policy DP36: Biodiversity Net Gain	No	‣ Justified ‣ Effective ‣ Consistent with national policy			Bellway consider that this policy is not required. The requirement to deliver a minimum Biodiversity Net Gain is now statutorily mandated by the Environment Act 2021.	To avoid unnecessary duplication of policy, and ensure the plan is consistent with national policy, we suggest this policy is removed.		20251212 504317 JE - North Somerset Reg 19 (Reps obo Bellway Homes).pdf
Policy DP37: Trees, Woodlands and Hedges	No	‣ Justified ‣ Effective			Draft Policy DP37 (Trees, woodlands and hedges) addresses the protection of existing trees and woodland, as well as requirements for new planting. Primarily, it appears this is an unnecessary expansion to Draft Policy DP35 (Nature conservation) with duplicate requirements in relation to the natural environment policies within the draft Local Plan. That being said, Bellway do not object to the principle of what the draft policy seeks to achieve. However, there are a number of aspects that require furtherconsideration: “The equivalent of a minimum of one tree per dwelling is planted, to be located in gardens where practical or within community gardens” - No justification or evidence is provided to support this formula, and it does not take account of site-specific characteristics. In addition, from a practical perspective, we do not consider tree planting within private gardens –“where practical” – to be desirable, for several reasons. - Firstly, locating trees within the curtilage of individual dwellings places responsibility for their maintenance and long-term health on residents rather than a management company or other accountable body, increasing the likelihood that trees will be removed. - Secondly, the requirement does not reflect the particular circumstances of different dwellings	See above		20251212 504317 JE - North Somerset Reg 19 (Reps obo Bellway Homes).pdf

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					and gardens, including factors such as topography, residential amenity, and maintenance constraints. For these reasons, we recommend removing references to planting within private gardens from the draft policy. “In exceptional circumstances where loss is unavoidable and fully justified, a suitable compensation strategy for replacement of trees, hedgerows, or to rectify damage (direct or indirect) to woodland is identified” - It is unclear whether this requirement applies to all existing trees or only to specific categories, such as veteran or champion trees. No definition is provided. If intended to apply to all trees and hedgerows, the requirement would be excessively onerous. There are many routine circumstances in which the removal of trees or hedgerows is necessary for safety and to deliver development and/or secure high-quality design and masterplanning. Such situations are commonplace and should not be constrained to “exceptional circumstances”. “Proposals for off-site provision is made where tree planting is not appropriate or practical on site” - This requirement lacks clarity and is therefore unsuitable as a basis for decision-making. The policy should specify the circumstances in which on-site tree planting would be considered “not appropriate or practical”.			
Policy DP43: Affordable housing (including rural exception schemes)	No	• Justified • Effective • Consistent with national policy			Draft Policy DP43 (Affordable housing and rural exception schemes) sets out the Council’s policy in respect of affordable housing. In terms of the trigger for affordable housing, the policy text states: “Affordable housing provision will be sought to meet local needs on all developments of 10 dwellings or more (or on sites of 0.5 hectare orabove), and five dwellings or more within the Mendip Hills National Landscape.” As drafted, this is in conflict with Paragraph 65 of the NPPF, which states that: "Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer).” The definition of major development provided in the Town and Country Planning Act (Development	See main comment.		20251212 504317 JE - North Somerset Reg 19 (Reps obo Bellway Homes).pdf

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					Management Procedure) (England) Order 2015 – in relation to the provision of dwellinghouses – states this is where: i. the number of dwellinghouses to be provided is 10 or more; or ii. the development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within sub-paragraph (c)(i); The policy should reflect the wording in planning legislation set out above, or simply just refer to the requirement being applied to 'major developments'. The policy acknowledges that the precise size and type of affordable housing to be provided on individual sites will be determined through negotiation, guided by available evidence as listed. This approach, which notes that provision will be guided by the Local Housing Needs Assessment, data from the housing needs register and local housing needs surveys, is also supported. It allows flexibility of approach to meet the needs of the particular site, location and market demand. In terms of the tenure split for affordable housing provision, the policy text confirms "the affordable housing mix should be 75% social rented and 25% shared ownership". However, this departs (without justification or evidence) from the evidence in the Local Housing Needs Assessment (September 2025) – which on pg. 8 (Figure 4) – confirms this to be 59% social rented, 17% affordable rent and 24% affordable home ownership. This should be updated accordingly. Moreover, the policy texts' reference to "housing mix" is wrong – it should be referred to as "tenure split", as is already (correctly) referenced in the supporting text. In terms of affordable housing requirement, in the case of greenfield sites, a requirement of 30% is requested on qualifying developments (amongst other values for Green Belt and previously developed sites). Within the Wolvershill strategic allocation under Draft Policy LP1, this is not reflected as %, but instead an equivalent amount (990 of 3,300). Bellway recognise the importance of delivering affordable homes. It also notes that this equivalent target is a reduction from the 35% required under the previous Regulation 19 consultation in December 2023. However, having reviewed the document 'Additional Sites Viability			

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					Addendum for North Somerset Local Plan 2041: Final Report' (October 2025) prepared by Dixon Searle Partnership, Bellway have concerns whether the 30% figure would be justified / achievable within the strategic Wolvershill allocation. Indeed, the Assessment states (inclusive of an uplift to the level of housing in the allocation from 2,800 to 3,300) that even a 25% AHcontribution would be challenging, largely due to infrastructure costs. The Assessment concludes: "The results of testing representing Wolvershill indicate that achieving 25% affordable housing could be challenging with the currently assumed infrastructure costs and therefore there may well need to be flexibility built into policy to allow for any necessary ongoing consideration of this to ensure that development can continue to come forward viably". We understand the emerging SPD for Wolvershill will be supported by an Infrastructure Delivery Plan, which would look at S.106 and viability. This will form an integral part of the delivery of the allocation, including associated costs and funding, impacting viability and consequently affordable housing – which should be confirmed and further tested as part of the Examination figure to ensure that this is a robust figure. In more simple terms, we consider the text in Draft Policy LP1 to be too stringent. Whilst the allocation is for 'around 3,330 homes', the affordable housing requirement is set at 990 dwellings. Therefore, should the amounts be delivered under or over 3,300, 990 may not be viable. We suggest the wording is more flexible, perhaps "around 3,300 dwellings, including an appropriate level of affordable housing". It is also noted the Council will provide an Affordable Housing SPD to set out further detail, in terms of delivery of the policy. Bellway welcome the opportunity to respond to the consultation on the emerging draft SPD in due course and suggest it would be beneficial for the Council to establish a timeline for this in an updated Local Development Scheme. In light of the evidence above, as drafted, we do not consider the requirements of Draft Policy DP43 to be appropriately justified. Notwithstanding the existing wording on sites that cannot be met, we suggest amendments are required to Policy DP43 to ensure a robust and sufficiently justified affordable housing policy which reflects the site-specific provision required by the evidence base and within the Wolvershill			

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					allocation under Draft Policy LP1.			
Policy DP44: Gypsies, Travellers and Travelling Showpeople.	No	• Positively prepared • Justified • Effective • Consistent with national policy			Draft Policy DP44 (Gypsies, Travellers and Travelling Showpeople) establishes allocations for Gypsy, Traveller and Travelling Showpeople (GTTS) sites (via Schedule 8), as well as development management requirements for applications including their provision. In addition, the policy wording notably states that need will also be met through provision on the strategic sites at Wolvershill (Draft Policy LP1) and Woodspring (Draft Policy LP2) – equating to a further 36 pitches. The allocation wording for Draft Policy LP1 includes a requirement to provide 18 pitches. At this stage, Bellway must object to inclusion of this requirement, as there is presently no clarity on where / if delivery of GTTP sites is possible within the Wolvershill allocation. Bellway notes the proposed Wolvershill Masterplan Framework SPD which is being prepared for the proposed strategic allocation and is referred to within Draft Policy LP1. Bellway reserve the right to comment on its detail as soon as a draft version can be shared –which should include justifiable evidence that this is the only or best location for G&T sites and/or mechanisms for delivery via financial contribution. Bellway understand the document is due to be considered by Cabinet in February 2026 and as a key stakeholder, would welcome any engagement with the Council prior to its publication.	Provision of evidence and justification for the allocation of 18 GTTS pitches for the Wolvershill allocation. Bellway reserve the right to comment on its detail as soon as a draft version can be shared – which should include justifiable evidence that this is the only or best location for G&T sites and/or mechanisms for delivery via financial contribution. Bellway understand the document is due to be considered by Cabinet in February 2026 and as a key stakeholder, would welcome any engagement with the Council prior to its publication.		20251212 504317 JE - North Somerset Reg 19 (Reps obo Bellway Homes).pdf
Policy DP45: Residential space standards	No	• Justified • Consistent with national policy			Draft Policy DP45 (Residential space standards) states all new residential development (including residential conversions) should meet the Nationally Described Space Standards (NDSS). Including NDSS as a mandatory requirement will need to be demonstrated and justified with specific evidence that there is a clear need for such a standard across North Somerset, as set out in PPG (Paragraph: 002 Reference ID: 56-002-20160519).	In accordance with PPG, the provision of specific evidence that such a standard is necessary.		20251212 504317 JE - North Somerset Reg 19 (Reps obo Bellway Homes).pdf
Policy DP46: Housing Type and Mix	No	• Justified • Effective • Consistent with national policy			Draft Policy DP46 (Housing type and mix) takes a generally flexible approach to defining housing type and mix, based on evidence from the Local Housing Needs Assessment (September 2025) and the site size, characteristics and location. This approach is generally justified and supported but should be underpinned by sufficient clarifications and guidance to support positive interpretation at development management stage. Accordingly, we consider certain elements could be strengthened/clarified:			20251212 504317 JE - North Somerset Reg 19 (Reps obo Bellway Homes).pdf

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					• Clarification has not been provided as to whether the requirements should be applied to developments allocated in the plan, including the site allocation at Wolvershill (north of Banwell) under Draft Policy LP1. Indeed, aspects (such as self-build) are not included in the policy wording of Draft Policy LP1. This should be clarified and if included, justified by the evidence base. • Defining the “self-build and custom built plots” requirement should relate to the self-build register in the locality of the site specifically, as well those with a genuine interest in self-build as part of a larger housing development, rather than the register for the district as a whole. inclusion of the above in the supporting text would strengthen the effectiveness of the policy. Accessible and adaptable homes: The policy text includes the following requirement: “All new dwellings will be required to meet Building Regulations M4(2) standard (‘accessible and adaptable dwellings’) except for those dwellings that are designed to M4(3) standard.” The supporting text to the policy states that: “The requirement for all homes to be accessible and adaptable reflects the government’s intention to incorporate M4(2) standard into building regulations and the level of need identified in the LHNA.” National planning guidance in the PPG (Paragraph: 007 Reference ID: 56-007-20150327) advises local planning authorities that “based on their housing needs assessment and other available datasets it will be for local planning authorities to set out how they intend to approach demonstrating the need for Requirement M4(2) (accessible and adaptable dwellings), and/or M4(3) (wheelchair user dwellings), of the Building Regulations.” There is no evidence provided to support the conclusion that 100% of homes should be Part M4(2) compliant in the LHNA. Indeed, the ‘Local Housing Needs Assessment’ (September 2025) concludes (at Paragraph 5.38) that: “Based on the evidence, it would be appropriate for at least 45% of homes on new developments to comply with Requirement M4(2) Accessible and Adaptable Dwellings and 5% to comply with Requirement M4(3) Wheelchair User Dwellings. However, the LPA could consider a higher target			

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					to ensure sufficient choice and flexibility for households, but this would need to be tested in the context of economic viability." The only justification is that this is likely to come through in a change to Building Regulations. As it stands, the policy requirement is therefore inconsistent with the guidance in the PPG and the evidence base in the LHNA. If the Building Regulations are updated after the plan is adopted, this will supersede the planning policy. It is not appropriate however to make policy on the basis of changes the authority consider may take place in a regime outside of planning. Indeed, there is also a possibility that it could be delivered through the introduction of National Development Management policies. There is no need to pre-empt changes to the building regs or the introduction of National DM policies and enshrine/duplicate the requirement in local policy. Whilst the M4(3) requirement is consistent with the LHNA, further clarification is also sought with regards to the evidence for the intended split of M4(3) in terms of M4(3)a (wheelchair adaptable) and M4(3)b (wheelchair accessible). This percentage should be justified with appropriate evidence and viability work. More generally, it would be extremely difficult for some sites to provide some or all of the homes as Part M4(2) or M4(3) compliant. Some of these site-specific factors such as vulnerability to flooding and site topography are mentioned specifically in Paragraph: 008 Reference ID: 56-008-20160519 of the PPG. The policy needs to consider potential exceptional circumstances which can justify appropriately reduced requirements due to these constraints in accordance with the PPG.			
Policy DP49: Healthy Places	No	• Justified			Draft Policy DP49 (Healthy places) relates to the requirement to produce Health Impact Assessments (HIAs) for developments that exceed certain thresholds. Notably, Bellway observe the threshold has dropped for residential developments from the previous full Regulation 19 consultation – from 200 to 50 dwellings. It is unclear what the justification is for this, particularly noting that neighbouring LPAs have lower thresholds in their emerging Local Plans. For example, the emerging Local Plan for Bristol (currently at Examination) sets the requirement for residential development at 100 dwellings (with no area threshold) under	The amended policy is not justified and sufficient evidence detailing the reason for the change should be provided.		20251212 504317 JE - North Somerset Reg 19 (Reps obo Bellway Homes).pdf

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					Draft Policy HW2B. The emerging Local Plan for South Gloucestershire (submitted for Examination) is proposing to retain adopted Policy PSP9, which requires a HIA only for 'Very Large Major' applications, which for residential, is considered to be 200 dwellings or sites of 4ha+ (as proposed in the previous Regulation 19 consultation).			
Policy DP52: Protection of open space and recreation	No	‣ Justified ‣ Effective ‣ Consistent with national policy			Whilst Bellway understand the desire to ensure the loss of formal designated open space with community use / importance is sufficiently justified, the policy and supporting text as drafted would result in any green or blue space being subject of this policy / open to interpretation. Outright protection should (and indeed is) already offered by Local Green Space designation. This can be extended, where justified, through Neighbourhood Development Plans.	To make the policy clear, justified and effective, the Council should: - Publish a specific list of open spaces that the policy would apply in the supporting text; and - Remove the following final sentence to the policy, which goes beyond reasonable justification: "Development proposals affecting other green and blue spaces will only be permitted provided they do not adversely affect areas which make a worthwhile contribution to the amenity and/or the character, setting and visual attractiveness of the area"		20251212 504317 JE - North Somerset Reg 19 (Reps obo Bellway Homes).pdf
Wolvershill (north of Banwell)					tor&co has been appointed by Bellway Homes Ltd. (Bellway) to respond to the North Somerset Local Plan Pre-Submission (Regulation 19) consultation. Bellway is currently the UK's 4th largest housebuilder, having built and sold 8,749 homes in the 2024/2025 trading year, marking an upturn following the industry wide contraction due to the Cost-of-Living Crisis (2023/2024 - 7,654). It caters for first time buyers through to more seasoned home buyers and their families, with their reputation built on designing and creating beautiful developments which meet the needs of today and consider the demands of the future. Their homes are designed, built and marketed by local regional offices managed and staffed by local people. This allows the company to stay close to its customers and take key decisions about design, build, materials, planning and marketing in response to local as opposed to national demands. Bellway is actively promoting land known as 'Land east of Summer Lane, Banwell' (the Site). The land forms a small parcel within the strategic allocation at Wolvershill (north of Banwell), allocated in the Local Plan under Draft Policy LP1 (please see Site Location Plan at Appendix 1). The Site and wider strategic allocation offer the opportunity to secure sustainable, plan-led			20251212 504317 JE - North Somerset Reg 19 (Reps obo Bellway Homes).pdf

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					development, delivering a significant portion of housing across the plan period to help provide resilience for the district in terms of its housing land supply. Bellway has an option on the Site and has undertaken technical work to explore the feasibility of development, in line with the wider strategic allocation and masterplan for Wolvershill, which is set out in the Framework Masterplan attached at Appendix 2. This demonstrates that the whole Bellway Site, as shown as part of the draft strategic allocation, represents a suitable site for development. The technical work progressed to date has not identified any fundamental constraints that would prevent the delivery of housing on the site. The site is available now and would meet the definition of deliverable and developable in the NPPF. This representation responds to North Somerset's latest consultation on the Pre Submission Regulation 19 document policies in the order that they appear in the plan for ease of reference. The comments provided are based on the 'tests of soundness' prescribed in NPPF paragraph 36. Finally, Bellway is aware of the emerging Wolvershill Masterplan Framework SPD which is being prepared for the proposed strategic allocation. This forms a significant part of the housing land supply for the Local Plan and incorporates the Site which Bellway is promoting. Therefore, it would like to reserve the right to comment on its detail as soon as a draft version can be shared. Bellwayunderstand the document is due to be considered by Cabinet in February 2026 and as a key stakeholder, would welcome engagement with the Council prior to its publication.			

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Land at Lodway Farm	No	• Positively prepared • Justified • Effective • Consistent with	Unsure	Unsure	The development behind Lodway Farm suffers from a number of issues. Firstly is one of access; The Breaches is a narrow residential road with poor lighting, no pavements and single direction traffic bottle-necks at each end. Access from Beechwood Rd is not much better - both discharge out onto Church road or Debeccas Lane, both of which are again narrow and unsuited for increased traffic - which WILL occur, no matter what the transport intent is. Given there is no space to improve matters and that the roads are regularly used by pedestrians varying from school children to OAPs, this will cause accidents and most likely fatalities.	A major drainage improvement scheme in the local area to manage peak water flows. Major improvements to Junction 19 t And adjacent roads to improve both flow and "buffer" zone for	Happy to consult and provide ideas for solutions.	

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		national policy			The land of Lodway Farm is, I believe, prone to flooding and home to wildlife which would be banished from the area completely, such as pheasants and deer. Church road regularly becomes borderline impossible in heavy rains; unless some very significant engineering is undertaken this will only become worse and likely spread to other roads,whose drainage is already insufficient. Finally there are issues which effect the whole area and new developments; - Flooding will get significantly worse, unless major engineering works to create new drainage paths beyond the limits of the developments are undertaken. - Junction 19 is already dangerously overloaded, backing onto the motorway every single working day. There are already frequent accidents in this location and adding to the traffic coming through this junction will make it worse - even if only 25% of the new homes has a car adding to it, it's an additional 275 cars using that junction. - Drs and other services in the village are not planned to be improved, which will cause a borderline functional system to collapse without significant investment to prevent it. As a note, this whole consultation feels like its been structured to dissuade involvement; even making these comments has been challenging and would have put many off!	cars to queue. A dedicated access route across the motorway and linking up to the Docks network of roads to avoid overloading local roads (including Marsh Lane) and the pinch point of the railway bridge. Ideally create some nature reserve type buffer areas, all interlinked, that gives the local wildlife a home.		
Land east of Gordano Services	Unsure	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	My main concerns with this development relate to flooding, traffic and local services. - Flooding: This site is steeply inclined, with local roads (Church Road/Marsh Lane) already suffering from significant flooding during heavy rainfall. Unless major drainage development is undertaken, the additional runoff will worsen the situation and may even adversely effect the motorway, as has happened locally recently. - Traffic: J19 is overloaded and dangerous as it is; additional traffic will only make this worse. Major rework is required. - Services; there has been no provision made for more drs, shops or village services. The existing ones will be overwhelmed.	See comments on Lodway development.		
Pill Green	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	My main concerns with this development relate to flooding, traffic and local services. - Flooding: This site is, I believe, steeply sloped and already suffers from significant flooding during heavy rainfall. Unless major drainage development is undertaken, the additional runoff will worsen the situation and may even adversely effect the motorway, as has happened locally recently. - Traffic: J19 is overloaded and dangerous as it is; additional traffic will only make this worse. Major rework is required. - Services; there has been no provision made for more drs, shops or village services. The existing ones will be overwhelmed	See comments on Lodway.		

Name: Ben Enright **I.D:** 62856961

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent	Unsure	Unsure	I am a Backwell resident and I strongly object to the current housing proposals. Backwell already has approval for 800 new homes, which is a major change for a small village. Adding another 1,000 on top is unreasonable. It places a far greater burden on Backwell than on other North Somerset villages and even some towns. Giving Backwell 7% of the district's total housing allocation while places like Clevedon take 2% is not balanced or fair.			

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		with national policy			There is no proper needs or viability assessment to justify this extra growth. Nothing explains why Backwell must take this level of development, why the numbers have not been spread more evenly, or whether local services can realistically support it. The proposals are not sustainable. There is no credible plan for how healthcare, schools, transport, shops, community facilities, utilities or leisure spaces will cope with thousands more residents. The documents do not show how the area can absorb this impact without serious harm. Part of the case relies on a new link road, yet there are no detailed plans, no costings and no confirmed funding. With our roads already under pressure, adding 1,000 more homes without a guaranteed transport solution will make daily life worse for existing residents. The plans would also destroy Grade 1 agricultural land, some of the best and rarest in North Somerset. Government policy says such productive land should be protected, yet this proposal ignores that principle. Once built on, it is lost forever. At a time when food security matters more than ever, building over high-quality farmland is a poor decision. The scheme also harms the Green Belt and the character of the village. Even the council's own documents flag concerns over flooding, the loss of high-quality land and uncertainty about the road delivery, yet the proposals continue regardless. Flooding is already a major issue, especially around Backwell Common. Developing on this land will make it worse, and the plan offers no convincing long-term protection. The scale and intensity of the proposals are simply too much. Forcing this level of development into Backwell without evidence, infrastructure, funding or clear justification is unsustainable and undeliverable. It places huge pressure on a village that cannot support it. For these reasons, I strongly object to the proposal.			

Name: Ben Goode **I.D:** 51107329

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Overdevelopment: 800 new houses are already approved (40% growth). Adding another 1,000 would overwhelm the village. Inadequate Infrastructure: Local schools, health services, and leisure facilities cannot support the proposed growth, and no further investment has been proposed. Traffic and Transport Concerns: The proposed road would not solve congestion on Station Road, Backwell Common, or Chapel Hill. Building under or over the railway would be costly and uncertain. Unfair Housing Allocation: Backwell is expected to take 7% of the district's housing—more than any other village and even higher than some towns. Lack of Evidence: No needs, viability, or social cohesion assessments have been provided. Loss of High-Quality Land: Development would destroy Grade 1 agricultural land, of which only 7% remains in North Somerset, undermining food security. Environmental Harm: Wildlife habitats, biodiversity, and the Brockley Maternity Roost (SSSI) for rare bats would be jeopardised. Flood Risk: Backwell Common and the planned development area, including Backwell Lake floodplain, already flood regularly. Insufficient Planning and Funding: The Infrastructure Delivery Plan lacks costings and firm funding commitments for roads and services.			

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					Unsustainable Growth: Rapid expansion without proper infrastructure investment would be destabilising and undeliverable. Transport Hub Limitations: Backwell railway station is already inaccessible for many and unsuitable as a transport hub. Policy Conflicts: Proposals contradict government policies on protecting versatile farmland, flood risk, and delivering affordable housing without undermining infrastructure contributions.			

Name: Ben Hayes **I.D:** 39209697

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell already has 800 new houses approved. This is existing plan is already going to stretch the traffic, schools, and other local facilities beyond their limit. I understand the target to build a certain amount of new homes in the county, but increasing the population of one village by 80% is not sensible at the local village level and will create a whole series of problems. Land along Backwell Common does not look like a sensible option. The road is narrow without good connections, and the area is prone to flooding. It is also a valuable area for wildlife and recreation.			

Name: Ben Houldsworth **I.D:** 62658625

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Justified • Effective • Consistent with national policy	No	No	Regulation 19 Representation – North Somerset Local Plan 2041 Objection to Allocations at Tower Farm (400 homes) and Black Rock (100 homes), Portishead Submitted on grounds of Soundness and Legal Compliance Dear Sir/Madam, I am writing as a resident of Portishead to object to the proposed housing allocations at Tower Farm and Black Rock in the North Somerset Local Plan 2041, totalling 500 homes. I do not believe these developments are sound or legally compliant, and I ask the Inspector to remove them from the local Plan. The Plan is Not Justified These sites were selected without a clear evidence-led explanation for why they must be developed when there are alternative approaches, including further use of brownfield land and higher density in central areas. This land is currently Green Belt and provides important landscape, ecological and recreational value. Exceptional circumstances for releasing this Green Belt have not been demonstrated. The Plan is Not Consistent with National Policy The sites sit beside Weston Big Wood, a designated SSSI and ancient woodland. Earlier ecological evidence recommended a 150-metre exclusion buffer, yet the plan now refers only to a vague “suitable buffer” without justification. This weakens the required level of environmental protection and could damage the woodland and wildlife habitat, contrary to national policy.			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					The sites are on the edge of Portishead, detached from essential services, and realistically car-dependent. Promised bus and walking improvements are speculative and unfunded, conflicting with national policy aims for sustainable transport and reducing emissions. The Plan is Not Effective The proposals depend on major infrastructure—school places, road improvements, active travel links, and ecological mitigation—but these lack confirmed funding, delivery mechanisms and timescales. Without certainty, these developments are not realistically deliverable. 4. Legal Compliance Concerns • The Sustainability Appraisal does not appear to assess realistic alternatives, such as excluding these sites or retaining the 150-metre buffer. • The Habitats Regulations Assessment does not convincingly evaluate cumulative impacts on Weston Big Wood or demonstrate certain mitigation. • Consultation has lacked transparency, with key evidence difficult to access and understand, limiting genuine participation. I don’t support in any way. Requested Change I request that the Inspector: removes Tower Farm and Black Rock from the Local Plan			
Black Rock, north of Clevedon Road	No	• Justified • Effective • Consistent with national policy	No	No	Regulation 19 Representation – North Somerset Local Plan 2041 Objection to Allocations at Tower Farm (400 homes) and Black Rock (100 homes), Portishead Submitted on grounds of Soundness and Legal Compliance Dear Sir/Madam, I am writing as a resident of Portishead to object to the proposed housing allocations at Tower Farm and Black Rock in the North Somerset Local Plan 2041, totalling 500 homes. I do not believe these developments are sound or legally compliant, and I ask the Inspector to remove them from the local Plan. The Plan is Not Justified These sites were selected without a clear evidence-led explanation for why they must be developed when there are alternative approaches, including further use of brownfield land and higher density in central areas. This land is currently Green Belt and provides important landscape, ecological and recreational value. Exceptional circumstances for releasing this Green Belt have not been demonstrated. The Plan is Not Consistent with National Policy The sites sit beside Weston Big Wood, a designated SSSI and ancient woodland. Earlier ecological evidence recommended a 150-metre exclusion buffer, yet the plan now refers only to a vague “suitable buffer” without justification. This weakens the required level of environmental protection and could damage the woodland and wildlife habitat, contrary to national policy. The sites are on the edge of Portishead, detached from essential services, and realistically car-dependent. Promised bus and walking improvements are speculative and unfunded, conflicting with national policy aims for sustainable transport and reducing emissions. The Plan is Not Effective			

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					The proposals depend on major infrastructure—school places, road improvements, active travel links, and ecological mitigation—but these lack confirmed funding, delivery mechanisms and timescales. Without certainty, these developments are not realistically deliverable. Legal Compliance Concerns • The Sustainability Appraisal does not appear to assess realistic alternatives, such as excluding these sites or retaining the 150-metre buffer. • The Habitats Regulations Assessment does not convincingly evaluate cumulative impacts on Weston Big Wood or demonstrate certain mitigation. • Consultation has lacked transparency, with key evidence difficult to access and understand, limiting genuine participation. Requested Change I request that the Inspector: • removes Tower Farm and Black Rock from the Local Plan. I don’t support in any way.			

Name: Ben Willis **I.D:** 58309057

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land off Millcross						The details are brief but appear compliant with necessary requirements however I would like to add that any residential building in any of these areas needs to be set up with two intentions 1) Be available to any and all ages 2) Be reasonably priced based on the income of a single person working and paying the bills alone My reason for this is as follows. Currently we have plenty of properties that are suitable for our elderly however not enough for our younger generations. Clevedon needs a viable amount of affordable housing to the younger generation in order to help drive the local economy The Millcross area is an ideal location for a younger generation housing.		
Castlewood						The details are brief but appear compliant with necessary requirements however I would like to add that any residential building in any of these areas needs to be set up with two intentions 1) Be available to any and all ages 2) Be reasonably priced based on the income of a single person working and paying the bills alone My reason for this is as follows. Currently we have plenty of properties that are suitable for our elderly however not enough for our younger generations. Clevedon needs a viable amount of affordable housing to the younger generation in order to help drive the local economy The area up in castlewood is ideally situated for an elderly housing area as it is a short walk to the medical center meaning quick and easy access to medical facilities. We could couple this with a mobility scooter rental booth in the gated area allowing those without access to their own a means to travel into the town center easier.		

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						If we where to build a 2 storey building on the castlewood gated area we could easily increase the capacity of available residential spaces this would in turn free up some of the other existing elderly residential properties to the younger generation. It would also make a good location to install a small office for our local police to use as a base of operations speeding up response times and providing an added level of safety to our elderly		

Name: Benjamin Marshalsea **I.D:** 62854689

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Normal issues of extensive building without uplifting local infrastructure first. Backwell schools are already over subscribed. Backwell buses are already over subscribed. Backwell commuter routes are already over subscribed, made worse by recent changes to single lane and the inside being for buses only. With the additional flooding the new housing will cause this will ensure not only Backwell, but those stations further west of Backwell will also be affected. The proposed road does not improve this in any shape of form and I suggest is minimum effort to tick a box. Backwell has large areas of greenfield and conservation - with endangered plants and animals, the uplift of this size will disrupt this. They are building on floodplain, and science and history shows what happens when this happens. This is completely unviable and should be enough to stop this. Why should others suffer from flooding due to the greed of others?			

Name: Beverly Johnson **I.D:** 62802657

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Black Rock, north of Clevedon Road	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	NSC has not properly considered the strategic ecological importance of these sites in protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor and the fact that both areas Blackrock and tower farm were both added to the green belt in the late 80s due to their high ecological value National planning policy allows Green Belt changes only in exceptional circumstances and these have not been demonstrated by NSC they have not properly considered alternative brown field sites with lower ecological impact both in Portishead and across N Somerset , NSC have opportunities to increase housing density on proposed brownfield sites which would remove the need to develop blackrock and tower farm both sites can not provide safe or suitable access the developments proposed would create unacceptable extra transport impacts failing the national soundness tests blackrock and tower farm are both not on a regular or suitable bus link and both sites are a mile or more from access to GP surgeries and shops causing the need for even more traffic on a very busy roads into portishead the town of Portishead has been swamped with houses in the past with no new infrastructure and total disregard to the impact on wild life and the environment REMOVE BLACKROCK FROM THE PLAN			

Name: Bhupinder Dularay **I.D:** 62860897

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure		1. The proposed development sites are established flooding plains with annual deep flooding of roads and residential properties. This has led to several properties no longer being covered by any insurer for flood damage. The proposed development will worsen the flooding on the area East of Backwell and the New Development itself will be flooded annually. The flooded boggy land adjacent to Backwell Common is now a winter feeding site for Egrets. 2. The land East of Backwell is highly prized Grade 1 agricultural farm land which is used to grow food for human and cattle consumption and therefore is part of local and national food security. 3. Several Grade 1 and Grade 2 Buildings will become surrounded by the proposed development losing their character, appearance and setting, essential requirements of their historic listing. The proposed development is within the curtilages of the buildings which is forbidden by the listing. 4. The proposed housing is clear overdevelopment putting a strain on all the roads and services in Backwell which will severely impact on current and new residents. 5. The existing roads cannot support the increased number of cars that will result from the development proposals. 6. The proposed cross rail road link whether achieved by a high bridge or a deep tunnel will be extraordinarily expensive 1.5 mile link that will only serve to connect existing bottlenecks.	Other far more suitable locations have been identified to NSC: 1. that will not flood, 2. are not grade 1 agricultural land 3. Will not enclose and therefore Grade 1 and Grade 2 Historical buildings 4. Have better road links to Bristol 5. Are not Green Belt		

Name: Bill Millar **I.D:** 31042785

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP10: Transport	No	• Effective	Yes	Yes	It appears to have completely missed the issue that the road network in the area is not adequate for the current traffic far less the extra traffic that would be generated with new housing. The policy is to build houses near workplaces. There are few job vacancies in Churchill, for example, but a significant number of houses are planned nearby. The road to Clevedon is not fit for early 20th century traffic far less the 21st century. If you build more houses near villages like Churchill residents will have to travel towards the M5 or Bristol simply aggravating a hopeless traffic situation. How on earth can you have a housing policy without a road improvement policy. Get a grip.	If you inlcude a plan to improve the road network to support current needs and plan to build houses where ther are jobs you might just be on the right track. Perhaps you need to include a plan of where the job need is.		

Name: Bleadon Parish Council **I.D:** 20583553

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP10: Strategic gaps	No	• Justified • Effective • Consistent with national policy	No	Unsure	The reasons for Bleadon Parish Council reaching this conclusion are as follows: The Parish Council has previously raised the need – in its view – for a strategic gap to be introduced between the urban area of Weston-super-Mare and the rural parish of Bleadon. The Local Planning Authority's response to this request has been largely predicated upon the view that the introduction of such a requirement is not considered necessary due to the topography and geology of the local area. The Council would offer the following comments in support of its – alternate - view: • Archaeological evidence clearly demonstrates that Bleadon was a bronze age settlement and has remained as a settlement over the last 2,000 years. The topography and geology of the Parish have not prevented construction using ancient methods. It is difficult, therefore, to accept that any natural barriers could not be suitably addressed using more modern construction methodologies.	In order to make the Plan legally compliant and sound, the Parish Council would suggest the introduction of a strategic gap (or gaps) between the urban area of Weston-super-Mare and the rural Parish of Bleadon. Such a gap (or gaps) to reflect the full length of the boundary between the two respective areas.		Screenshot 2025-12-11 at 19.19.29.png

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					• Reliance upon designation of part of the area in question (to the East of the urban area of Weston-super-Mare) as being within the Mendip Hills AONB is unsafe. North Somerset Council's own consultation page specifically states the following: 'Reliance on countryside policies alone would be unlikely to provide sufficient protection against the reduction or loss of such important gaps to development, particularly in the absence of a clear landscape harm. Without the added protection of strategic gap designation, there is a significant risk that incremental development would eventually erode the gaps, with the detrimental effects on settlement identity and character. ' • By way of further evidence, the Mendip Hills National Landscape (the body responsible for the AONB) does not currently have an active Management Plan; the last one having expired in 2024. The Management Plan is supposed to be a key document to be used by relevant Local Planning Authorities. Whilst Mendip Hills National Landscape has consulted upon the adoption of a new Management Plan, the consultation period ended in July 2025 and no successor document has yet been produced. As a consequence, there is currently no approved reference document which the relevant Local Planning Authority could rely upon to argue against development proposals. The parishioners of Bleadon should not fall victim to the inability of statutory bodies/agencies to effectively co-ordinate their activities – as is currently the case. • Furthermore, even if the draft Management Plan were to be adopted, its wording does not offer the protection which would be afforded by the introduction of a strategic gap. The Management Plan mirrors the wording of the NPPF, which states that 'the scale and extent of development in National Landscapes should be limited'. 'Should' is not an absolute and the clear implication is that development is not specifically prohibited. The introduction of a strategic gap would offer greater protections and – in the context of the AONB – better reflect the spirit of the NPPF in terms of how it should be applied in respect of National Landscapes. • The area to the South of the urban area of Weston-super-Mare (the Bleadon levels) also falls within the rural Parish boundary. Although part of the levels form a Nature Reserve, the point made above in respect of the area of AONB would – to the Council – seem to be equally applicable in respect of the Bleadon Levels. • Strategic gaps are already in place or proposed for other boundaries between the urban area of Weston-super-Mare and rural parishes. This is best illustrated by way of referencing an extract from North Somerset's own 'Key Diagram' under its Strategic Policies section. As can be seen on attached plan, with the exception of the boundary between Weston-super-Mare and rural Bleadon, all of the other boundaries to the East/South-East of the urban area of Weston-super-Mare are the subject of strategic gaps (as highlighted in orange). Two of these areas – Locking and Hutton – are in the same District Ward as Bleadon. • In terms of geographical area, the rural Parish of Bleadon is significantly bigger than the Parishes of Hutton and Locking, yet it is not referenced in the ward descriptor – which is the Hutton & Locking Ward. The Parish Council is of the view that this is significant. Bleadon is the only main rural settlement which is not directly referenced in ward descriptors and this inevitably leads to lack of clarity and democratic accountability. Whilst this has been acknowledged by North Somerset Council with assurances that the matter will be addressed as part of the next boundary review process, the Parish Council is of the view that Bleadon is often overlooked or forgotten about and that this is part of an unconscious mindset which affects many aspects of North Somerset Council's operations. The Parish Council is not suggesting that this is in anyway deliberate and when issues are raised, North Somerset Council officers and elected members respond professionally.			

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					Given all of the above, the Parish Council is unable to reconcile why a strategic gap (or gaps) has not been introduced to afford a greater degree of protection between the urban area of Weston-super-Mare and the rural Parish of Bleadon. As a consequence, the Council does not consider the Plan to be sound in respect of LP10. The Council also does not consider the Plan to be legally compliant in respect of LP10 as it would appear to rely upon documentation which does not or may not exist e.g. the Mendip Hills National Landscape Management Plan.			
Policy DP53: Best and most versatile land	No	‣ Justified ‣ Effective ‣ Consistent with national policy	No	Unsure	The reasons for Bleadon Parish Council reaching this conclusion are as follows: The Plan does not afford land used for food production sufficient protection from development (other than residential development). This is despite the fact that food security is one of the 13 national infrastructure sectors identified by the National Protective Security Authority. Conversely, DP52 (Protection of open space and recreation) – which is not land forming part of a national infrastructure sector - establishes a far higher standard of protection in that a condition of development is (amongst other aspects) a requirement for any land to be used for development purposes to be replaced 'by at least equivalent or better'. The UK is already heavily reliant upon imported food in a number of respects. The loss of any further land currently used for food production will, therefore, only serve to exacerbate the current position. DP53 states that the proportion of Grade 1 land in North Somerset is approximately 7% and 10% for Grade 2. 60% falls in Grade 3 and that the best and most versatile (BMV) land (grades 1, 2 and 3a) will be protected from significant, inappropriate and unsustainable proposals. However, there is no clear distinction between the proportion of land which is classified as Grade 3a and Grade 3b. The definition of permitted development as currently worded is where development is proposed on sites of one hectare or greater on Grade 3a BMV agricultural land, development will only be permitted if: • It is one of the exceptions listed under Grades 1 and 2; or • It is to be used for renewable energy production where the land could be returned to agriculture without a loss of quality; or • Is for aVordable housing; or • The sustainability benefits of the proposal clearly outweigh the long-term loss of the best and most versatile agricultural land. As a consequence, the protection afforded to Grade 3a land is limited and no protection is offered to Grade 3b land. Significant areas of land within the Bleadon Parish boundary currently used in relation to food production is classified as Grade 3 and this land is vulnerable to development in relation to such aspects as renewable energy development. This vulnerability is likely to be compounded by pressures upon/incentives for landowners arising from aspects such as the Biodiversity Net Gain regulations. Whilst it is recognized that the proposed wording includes reference to permission being granted only if land could be returned to agriculture without loss of quality, the wording fails to recognize the practical implications of any change of use upon existing communities. By way of an example, agreements in relation to the placing of solar panels will likely be for a number of decades and once such land is lost, the farming communities (and knowledge and skills base) will also be lost. As currently framed, the Parish Council is of the view that DP53 runs contrary to the expectations of the efficient use of land expectations as set out in paragraphs 124 to 127 of the NPPF. Specifically, the NPFF states the following:	In order to make the Plan legally compliant and sound in respect of DP53, the Parish Council would wish to see more explicit protection of Grade 3 (and above) land currently used to support food production. If North Somerset Council proposes that such protection/ clarification might come by way of the preparation of a Supplementary Planning Document, then the Parish Council would urge early completion of such a document. The Council would also suggest that there is an opportunity for the wording under DP8 (Efficient Use of Land) to be strengthened. At the moment, the wording of DP8 is heavily influenced by the NPPF in terms of housing targets. Whilst this is understandable, DP8 could be strengthened to clarify expectations around use of land to limit impacts elsewhere. A prime example of an approach which would potentially limit the impact upon agricultural land would be for DP8 to be clear on the need for solar panels on roofs rather than on agricultural land – with a corresponding cross reference to DP7 (Large scale renewable and low carbon renewable energy).		

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					Planning policies and decisions should promote an e6ective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment Planning policies and decisions should: … b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production; Planning policies and decisions need to reflect changes in the demand for land. The Parish Council is of the opinion that – in providing insufficient protection for agricultural land under DP53 – the Plan fails to meet these requirements and that there is a serious risk of agricultural land being lost to the extent that any requirements identified by the National Protective Security Agency will not be able to be met. Furthermore, the Parish Council is of the view that the plan relies upon land classifications which are out of date e.g. Chris Hinchcliff MP states, “We must urgently update our agricultural land classification. The system we use to determine potential farmland productivity is desperately out of date. It uses rainfall data from 1941 to 1970 and temperature measurements from 1961 to 1980. The impacts of climate change are already being severely felt on our farmland and intensive farming is degrading soils, with 5.3 million tonnes of organic carbon lost from our soils every year, so the likelihood is that the current agricultural land classification system substantially overestimates land productivity. We must update it.” Westminster Hall debate regarding the impact of land use change on food security (Tuesday 18 November 2025) and related Hansardtranscript.			
Land at Leighton Crescent	No	‣ Justified ‣ Effective	No	Yes	The reasons for Bleadon Parish Council reaching this conclusion are as follows: The Council’s specific concerns relate to the proposals on Bleadon Hill. The site in question is immediately adjacent to the area known as ‘Hillcote’. North Somerset Council has historically treated sites to the West of the Hillcote area as a ‘buffer zone’ separating the urban area of Weston-super-Mare and the rural area of Bleadon. Allowing development in this location would fundamentally change this position and may make it difficult for North Somerset Council – as Local Planning Authority – to defend against subsequent applications for development further East along Bleadon Hill and South towards the village centre. Retention of the existing designation of these sites would also ensure that development could only be considered through the prism of rural exception sites.	The Council would strongly urge North Somerset Council to maintain its strategic approach.		
Schedule 3: Local Green Space	No	‣ Effective	Unsure	Unsure	Bleadon Parish Council is of the opinion that the area of Public Open Space identified by way of planning permission 19/P/0835/OUT (the development of the former quarry site) should be included within the relevant schedule and afforded the same degree of status and protection as other sites within the schedule. This land will be the only significant parcel of public open space land within the entire parish, and it is important that it is recognized as such and formally protected through the Local Plan.	Inclusion of the area of Public Open Space identified by way of planning permission 19/P/0835/OUT		

Name: Bloor Homes (North of Pound Lane Nailsea site) **I.D:** 63114593

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SP1: Sustainable Development	No	• Positively prepared • Justified • Effective • Consistent with national policy		No	Policy SP1: Sustainable Development The starting point for defining 'sustainable development' is Paragraph 8 of the NPPF. However, the draft Policy does not make reference to the NPPF, other than in the supportive text. For the clarity of interpretation, it is suggested that specific reference is made to the NPPF (and a caveat included that the latest NPPF/government definition of Sustainable Development should be used at the time of decision making). We suggest that this policy is shortened, to focus on the aspiration to achieve Sustainable Development within North Somerset, and what this means locally. Supporting text states, the draft policy sets an 'Overall Framework' for other policies in the plan, the principles are then articulated in more detail in the other strategic policies. As specific requirements are set out in other draft policies, it is unclear how this policy will be implemented & subsequently monitored. As such, it is not clear how this policy will be truly effective (in contradiction with Paragraph 36 of the NPPF). Further, many of the bullet points would not be applicable to some types of development. It would be more effective for the policy to contain a more limited number of criteria. Some of the points also have the potential to be overly onerous and restrictive if interpreted literally, it offers no caveats or flexibility to allow for good planning judgement to be applied. This is in contradiction with Paragraph 9 of the NPPF which states the objectives of Sustainable Development are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area. Based on the above, it is recommended this Policy is amended.	It is suggested that specific reference is made to the NPPF (and a caveat included that the latest NPPF/ government definition of Sustainable Development should be used at the time of decision making). We suggest that this policy is shortened, to focus on the aspiration to achieve Sustainable Development within North Somerset, and what this means locally. It would be more effective for the policy to contain a more limited number of criteria. Some of the points also have the potential to be overly onerous and restrictive if interpreted literally, it offers no caveats or flexibility to allow for good planning judgement to be applied. This is in contradiction with Paragraph 9 of the NPPF which states the objectives of Sustainable Development are not criteria against which every decision can or should be judged		BLOA3068 - Nailsea - North Somerset Local Plan Regulation 19 Consultation - Dec 25.pdf
SP2: Climate Change	No	• Positively prepared • Justified • Effective • Consistent with national policy		No	Policy SP2: Climate change Strategic Policy SP2 sets out the overarching principles for how development should address both climate change mitigation and adaptation, this includes a number of key requirements around resource use, net zero, energy generation, climate resilience, transport, and green infrastructure. The updated Regulation 19 consultation makes no substantial changes to this policy. While the objective of the policy is welcomed there are elements which need to be reviewed to ensure alignment with subsequent sustainability policies. The UK Climate Projections (UKCP18) set out the likely effects of climate change in the UK, these include increasing annual temperatures, increasing winter rainfall and decreasing summer rainfall as a result of increasing global temperatures, driven by GHG emissions. How development contributes to tackling climate change mitigation and adaptation is therefore a key consideration. We fully support the inclusion of the climate 15 change strategic policy and setting out the overarching aims for development in North Somerset. It is noted that elements of the development expectations include the phrases 'minimise' and 'maximise'. By stating 'minimising' or maximising' the policy sets an open-ended requirement which itself is not fully tested as part of the viability considerations for subsequent Policies including Policy DP5, and Policy DP6. We have recent examples of Local Authorities using the overarching text to maximise or minimise specific requirements for new development which are outside of the intent of the Plan policies and were not considered as part of the preparation of the Plan.	Re Policy SP2: (delete "Maximise") (add "Reduce") water (delete "re-")use and (add "prioritise") the protection of water resources; • (delete "Minimise") (add" Reduce") energy use and deliver (delete "a net zero energy standard in new buildings"); (add "Net Zero Ready buildings"); • (delete "Maximise") Incorporate the generation of energy from renewable and low carbon sources of energy;		BLOA3068 - Nailsea - North Somerset Local Plan Regulation 19 Consultation - Dec 25.pdf

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					There is therefore the potential for interpretation of policies leading to unintended consequences of this wording which could supersede requirements set out in the subsequent Development Management Policies. Given the accompanying evidence base and viability assessment considers a specific set of performance targets and requirements elements it is recommended that the wording is updated as below to be more reflective of the intent of the policy in setting out the overarching strategy of the policy. • (delete "Maximise") (add "Reduce") water (delete "re-")use and (add "prioritise") the protection of water resources; • (delete "Minimise") (add" Reduce") energy use and deliver (delete "a net zero energy standard in new buildings"); (add "Net Zero Ready buildings"); • (delete "Maximise") Incorporate the generation of energy from renewable and low carbon sources of energy;			
SP3: Spatial strategy	No	• Positively prepared • Justified • Effective • Consistent with national policy		No	The stated Spatial Strategy (SP3) is logical for North Somerset on the basis of the ability to locate new development within or close to existing urban areas where there is greatest potential to access a wide range of facilities, services and jobs, and there are opportunities to use existing or enhanced active travel and public transport routes. However, the Spatial Strategy is stated in general terms only with no detail in terms of any settlement hierarchy or the specific locations, or areas, where new development might be encouraged (or conversely might be restricted). It is considered that there is considerable scope to add additional clarity and detail to the proposed Spatial Strategy (Policy SP3) in the interests of the overall effectiveness of the plan. Distribution of Housing The draft policy states that priority will be given to locating new residential and mixed⟐use development in or close to urban areas where there is an existing or proposed wide range of facilities, services and jobs, and there are opportunities to encourage active travel. The approach taken in Draft Policy SP8 confirms that 15% of housing will be provided across Nailsea and Backwell. The proportion of housing delivery in villages and rural areas has reduced from 23% to 12% from the last Regulation 19 consultation. This amended approach is broadly supported, and better reflects the spatial strategy in Policy SP3. However, more can be done in our view in terms of prioritising development at the main towns in North Somerset in line with spatial strategy. Sequentially, existing towns must be preferred as locations for sustainable growth, ahead of the larger villages, consistent with the current settlement hierarchy and spatial strategy in the current adopted local plan, and also the spatial strategy in the emerging local plan. The Council, within its consultation paper on additional sites, and in a number of earlier reports to Executive and other committees, set out a clear hierarchy to follow when considering the allocation of additional sites, as follows: (a) Sites outside the Green Belt, but well related to the towns (b) Sites outside the Green Belt, but well related to the larger villages. (c) Sites in the Green Belt well related to the towns, including Bristol. (d) Sites in the Green Belt well related to the larger villages. (e) Elsewhere. The above hierarchy provides a logical approach to identifying sites for new development in the most sustainable locations, consistent with the emerging spatial strategy and in a manner that is also consistent with national policy (with consistency with the NPPF being a clear test of Soundness). As such, sequentially, where there is a need for the release	The Draft Policy SP3 should be amended to recognise that the delivery of sustainable development should follow the sequential approach, where existing towns must be preferred as locations for sustainable growth, ahead of the larger villages. Delivery of housing within or adjoining existing settlement boundaries of existing towns (including Nailsea) should be considered acceptable		BLOA3068 - Nailsea - North Somerset Local Plan Regulation 19 Consultation - Dec 25.pdf

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					of sites from the Green Belt (which we agree there is), suitable sites in the Green Belt adjoining existing towns (Portishead, Clevedon and Nailsea) must be identified/prioritised, before any sites in the Green Belt at larger villages (particularly where such sites would be on land classified as grey belt), including Backwell and Pill. The emerging plan now seeks to provide 15% of housing across Nailsea and Backwell. The previous version of the plan did not specifically list Backwell in the list of settlements (stating that 6% of housing would be provided in Nailsea). From reviewing the large site allocations listed within the emerging Local Plan, of the housing now proposed across the two settlements, circa 52% is to be provided in Nailsea and 48% is to be provided in Backwell. Backwell is defined as a village in the Local Plan, whereas Nailsea is a defined town within the emerging Plan. Nailsea is one of the largest settlements in the authority boundary; it has a vast range of services and facilities and is highly accessible. Our view remains that following the sequential approach set out above, suitable sites adjoining existing towns must be prioritised, before any sites in the Green Belt at larger villages. On this basis, the Draft Policy SP3 should be amended to recognise that the delivery of sustainable development should follow the sequential approach, where existing towns must be preferred as locations for sustainable growth, ahead of the larger villages. Delivery of housing within or adjoining existing settlement boundaries of existing towns (including Nailsea) should be considered acceptable.			
SP5: Towns	No	• Positively prepared • Justified • Effective • Consistent with national policy		No	Policy SP5 (Towns) and SP6 (Villages and Rural Areas) The general approach taken with the development strategy at Towns and Villages & Rural Areas is supported. However, the sequential approach set out by these policies has not been wholly followed through in the final strategy for growth (Policy SP3) and the draft site allocations that have been identified. As set out above, Policy SP3 states that priority will be given to locating new residential and mixed-use development in or close to urban areas where there is an existing or proposed wide range of facilities, services and jobs, and there are opportunities to encourage active travel. The justification text under policy SP5 recognises that Towns are the most sustainable locations within North Somerset. Similarly, the justification text for Policy SP6 confirms that the rural areas are relatively less sustainable given the absence of a range of services, facilities and job opportunities. There are inconsistencies in the proposed policy and draft housing allocations. It seems that villages have been considered areas appropriate for higher or equal levels of growth to defined Towns.	There are inconsistencies in the proposed policy and draft housing allocations. It seems that villages have been considered areas appropriate for higher or equal levels of growth to defined Towns.		BLOA3068 - Nailsea - North Somerset Local Plan Regulation 19 Consultation - Dec 25.pdf
SP6: Villages and rural areas	No	• Positively prepared • Justified • Effective • Consistent with national policy		No	Policy SP5 (Towns) and SP6 (Villages and Rural Areas) The general approach taken with the development strategy at Towns and Villages & Rural Areas is supported. However, the sequential approach set out by these policies has not been wholly followed through in the final strategy for growth (Policy SP3) and the draft site allocations that have been identified. As set out above, Policy SP3 states that priority will be given to locating new residential and mixed-use development in or close to urban areas where there is an existing or proposed wide range of facilities, services and jobs, and there are opportunities to encourage active travel. The justification text under policy SP5 recognises that Towns are the most sustainable locations within North Somerset. Similarly, the justification text for Policy SP6 confirms that the rural areas are relatively less sustainable given the absence of a range of services, facilities and job opportunities.	There are inconsistencies in the proposed policy and draft housing allocations. It seems that villages have been considered areas appropriate for higher or equal levels of growth to defined Towns.		

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					There are inconsistencies in the proposed policy and draft housing allocations. It seems that villages have been considered areas appropriate for higher or equal levels of growth to defined Towns.			
SP7: Green Belt	No	• Positively prepared • Justified • Effective • Consistent with national policy		No	Policy SP7: Green Belt It is agreed that there are exceptional circumstances which justify the revision of the Green Belt boundary within North Somerset as part of the plan review. The fact that a review of the Green Belt has been undertaken is a positive approach for the plan to take. Land North of Pound Lane The proposed allocation of residential development on Land North of Pound Lane is supported. From reviewing the Policy Map and Schedule 1 of the emerging plan, it confirms the northern parcel will remain within the Green Belt, to provide ecological mitigation associated with the southern parcel. The proposed location for the repositioned Green Belt boundary is supported in principle. The site requirements listed in Schedule 1 are considered in further detail at Table 2.1 of our submission. Meeting the 'Golden Rules' Set Out in the NPPF: The draft policy states new residential development will only be permitted on land released from the Green Belt, where it is demonstrated how the development meets the 'Golden Rules' requirements as set out in the NPPF. Paragraph 151 of the NPPF confirms that where Green Belt land is released for development trough plan preparation or review, the 'Golden Rules' set out in paragraph 156 of the NPPF should apply. These 'Golden Rules' require: • The delivery of affordable housing, at a percentage that is (with regards to plan making) 15% above the highest affordable housing requirement, subject to a cap of 50%, and subject to viability assessment through the plan (following national planning practice guidance). • The securing of contributions towards necessary improvements to local and national infrastructure. • The provision of new, or improved, green space that are accessible to the public. It is considered the viability of providing 50% AH on GB sites should be tested and evidenced as part of the emerging local plan. The viability assessment that supports the emerging Local Plan does not test this scenario. It tests various levels up to 40% on greenfield sites but not 50%. Given the plan now includes for 30%, on greenfield sites elsewhere, it suggests 40% was found to not be a viable option, let alone 50% provision. It is worth noting that construction costs have increased, whilst market values have not risen. Indeed, respondents to the MHCLG NPPF (published in Dec 2024) consultations including RICS and HBF raised viability concerns, and supplied case studies highlighting that there would be few if any areas where 50% is achievable, highlighting the risk of allocating land and it then not coming forward for housing early in the plan period. It is therefore considered thateeting the 'Golden Rules' Set Out in the NPPF	The viability of providing 50% AH on GB sites should be tested and evidenced as part of the emerging local plan. The viability assessment that supports the emerging Local Plan does not test this scenario. It tests various levels up to 40% on greenfield sites but not 50%. Given the plan now includes for 30%, on greenfield sites elsewhere, it suggests 40% was found to not be a viable option, let alone 50% provision. So further evidence is required to appropriately justify the position in line with NPPF.		BLOA3068 - Nailsea - North Somerset Local Plan Regulation 19 Consultation - Dec 25.pdf
SP8: Housing	No	• Positively prepared • Justified • Effective • Consistent with national		No	The Plan as proposed risks not allowing for sufficient time (15 years from adoption) to meet a basic requirement for strategic polices set by national policy. A longer plan period is required to ensure that the plan for North Somerset covers a period of at least 15 years from adoption, with a longer period likely to enable the Council to more effectively plan for future development in the area. The plan must be extended to 2041 as a minimum. • There is concern, and risks in respect of the soundness of the Plan as	A longer plan period is required A higher housing requirement should be set to address affordable housing needs and to also accommodate some of Bristol's unmet needs. Lack of housing delivery trajectory has been provided for the Plan as a whole, or for the specific sites which are identified as part of the proposed		

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		policy			proposed where, whilst seeking to meet the minimum level of housing need identified using the standard method, there is evidence to suggest that a higher housing requirement should be set to address affordable housing needs and to also accommodate some of Bristol's unmet needs. • There is concern, and risks in respect of the soundness of the Plan as proposed, where no housing delivery trajectory has been provided for the Plan as a whole, or for the specific sites which are identified as part of the proposed strategic policies. This should be addressed as part of the submission of the plan	strategic policies, which should be addressed.		
SP11: Historic and natural environment	No	• Positively prepared • Justified • Effective • Consistent with national policy		No	Policy SP11 (Historic and Natural Environment) We support the broad aims and aspirations of this draft policy. However, we do have concerns regarding the wording and the level of detail the policy seeks to set out. Some of the terminology proposed is vague at present, and we consider it may be challenging/difficult for planning applications to demonstrate how they adhere to the various requirements. It is in contradiction with part (d) of paragraph 16 of the NPPF which states plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. We welcome the caveat at the start of the second paragraph in the policy that confirms the bullet point examples apply only 'where appropriate', albeit some of the detail may be best refined and streamlined to be less generic. Alternatively, some of the lengthy wording may be better captured as accompanying paragraphs to support the policy itself	Some of the policy detail may be best refined and streamlined to be less generic. Alternatively, some of the lengthy wording may be better captured as accompanying paragraphs to support the policy itself		BLOA3068 - Nailsea - North Somerset Local Plan Regulation 19 Consultation - Dec 25.pdf
Policy DP1: High quality design	No	• Positively prepared • Justified • Effective • Consistent with national policy		No	Policy DP1 (High Quality Design) Our comments from representations submitted with the previous Regulation 19 Consultation in January 2024 remain. Policy DP1 has support from national policy and other guidance in respect of supporting high quality design, to ensure that high quality new development is delivered in North Somerset. However, in common with other policies, the wording is lengthy and there are numerous detailed criteria, much of which is likely to be better placed in supporting text, or even other supporting design guidance, rather than an overarching design quality policy for the Local Plan. It is suggested that this policy is reviewed to be more concise and focused on the key aspects of successful high-quality design for North Somerset, including referencing other national design guidance or policy as necessary, with then more detail placed in supporting text or other supplementary documents.	It is suggested that this policy is reviewed to be more concise and focused on the key aspects of successful high-quality design for North Somerset, including referencing other national design guidance or policy as necessary, with then more detail placed in supporting text or other supplementary documents.		BLOA3068 - Nailsea - North Somerset Local Plan Regulation 19 Consultation - Dec 25.pdf
Policy DP6: Net zero construction	No	• Positively prepared • Justified • Effective • Consistent with national policy		No	As noted in great detail in our submission, there are a number of potential issues with the requirements set out in Policy DP6. In the first instance the Government's December 2023 WMS and subsequent legal challenges and opinions note that local policies can be put in place where they are consistent with national policy and are appropriately evidenced. There are a number of other issues with the requirements of Policy DP6 and focus on minimising energy demand which are contrary to the WMS and the evidence set out in the 2023 FHS and FBS consultation and not consistent with the approach set out through National Policy.	A number of recommendations are set out above and the changes proposed are set out below to ensure that Policy DP6 aligns with national guidance, is deliverable and viable. Policy DP6: Net zero construction All development must be designed to minimise its impact on the		BLOA3068 - Nailsea - North Somerset Local Plan Regulation 19 Consultation - Dec 25.pdf

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					We also have concerns about how the viability of Policy DP6 has been considered, noting that the costs used do not align with the Government's FHS and FBS consultation. In this context a number of recommendations are set out above and the changes proposed are set out below to ensure that Policy DP6 aligns with national guidance, is deliverable and viable.	environment and create high quality internal and external spaces for people to use. Proposals must demonstrate that all resources are used efficiently, as part of the construction and operation of a building. • All development must follow the principles of the energy hierarchy to ensure that the design of a building prioritises energy reduction through highly energy efficient fabric measures, lighting, ventilation, and orientation. Once energy demand is minimised and efficiency design measures are in place, renewable energy technologies will be used to meet residual energy demand. • All new buildings will be required to achieve net zero operational energy compliance in respect of (delete "both") regulated (delete "and unregulated") energy and minimise embodied carbon. • All new development should seek to minimise embodied carbon in respect of both upfront (emissions associated with raw materials, transportation, manufacturing and construction) and whole life carbon. For development of more than 50 dwellings, or in excess of 5,000m² non-residential floorspace, (add "full planning applications, or Reserved Matters applications") (delete "proposals") must be accompanied by an embodied carbon assessment which demonstrate that upfront embodied carbon emissions do not exceed 750kg CO2e/m². • The retention of existing buildings will usually be given preference to their demolition. Retrofitting energy efficiency measures in existing buildings will be supported and significant weight will be given to the benefits of development resulting in considerable improvements to energy efficiency. All proposals must demonstrate high standards of insulation and Passivhaus Enerphit standards are encouraged. Net zero operational energy: residential		

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						• In order to demonstrate compliance with the net zero operational energy requirement, all new residential buildings must demonstrate through an energy statement, that the following have been achieved: • No on-site use of fossil fuels; • (add "Meet the requirements of the FHS") • (delete "Ultra low energy use, to be demonstrated through: Space heating demand of less than 15kWh/m²/year ") • (delete "Overall operational energy use of less than 35kWh/m²/year; and") • On-site renewable energy generation is (add "provided in line with the Future Homes Standard"), (delete "maximised, equivalent to at least the onsite energy demand.") • Alternatively, compliance can be demonstrated through Passivhaus Plus Standard accreditation, using the Passivhaus Planning Package. Net zero operational energy: non-residential In order to demonstrate net zero operational energy, all new non-residential buildings must demonstrate through an energy statement, that the following have been achieved: • No use of on-site fossil fuels; • Energy use is minimised (add "as far as practical and feasible"), appropriate to the end use; • On-site renewable energy generation is (add "provided in line with the Future Buildings Standard") (delete "maximised, equivalent to at least the onsite energy demand; and") • (delete "The end users report their energy use in operation for five years post-completion".) Alternatively, compliance can be demonstrated by using BREEAM Excellent level accreditation, (add		

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						"where feasible targeting an") outstanding level for energy use (Credit Ene01). An alternative compliance route may be allowed with prior agreement. Renewable Energy Offsetting (add "Where feasible and viable") residual energy demand should be met through the generation of onsite renewable energy, but if this is not technically feasible, the requirement may be met elsewhere by means of offsite renewable energy generation, (add "either through a contribution to the Council's offsetting scheme or via a renewable energy generation scheme approved by the Local Authority.") All development must demonstrate measures to minimise potable water use (delete "and") , (add "residential development should") aim to achieve an estimated water consumption of no more than 100litres/person/day, (add "and non-residential development should aim to achieve the equivalent of 2 BREEAM Version 6 Wat 01 Water Efficiency credits"). All measures will optimise water use systems and may include rainwater harvesting and other mechanisms for recycling and reusing water on-site. All development will need to demonstrate measures to reduce the risk of the building overheating. Energy use intensity and space heating targets should be prioritised regardless of any district heating connection and all reasonable efforts should be made to meet these requirements prior to buildings connecting to a district heating network. (Add "Connection to any district heating network should follow the guidance set out as part of the FHS and FBS to ensure development is connecting to low carbon heat.")		
Policy DP8: Efficient use of land	No	• Positively prepared • Justified • Effective		No	Policy DP8: Efficient use of land Our comments from representations submitted with the previous Regulation 19 Consultation in January 2024 remain. It is clearly desirable for all new development to ensure that effective and	It is suggested the policy wording be amended for clarity to state that an average target density of 40dph will be sought, with lower or higher densities having regard to accessibility and other design		BLOA3068 - Nailsea - North Somerset Local Plan Regulation 19

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		• Consistent with national policy			efficient use of land, informed by local context and the specific requirements of the development being considered. The policy requirement of a minimum target density of 40dph may not be desirable in all locations as part of a comprehensive and well considered design approach. It is noted the supporting text clarifies that this is an average density, but this is not clear from the policy wording. It is suggested the policy wording be amended for clarity to state that an average target density of 40dph will be sought, with lower or higher densities having regard to accessibility and other design considerations.	considerations.		Consultation - Dec 25.pdf
Policy DP37: Trees, Woodlands and Hedges	No	• Positively prepared • Justified • Effective • Consistent with national policy		No	DP37 (Trees, woodland and hedges) Our comments from representations submitted with the previous Regulation 19 Consultation in January 2024 remain. In common with other policies, the wording is lengthy and there are numerous detailed criteria, much of which is likely to be better placed in supporting text, or even other supporting design guidance, rather than an overarching design quality policy for the Local Plan. It is suggested that this policy is reviewed to be more concise and focused on the key aspects of successful tree / hedge / woodland provision. This should include referencing other national guidance or policy as necessary, with then more detail placed in supporting text or other supplementary documents	It is suggested that this policy is reviewed to be more concise and focused on the key aspects of successful tree / hedge / woodland provision. This should include referencing other national guidance or policy as necessary, with then more detail placed in supporting text or other supplementary documents		BLOA3068 - Nailsea - North Somerset Local Plan Regulation 19 Consultation - Dec 25.pdf
Policy DP43: Affordable housing (including rural exception schemes)	No	• Positively prepared • Justified • Effective • Consistent with national policy		No	Policy DP43: Affordable housing (including rural exception schemes) It is considered the viability of providing 50% AH on GB sites should be tested and evidenced as part of the emerging local plan. The viability assessment that supports the emerging Local Plan does not o test this scenario. It tests various levels up to 40% on greenfield sites but not 50%. Given the plan now includes for 30%, on greenfield sites elsewhere, that confirms the position that 40% affordable housing delivery would lead to viability challenges, let alone 50% provision. It's worth noting that construction costs have increased and market values have reduced. Indeed, respondents to the MHCLG NPPF (published in Dec 2024) consultations including RICS and HBF raised viability concerns, and supplied case studies highlighting that there would be few if any areas where 50% is achievable, highlighting the risk of allocating land and it then not coming forward for housing early in the plan period. It is therefore considered that further evidence is required to appropriately justify the position in line with NPPF	It is considered that further evidence is required to appropriately justify the position in line with NPPF		BLOA3068 - Nailsea - North Somerset Local Plan Regulation 19 Consultation - Dec 25.pdf
Land off Pound Lane, Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy		No		We have suggested some minor policy changes to the site◈specific policy requirements for land North of Pound Lane in Schedule 1. We set out adjustments to provide some flexibility which, in our view, will support high quality sustainable development on the Site in coming forward, including:. -the schedule be updated to reflect drainage solutions may	Land North of Pound Lane The proposed allocation of residential development on Land North of Pound Lane is supported. From reviewing the Policy Map and Schedule 1 of the emerging plan, it confirms the northern parcel will remain within the Green Belt, to provide ecological mitigation associated with the	BLOA3068 - Nailsea - North Somerset Local Plan Regulation 19 Consultation - Dec 25.pdf

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						also be provided within this northern strip – such drainage in itself can offer ecological benefits. -the policy should be clear that drainage attenuation within the northern part of the site is suitable. In addition, it would be helpful to explain within the site policy requirements the rationale for this restriction to 2l/s/ha. - it is recommended that the wording be changed to ‘take account of key views and preserve where possible’. -it would be helpful for the policy to be amended as follows: “A planning application on the site shall be supported by a Heritage Assessment and Masterplan which demonstrate how key views from heritage assets, as set out in the Historic Environment Assessment (HEA), have been taken into account and preserved where possible.” The requirement that tree boundaries be retained and created to maintain rural views from Tickenham Church and Cadbury Camps should be amended to state ‘where possible’ to ensure appropriate flexibility is built in.	southern parcel. The proposed location for the repositioned Green Belt boundary is supported in principle. Regarding site requirements listed in Schedule 1: This proposed Green Belt boundary is supported, ecological mitigation can be accommodated on the northern parcels. Given the environmental considerations on he site, it is considered the schedule be updated to reflect drainage solutions may also be provided within this northern strip – such drainage in itself can offer ecological benefits. As the watercourse borders the northern nedge, and the northern strip will be retained in the Green Belt, this is can be accommodated. Overland flows and attenuations volumes required on the Site can be suitable considered and addressed by the emerging development proposals on the Site. Whilst restricted down to 2l/s/ha will increase the required attenuation on Site, this can be accommodated by the proposals although, as per our comments above, the policy should be clear that drainage attenuation within the northern part of the site is suitable. In addition, it would be helpful to explain within the site policy requirements the rationale for this restriction Flexibility should be built into this requirement to ensure the developable area can be maximised when having due consideration of the environmental considerations on site. It is expected that contributions required to schemes identified in the Nailsea and Backwell Transport Strategy.will be appropriately calculated and methodology shared. No objection to the requirement	

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							for active travel provision along site frontage on Pound Lane, and active travel priority crossing required on Pound Lane and Clevedon Road. No objection to the requirement for direct access to public right of way A13/11/30 . Whilst the development can take account of access proposals for Land North of Nailsea, it is expected that the main access for the Site will be from Pound Lane itself and the Site could be delivered without any new junction or roundabout on the B3130, but equally would not prejudice a future access in that location from being developed, as part of 'Land North of Nailsea'. As such, it would be helpful if the policy could be amended to confirm that this is "...as required." Whilst any future development will have regard to heritage assets surrounding the site, this policy requirement is too prescriptive and rather that 'preserve key views', it is recommended that the wording be changed to 'take account of key views and preserve where possible'. It is also expected that a future application will be supported by its own heritage assessment, and it would be helpful for the policy to be amended as follows: "A planning application on the site shall be supported by a Heritage Assessment and Masterplan which demonstrate how key views from heritage assets, as set out in the Historic Environment Assessment (HEA), have been taken into account and preserved where possible." There is no need for the specific policy requirement that the view from B3130 to Tickenham Church be preserved. No objection to archaeological assessment required. What is considered to be 'traditional scale' and an 'attractive vernacular' is ambiguous. Detailed building	

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							matters should be dealt with by other plan polices, if specific local standards are justified. This aspect of the policy is not sufficiently precise and the language of this requirement is ill-defined. The requirement that tree boundaries be retained and created to maintain rural views from Tickenham Church and Cadbury Camps should be amended to state ‘where possible’ to ensure appropriate flexibility is built in.	

Name: Bloor Homes South West **I.D:** 31088129

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SP1: Sustainable Development	No	• Positively prepared • Justified • Effective • Consistent with national policy		No	Policy SP1: Sustainable Development The starting point for defining ‘sustainable development’ is Paragraph 8 of the NPPF. However, the draft Policy does not make reference to the NPPF, other than in the supporting text. For the clarity of interpretation, it is suggested that specific reference is made to the NPPF (and a caveat included that the latest NPPF/government definition of Sustainable Development should be used at the time of decision making). We suggest that this policy is shortened, to focus on the aspiration to achieve Sustainable Development within North Somerset, and what this means locally. Supporting text states that, the draft policy sets an ‘Overall Framework’ for other policies in the plan, the principles are then articulated in more detail in the other strategic policies. As specific requirements are set out in other draft policies, it is unclear how this policy will be implemented and subsequently monitored. As such, it is not clear how this policy will be truly effective (in contradiction with Paragraph 36 of the NPPF). Further, many of the bullet points would not be applicable to some types of development. It would be more effective for the policy to contain a more limited number of criteria. Some of the points also have the potential to be overly onerous and restrictive if interpreted literally, it offers no caveats or flexibility to allow for good planning judgement to be applied. This contrasts with Paragraph 9 of the NPPF which states the objectives of Sustainable Development are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area. Based on the above, it is recommended this Policy is amended.	The draft Policy does not make reference to the NPPF, other than in the supporting text. For the clarity of interpretation, it is suggested that specific reference is made to the NPPF (and a caveat included that the latest NPPF/government definition of Sustainable Development should be used at the time of decision making). We suggest that this policy is shortened, to focus on the aspiration to achieve Sustainable Development within North Somerset, and what this means locally.		BLOA3050 - Portishead Reps - NS Local Plan Regulation 19 - Turley Updated (V2).pdf
SP2: Climate Change	No	• Positively prepared • Justified • Effective • Consistent with national policy		No	Policy SP2: Climate change Strategic Policy SP2 sets out the overarching principles for how development should address both climate change mitigation and adaptation, this includes a number of key requirements around resource use, net zero, energy generation, climate resilience, transport, and green infrastructure. The updated Regulation 19 consultation makes no substantial changes to this policy. While the objective of the policy is welcomed there are elements which need to be reviewed to ensure alignment with subsequent sustainability policies. The UK Climate Projections (UKCP18) set out the likely effects of climate change in the UK, these include increasing annual temperatures, increasing winter rainfall and decreasing summer rainfall as a result of increasing global temperatures, driven by GHG emissions. How development contributes to tackling climate change mitigation and adaptation is therefore a key consideration. We fully support the inclusion of the climate change strategic policy and setting out the overarching aims for development in North Somerset. It is noted that elements of the development expectations include the phrases ‘minimise’ and ‘maximise’.	It is recommended that the wording is updated as below to be more reflective of the intent of the policy in setting out the overarching strategy of the policy • Maximise Reduce water re-use and prioritise the protection of water resources; • Minimise Reduce energy use and deliver a net zero energy standard		BLOA3050 - Portishead Reps - NS Local Plan Regulation 19 - Turley Updated (V2).pdf

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					By stating ‘minimising’ or ‘maximising’ the policy sets an open-ended requirement which itself is not fully tested as part of the viability considerations for subsequent Policies including Policy DP5, and Policy DP6. We have recent of Local Authorities using the overarching text to maximise or minimise specific requirements for new development which are outside of the intent of the Plan policies and were not considered as part of the preparation of the Plan. There is therefore the potential for interpretation of policies leading to unintended consequences of this wording which could supersede requirements set out in the subsequent Development Management Policies. Given the accompanying evidence base and viability assessment considers a specific set of performance targets and requirements elements it is recommended that the wording is updated as below to be more reflective of the intent of the policy in setting out the overarching strategy of the policy • Maximise Reduce water re-use and prioritise the protection of water resources; • Minimise Reduce energy use and deliver a net zero energy standard in new buildings; Net Zero Ready buildings; • Maximise Incorporate the generation of energy from renewable and low carbon sources of energy.	in new buildings; Net Zero Ready buildings; • Maximise Incorporate the generation of energy from renewable and low carbon sources of energy.		
SP3: Spatial strategy	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy		No	Policy SP3: Spatial strategy The stated Spatial Strategy (SP3) is logical for North Somerset on the basis of the ability to locate new development within or close to existing urban areas where there is greatest potential to access a wide range of facilities, services and jobs, and there are opportunities to use existing or enhanced active travel and public transport routes. However, the Spatial Strategy is stated in general terms only with no detail in terms of any settlement hierarchy or the specific locations, or areas, where new development might be encouraged (or conversely might be restricted). It is considered that there is considerable scope to add additional clarity and detail to the proposed Spatial Strategy (Policy SP3) in the interests of the overall effectiveness of the plan. Distribution of Housing The draft policy states that priority will be given to locating new residential and mixed⟐use development in or close to urban areas where there is an existing or proposed wide range of facilities, services and jobs, and there are opportunities to encourage active travel. The approach taken in Draft Policy SP8 confirms that 7% of housing will be delivered in Portishead (an increase from 5% in the previous Regulation 19 consultation). The proportion of housing delivery in villages and rural areas has reduced from 23% to 12% from the last Regulation 19 consultation. This amended approach is broadly supported, and better reflects the spatial strategy in Policy SP3. However, more can be done in terms of prioritising development at the main towns in North Somerset in line with spatial strategy. Sequentially, existing towns must be preferred as locations for sustainable growth, ahead of the larger villages, consistent with the current settlement hierarchy and spatial strategy in the current adopted local plan, and also the spatial strategy in the emerging local plan. The Council, within its consultation paper on additional sites, and in a number of earlier reports to Executive and other committees, set out a clear hierarchy to follow when considering the allocation of additional sites, as follows: (a) Sites outside the Green Belt, but well related to the towns (b) Sites outside the Green Belt, but well related to the larger villages. (c) Sites in the Green Belt well related to the towns, including Bristol. (d) Sites in the Green Belt well related to the larger villages. (e) Elsewhere. The above hierarchy provides a logical approach to identifying sites for new development in the most sustainable locations, consistent with the emerging spatial strategy and in a manner that is also consistent with national policy (with consistency with the NPPF being a clear test of Soundness). As such, sequentially, where there is a need for the release of sites from the Green Belt (which we agree there is), suitable sites in the Green Belt adjoining existing towns (Portishead, Clevedon and Nailsea) must be identified/prioritised, before any sites in the Green Belt at larger villages (particularly where such sites would be on land classified as grey belt), including Backwell and Pill. The emerging plan now seeks to provide 15% of housing across Nailsea and Backwell. The previous version of the plan did not specifically list Backwell in the list of settlements (stating that 6% of housing would be provided in Nailsea). From reviewing the large site allocations listed within the emerging Local Plan, of the housing now proposed across the two settlements, circa 52% is to be provided in Nailsea and 48% is to be provided in Backwell. Further, of the 1683 homes allocated at Backwell, 83% is to be provided from two strategic allocations. Grove Farm is proposed to deliver 515 dwellings. That site has a resolution to grant consent subject to legal agreement. Land east of Backwell is proposed to provide	The Draft Policy SP3 should be amended to recognise that the delivery of sustainable development should follow the sequential approach, where existing towns must be preferred as locations for sustainable growth, ahead of the larger villages. Delivery of housing within or adjoining existing settlement boundaries of existing towns (including Portishead) should be considered acceptable.		BLOA3050 - Portishead Reps - NS Local Plan Regulation 19 - Turley Updated (V2).pdf

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					889 dwellings. It is a new allocation and represents land that will be released from the green belt. Backwell is defined as a village in the Local Plan, whereas Portishead is a defined town within the emerging Plan. It is the second largest town after Weston so is clearly an appropriate location for more growth. The town has a vast range of services and facilities and is highly accessible. Our view remains that following the sequential approach set out above, suitable sites adjoining existing towns must be prioritised and maximised for development to their full ability, before any sites in the Green Belt at larger villages. Taking the above into consideration, we are therefore of the view that releasing all of the promoted land (HE20124) at Black Rock, Portishead represents an opportunity to both: • Follow the sequentially preferable approach to releasing land from the green belt, particularly given the land is considered to be grey belt. Further detailed comments on this are provided in relation to draft policy SP7. However, it is worth noting the Council's emerging evidence base, together with comprehensive favourable EIA scoping opinion (2018), site-specific landscape and ecological work supports the promoted land definition as 'grey belt'. The removal of the whole parcel would therefore be in accordance with national policy. • Assist with unlocking a medium sized site to support overall housing delivery, viability and affordable housing provision within the plan period. On this basis, the Draft Policy SP3 should be amended to recognise that the delivery of sustainable development should follow the sequential approach, where existing towns must be preferred as locations for sustainable growth, ahead of the larger villages. Delivery of housing within or adjoining existing settlement boundaries of existing towns (including Portishead) should be considered acceptable.			
SP5: Towns	No	• Positively prepared • Justified • Effective • Consistent with national policy		No	Policy SP5 (Towns) and SP6 (Villages and Rural Areas) The general approach taken with the development strategy at Towns and Villages & Rural Areas is supported. However, the sequential approach set out by these policies has not been wholly followed through in the final strategy for growth (Policy SP3) and the draft site allocations that have been identified. As set out above, Policy SP3 states that priority will be given to locating new residential and mixed-use development in or close to urban areas where there is an existing or proposed wide range of facilities, services and jobs, and there are opportunities to encourage active travel. The justification text under policy SP5 recognises that Towns are the most sustainable locations within North Somerset. Similarly, the justification text for Policy SP6 confirms that the rural areas are relatively less sustainable given the absence of a range of services, facilities and job opportunities. From reviewing the strategic housing allocations listed in Schedule 1 of the emerging plan, 1683 homes are allocated at Backwell (a village), but 1,347 homes are allocated at Portishead (a town). The figure for Portishead includes 785 homes at Wyndham Way, despite the Council's own evidence base confirming that only 485 homes are deliverable in the Plan period and so the actual number of homes expected to be delivered in the Plan period at Portishead will be lower. Based on this example, there are clear inconsistencies in the proposed policy and draft housing allocations. It appears that villages have been considered areas appropriate for higher or equal levels of growth to defined Towns. Removing the entirety of the promoted land (HE20124) at Black Rock, Portishead represents an opportunity to strengthen delivery at the town in accordance with the Council's strategy, and this should be prioritised ahead of growth at lower order settlements.	Removing from the Green Belt the entirety of the promoted land (HE20124) at Black Rock, Portishead represents an opportunity to strengthen delivery at the town in accordance with the Council's strategy, and this should be prioritised ahead of growth at lower order settlements.		BLOA3050 - Portishead Reps - NS Local Plan Regulation 19 - Turley Updated (V2).pdf
SP5: Towns	No	• Positively prepared • Justified • Effective • Consistent		No	Policy SP5 (Towns) and SP6 (Villages and Rural Areas) The general approach taken with the development strategy at Towns and Villages & Rural Areas is supported. However, the sequential approach set out by these policies has not been wholly followed through in the final strategy for growth (Policy SP3) and the draft site allocations that have been identified. As set out above, Policy SP3 states that priority will be given to locating new residential and mixed-use development in or close to urban areas where there is an existing or proposed wide range of facilities,	Removing from the Green Belt the entirety of the promoted land (HE20124) at Black Rock, Portishead represents an opportunity to		BLOA3050 - Portishead Reps - NS Local Plan Regulation 19 - Turley Updated

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		with national policy			services and jobs, and there are opportunities to encourage active travel. The justification text under policy SP5 recognises that Towns are the most sustainable locations within North Somerset. Similarly, the justification text for Policy SP6 confirms that the rural areas are relatively less sustainable given the absence of a range of services, facilities and job opportunities. From reviewing the strategic housing allocations listed in Schedule 1 of the emerging plan, 1683 homes are allocated at Backwell (a village), but 1,347 homes are allocated at Portishead (a town). The figure for Portishead includes 785 homes at Wyndham Way, despite the Council's own evidence base confirming that only 485 homes are deliverable in the Plan period and so the actual number of homes expected to be delivered in the Plan period at Portishead will be lower. Based on this example, there are clear inconsistencies in the proposed policy and draft housing allocations. It appears that villages have been considered areas appropriate for higher or equal levels of growth to defined Towns. Removing the entirety of the promoted land (HE20124) at Black Rock, Portishead represents an opportunity to strengthen delivery at the town in accordance with the Council's strategy, and this should be prioritised ahead of growth at lower order settlements.	strengthen delivery at the town in accordance with the Council's strategy, and this should be prioritised ahead of growth at lower order settlements.		(V2).pdf
SP6: Villages and rural areas	No	• Positively prepared • Justified • Effective • Consistent with national policy		No	Policy SP5 (Towns) and SP6 (Villages and Rural Areas) The general approach taken with the development strategy at Towns and Villages & Rural Areas is supported. However, the sequential approach set out by these policies has not been wholly followed through in the final strategy for growth (Policy SP3) and the draft site allocations that have been identified. As set out above, Policy SP3 states that priority will be given to locating new residential and mixed-use development in or close to urban areas where there is an existing or proposed wide range of facilities, services and jobs, and there are opportunities to encourage active travel. The justification text under policy SP5 recognises that Towns are the most sustainable locations within North Somerset. Similarly, the justification text for Policy SP6 confirms that the rural areas are relatively less sustainable given the absence of a range of services, facilities and job opportunities. From reviewing the strategic housing allocations listed in Schedule 1 of the emerging plan, 1683 homes are allocated at Backwell (a village), but 1,347 homes are allocated at Portishead (a town). The figure for Portishead includes 785 homes at Wyndham Way, despite the Council's own evidence base confirming that only 485 homes are deliverable in the Plan period and so the actual number of homes expected to be delivered in the Plan period at Portishead will be lower. Based on this example, there are clear inconsistencies in the proposed policy and draft housing allocations. It appears that villages have been considered areas appropriate for higher or equal levels of growth to defined Towns. Removing the entirety of the promoted land (HE20124) at Black Rock, Portishead represents an opportunity to strengthen delivery at the town in accordance with the Council's strategy, and this should be prioritised ahead of growth at lower order settlements.	Removing from the Green Belt the entirety of the promoted land (HE20124) at Black Rock, Portishead represents an opportunity to strengthen delivery at the town in accordance with the Council's strategy, and this should be prioritised ahead of growth at lower order settlements.		BLOA3050 - Portishead Reps - NS Local Plan Regulation 19 - Turley Updated (V2).pdf
SP7: Green Belt	No	• Positively prepared • Justified • Effective • Consistent with national policy		No	Policy SP7: Green Belt It is agreed that there are exceptional circumstances which justify the revision of the Green Belt boundary within North Somerset as part of the plan review. The fact that a review of the Green Belt has been undertaken is a positive approach for the plan to take. Land at Black Rock Policy SP7 confirms that land at Black Rock is one of the sites to be released from the Green Belt for residential development. The proposed removal of the Site from the Green Belt and allocation of residential development is supported, in principle. From reviewing the Policy Map and Schedule 1 of the emerging plan, it confirms the western parcel will remain within the green belt, to provide ecological mitigation associated with the eastern parcel. This aspect of the allocation requires further adjustment in our view in order to maximise the Site's potential as a sequentially preferable site against the Councils hierarchy, being on Grey Belt land adjoining a main town. Not only will this help to deliver additional homes in a sustainable location, it offers the potential to deliver additional ecological and education benefits through its sensitive development. When considering points we set out, our view remains that the entirety of the site (both eastern and western parcels) should be allocated for residential development and released from the green belt. For reasons we set out, we consider the site firmly falls to be considered as Grey Belt land and must be prioritised for development before other Green Belt locations. We consider entirety of the Site has grey belt status and should be released from the Green Belt. Indeed, the release of the entirety of the site would ensure the Green Belt boundary would be readily recognisable in line with paragraph 149 of the NPPF. There is no evidential basis within the Council's Green Belt	Regarding Black Rock, we consider the western parcel should not be retained in the Green Belt. It could accommodate further sensitive residential development. This would be alongside the incorporation of appropriate pedestrian and cycle links between the two parcels and with the provision of further green infrastructure within the eastern parcel and opportunities for education.		BLOA3050 - Portishead Reps - NS Local Plan Regulation 19 - Turley Updated (V2).pdf

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					work for subdividing the parcel or retaining the western part within the Green Belt. Historic mapping and 1945 RAF aerial imagery demonstrate that the western fringe of Portishead was historically industrial and quarried in character, with the woodland adjacent to the western parcel representing post-war regeneration rather than ancient or semi-ancient woodland (see the Cultural & Heritage Report previously submitted with the site promotion materials). This historic context strengthens the grey◈belt classification and confirms that ecological matters can appropriately be addressed through mitigation rather than by retaining part of the site within the Green Belt. We consider the western parcel could accommodate further sensitive residential development. This would be alongside the incorporation of appropriate pedestrian and cycle links between the two parcels and with the provision of further green infrastructure within the eastern parcel and opportunities for education. Indeed, the retention of the western parcel within the Green Belt (despite its clear grey belt status, in our view) will lead to a reduction in the overall capacity of the site to accommodate homes, when North Somerset is clearly having to draw on a significantly number of sites to meet its need – for those sites being take forward, dwelling numbers need to be maximised. Additional development can support overall viability and provide the basis for the delivery of further green infrastructure to the west. Therefore, we consider an opportunity for maximising development on this Site should be taken.			
SP8: Housing	No	• Positively prepared • Justified • Effective • Consistent with national policy		No	We are broadly supportive of the revised minimum housing need figure, as set out in Policy SP8, over the plan period. It meets the government's standard method for calculating the minimum level of local housing need set out in national planning policy and guidance. This change from the previous version of the plan is welcomed and it represents a significant increase in homes compared to earlier draft plans. However, national policy is clear that local housing need is a minimum starting point and that the final housing requirement may be higher to address affordable housing need, to support economic ambitions and/or to address the needs of neighbouring areas. Importantly,there is a requirement to address Bristol's acknowledged unmet needs, and this is not addressed in any way by the Plan. North Somerset must work positively with Bristol City and other West of England Authorities to agree on an approach to meeting these needs in a sustainable way. As such, the overall planned level of growth should increase to meet overall housing needs, including affordable needs, for North Somerset and the wider West of England area. the NPPF is also clear that local housing need derived from the standard method requirement is a minimum figure and any final housing requirement should take into account affordable housing needs, ambitions for economic development and any unmet includes within neighbouring authorities. Whilst we recognise the housing requirements in Policy SP8 is expressed as a minimum, evidence documents such as the Local Housing Need Assessment (September 2025) (LHNA) point to the need for more homes to be planned for. The LHNA confirms that there is a total net affordable need of 10,577 homes - based on a housing requirement of 23,700 homes, this would require 45% of all homes to be delivered as affordable housing. However, whilst 50% affordable housing is currently proposed on Green Belt sites, 30% is proposed (based on viability testing) on other greenfield sites and 20% on brownfield sites. In addition, the Council's viability work has not tested the viability of 50% affordable housing on Green Belt sites, as required by national policy. Overall, therefore, affordable housing needs will not be met by the current proposed levels of housing, and there is a clear case for the final housing requirement to be set higher. In respect of unmet needs, the Plan makes no provision for the unmet needs of Bristol City. The Inspectors for the Bristol Local Plan have recently (on 21st November 2025) issued its final advice entitled "IN11: Final advice and actions arising from the Council's responses to IN7 to IN10" which, whilst increasing the housing requirement to 39,915 dwellings, acknowledges that there is insufficient capacity to meet the Council's objectively assessed housing need, as calculated by the standard method. The Inspectors also require Bristol City Council to set out what the level of unmet housing need is, to be clear about the situation at the time of adoption, which may be important in continuing work being done on other Plans. That is clearly the case here where unmet housing needs from Bristol City exists, where national policy required effective cooperation to address unmet needs, but where there are no provisions in the NSC Local Plan to address any of these eeds or any clear evidence setting out why NSC is unable to meet any of the city's unmet needs. Overall, North Somerset Council should address both affordable housing needs across the district and consider its ability to meet some of Bristol's unmet housing needs when setting its final housing requirement Given that the Plan includes large-scale strategic allocations for new homes it would be appropriate for Policy SP8 to be accompanied by a delivery trajectory, to identify the expected delivery of new homes in these locations, either as part of a comprehensive trajectory for the plan associated with Policy SP8, or to	North Somerset Council should address both affordable housing needs across the district and consider its ability to meet some of Bristol's unmet housing needs when setting its final housing requirement. There is concern, and risks in respect of the soundness of the Plan as proposed, where no housing delivery trajectory has been provided for the Plan as a whole, or for the specific sites which are identified as part of the proposed strategic policies. This should be addressed as part of the submission of the plan.		BLOA3050 - Portishead Reps - NS Local Plan Regulation 19 - Turley Updated (V2).pdf

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					accompany policies associated with the strategic allocations. It is important to ensure that these trajectories provide a realistic assessment of delivery that can be expected from each site in the Plan period, with realistic lead in times and delivery rates.			
SP11: Historic and natural environment	No	• Positively prepared • Justified • Effective • Consistent with national policy		No	Policy SP11 (Historic and Natural Environment) We support the broad aims and aspirations of this draft policy. However, we do have concerns regarding the wording and the level of detail the policy seeks to set out. Some of the terminology proposed is vague at present, and we consider it may be challenging/difficult for planning applications to demonstrate how they adhere to the various requirements. It contrasts with part (d) of paragraph 16 of the NPPF which states plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. We welcome the caveat at the start of the second paragraph in the policy that confirms the bullet point examples apply only 'where appropriate', albeit some of the detail may be best refined and streamlined to be less generic. Alternatively, some of the lengthy wording may be better captured as accompanying paragraphs to support the policy itself.	Some of the detail may be best refined and streamlined to be less generic. Alternatively, some of the lengthy wording may be better captured as accompanying paragraphs to support the policy itself.		BLOA3050 - Portishead Reps - NS Local Plan Regulation 19 - Turley Updated (V2).pdf
Policy DP1: High quality design	No	• Positively prepared • Justified • Effective • Consistent with national policy		No	Our comments from representations submitted as part of the previous Regulation 19 Consultation in January 2024 remain. Policy DP1 has support from national policy and other guidance in respect of supporting high quality design, to ensure that high quality new development is delivered in North Somerset. However, in common with other policies, the wording is lengthy and there are numerous detailed criteria, much of which is likely to be better placed in supporting text, or even other supporting design guidance, rather than an overarching design quality policy for the Local Plan. It is suggested that this policy is reviewed to be more concise and focused on the key aspects of successful high-quality design for North Somerset, including referencing other national design guidance or policy as necessary, with more detail placed in supporting text or other supplementary documents.	It is suggested that this policy is reviewed to be more concise and focused on the key aspects of successful high-quality design for North Somerset, including referencing other national design guidance or policy as necessary, with more detail placed in supporting text or other supplementary documents.		
Policy DP6: Net zero construction	No	• Positively prepared • Justified • Effective • Consistent with national policy		No	Policy DP6 sets out the requirements for development to deliver Net Zero development, minimising embodied carbon and net zero operational emissions, including both regulated and unregulated energy. The policy includes specific targets for embodied carbon and operational energy and space heating for homes. Residual energy demand is to be met through onsite renewable energy generation, or where this is not technically feasible, by means of offsite renewable energy generation. To help tackle climate change and meet the UK's Net Zero target we support the transition to net zero development. However, we would note that there are issues with deliverability and viability with going beyond, and accelerating the Government's net zero transition which is being driven by progressive changes to the Building Regulations. It is noted that Policy DP6 states that net zero operational energy covers both regulated and unregulated energy. While we support the delivery of low carbon development it is considered any targets should be restricted to regulated energy only. Developers only have the ability to influence the regulated energy demand through design and specification of materials and systems and renewable energy technologies. The unregulated energy consumption, (often referred to as 'plug in load') of development is ultimately the function of the residents or occupiers use of the building, which cannot be influenced by the developer and therefore the requirement on the developer to offset emissions from unregulated energy use is not appropriate. For example, post 2025 one of the greatest demands for unregulated energy in new homes will be to charge an electric vehicle. It unreasonable to assume that a developer should effectively meet the cost of mitigating energy and carbon from charging an electric vehicle. Similarly non-residential building uses, including commercial uses can include significant process loads, e.g. refrigeration, it is again unreasonable to assume that a developer should effectively meet the cost of mitigating energy and carbon from these uses. The responsibility of unregulated energy use and emissions therefore should sit with the building residents and occupiers.	A number of recommendations are set out above and the changes proposed are set out below to ensure that Policy DP6 aligns with national guidance, is deliverable and viable. Policy DP6: Net zero construction All development must be designed to minimise its impact on the environment and create high quality internal and external spaces for people to use. Proposals must demonstrate that all resources are used efficiently, as part of the construction and operation of a building. • All development must follow the principles of the energy hierarchy to	DP6 re Water efficiency for residential homes: The Policy has been updated to require all residential development to achieve an estimated water consumption of no more than 110l/p/d in line with Part G of the Building Regulations. We support the need to reduce water consumption from development and welcome	BLOA3050 - Portishead Reps - NS Local Plan Regulation 19 - Turley Updated (V2).pdf

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					The Governments Future Homes and Buildings Standard Consultation published in December 20232 states in reference to setting energy intensity targets, 'We consider that metrics which include unregulated loads are not a suitable because designers and housebuilders have little or no control over these end uses of energy.'. In this context it is recommended that the policy is updated to reference operational net zero as regulated energy only. • All new buildings will be required to achieve net zero operational energy compliance in respect of (delete "both") regulated (delete "and unregulated") energy and minimise embodied carbon. The Policy has been updated as part of the update and now requires development to minimise embodied carbon emissions, reducing upfront carbon with a target of 750 kgCO2e compared to 900kg CO2e in the previous version. The Climate change and energy topic paper includes further evidence on embodied carbon, including links to the evidence base prepared for the West of England Plan Net Zero Building Policy. We would note that the evidence base and in particular costs included are based on data from 2021 and should be updated and greater consideration given to supply chain capacity and likely costs. For example enhanced embodied carbon targets may result in increased timber frame construction impacting supply chains and costs. We support the need to assess and reduce the embodied carbon of new development, however we would note that the information available to complete that work will likely not be available until the detailed design stage. We therefore recommend the policy text is updated to make reference to full, or reserved matters applications. The target set out in the policy and need for an LCA can be made part of conditions attached to outline applications. • For development of more than 50 dwellings, or in excess of 5,000m² non-residential floorspace, (add "full planning applications, or Reserved Matters applications" delete "proposals" must be accompanied by an embodied carbon assessment which demonstrate that upfront embodied carbon emissions do not exceed 750kg CO2e/m². Net zero operational energy: residential This element of the policy sets out a number of requirements which are reviewed below. No on-site use of fossil fuel: The Future Homes Standard consultation confirms that from 2025 homes will no longer be able to use fossil fuel heating systems. The current Part L 2021, while still allowing the use of fossil fuels supports the use of electric heating systems. We support the transition of development away from fossil fuel based systems in favour of low carbon, renewable energy, for example heat pumps. Space heating demand of less than 15kWh/m²/year and Overall operational energy use of less than 35kWh/m²/year. These targets are drawn from guidance including the LETI Design Guide which goes significantly beyond the requirements of the Building Regulations and Government's national strategy for delivering Net Zero. In December 2023 the Government published its response to the to the Levelling-up and Regeneration Bill: reforms to national planning policy consultation. In its response the Government has noted it will proceed with the preparation of a suite of National Development Management Policies, local authorities will be able to address matters of local importance provided they are not inconsistent with or repeat national policy. While not yet finalised it is our expectation that this will include new carbon reduction related guidance to ensure a consistent approach is applied across the country. In December 2023 the Government also published the next stage of consultation for the Future Homes and Buildings Standard (FHS and FBS. The consultation specifically states that the FHS will set, 'the performance requirements at a level which ensures new homes and non-domestic buildings have high fabric standards, use low-carbon heating and are 'zero-carbon ready', setting policies which go beyond this standard are therefore not considered necessary. In setting fabric standards for the FHS the government has decided to keep fabric levels largely the same as those put in place in 2021.	ensure that the design of a building prioritises energy reduction through highly energy efficient fabric measures, lighting, ventilation, and orientation. Once energy demand is minimised and efficiency design measures are in place, renewable energy technologies will be used to meet residual energy demand. • All new buildings will be required to achieve net zero operational energy compliance in respect of (delete "both") regulated (delete "and unregulated") energy and minimise embodied carbon. • All new development should seek to minimise embodied carbon in respect of both upfront (emissions associated with raw materials, transportation, manufacturing and construction) and whole life carbon. For development of more than 50 dwellings, or in excess of 5,000m² non-residential floorspace, (add "full planning applications, or Reserved Matters applications") (delete "proposals") must be accompanied by an embodied carbon assessment which demonstrate that upfront embodied carbon emissions do not exceed 750kg CO2e/m². • The retention of existing buildings will usually be given preference to their demolition. Retrofitting energy efficiency	this amendment. We would note that Part G of the Building Regulations is currently under examination and an enhancement to the higher water efficiency target is likely to be forthcoming.	

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					With reference to the Council's proposed energy use intensity targets the Government confirms that targets which include both regulated and unregulated energy, i.e. the Overall operational energy use of less than 35kWh/m²/year, are not suitable as housebuilders have little or no control over this energy use, as referenced above. In this context it is recommended that this requirement is removed from the policy. In addition the Government's consultation cites three reasons for not providing further fabric improvements through the FHS, in summary demonstrating that further improvements are not cost-effective. The space heating demand target of 15kWh/m2/year therefore sets a target which may exceed the requirements of the FHS, and contradict national policy. Given the approach set through the FHS to reduce regulated emissions, and Government's stated intent to develop a set out National Development Management Policies to provide consistent policy it is considered that additional targets which relate to unregulated emissions are not appropriate. On-site renewable energy generation is maximised, equivalent to at least the onsite energy demand: This element of the policy requires homes to provide onsite energy generation equivalent to the onsite energy demand, as it currently stand this would cover demand from both regulated and unregulated energy. As noted the future of vehicle transport will likely include a shift to EV charging which will have a significant impact on unregulated energy demand. Furthermore the Government has stated unregulated loads are not a suitable because designers and housebuilders have little or no control over these end uses of energy. Any requirement for energy generation should therefore only refer to regulated energy. As part of the FHS consultation the Government has indicated that due to grid decarbonisation the benefit of additional energy generation through Solar PV has a diminishing return. In this context the consultation sets out two options for domestic buildings, one option including Solar PV and the other without. While we support the provision of renewable energy as part of new development this should be provided in the context of updated national guidance on setting energy efficiency targets and Building Regulations. We would recommend that this element is amended to align with the FHS. Renewable energy offsetting: This element requires that residual energy demand should be met through the generation of onsite or offsite renewable energy generation. In the first instance, as noted above any residual energy requirement should only relate to regulated energy. As noted in the Government's FHS consultation inclusion of unregulated energy is not appropriate as development have little or no control over this element. Furthermore the Policy does not set a specific cost for offsetting, it is noted this will be set through the preparation of a Supplementary Planning Document. No specific cost is proposed for offsetting any residual energy demand at this stage. Given this would be an additional cost to the development it needs to be considered as part of the viability assessment to be justified. In this context this element needs to be properly justified and considered as part of the viability assessment, and until such time this should be removed. It is common place in setting offsetting targets to include an alternative option to the Council's offset fund to allow developers flexibility in how residual offsetting is met. The Council's summary of evidence to support Policy DP64 notes that offsetting schemes should focus on either developer procured renewable energy supply at the point of planning and/or council collected payments with robust, transparent, and accountable expenditure plans. It is considered that developer procured renewable energy supply could include development of a developers own renewable energy scheme. We would recommend that if retained an allowance is included to allow developers to develop their own renewable energy generation scheme to offset residual energy provided this meets the objectives of additionality and is transparent, subject to approval by the Council. Due to the varying nature of non-residential development this target it not appropriate for non-residential development. We would recommend that a suitable water efficiency target for non-residential development can be drawn from BREEAM and the Wat01 Water Efficiency criteria. For example achieving 2 credits here requires a 25% reduction in water consumption.	measures in existing buildings will be supported and significant weight will be given to the benefits of development resulting in considerable improvements to energy efficiency. All proposals must demonstrate high standards of insulation and Passivhaus Enerphit standards are encouraged. Net zero operational energy: residential • In order to demonstrate compliance with the net zero operational energy requirement, all new residential buildings must demonstrate through an energy statement, that the following have been achieved: • No on-site use of fossil fuels; • (add "Meet the requirements of the FHS") • (delete "Ultra low energy use, to be demonstrated through: Space heating demand of less than 15kWh/m²/year ") • (delete "Overall operational energy use of less than 35kWh/m²/year; and") • On-site renewable energy generation is (add "provided in line with the Future Homes Standard"), (delete "maximised, equivalent to at least the onsite energy demand.") • Alternatively,		

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					In this context it is recommended that this section is updated to include separate residential and non-residential requirements, including: (addition:"and non-residential development should aim to achieve the equivalent of 2 BREEAM Version 6 Wat 01 Water Efficiency credits".) Overheating: The policy states that ,'All development will need to demonstrate measures to reduce the risk of the building overheating'. The Building Regulations include requirements for the consideration of overheating. Part O introduced in 2021 sets enhance consideration for residential and occupied spaces to take better account of overheating and climate change. We support the need to consider overheating as this is a key potential effect of climate change. District Heating: The policy references the potential for connection to district heating schemes. The 2025 FHS and FBS consultation notes that connection to a heat network where those buildings are supplied via new or existing low carbon technologies. Connection to systems which are not considered low carbon, e.g. gas fired Combined Heat and Power systems would not be applicable. We would recommend that reference is included to the Government's FHS and FBS requirements for connection to heat networks. Viability The Climate change and energy topic paper provides further details on costs for achieving the net zero requirements set out. We have a number of concerns with regards to the viability of the requirements of Policy DP6. - Residential costs – While clarity has been provided as part of the evidence base it is considered that the costs used are not likely to be representative of the requirements put in place by the Policy. -We would recommend that consideration is given to the costs used for assessing Policy DP6 to ensure recent inflation and build cost challenges are included. -With regards to the renewable energy offsetting requirements no cost is set out in the Policy itself, it is noted this will be set through the preparation of a Supplementary Planning Document. Given this would be an additional cost to the development it needs to be considered as part of the viability assessment. We would recommend that wording is considered, and wording added to the policy to note this would be require where feasible and viable. Summary There are a number of potential issues with the requirements set out in Policy DP6. The Government's December 2023 WMS and subsequent legal challenges and opinions note that local policies can be put in place where they are consistent with national policy and are appropriately evidenced. There are a number of other issues with the requirements of Policy DP6 and focus on minimising energy demand which are contrary to the WMS and the evidence set out in the 2023 FHS and FBS consultation and not consistent with the approach set out through National Policy. We also have concerns about how the viability of Policy DP6 has been considered, noting that the costs used do not align with the Government's FHS and FBS consultation.	compliance can be demonstrated through Passivhaus Plus Standard accreditation, using the Passivhaus Planning Package. Net zero operational energy: non-residential In order to demonstrate net zero operational energy, all new non-residential buildings must demonstrate through an energy statement, that the following have been achieved: • No use of on-site fossil fuels; • Energy use is minimised (add "as far as practical and feasible"), appropriate to the end use; • On-site renewable energy generation is (add "provided in line with the Future Buildings Standard") (delete "maximised, equivalent to at least the onsite energy demand; and") • (delete "The end users report their energy use in operation for five years post-completion".) Alternatively, compliance can be demonstrated by using BREEAM Excellent level accreditation, (add "where feasible targeting an") outstanding level for energy use (Credit Ene01). An alternative compliance route may be allowed with prior agreement. Renewable Energy Offsetting		

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						(add "Where feasible and viable") residual energy demand should be met through the generation of onsite renewable energy, but if this is not technically feasible, the requirement may be met elsewhere by means of offsite renewable energy generation, (add "either through a contribution to the Council's offsetting scheme or via a renewable energy generation scheme approved by the Local Authority.") All development must demonstrate measures to minimise potable water use (delete "and") , (add "residential development should") aim to achieve an estimated water consumption of no more than 100litres/person/ day, (add "and non-residential development should aim to achieve the equivalent of 2 BREEAM Version 6 Wat 01 Water Efficiency credits"). All measures will optimise water use systems and may include rainwater harvesting and other mechanisms for recycling and reusing water on-site. All development will need to demonstrate measures to reduce the risk of the building overheating. Energy use intensity and space heating targets should be prioritised regardless of any district heating connection and all reasonable efforts should be made to meet these requirements prior to buildings connecting		

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						to a district heating network. (Add "Connection to any district heating network should follow the guidance set out as part of the FHS and FBS to ensure development is connecting to low carbon heat.")		
Policy DP8: Efficient use of land	No	• Positively prepared • Justified • Effective • Consistent with national policy		No	Policy DP8: Efficient use of land Our comments from representations submitted as part of the previous Regulation 19 Consultation in January 2024 remain. It is clearly desirable for all new development to ensure the effective and efficient use of land, informed by local context and the specific requirements of the development being considered. The policy requirement of a minimum target density of 40dph may not be desirable in all locations as part of a comprehensive and well considered design approach. It is noted the supporting text clarifies that this is an average density, but this is not clear from the policy wording. It is suggested the policy wording be amended for clarity to state that an average target density of 40dph will be sought, with lower or higher densities having regard to accessibility and other design considerations	It is suggested the policy wording be amended for clarity to state that an average target density of 40dph will be sought, with lower or higher densities having regard to accessibility and other design considerations.		BLOA3050 - Portishead Reps - NS Local Plan Regulation 19 - Turley Updated (V2).pdf
Policy DP16: Active travel routes	No	• Positively prepared • Justified • Effective • Consistent with national policy		No	We support the principle of the policy that active travel routes will be safeguarded, noting that this includes the Gordano Greenway. This is the final section of the active travel route from Brean to Weston, Clevedon, and finally Portishead, linking the coastal towns. The delivery of this route should therefore be prioritised by the Council. We support the principle that, where appropriate, new development proposals will be expected to provide direct, safe and secure links to existing or proposed services, facilities an active travel routes. Indeed, the development of land at Black Rock can help deliver th Gordano Greenway, a key active travel route that the emerging plan acknowledges. We consider the draft policy's requirement to segregate cycle and pedestrian routes is not always necessary and can lead to over-engineered and unattractive solutions. It should therefore be amended to state 'where appropriate'.	The draft policy's requirement to segregate cycle and pedestrian routes is not always necessary and can lead to over-engineered and unattractive solutions. It should therefore be amended to state 'where appropriate'.		BLOA3050 - Portishead Reps - NS Local Plan Regulation 19 - Turley Updated (V2).pdf
Policy DP37: Trees, Woodlands and Hedges	No	• Positively prepared • Justified • Effective • Consistent with national policy		No	DP37 (Trees, woodland and hedges) Our comments from representations submitted as part of the previous Regulation 19 Consultation in January 2024 remain. In common with other policies, the wording is lengthy and there are numerous detailed criteria, much of which is likely to be better placed in supporting text, or even other supporting design guidance, rather than an overarching design quality policy for the Local Plan. It is suggested that this policy is reviewed to be more concise and focused on the key aspects of successful tree / hedge / woodland provision. This should include referencing other national guidance or policy as necessary, with more detail placed in supporting text or other supplementary documents.	It is suggested that this policy is reviewed to be more concise and focused on the key aspects of successful tree / hedge / woodland provision. This should include referencing other national guidance or policy as necessary, with more detail placed in supporting text or other supplementary documents.		BLOA3050 - Portishead Reps - NS Local Plan Regulation 19 - Turley Updated (V2).pdf
Policy DP43: Affordable housing (including	No	• Positively prepared		No	It is considered the viability of providing 50% AH on GB sites should be tested and evidenced as part of the emerging local plan. The viability assessment that supports the emerging Local Plan does not o test this scenario. It tests various levels up to 40% on greenfield sites but not 50%. Given the plan now includes for 30%, on greenfield sites elsewhere, that confirms the position that 40% affordable housing delivery would	Respondents to the MHCLG NPPF (published in Dec 2024) consultations including		BLOA3050 - Portishead Reps - NS Local Plan

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rural exception schemes)		• Justified • Effective • Consistent with national policy			lead to viability challenges, let alone 50% provision. It's worth noting that construction costs have increased and market values have reduced. Indeed, respondents to the MHCLG NPPF (published in Dec 2024) consultations including RICS and HBF raised viability concerns, and supplied case studies highlighting that there would be few if any areas where 50% is achievable, highlighting the risk of allocating land and it then not coming forward for housing early in the plan period. It is therefore considered that further evidence is required to appropriately justify the position in line with NPPF.	RICS and HBF raised viability concerns, and supplied case studies highlighting that there would be few if any areas where 50% is achievable, highlighting the risk of allocating land and it then not coming forward for housing early in the plan period. It is therefore considered that further evidence is required to appropriately justify the position in line with NPPF.		Regulation 19 - Turley Updated (V2).pdf
Black Rock, north of Clevedon Road	No	• Positively prepared • Justified • Effective • Consistent with national policy		No	From reviewing the strategic housing allocations listed in Schedule 1 of the emerging plan, 1683 homes are allocated at Backwell (a village), but 1,347 homes are allocated at Portishead (a town). The figure for Portishead includes 785 homes at Wyndham Way, despite the Council's own evidence base confirming that only 485 homes are deliverable in the Plan period and so the actual number of homes expected to be delivered in the Plan period at Portishead will be lower. Based on this example, there are clear inconsistencies in the proposed policy and draft housing allocations. It appears that villages have been considered areas appropriate for higher or equal levels of growth to defined Towns.	Removing from the Green Belt the entirety of the promoted land (HE20124) at Black Rock, Portishead represents an opportunity to strengthen delivery at the town in accordance with the Council's strategy, and this should be prioritised ahead of growth at lower order settlements		BLOA3050 - Portishead Reps - NS Local Plan Regulation 19 - Turley Updated (V2).pdf

Name: Bloor Homes South West (Wolvershill) **I.D:** 21449761

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SP1: Sustainable Development	No	• Positively prepared • Justified • Effective • Consistent with national policy		No	Policy SP1 provides an overarching policy relating to Sustainable Development, and although it is intended to reflect requirements for North Somerset, the list of criteria is relatively generic and reflects general requirements set by national policy and the approach to sustainable development set out in national policy (the NPPF). Supporting text identifies that the policy is intended to provide principles that are articulated in more detail in other strategic policies. However, it is not clear that not all elements of the policy could (or should) apply to all developments – for example not all development proposals will be able to support the delivery of a variety of housing (where no housing is included). Care should be taken with the drafting of this policy to ensure that it is appropriately clear and focused and adds value to the definition of sustainable development within North Somerset. As drafted, there are ambiguities and there is not sufficient differentiation from the general sustainable development policies, which are already a feature of national planning policy.	Care should be taken with the drafting of this policy to ensure that it is appropriately clear and focused and adds value to the definition of sustainable development within North Somerset. As drafted, there are ambiguities and there is not sufficient differentiation from the general sustainable development policies, which are already a feature of national planning policy.		Reps on Behalf of Bloor Homes to NS LP 2041 Reg 19 Consultation (Wolvershill) merged.pdf

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SP2: Climate Change	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy		No	Strategic Policy SP2 sets out the overarching principles for how development should address both climate change mitigation and adaptation, this includes a number of key requirements around resource use, net zero, energy generation, climate resilience, transport, and green infrastructure. The updated Regulation 19 consultation makes no substantial changes to this policy. While the objective of the policy is welcomed there are elements which need to be reviewed to ensure alignment with subsequent sustainability policies. The UK Climate Projections (UKCP18) set out the likely effects of climate change in the UK, these include increasing annual temperatures, increasing winter rainfall and decreasing summer rainfall as a result of increasing global temperatures, driven by GHG emissions. How development contributes to tackling climate change mitigation and adaptation is therefore a key consideration. We fully support the inclusion of the climate change strategic policy and setting out the overarching aims for development in North Somerset. It is noted that elements of the development expectations include the phrases ‘minimise’ and ‘maximise’. By stating ‘minimising’ or ‘maximising’ the policy sets an open-ended requirement which itself is not fully tested as part of the viability considerations for subsequent Policies including Policy DP5, and Policy DP6. We have recent examples of Local Authorities using the overarching text to maximise or minimise specific requirements for new development which are outside of the intent of the Plan policies and were not considered as part of the preparation of the Plan. There is therefore the potential for interpretation of policies leading to unintended consequences of this wording which could supersede requirements set out in the subsequent Development Management Policies. Given the accompanying evidence base and viability assessment considers a specific set of performance targets and requirements elements it is recommended that the wording is updated as [set out in attached representation] to be more reflective of the intent of the policy in setting out the overarching strategy of the policy.	Given the accompanying evidence base and viability assessment considers a specific set of performance targets and requirements elements it is recommended that the wording is updated as [set out in attached representation] to be more reflective of the intent of the policy in setting out the overarching strategy of the policy.		Reps on Behalf of Bloor Homes to NS LP 2041 Reg 19 Consultation (Wolvershill) merged.pdf
SP3: Spatial strategy	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy		No	The stated Spatial Strategy (SP3) is logical for North Somerset on the basis of the ability to locate new development within or close to existing urban areas where there is greatest potential to access a wide range of facilities, services and jobs, and there are opportunities to use existing or enhanced active travel and public transport routes. However, the Spatial Strategy for North Somerset is stated in general terms only with no detail in terms of any settlement hierarchy or the specific locations, or areas, where new development might be encouraged (or conversely might be restricted). There are various Main Towns and villages that are identified in the plan (on the Key Diagram and as part of later polices – SP5 and SP6) yet the Spatial Strategy makes no reference to these places. There is also no reference to other policy designations, such as the Green Belt (either existing or proposed as new), the Mendip Hills Area of Outstanding Natural Beauty (now Mendip Hills National Landscape), or various proposed Strategic Gaps (Policy LP7) all of which are referenced on the Key Diagram and have informed the Spatial	It is considered that there is considerable scope to add additional clarity and detail to the proposed Spatial Strategy (Policy SP3) in the interests of the overall effectiveness of the plan. This detail could reflect the content of various later parts of the plan, and which is as set out more comprehensively within the “Spatial strategy, site selection and capacity” (October 2025) topic paper.		Reps on Behalf of Bloor Homes to NS LP 2041 Reg 19 Consultation (Wolvershill) merged.pdf

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					Strategy proposed by the Plan. The Plan includes development in various locations including one significant new Strategic Location (Wolvershill, north of Banwell – Policy LP1) which is a significant feature of the plan and Key Diagram yet is not mentioned within the Spatial Strategy. It is considered that there is considerable scope to add additional clarity and detail to the proposed Spatial Strategy (Policy SP3) in the interests of the overall effectiveness of the plan. This detail could reflect the content of various later parts of the plan, and which is as set out more comprehensively within the “Spatial strategy, site selection and capacity” (October 2025) topic paper.			
SP4: Placemaking	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy		No	Policy SP4 is generally agreeable given that it sets clear expectations for high quality design. The requirement to “reflect” local character could be interpreted to be restrictive as a requirement in all circumstances – a narrow interpretation of this point would be to suggest a reproduction of whatever has gone before (in whatever area is defined to be local to a specific development site). It is considered preferable that the wording is amended (in the interests of effectiveness) to “Respond to and complement” local character. Requirements have been added to the policy which would mandate the provision of a Community Engagement Statement in respect of all major planning application proposals. It is not clear why this requirement is to be set for all such applications as there are many major applications at or around the threshold where only limited engagement may be needed or justified prior to the submission of an application. This requirement should be in supporting text or alternatively be set as part of the Council’s Local List of validation requirements, if justified (rather than a policy requirement to be set by the plan). Likewise, the requirement for design review may represent good practice but is suggested to only be where justified by the circumstances of the scheme. This would also be better stated in supporting text rather than the policy wording.	It is considered preferable that the wording is amended (in the interests of effectiveness) to “Respond to and complement” local character. This requirement [for Community Engagement Statement] should be in supporting text or alternatively be set as part of the Council’s Local List of validation requirements, if justified (rather than a policy requirement to be set by the plan). Likewise, the requirement for design review may represent good practice but is suggested to only be where justified by the circumstances of the scheme. This would also be better stated in supporting text rather than the policy wording.		Reps on Behalf of Bloor Homes to NS LP 2041 Reg 19 Consultation (Wolvershill) merged.pdf
SP7: Green Belt	Yes						It is agreed that there are exceptional circumstances which justify the revision of the Green Belt boundary within North Somerset as part of the plan, and the fact that a review of the Green Belt is being undertaken is a positive approach for the plan to take. Additional detailed comments on the Green Belt and approach to Green Belt review/ release are made in other representations being submitted on behalf of Bloor Homes.	Reps on Behalf of Bloor Homes to NS LP 2041 Reg 19 Consultation (Wolvershill) merged.pdf

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SP8: Housing	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy		No	Summary of representation (see attached full document for detail) The Plan as proposed risks not allowing for sufficient time (15 years from adoption) to meet a basic requirement for strategic polices set by national policy. A longer plan period is required to ensure that the plan for North Somerset covers a period of at least 15 years from adoption, with a longer period likely to enable the Council to more effectively plan for future development in the area. There is concern, and risks in respect of the soundness of the Plan as proposed where, whilst seeking to meet the minimum level of housing need identified using the standard method, there is evidence to suggest that a higher housing requirement should be set to address affordable housing needs and to also accommodate some of Bristol's unmet needs. There is concern, and risks in respect of the soundness of the Plan as proposed, where no housing delivery trajectory has been provided for the Plan as a whole, or for the specific sites which are identified as part of the proposed strategic policies. This should be addressed as part of the submission of the plan.			Reps on Behalf of Bloor Homes to NS LP 2041 Reg 19 Consultation (Wolvershill) merged.pdf
SP9: Employment	Yes						Policy SP9 (Employment) identifies that the Plan will deliver around 72.8ha of land for business purposes during the plan period, in order to meet needs and aspirations across a range of economic sectors. As part of the Wolvershill strategic location there is an identified requirement for additional employment provision of 3ha as part of the masterplanning of this development. This level of provision has been reduced from previous versions of the plan, reflecting the slight reduction in the overall provision for the plan and the specific circumstances of this strategic site. It is agreed that the strategic location should make provision for new employment land to be delivered via a new business park (as part of the wider masterplan) and smaller scale land and premises as part of a mixed use local centre. This provision is appropriate having regard to the close connection between Wolvershill and Weston-super-Mare as the principal economic centre within North Somerset, and where additional substantial employment provision is proposed by the plan (43.6ha. increased by some 5ha from the previous version of the plan). The provision of employment land as part of the emerging Wolvershill strategic location development has been the subject of detailed submissions by the Main Parties at Wolvershill as part of previous stages in the preparation of the plan. The provision proposed to be made is considered to be	Reps on Behalf of Bloor Homes to NS LP 2041 Reg 19 Consultation (Wolvershill) merged.pdf

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							appropriate to the context of the site and is expected to be successfully accommodated through the ongoing masterplanning process. The precise type of employment floorspace will remain flexible as the masterplan and specific development proposals evolve, to help ensure that local market conditions can be addressed, and the optimum provision made as part of delivery of new jobs and homes at this site.	
Policy LP1: Strategic location: Wolvershill (north of Banwell)	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy		No	Summary of representation (see full attached document) Policy LP1 for the Wolvershill strategic location is supported in principle as it represents a significant opportunity for the delivery of sustainable development within North Somerset. The are changes suggested to detailed elements of this policy that are considered beneficial for the purposes of clarity and effectiveness, or where it is considered that evidence suggests that a different approach should be pursued. The changes suggested to Policy LP1 can be summarised as follows: Confirm and clarify the capacity for 3,300 dwellings to be delivered at the Wolvershill Strategic Location and within the plan period to 2041; Reframe the affordable housing requirements for Policy LP1 based on a percentage figure, in line with any final figure set by Policy DP43 for all greenfield sites, or a bespoke rate for the Policy LP1 allocation based on final viability testing (accounting fully for all policy requirements); Identify specific locations of M5 crossing points referenced in policy text on a supporting plan or diagram to improve clarity; Clarify and confirm specific requirements for healthcare facilities within the development or as off-site contributions, with costs fully accounted for as part of viability assessment; Clarify density expectations for Strategic Location with reference to terms “medium” and “high” density used within the strategic location policy; Clarify expectations and requirements for the North Somerset Nature Park in terms of how the Council expects this to be delivered, and how it is to managed and maintained; Remove the requirement for “A strategy to support and maximise climate change resilience will be required including an approach to maximising carbon storage and other measures across the development with exploration of opportunities for community-based renewable energy generation” – these aspects are adequately covered by other policies within the plan; Remove requirement for “Defined areas of green infrastructure should be planted with wildflower species within a wider natural landscape setting”; Remove or amend the requirement for treatment of historic farmsteads, to ensure that this requirement is clearly stated and aligns with other policies within the plan on heritage assets and placemaking principles; Remove requirement that “Rainwater should be treated as a resource and	Changes as above.		Reps on Behalf of Bloor Homes to NS LP 2041 Reg 19 Consultation (Wolvershill) merged.pdf

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					proposals should maximise its reuse"; Clarify justification for all recreation provision to be sought via Policy LP1, including specifically the requirement for outdoor tennis courts; Reflect amendments required to clarify provision to be made for the effective delivery of Primary Education places with the development; and Remove requirement for gypsy and traveller provision (or contributions) from with Policy LP1, in line with comments made on Policy DP44.			
Policy LP10: Strategic gaps	No	• Positively prepared • Justified • Effective • Consistent with national policy		No	The use of proposed Strategic Gaps within the Plan is supported, in principle, where there is clear evidence that specific gaps between settlements (both existing and proposed) play an important role in maintaining character and distinctiveness, and to prevent harmful coalescence. However, the proposed wording of Policy LP10 is not sufficiently clear within respect to flexibility that would (and should) exist for the provision of new Green Infrastructure or other development and uses within Strategic Gaps. This provision and associated development would provide beneficial facilities and amenity for surrounding communities (such as built education, community facilities or other active Green Infrastructure uses with supporting infrastructure), and would be possible whilst ensuring that the separate identity of settlement would not be harmed, especially where there are already (or could be in the future) close and beneficial interrelationships and the provision of complementary or shared services, facilities and amenities (alongside new or improved active travel and public transport connections). In such circumstances (such as with the Strategic Gap proposed for Banwell and Wolvershill) the Strategic Gap land provides an important potential area of interface between the existing and new communities, and where there is significant potential to deliver new facilities within the Strategic Gap area. Supporting text suggests that Strategic Gap policies have a broadly similar purpose to that of Green Belts, however given that the policy should not operate on the same rigid and restrictive basis then more flexible wording should be introduced into Policy LP10. Alternatively, or as part of this, it should be made very clear that there are a variety of appropriate forms of development (to borrow wording from Green Belt policy) that are appropriate within Strategic Gaps (as is the case with Green Belt), such as built development relating to outdoor sport and recreation. Changes should be made to the policy text to clarify that there is flexibility to accommodate potential community, education or active Green Infrastructure uses (within the Strategic Gaps) that are required to serve adjacent communities, where this provision is in the best interests of the masterplanning and delivery of wider development, and in a way that is consistent with the location and function of the Strategic Gap.	Changes should be made to the policy text to clarify that there is flexibility to accommodate potential community, education or active Green Infrastructure uses (within the Strategic Gaps) that are required to serve adjacent communities, where this provision is in the best interests of the masterplanning and delivery of wider development, and in a way that is consistent with the location and function of the Strategic Gap.		Reps on Behalf of Bloor Homes to NS LP 2041 Reg 19 Consultation (Wolvershill) merged.pdf
Policy LP11: Transport infrastructure, allocations and safeguarding	No	• Positively prepared • Justified • Effective • Consistent with national		No	Policy LP11 continues to (via Schedule 7 and the Policies Map) identify land for the Banwell Bypass and land allocated/safeguarded for the J21 Bypass Scheme. As part of working to progress design and delivery matters in respect of the proposed Wolvershill strategic location development, the main parties (including Bloor Homes) have engaged with the Council to ensure the effective integration of the development's access proposals with the Banwell Bypass in respect of vehicles, pedestrians and cyclists, so that	It may now be appropriate to remove the safeguarding of the Banwell Bypass scheme route, given that this new infrastructure is committed (via a Planning Permission) and is under construction (with		Reps on Behalf of Bloor Homes to NS LP 2041 Reg 19 Consultation (Wolvershill) merged.pdf

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		policy			appropriate junction designs can be provided as part of the implementation of the scheme. The Banwell Bypass is now under construction and is expected to be complete and operational by Spring 2027, it may be unnecessary to continue to safeguard the route within the plan, given that stage reached in the delivery of this scheme. In respect of the allocated/safeguarded route for the J21 Bypass Scheme, it is understood that the Council has had a historical and long-term ambition to deliver this infrastructure, to reduce congestion at M5 J21 from traffic that does not access or egress the Strategic Road Network. However, whilst the potential delivery of the scheme is anticipated to provide some benefit, there are no detailed or active proposals for it be brought forward, and it remains unclear within the plan how it is to be considered in relation to the Wolvershill strategic location allocation (Policy LP1). Absent any further evidence in respect of the long-term benefit and delivery of the J21 Bypass Scheme it should be removed from Schedule 7 and the Policies Map. If it is to be retained then the identified corridor and design principles should be reviewed, to ensure no adverse impact on the delivery of the sustainable transport requirements for the Wolvershill strategic location, so that this important development is able to effectively deliver an active travel route to Worle railway station (alongside the possible removal of general vehicular traffic to the Wolvershill Road M5 overbridge).	expected completion in early 2027); Clarification should be provided in respect of the ongoing retention of the J21 Bypass Scheme allocation/safeguarding route, including any potential to impact on the delivery of the active travel and other measures required as part of the Wolvershill strategic location development.		
Policy DP6: Net zero construction	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy		No	Summary of representation (see attached full document for detail and suggested policy changes) As noted above there are a number of potential issues with the requirements set out in Policy DP6. In the first instance the Government's December 2023 WMS and subsequent legal challenges and opinions note that local policies can be put in place where they are consistent with national policy and are appropriately evidenced. There are a number of other issues with the requirements of Policy DP6 and focus on minimising energy demand which are contrary to the WMS and the evidence set out in the 2023 FHS and FBS consultation and not consistent with the approach set out through National Policy. We also have concerns about how the viability of Policy DP6 has been considered, noting that the costs used do not align with the Government's FHS and FBS consultation. In this context a number of recommendations are set out above and the changes proposed are set out below to ensure that Policy DP6 aligns with national guidance, is deliverable and viable.	See attached full document.		Reps on Behalf of Bloor Homes to NS LP 2041 Reg 19 Consultation (Wolvershill) merged.pdf
Policy DP8: Efficient use of land	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy		No	It is clearly desirable for all new development to ensure that effective and efficient use of land, informed by local context and the specific requirements of the development being considered. The policy requirement of a minimum target density of 40dph may not be desirable in all locations as part of a comprehensive and well considered design approach. It is noted the supporting text clarifies that this is an average density, but this is not clear from the policy wording. It is suggested the policy wording be amended for clarity and effectiveness to state that an average target density of 40dph will be sought, with lower or higher densities having regard to accessibility and other design considerations.	It is suggested the policy wording be amended for clarity and effectiveness to state that an average target density of 40dph will be sought, with lower or higher densities having regard to accessibility and other design considerations.		Reps on Behalf of Bloor Homes to NS LP 2041 Reg 19 Consultation (Wolvershill) merged.pdf

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Policy DP43: Affordable housing (including rural exception schemes)	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy		No	Summary of representation (see attached full document) Additional clarification should be provided via further supplementary Viability Assessment to fully evidence the proposed affordable housing target percentage for major greenfield development sites (including the Wolvershill strategic location), where the current assessment continues to acknowledge the target level (now at 30%) to be ambitiously set (the assessment states that even at 25% viability may be marginal); As part of resolving necessary clarifications in respect of the Wolvershill strategic location policy (LP1) in respect of specific capacity and development requirements, supplementary assessment should confirm that the 30% target for this development is likely to remain viable over the full delivery period of the development, based on the full costs that will arise, including all necessary infrastructure that the Council expects to be delivered. The extent to which site-specific infrastructure delivery has been accounted for at the Wolvershill strategic location should be further clarified and tested (justified), and there should be further consideration of the CIL Schedule for North Somerset, so that this appropriately supports the new Local Plan, including with respect of CIL being charged at the Wolvershill strategic location.	See attached and above.		Reps on Behalf of Bloor Homes to NS LP 2041 Reg 19 Consultation (Wolvershill) merged.pdf
Policy DP44: Gypsies, Travellers and Travelling Showpeople.	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy		No	Summary of representation (see attached full document) There is a lack of clarity provided by Policy DP44 (and Policy LP1) in respect of the type and scale of pitch and/or plot provision that is expected to be met overall within the plan period, and specifically the Wolvershill strategic location. The policy is not justified and will not be effective, it is therefore not sound. The inclusion of a requirement for pitch/plot provision within the Wolvershill strategic location allocation is not based on any specific evidence of availability of suitability, and may have implications for both the effective delivery of the wider strategic location development, and for suitable sites that meet the specific needs that arise within the local area. Prior to any identification of a requirement for specific pitch/plot provision as part of the Wolvershill strategic location, the Council should undertake (and evidence) a thorough review of available Council owned assets that may be available to meet the need for additional pitches and plots, as these sites are likely to be the most deliverable options within the local area for this provision. The Council should also review and evidence why sites available as part of the Council's brownfield register are not also available and suitable. As drafted Policy DP44 (and the element of Policy LP1 relating to new sites for Gypsy and Traveller pitches) is not justified and is not sound.	See attached and above.		Reps on Behalf of Bloor Homes to NS LP 2041 Reg 19 Consultation (Wolvershill) merged.pdf

Name: Bob Beale **I.D:** 27752129

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The Council Pre-Submission Plan is not sound because it fails to address adequately the impact of the proposed level of housing development on the infrastructure in the area around Nailsea, Clevedon and Backwell and, in particular, the roads in and around Tickenham. These include the B3130 through the Village, including the stretch known as “The Batch”, Washingpound Lane, The Causeway and Church Lane. These are narrow roads carrying heavy volumes of traffic from Nailsea to Bristol and the M5 junction at Clevedon as well as traffic from that junction to Bristol. This includes public service vehicles (fire and ambulance stations are based in Nailsea) as well as heavy goods vehicles. The narrowness of the roads, the inadequacy and/or complete lack of pavements and, particularly in the case of The Causeway the poor maintenance of the roads make them inadequate for the amount and type of vehicles they carry. These factors also discourage active travel which seems to be an aim of the various local plans produced over the last few years and represent a risk to health and safety. This was the case even before recent development in and around the Youngwood Lane area of Nailsea. This saw a significant increase of traffic between Nailsea and Tickenham, particularly along The Causeway. Whilst walking over The Causeway on five occasions I counted the amount of traffic between the ‘Monkey Bridge’ near Tickenham Church and Parish Brook Road, a walk of approximately 12 minutes depending on how long was spent standing in the verge to allow traffic past. The results were as follows: Sat. August 16th c 10.40 (Note 1) 41 vehicles (Note 2) Sun August 17th 16.00 64 vehicles Sat August 23rd 10.10 71 Tues Sept 16th 11.10 82 Mon Nov 17th 14.15 99 Note 1. This shows the time I was at the Bridge at the start of the survey. Note 2. This was the volume I counted on one leg of the journey. All others are on both legs. “Pinch points” of delays and risk to safety on the roads mentioned in paragraph 1 innclude: 1. “The Batch” where buses and large HGVs are unable to pass in opposite directions. This is exacerbated by the junction of Tickenham Hill with the B3130. 2. As previously mentioned The Causeway, Church Lane and Washingpound Lane, particularly at the junction of the first two mentioned where there is a blind corner. On an anecdotal note I met a group of walkers at this junction one Sunday morning. A welcome but now seldom seen feature. Noting the volume of traffic one of the group said to me “What is this, the busiest road in Nailsea?”. When I mentioned that North Somerset Council were keen to promote active travel along that stretch of road, he laughed. 3. The Middletown area of Tickenham. School parents and carers have to walk their children from the Village Hall car park to the School in one direction and from the Garden Park to School in the other. Although there is a set of pedestrian traffic lights (between the School and Hall) the pavements are inadequate and carers and children run the risk of being struck by vehicle mirrors or vehicles mounting the pavement because of the narrowness of the road and size of vehicles. This overall position is made worse on the occasions, of which there have been many recently, when there are road or utility works going on, some related to housing development in the Village, and when the M5 is shut. As mentioned previously, the current traffic flow already makes the roads mentioned inadequate. Building 3,728 homes in the Nailsea and Backwell area will mean a 42 pc increase in traffic volumes which will put all the mentioned roads over capacity, resulting in even more serious delays and risk to safety. It also undervalues the importance of a proper transport infrastructure to the economy. These figures also do not take in to account the effect of factors such as the expansion of Bristol International Airport and development at Long Ashton and Weston-super-Mare. There is no adequate solution in the proposed Plan to these issues. The proposal should be to construct an enhanced link road from Nailsea West End at the Youngwood Lane development area along Nailsea Wall to the M5 at Clevedon.			

Name: Bob Durie **I.D:** 30323233

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP5: Housing, employment	Unsure		Unsure	Unsure			Promotion of land at South Yanley Lane Long Ashton Identified in the consultation as Site HE2021.	2025 03 19 Yanley Lane submission 19-03-2025.docx

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and mixed use allocations							This submission to the North Somerset Local Plan 2040 Additional Sites consultation is made by Mary Lazo and Susan Pearce, co- owners with others of land at Bridge Farm and either side of Yanley Lane at Long Ashton. A location plan is attached. The site is identified as 'Other potential' in the North Somerset Local Plan 2040 Additional Sites consultation. It is SHLAA site HE2021 and comprises an area of 14 hectares with a suggested total capacity of 280 dwellings. The owners of the land wish the site to be taken into the forthcoming Regulation 19 consultation version of the Local Plan as a proposed allocation. The site's promoters will engage with the Regulation 19 consultation with further information on the site and the way it could be developed to provide confidence to the Council that the site is suitable and could be relied upon for development. See attached for full submission.	Title plan for Bridge Farm.docx North Somerset Local Plan Regulation 19 Consultation December 2025.pdf

Name: Bob Keightley **I.D:** 10409793

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Having lived in Backwell for 20 years, I have observed the increase of problems in the village. In particular, there is frequently traffic congestion on the A370 and on Station Road, which is the access to the A370 from Nailsea. This is due to increased housing in Nailsea and villages to the south west of Backwell. There has been an increase of flooding events caused by extreme weather conditions as a result of climate change. With the development already approved in Backwell and Nailsea this will only get worse. There are already 800 new houses approved, a 40% increase in the size of the village. The additional numbers proposed indicate total over development. The plans include a new road linking Station Road near Backwell Lake with the A370 still in Backwell. This has to cross the railway, the feasibility for which has not been demonstrated. It is unlikely that this would relieve congestion on neighbouring roads which with the increase in housing in Backwell and Nailsea will become horrendous. The bulk of the proposed development is on Grade 1 Agricultural Land currently used for food crops and grazing. There is only 7% of this high quality land left in North Somerset. This is despite Government policy stating that "we must protect our best and most versatile land" to safeguard food security. The proposals contradict this policy and undermine food security. There is nothing in the plan about necessary improvements to infrastructure, particularly school places and health services. The sheer volume of growth with the required investment infrastructure and services over such a short period is destabilising, unsustainable and undeliverable. Development would destroy valuable wildlife habitats and further harm biodiversity in one of the world's most nature-depleted countries. Areas around the proposed development are regularly subject to flooding which will only be made worse by the excessive number of houses proposed. Backwell is allocated a higher number of houses than any other village in North Somerset. It is not an employment hub – most residents commute, mainly into Bristol. The railway station is already not fit for purpose as a transport hub; it remains inaccessible for people with mobility issues and presents serious challenges when travelling with young children.			

Name: Bob Taylor Backwell Parish Council **I.D:** 9242785

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Land east of Backwell	No	• Positively prepared	Unsure	Unsure	Our village (Backwell) has 800 new homes and any more cannot be classed as sustainable. At this time we have a serious shortfall of school places meaning all these new residents will not be able to attend a school in Backwell apart from lack of infrastructure and services this proposed amount of development is without serious thought, planning and a sensible master plan for the whole of NSC.			

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		• Justified • Effective • Consistent with national policy			The proposed infrastructure plan lacks analysist and the costings are unbelievable short and where is the funding to be found as the developer seems reluctant. What does surprise me is the lack of serious thought on flooding The developer seems to think they only have to address flooding created on there single development and ignores the knock on effect of flooding around that site. I must comment on the Railway station being not fit for purpose. No wheelchair access on the Backwell side and on the Nailsea side the serious gap between train and platform is an accident waiting to happen ,the platform needs raising and health and safety does not apply to this station which apparently is an asset.			

Name: Breedon Trading Ltd **I.D:** 40891777

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP12: Minerals	Unsure		Yes	Yes	The Company supports the policy commitment to a steady and adequate supply of aggregates, and seeking to maintain a land bank for crushed rock of at least 10 years throughout the Plan period. It also supports the policy to safeguard permitted limestone workings from inappropriate development which could adversely affect mineral production. It is felt, however, that the reference to recycled aggregates implies that it forms part of the maintenance of the steady and adequate supply of aggregates, which in the Company's view would be contrary to paragraph 226 of NPPF.	The council will plan for a steady and adequate supply of aggregates, by seeking to maintain a land bank for crushed rock of at least 10 years, and allocating areas for mineral working where necessary, having regard to the need to promote deliverability of permitted reserves of crushed rock. It will also seek to encourage the provision of facilities for the production of recycled aggregate.		
Policy LP17: Preferred Area of search for minerals working – land at Downside Farm, south of Freemans Quarry	Yes		Yes	Yes		Proposals for the winning and working of mineral should include the phased extraction. The Company supports the policy but feels that the reference to "...the satisfaction of the council..." by the first bullet point is unnecessarily vague and should be deleted. An alternative wording for the first bullet point of the policy is suggested above.		
Policy LP18: Minerals Safeguarding Area for carboniferious limestone	Yes		Yes	Yes		The applicant can demonstrate through the submission of a Minerals Assessment that:	The Company is supportive of the policy but feels that the reference to "...the satisfaction of the council..." by the policy is unnecessarily vague. It also notes that although thought the need for a Minerals Assessment to be undertaken in such circumstances is referred to in the explanatory text it is not referred to by the policy itself. It is suggested, therefore, that the reference to the satisfaction of the Council be replaced with a reference to the need to submit a Minerals Assessment.	
Policy DP30: Control of non-mineral development	No	• Effective	Yes	Yes	The Company is supportive of the policy as far as it goes, but notes that the policy does not extend to sites identified as Preferred Areas or Preferred Areas of Search identified by the Plan. This is considered to reduce the effectiveness of the Plan as it would be possible for non-mineral development to	Proposals for non-mineral development close to (generally within about 500m of the boundary of) carboniferous limestone mineral working sites which are active, recently granted consent for		

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					potentially sterilise these areas. The reach of Policy DP30 should be extended to relate to both Preferred Areas or Preferred Areas of Search.	mineral working or identified as Preferred Areas or Preferred Areas of Search by this Plan, including ancillary activities, will not be supported where, due to their nature and location, they would be likely to impair mineral working activities of such sites, unless satisfactory mitigation measures can be identified.		
Policy DP31: Mineral working exploration, extraction and processing	No	• Positively prepared • Consistent with national policy	Yes	Yes	The policy refers to the requirement for applicants for planning permission for the winning and working of minerals to demonstrate a need for the development proposed. The Company considered this requirement not to reflect the overall tenor of guidance or to be positive planning and should be deleted. Nowhere within NPPF does guidance point to applicants needing to justify the need for developments for winning and working of mineral. Paragraph 226 of NPF suggests that minerals planning authorities should plan for a steady and adequate supply of minerals by the consideration of a number of material considerations, including the LAA (a) and landbank considerations (e). These are the metrics that should be material when determining an application, not need as stated.	The first bullet point of the policy should be deleted and replaced with the following: - "Consideration of the development in the context the need to provide for the steady and adequate supply of minerals (see Policy SP12), the LAA and the landbank" The phrase "...supported by adequate evidence that the development is needed and justified..." should be deleted.		

Name: Brenda Shyne **I.D:** 42816289

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No		No	No	I believe that there are more suitable sites for development than Tower Farm. Other sites, some previously dismissed have not been given renewed vigorous consideration. Tower Farm is adjacent to an ancient woodland. Under DP 35 of the draft plan {Nature Conservation} it points out that development within or in proximity to a SSI will not normally be permitted. During Covid it was found that the temporary increased use of the woodland had a negative impact on the wood from which it is still to recover. This suggests that a housing estate so close to the woods, together with increased surface water rainwater would lead to permanent and irreversible damage to the woods, it's ecology and result in loss of biodiversity. I do not see the justification for conflicting with National Planning Policy Framework paragraphs 180-182. This is designed to protect habitats such as Ancient Woodland and as no exceptional circumstances exist it should be adhered to. Tower Farm is a working farm and is designated as of Highest Quality Agricultural Land. The National Planning Framework requires local authorities to protect BMV land. The proposed development of Tower Farm would greatly increase the number of cars in use. This would have a negative impact on the environment, especially harmful to a Site of Nature Conservation Interest. The very long and very steep gradient leading from the town and it's facilities to the proposed site would deter all but the very fittest walker or cyclist. But allow for shopping, small children and pushchairs, even this hardy minority will choose to use a car. In fact this location could probably lead to two cars per family being seen as a necessity. In conclusion, surely the development of other sites, even those previously dismissed for various reasons would have a less catastrophic effect than the potential loss of an irreplaceable Ancient Woodland that we should be preserving for future generations.			

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					No modifications to the proposed development of Tower Farm could ensure the preservation of The Ancient Woodland, Weston Big Wood. The development of this site is inappropriate and I hope the removal of the proposal will allow The Woodland Trust, with the support of The Avon Wildlife trust to continue to conserve this habitat for generations to come. I do not wish to support the North Somerset Local Plan 2014 for the location at Tower Farm, Portishead.			

Name: Brian Campbell **I.D:** 44514785

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	This is not an environmentally sound proposal. It merely provides houses for people who will commute to the surrounding area. This will increase congestion in the area to the detriment of all. There has already been a very large increase of house building already and it is difficult to believe that there will adequate provision of school places, GPs etc.			

Name: Brian O'Donovan **I.D:** 62839137

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Land at North West Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	The loss of the green belt is a major concern especially with the amount of flooding already seen in the area. The added extra housing will not improve the situation and will leave even more areas at risk of flooding. As a keen runner / walker it is disappointing how current developments take no ownership of their responsibility and close off paths that have been used for decades and have been majorly beneficial to the people of Nailsea and Backwell and the surrounding areas.	Not enough considerations have been taken to manage the extra traffic this development will bring and hence the impact the way of life of current residence. As a avid cyclists I find the lack of cycle infrastructure for all the extra recent developments disappointing and putting cyclists in danger on narrow roads due to the extra traffic on the roads.		

Name: Brian Rees **I.D:** 62560257

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with	Unsure	Unsure	RESPONSE TO THE NSC 19 LOCAL PLAN 2041 The 2041 Plan is fundamentally flawed as it fails to adequately consider the negative impact it would impose upon Backwell as a community. No doubt many respondents to this proposal will enumerate the same concerns, albeit with different emphases. However, it is difficult to avoid the central issues that threaten the very existence of this beautiful village, and indeed the neighbouring			

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		• national policy			town of Nails. No infrastructure to support such a large development. There is no detailed costing visible to support such a wide-ranging proposal. There appears to be no detailed SWOT analysis available that would at least provide some assurances that the whole Plan has been given a detailed and considered assessment, with actions in place to address the key points emerging. The existing Backwell infrastructure, in terms of population capacity, basic services availability and transport integration, is already inadequate and overstretched e.g. Backwell Railway Station. Since the village is basically a commuter hub for Bristol and Weston-Super-Mare, to significantly increase the population would certainly lead to overloading. The outline proposals for a new road seems to give no consideration to the extremely heavy, and fast moving traffic, that is already a negative feature of the Station Road connection between Nailsea and Backwell. This road is already overcrowded and a danger to those commuters, including children, who need to use the narrow pavements to go to and from their destinations. For such an ambitious road scheme to be safe, the whole transport infrastructure between the two villages would need to be re-examined and modified. This would be extremely expensive and there is no indication that any thought has been given to this problem. In conclusion, it would appear that a woeful lack of consideration has been given to the overall impact that this Plan would have on services support, transport implications, quality of life for residents, ecological disruption and future wellbeing of Backwell Village, a vibrant community now under significant threat. Brian Rees FCIPS Bucklands Grove			

Name: Bristol Airport **I.D:** 41396737

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SP7: Green Belt	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	Yes	Click or tap here to enter text.Bristol Airport Ltd (BAL) welcomes the release of land from the Green Belt to reflect the grant of planning permission for an increase in operational capacity up to 12 million passengers per annum (mppa). However, our fundamental objection to the Pre-submission Local Plan is that it has failed to consider the future identified needs and requirements of Bristol Airport, North Somerset's largest employer, a strategically important piece of regional infrastructure and an international transport hub. Our position has been clear throughout the Plan making process. The Local Plan Issues and Options Document (September 2018) identified four potential options for a new policy for Bristol Airport and in our response to that consultation, we set out the reasons why BAL was strongly in favour of Option 4 (Remove Airport area from the Green Belt and allocate land for expansion now and in the future). Our position has not changed, and we are unaware of any justification for why Option 4 was removed and why the Council has pursued the approach it has. The Sustainability Appraisal (SA) supporting the Local Plan must be undertaken in accordance with 'The Environmental Assessment of Plans and Programmes Regulations 2004' which require that the Council: outlines the reasons the alternatives were selected; identifies, describes and evaluates their likely significant effects; details the reasons why alternatives were rejected; and sets out the reasons for selecting the preferred approach in light of the alternatives. In our opinion, the Council has not fulfilled these requirements in its SA Report with respect to Bristol Airport. As part of our Preferred Options consultation response in April 2022, we again emphasised the importance of Bristol Airport's longer-term growth to North Somerset and the wider region and requested that land should be allocated to	BAL requests that the Green Belt Inset is extended to reflect our adopted Master Plan land requirements to accommodate longer-term development up to 15mppa.		North Somerset Local Plan Pre-submission Plan - Representation form Part B - SP7 Green Belt_submitted 08.12.25.docx

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					accommodate longer-term development to support infrastructure for circa 15mppa, in line with our emerging Master Plan. We repeated our views again in January 2024 for the Pre-submission Local Plan which was later withdrawn. Our Master Plan is no longer emerging and was formally adopted in June 2025. This followed an extensive period of consultation with the public and key stakeholders, including the Council, during the winter period of 2024/2025. The adopted Master Plan clearly sets out the Airport's future development requirements to meet anticipated demand. In accordance with the Aviation Policy Framework (APF) (March 2013), para 4.11 notes that the 'primary objective of master plans is to provide a clear statement of intent on the part of an airport operator to enable future development of the airport to be given due consideration in local planning processes'. There is no evidence that the Council has given our Master Plan appropriate due consideration in relation to Green Belt boundaries. In addition, and in accordance with the NPPF paragraph 85, 'planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt'. Paragraphs 86 and 87 set out how planning policies can help build a strong and competitive economy and NPPF Policy 111(e) specifically identifies 'airports' as an example of a large-scale transport facility. It notes that planning policies should provide for large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. The Pre-submission Local Plan fails to address these national policies and therefore fails to meet soundness tests (A) Positively prepared and (D) Consistent with national policy. The Pre-submission Local Plan is supported by a Stage 1 Green Belt Assessment. The Stage 1 Green Belt Assessment has considered a parcel of land which includes Bristol Airport (P-032). This parcel is a sizeable area, one of the largest within the Stage 1 assessment. Goblin Combe SSSI, along with King's Wood and Urchin Wood SSSI to the west, account for approximately 40% of the parcel, while areas of ancient woodland located to the south and west also cover around 40%. The Stage 1 Assessment concludes that Parcel 032 makes a 'moderate' and not a 'strong' contribution to the Green Belt purposes and, accordingly, notes that the parcel should be included in an 'area of search' for potential grey belt land. Due to the scale of the parcel, and the significant amount of woodland included, we do not consider it was particularly representative of Bristol Airport and land surrounding the Airport. In our view, it would have been appropriate to conduct a more focused Stage 2 Assessment on the proposed Bristol Airport expansion land immediately adjacent to the Green Belt Inset (as set out in the Airport's adopted Master Plan). The failure to conduct a Stage 2 Assessment and the failure to consider further amendments to the Green Belt Inset is not 'Justified' and as a result Policy SP7 within the Pre-submission Plan as drafted cannot be considered sound. The purpose of the Stage 2 Assessment, as identified within the document itself, was to assess parcels of land on the edge of identified more sustainable towns and villages in Green Belt. It appears that the Stage 2 Assessment has only focussed on housing need, noting that the "assessment, in accordance with the NPPF paras 145 and 149, has helped the Council consider which areas to propose for release from Green Belt and allocate for housing to meet the identified house need". Considering the potential for grey belt land within Parcel 032 (as acknowledged in the Stage 1 Assessment) along with the Airport's adopted Master Plan and previous representations calling for expansion land to be allocated, the absence of a Stage 2 Assessment on land surrounding the Airport (as identified within the adopted Master Plan) is significant. We consider this to be a significant omission within the Stage 2 Green Belt Assessment which ultimately renders Policy SP7 unsound. We believe the proposed Bristol Airport expansion land immediately adjacent to the Green Belt Inset to be grey belt as i) it does not contribute strongly to purposes a), b)			

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					and d) of the Green Belt as defined by NPPF para 143; and ii) applying the policies relating to the areas or assets of particular importance in footnote 7 of the NPPF would not provide a strong reason for refusing or restricting development. It is our view that development of the expansion land as defined with the Airport's Adopted Master Plan would not fundamentally undermine the purposes of the Green Belt across the wider Plan area. The lack of consideration for airport growth requirements is an issue that has been previously highlighted during the preparation of the West of England Joint Spatial Plan (JSP). In September 2019, the Planning Inspectorate wrote to the Combined Authority with a list of fundamental concerns, which ultimately led to the JSP being withdrawn from examination. Amongst these concerns was the lack of evidence for allocating land for airport requirements and removal of Green Belt land if necessary. At the time, the Councils explained it would be for subsequent Local Plans to consider the case for the allocation of land for Bristol Airport. The Inspectors noted that they would be likely to conclude, for the JSP to be sound, that decisions on the nature, scale and location of growth at Bristol Airport should be addressed through the JSP. Following the withdrawal of the JSP, the identified requirements, set out within our Master Plan to support Bristol Airport's growth, have not been considered and positively planned for at a regional level, and to compound this, have not been considered at the local level through the Local Plan. By contrast, without going into specific detail on Policy LP14; Royal Portbury Dock, the Policy notes that 'the Replacement Local Plan and Core Strategy considered port expansion issues and land was removed from the Green Belt and safeguarded for future port use, subject to demonstrating need and other detailed requirements. Further opportunities have been reviewed but no further Green Belt amendment is proposed'. The fact that 'expansion issues' have been considered, and land was previously safeguarded, demonstrates a direct contrast between how the Port's needs have at least been considered, compared to no consideration of airport needs. The NPPF sets out that Green Belt boundaries should only be amended where exceptional circumstances exist. The exceptional circumstances that establish the need for changes to the Green Belt boundary in respect of Bristol Airport are set out below: • National policy: National aviation policy set out in the APF and The Future of UK Aviation: Making Best Use of Existing Runways (June 2018) recognises the important role regional airports play in UK connectivity and economic growth and establishes in principle support for regional airports such as Bristol making best use of their runways. The NPPF affords significant weight to the need to support economic growth and, as set out above, stipulates that local plans make provision for large scale transport infrastructure. An amendment to the Green Belt to make provision for the growth and development of Bristol Airport over the Plan period would be consistent with the Government's aviation and planning policy. It would ensure that best use is made of the airport runway and support local, regional and national economic priorities and objectives. • Development requirements: Bristol Airport's development requirements in the short to medium term have been clearly established and accepted by the grant of planning permission for the development of the Airport to accommodate 12 mppa. BAL forecasts that passenger demand will rise over and above 12 mppa during the Local Plan period, increasing to around 15 mppa and our adopted Master Plan provides a positive strategy for this growth, establishing the longer development requirements of the Airport. However, the Airport is constrained by the Green Belt and it is therefore essential that the Inset is reviewed in order to ensure that the Local Plan makes positive provision for growth beyond 12 mppa linked to wider economic priorities and that the Green Belt endures. • Openness: The NPPF makes clear that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. At			

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					paragraph 143, the NPPF establishes five purposes of including land within the Green Belt. The Green Belt in the vicinity of Bristol Airport only engages one of these purposes in any substance, which is 'to assist in safeguarding the countryside from encroachment'. This is supported by the Council's own Stage 1 Assessment, but critically no further investigation in the form of a Stage 2 Assessment has been undertaken. • Grey belt: As set out above, we consider the expansion land to be grey belt. Its development will not fundamentally undermine the purposes of the Green Belt across the wider Plan area. • The economic importance of Bristol Airport: Bristol Airport is a significant economic driver within North Somerset, the West of England sub-region, the South West region and South Wales. The Airport's adopted Master Plan outlines the expected economic impact of growth, including an increase of over 7,000 jobs and almost £700m of GVA. It is therefore essential that the Green Belt Inset is reviewed in order to accommodate the continued operation and growth of the Airport. This would be consistent with the evidence provided by the Employment Land Evidence Report (2025), which states that 'expansion of the airport could be beneficial to the North Somerset economy, providing jobs in target sectors and is likely to be commercially attractive to the market' • The specific contribution Bristol Airport will make to the effectiveness of the Local Plan: Bristol Airport is at the heart of the Local Plan's ability to deliver its employment growth aspirations. When considering the exceptional circumstances that might exist, the Airport's significance to Local Plan effectiveness should be taken into account. In conclusion, the North Somerset Local Plan is meant to set out a vision and a framework, addressing needs to 2041. Whereas future housing need has been considered, future retail need, future employment land need etc. no consideration has been given to the Airport's future requirements. Simply reflecting the Airport's 12mppa planning permission is a reactive approach and defeats the purpose of forward planning and the purpose of Local Plan production. As a result, we believe the Pre-submission Plan is unsound.			
Policy LP12: Bristol Airport	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	Yes	Bristol Airport Ltd (BAL) recognises the changes that have been incorporated in Policy LP12 since the previous Pre-submission Local Plan version to remove ambiguity and provide greater clarity. However, our fundamental objection is the spatial aspect of Policy LP12, which applies to the Green Belt Inset only. It is not evident that the Pre-submission Plan has positively considered the future needs and requirements of Bristol Airport, as set out in our adopted Master Plan (June 2025), and as required by paragraph 4.11 of the Aviation Policy Framework (APF) (March 2013). Please refer to our representations on Policies SP7 (Green Belt) and LP9 (Extent of the Green Belt) which set out the reasoning why the Green Belt Inset should be extended, which would have then informed the spatial aspect of LP12 on the Policies Map. As Policies SP7 and LP9 directly impact the spatial aspect of Policy LP12, the reasons given for the Pre-submission Plan being unsound and not legally compliant within our representation for SP7/LP9 are also very relevant to this representation on LP12. In accordance with the NPPF paragraph 85, 'planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt'. Paragraphs 86 and 87 set out how planning policies can help build a strong and competitive economy and NPPF Policy 111(e) specifically identifies 'airports' as an example of a large-scale transport facility. It notes that planning policies should provide for large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. The Pre-submission Local Plan fails to address these national policies and therefore fails to meet soundness tests (A) Positively prepared and (D) Consistent with national policy. As drafted, Policy LP12 supports the development of the Airport only within the	To achieve soundness, BAL requests that the Green Belt Inset is extended to align with our adopted Master Plan land requirements to accommodate longer-term development up to 15mppa. This would require amendments to the spatial aspect of Policy LP12 on the Policies Map. The Key Diagram should also be corrected. To achieve soundness, BAL requests that growth to 15mppa should also be included within the transport modelling used to inform the Local Plan, to ensure compliance with DfT TAG Unit M4. Finally, BAL requests that Policy LP12 properly reflects the adopted policy position from JLTP4 and recognises the role of WECA (and other stakeholders) in defining and delivering improvements to the transport network.		North Somerset Local Plan Pre-submission Plan - Representation form Part B - SP7 Green Belt_submitted 08.12.25.docx

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					Green Belt Inset. Outside of the Green Belt Inset, the Policy notes that proposals will need to demonstrate very special circumstance that clearly outweigh the harm to the Green Belt and provide compensatory improvements to the environment. This policy approach is restrictive on the development and planned growth of the Airport over the Plan Period, as identified in our Master Plan. As per our comments on Policy SP7, a Stage 1 Green Belt Assessment has been provided within the evidence base that supports the Pre-submission Plan. This Stage 1 Assessment has identified Parcel 032, which includes Bristol Airport. The Stage 1 Assessment is clear that Parcel 032 makes only a 'moderate' and not a 'strong' contribution to the Green Belt purposes and, accordingly, clearly states that the parcel should be included in an area of search for potential grey belt land. However, no search and assessment has been completed to inform the Pre-submission Local Plan. To support the development of LP12, a Stage 2 Green Belt Assessment should have considered the proposed Bristol Airport expansion land immediately adjacent to the Green Belt Inset (clearly identified in the Airport's adopted Master Plan) in more detail and considered whether it could be classified as grey belt land and released from the Green Belt. In accordance with the NPPF para 155, development in the Green Belt should not be regarded as inappropriate if 'the development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan'. We firmly believe the Bristol Airport expansion land would have been identified as grey belt within a Stage 2 Assessment. This conclusion would fundamentally change the purpose of Policy LP12. If deemed grey belt, Green Belt Policy would not apply, and very special circumstances would not need to be demonstrated. A judgement has been made that outside of the Green Belt Inset, development is inappropriate and will need to demonstrate very special circumstances. In the absence of a properly conducted Stage 2 Assessment, this unevidenced assertion means reasonable alternatives have not been considered, resulting in a Plan which is not justified or positively prepared, consequently rendering the Plan unsound. In addition, the Key Diagram on Page 15 refers to Bristol Airport as Policy LP9. This should be corrected to LP12. Future growth at the Airport has also not been considered within the Transport Assessment (TA) prepared as part of the Evidence Base. The TA states in paragraph 5.172 "Notably, the modelling includes Airport growth up to the consented 12MPPA only. Any further applications for growth at Bristol Airport will be required to take account of the Local Plan growth in a Transport Assessment." This approach is contrary to the Department for Transport's guidance for transport modelling, set out in TAG Unit M4 Forecasting and Uncertainty. Paragraph 3.2.4 of this guidance states: "…it would be expected that those inputs categorised as more than likely will be included in the core scenario." Table A2 goes on to define developments considered as 'more than likely' to include those where "Submission of planning or consent application imminent." The Council is aware of Bristol Airport's intention to submit a planning application for further growth at the Airport, evidenced by the reference to BAL's submission of an EIA Scoping Request within the justification for LP12. TAG Unit M4 also states that "The practitioner should summarise all known assumptions and uncertainties in the modelling and forecasting approach in an uncertainty log." Contrary to this guidance, the uncertainty logs appended to the Model Development Report within the Evidence Base make no reference to growth at Bristol Airport in			

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					any way (including any assumptions for consented growth to 12mppa, such as modal share). No justification has therefore been provided for this departure from TAG guidance to justify the exclusion of airport growth from the modelling. This unfortunately calls into question all the findings reported in the TA, including the mitigation requirements associated with the proposed housing allocations such as Woodspring. On this basis, we consider the Plan to be unevidenced, and therefore unsound. Finally, within the justification for Policy LP12 relating to transport, the Council state (with emphasis added in bold): “Bristol Airport will be expected to define and deliver a low carbon, accessible, integrated, and reliable transport network, for both staff and passengers…” This wording plays back adopted transport policy from the Joint Local Transport Plan 4 (JTLP4), however with an important change in emphasis made to increase the role for Bristol Airport. JTLP4 states on Page 39 (with emphasis added in bold): “We [WECA] will work with Bristol Airport to define and deliver a low carbon, accessible, integrated, and reliable transport network, for both staff and passengers…” Policy LP12 is therefore inconsistent with adopted regional policy, by not recognising that the delivery of improvements to the local and regional transport network is a joint endeavour, which requires contributions from a range of stakeholders to bring forward, including the Council, WECA and other developers. Bristol Airport cannot reasonably be expected to define and deliver an improved transport network in isolation, and so this wording should be amended to be consistent with the adopted policy position from JLTP4.			
Policy LP13: Air safety	No	• Consistent with national policy	No	Yes	The Public Safety Zones presented on the Policies Plan are correct. With regard to the Policy wording, we would suggest a minor amendment to futureproof the Local Plan. Public Safety Zones can change following changes to Airport runway layout or DfT regulations. DfT regulations on Public Safety Zones were changed in 2021 for example. We would therefore recommend adding the wording ’or any replacement thereof’ to allow for the possibility that these PSZs could change within the Plan Period.	Minor addition to the Policy wording to futureproof the PSZs - 'Specifically, within the Public Safety Zones (1-in-100,000 individual risk contours) at Bristol Airport, shown on the Policies Map (or any replacement thereof)’		North Somerset Local Plan Pre-submission Plan - Representation form Part B1 - __LP13 Air Safety__submitted 08.12.25.docx
Policy DP17: Public transport accessibility	No	• Justified • Effective		Yes	Whilst the overall objective of this policy to deliver improved public transport accessibility is supported, the precise wording is ambiguous, particularly in relation to the target frequencies based on population size. There is no justification or evidence provided for the target frequencies set, nor how developments should contribute to the achievement of these target frequencies in a way that is proportionate to the scale of the development proposed. How the targets could be applied to a non-residential development such as Bristol Airport, whose transport demands are not linked to the local population, is also unclear.	Justification for the target frequencies should be provided, with the wording of the policy made clearer as to how the targets will be applied in a way that is proportionate to the scale of the development.		North Somerset Local Plan Pre-submission Plan - Representation form Part B1 - DP17 Public Transport Accessibility_submitted 08.1.docx
Policy DP20: Airport related car parking	No	• Justified • Effective	No	Yes	The following wording of Policy DP20 is ambiguous in so far as it suggests that car parking can deliver improved public transport: “Any car parking provision, within the airport boundary as defined on the Policies Map, should be designed to deliver improved public transport to and from the airport, reducing reliance on private vehicles and will only be permitted where it does not undermine the objectives of the Airport Surface Access Strategy and the Joint Local Transport Plan.”	The intent behind the requirement for car parking provision to deliver improved public transport provision should be clarified and amended wording considered.		North Somerset Local Plan Pre-submission Plan - Representation form Part B1 - DP20 Airport related car parking_submitted 08.12.2.docx

Name: Bristol City Council **I.D:** 11678657

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SP8: Housing	No	• Positively prepared	Yes	Yes	Bristol City Council suggests a modification to Policy SP8 ('Housing') which would include a commitment to an early review of North Somerset's housing policies to reassess whether North Somerset could accommodate any the unmet housing needs arising across the West of England area.	The suggested modification is to incorporate the following wording into Policy SP8: 'The appropriate level of new homes will be subject to an early review following the adoption of the Local Plan in order to take account of any unmet housing needs of neighbouring authorities where these can be accommodated, in the context of the emerging Spatial Development Strategy for the West of England area.'		
Policy LP2: Strategic location: Woodspring (south west of Bristol)	No	• Positively prepared	Yes	Yes	This representation relates to a limited part of this strategic location – the area of land east of Colliters Way/north of the A38 Bridgwater Road, a parcel of approximately 6.5 hectares. Bristol City Council maintains the position that this area should remain a largely undeveloped and green area in the Green Belt. The adjacent land in Bristol is in the Green Belt and is proposed to remain as Green Belt in the well advanced emerging Bristol Local Plan. This land is also a Site of Nature Conservation Interest (SNCI). It is acknowledged that the 'Green Infrastructure and Landscape' development principles for Policy LP2 state that 'development must retain and enhance strategic green buffers to maintain visual separation from Bristol'; however, the boundary for LP2 as shown on the Policies Map does not enable the degree of continued separation from Bristol which would be assured by retaining the land in the Green Belt. By retaining this land in the Green Belt, the area would act as a strategic green corridor by linking the adjoining Green Belt land and SNCI in Bristol with the Hanging Hill Wood area in North Somerset. Bristol City Council acknowledges the rest of proposed strategic allocation LP2 at Woodspring (SW Bristol) for the proposed residential capacity of up to 3,500 homes and looks forward to continuing to engage and collaborate with North Somerset Council regarding the development of this location.			

Name: Brockley Parish Council **I.D:** 62800769

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Grove Farm	No	• Justified • Consistent with national policy			Brockley Parish Council (BPC) refer NSC planning to our submission made regarding the North Somerset Local Plan 2039 Pre-submission (reg 19) document, published November 2023 and to our submission made regarding the Additional housing sites Consultation in February 2025. We consider our comments are still valid and wish these to be taken into consideration. BPC wish to object to the current NS Pre-submission Plan 2041 on the grounds that the proposed scale , distribution and nature of development in Backwell and the immediate area to the west of the town towards Brockley is inconsistent with the requirements of the National Policy Framework (NPPF, 2023) and fails to deliver sustainable , justified and infra-structure-led growth. BPC recognises the need for the future development of sustainable	Brockley Parish Council (BPC) refer NSC planning to our submission made regarding the North Somerset Local Plan 2039 Pre-submission (reg 19) document, published November 2023 and to our submission made regarding the Additional housing sites Consultation in February 2025. We consider our comments are still valid and wish these to be taken into consideration. BPC wish to object to the current NS Pre-submission Plan 2041 on the grounds that the proposed scale , distribution and nature of development in Backwell and the immediate area to the west of the town towards Brockley is inconsistent with the requirements of the National Policy Framework (NPPF, 2023) and fails to deliver sustainable , justified and infra-structure-led growth. BPC recognises the need for the future development of sustainable		Local Plan 2025 october.pdf

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					housing to support growth in the area. The scale of change proposed within the Backwell settlement area will inevitably spill environmental, traffic and service impacts into adjoining communities; Brockley is a neighbouring parish. With reference to key elements of the NPPF, BPC make the following comments. Failure to deliver truly sustainable development (NPPF para's 8 and 11) The area's limited public transport provision, constrained road network and already overstretched local services mean that the proposed growth would generate a disproportionate car-dependency, contradicting the NPPF's requirement that new development be located where sustainable modes of transport are available (para 8(b) , para 105). The Draft Plan does not demonstrate how Backwell can accommodate this growth safely BEFORE development occurs which conflicts with NPPF para11(b) requiring plans to be 'positively prepared' and capable of meeting needs in a sustainable manner. Inadequate Transport Evidence and conflict with NPPF policies on sustainable Travel (paras 104-108) Backwell already experiences significant congestion along the A370, Station Road and surrounding junctions, particularly during peak hours and rail station traffic. Brockley is served by a network of rural lanes mostly single track and bounded by drainage ditches, which are already experiencing problems caused by increased local traffic arising from housing developments currently under construction. The Draft Plan lacks a credible transport mitigation strategy showing how additional development will avoid severe cumulative impacts, which the NPPF (para 111) requires to be demonstrated before site allocation. Nailsea and Backwell's station has limited capacity and parking constraints. Backwell already experiences kerbside parking overspill from the station during working hours. New development will not meaningfully shift travel behaviour towards sustainable modes, conflicting with NPPF's para 104(c) and 105, which emphasise locating development where sustainable transport can be maximised. DISPROPORTIONATE Housing Allocation Relative to Settlement Role (NPPF para 11, para 60) While Backwell is identified as a "Service Village," the scale of growth proposed is disproportionate to its size, services and infrastructure. With approximately 800 new houses already approved, an additional 1000 as proposed in the draft plan, would result in an overall increase of 80% . NPPF para 60 requires local authorities to meet housing needs in full only where it is sustainable to do so; it does not justify over-concentrating new	housing to support growth in the area. The scale of change proposed within the Backwell settlement area will inevitably spill environmental, traffic and service impacts into adjoining communities; Brockley is a neighbouring parish. 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					housing in smaller rural settlements where infrastructure cannot support it. The Draft Plan has not demonstrated either a justified settlement hierarchy or an evidence◈based rationale for selecting Backwell for such substantial growth relative to other locations with greater capacity. Conflict with NPPF Requirements for Infrastructure Delivery (para 34, para 20) The NPPF requires plans to be specific about the infrastructure necessary to support development and to show how and when it will be delivered (para 34). The Draft Plan includes no guaranteed or funded programme for essential upgrades to highways capacity, bus service provision, education, healthcare, drainage or utilities in Backwell. Without clear deliverability evidence, the plan fails NPPF para 20(b), which requires strategic policies to provide “sufficient certainty” over infrastructure. Harm to Local Landscape, Rural Character and Settlement Identity (NPPF para 174, para 130) Backwell sits within a sensitive landscape setting with valued rural approaches and green gaps separating it from Nailsea and the wider AONB setting to the south. Large-scale development, particularly the open countryside adjoining the Backwell village, would cause irreversible landscape harm and erode settlement separation. This conflicts with NPPF para 174(a) requiring planning policies to protect and enhance valued landscapes, and para 130 which requires developments to be sympathetic to local character and maintain a strong sense of place. Failure to Make Effective Use of Land Elsewhere (NPPF para 119, para 120) The NPPF prioritises development on brownfield, underutilised and sustainable locations before releasing large amounts of greenfield land. The Draft Plan does not demonstrate that all reasonable opportunities for urban regeneration, densification, or optimising brownfield land in Weston-super-Mare, Clevedon, Nailsea or Portishead have been maximised before allocating major greenfield extensions in Backwell. This conflicts with NPPF paras 119–121. Inadequate Consideration of Environmental Impacts and Biodiversity (NPPF paras 179–182) The Plan does not provide a robust ecological assessment for Backwell-adjacent sites. Potential biodiversity loss, woodland impact and pressure on local habitats have not been evaluated at the strategic level required for	housing in smaller rural settlements where infrastructure cannot support it. The Draft Plan has not demonstrated either a justified settlement hierarchy or an evidence◈based rationale for selecting Backwell for such substantial growth relative to other locations with greater capacity. Conflict with NPPF Requirements for Infrastructure Delivery (para 34, para 20) The NPPF requires plans to be specific about the infrastructure necessary to support development and to show how and when it will be delivered (para 34). The Draft Plan includes no guaranteed or funded programme for essential upgrades to highways capacity, bus service provision, education, healthcare, drainage or utilities in Backwell. Without clear deliverability evidence, the plan fails NPPF para 20(b), which requires strategic policies to provide “sufficient certainty” over infrastructure. Harm to Local Landscape, Rural Character and Settlement Identity (NPPF para 174, para 130) Backwell sits within a sensitive landscape setting with valued rural approaches and green gaps separating it from Nailsea and the wider AONB setting to the south. Large-scale development, particularly the open countryside adjoining the Backwell village, would cause irreversible landscape harm and erode settlement separation. This conflicts with NPPF para 174(a) requiring planning policies to protect and enhance valued landscapes, and para 130 which requires developments to be sympathetic to local character and maintain a strong sense of place. Failure to Make Effective Use of Land Elsewhere (NPPF para 119, para 120) The NPPF prioritises development on brownfield, underutilised and sustainable locations before releasing large amounts of greenfield land. The Draft Plan does not demonstrate that all reasonable opportunities for urban regeneration, densification, or optimising brownfield land in Weston-super-Mare, Clevedon, Nailsea or Portishead have been maximised before allocating major greenfield extensions in Backwell. This conflicts with NPPF paras 119–121. Inadequate Consideration of Environmental Impacts and Biodiversity (NPPF paras 179–182) The Plan does not provide a robust ecological assessment for Backwell-adjacent sites. Potential biodiversity loss, woodland impact and pressure on local habitats have not been evaluated at the strategic level required for		

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					site allocation. This conflicts with NPPF para 179(b), which requires plans to protect and enhance biodiversity, and para 182, mandating avoidance of significant ecological harm. Additionally, Brockley Parish Council draw attention to our following observations : 1. Whilst having no objections to new development we have doubts over the Councils ability to monitoring and follow up and if necessary, legally enforce conditions clearly stated as part of the planning consent. Of greatest concern are those which require onward monitoring for a period of ten years, relating to 'land management, the natural environment and ecology'. 2. With a policy focussing on delivering an ever-increasing number of houses, BPC consider that this will lead to an increase in 'land banking' and subsequent overall degradation of agricultural quality. Parcels of land (often a defined field) will be purchased by developers with little interest in the local community, with little or no interest in farming and agricultural land management, leading towards fragmentation and an eventual downgrade in agricultural quality. 3. BPC are concerned that given the Government's stated intentions to relax development constraints on Green Belt land, options on such land will be acquired by developers when it is adjacent to areas designated for potential development, in anticipation of such relaxation. This is already occurring. An example of this is land in Brockley, on the western side of Chelvey Road, being part of the Grove Farm and Burnt House Farm within the present Green Belt. This land was included in the original option acquired by Countryside Homes in 1999. 4. BPC has concerns regarding the constant reference to cattle grazed land being specified as compensation for the loss of existing well used feeding grounds of the greater and lesser horseshoe bats (and others). Because of several factors, including change in farm ownership and farm inheritance tax laws, and the increasing zero grazing of cattle to minimise the risk of TB, it will become increasingly difficult to ensure that this is complied with, with subsequent negative impact on these internationally protected animals. Conclusion Brockley Parish Council therefore consider for the reasons stated above, the proposed development strategy for Backwell in the North Somerset Draft Local Plan is not consistent with national policy, not justified, not deliverable, and not sound under the NPPF tests.	site allocation. This conflicts with NPPF para 179(b), which requires plans to protect and enhance biodiversity, and para 182, mandating avoidance of significant ecological harm. 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						infrastructure, environmental protection whilst also reflecting and maintaining local identity.		

Name: Bruce Campbell **I.D:** 29222017

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Policy LP3: Strategic location: Nailsea and Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I wish to raise serious concerns about the soundness of the North Somerset Council Pre-Submission Local Plan 2041. Although I welcome the Local Plan as it will identify locations for housing development, I believe there are shortcomings in the analysis of traffic impacts and plans to support the increased housing numbers. 1. The Local Plan whilst considering the traffic impacts of the isolated additional housing developments mentioned in the Local Plan does not address overall traffic growth over the 15-year period of the Local Plan, nor provide a strategic view of how traffic will be routed through key transport routes in North Somerset. 2. The Local Plan does not address existing traffic issues in impacted villages and rural lanes/roads which will be subject to a 40% proportional increase in traffic through the increased number of homes alone. 3. The Local Plan does not address the additional HGV and other commercial traffic on rural roads and villages that will be necessary to support the increased population size and improved/expanded town centres. 3.1. Increasing the number of dwellings will increase the volume of HGV traffic to support the shopping centres and homes supporting the increased number of dwellings. 3.2. The HGV route through Tickenham and Stone-Edge-Batch is the only HGV route from the M5 to Nailsea. There is no route via the A370 to Nailsea. The current roads are not suitable for this traffic and do not have any capacity for any increase in HGV traffic volume. 4. Without significant mitigations, Active Travel policies will decrease road capacity in the villages of North Somerset due to lack of adequate cycle and pedestrian paths. 4.1. Residents of Tickenham are highly favourable to Active Travel policies and wish to participate in walking and cycling to local destinations avoiding unnecessary car use, however without adequate infrastructure (pavements and cycle lanes) this policy will reduce road capacity on Tickenham roads by slowing traffic. 4.2. Tickenham residents do not feel safe walking or cycling through the village due to the high traffic volumes. There are no suitable Active travel routes from Tickenham to the surrounding towns of Nailsea/Backwell and Clevedon or to the Nailsea and Backwell railway station. This lack of suitable routes is forcing residents to use their vehicles even when they wish to use Active travel means. 5. If public transport usage is not increased in line with the increase in homes (42% for Nailsea and Backwell), this will force more use of private vehicles to fill the public transport gap. 6. The Local Plan does not consider any mitigations to traffic issues on the roads and lanes of Tickenham, in particular the viability of a route from Nailsea directly to the M5 J20. The route for traffic between Nailsea/ Backwell and the M5 would be via an improved Nailsea Wall route, considerably alleviating traffic issues on the roads and lanes through Tickenham. It is appreciated that improvements would need to be made to the existing roads, but this route would provide a direct connection between the M5 and Nailsea/Backwell to support existing and future traffic needs. 7. There is no local traffic mitigation included in the Local Plan for Clevedon Road (B3130) in Tickenham and Stone-Edge-Batch to enable safer pedestrian, wheeling and cycling use. 8. The Local Plan does not assess the volume of additional traffic on Tickenham roads/lanes from the introduction of the proposed Strategic Rail Crossing from East of Backwell to Station Road Nailsea. The review looked only at displacement of existing traffic. Introducing the Strategic Rail Crossing will encourage additional traffic from	1) Provide a fully funded direct link from Nailsea to the J20 roundabout of the M5 to carry traffic to/ from Nailsea and Backwell. The Nailsea Wall route would provide the shortest and least disruptive route. 2) Introduce significant traffic calming and speed restrictions (20mph) on The Causeway, Church Lane and Washing Pound Lane.		

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					Bristol and the southern ring road (Colliters Way) to use this route for access to the M5 and vice-versa. 9. I do not agree with the assumption that the Strategic Rail Crossing will reduce traffic volumes on the Causeway or Stone-Edge-Batch. We agree that traffic using the route to/from Nailsea on Station Road will be attracted to use the Strategic Rail Crossing, but we fail to see how North-bound traffic to Clevedon/M5 from Nailsea or Backwell would use this new route. 10. The Local Plan proposes the introduction of Quiet Lanes for the Causeway, Church Lane and Washing Pound Lane which would make these routes more attractive for pedestrians, cyclists and horse riders, but does not assess the traffic impacts on the congested route (Stone-Edge-Batch) which would carry the displaced vehicle traffic. 11. The assumptions made for Active travel used to mitigate traffic volumes are without any evidence to support the offsets stated particularly in a semi-rural environment with dangerous roads such as Tickenham. Therefore, use of these assumptions is highly risky. 12. Personally, I am daily impacted by the high volume of traffic that passes my home on Church Lane. Every morning, I am woken by a procession of vehicles using Church Lane as a cut through from Nailsea to the B3130. It is no longer safe to walk on the lane due to the speed and frequency of the traffic. The traffic has destroyed the verges of the lane leaving large unsightly potholes. Cars use the verge outside my house and my driveway as passing places. I regard myself as being active and I like to walk, run and cycle however I feel in high danger when crossing the Causeway due to the volume of traffic. Vehicle drivers regard me with contempt because they feel that I am restricting the flow of traffic. I know others in Tickenham that will not consider walking or cycling on the roads and lanes as they feel that it is way too dangerous. These roads are just not fit for purpose. I can scarcely comprehend what it will be like with another 40% of traffic as a result of the additional homes proposed in the Local Plan 2041.			

Name: Bryan Stokes **I.D:** 62716801

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Land at Tower Farm					Tower Farm and Black Rock - proposals I object to both of these sites for the following reasons: They will have a serious detrimental impact on the Weston Big Wood SSSI site. - A significant border around the woodland is essential for the ecology of the woodland species. - These areas are in the Green Belt and were added as late as the 1980s as essential protection. - Removing their Green Belt status is not sufficiently justified. There are other areas of brownfield sites in Portishead that have not been sufficiently investigated to provide housing that would be a more suitable alternative to the above mentioned sites. Access to sites around Weston Big Wood will have a major impact on the existing residents in an already congested area around the vicinity of Highdown school. Undoubtedly the majority of newcomers to these sites would have an occupation needed to fund their ownership, that required them to travel in the direction of Bristol or the M5 Motorway or even to the new railway connection by motor car.			
Black Rock, north of Clevedon Road					Tower Farm and Black Rock - proposals I object to both of these sites for the following reasons: They will have a serious detrimental impact on the Weston Big Wood SSSI site.			

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Name: Bryn Jones **I.D:** 62862881

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Land at North West Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The proposed number of new homes, 1,817 in Nailsea, will be a total over development of the town. The resulting population increase will overload local infrastructure including healthcare, schools, leisure facilities and town centre parking. The policy states that to accommodate the additional housing, transport infrastructure development is needed. NSC proposes that an East Backwell Link Road is built. Developers will be expected to contribute to the funding for the road; however, developer contributions will not cover the whole cost of the road. The developer has stated that it will only connect the road through their site once the housing has been built. This statement does not align with NSC statement on linking proposed development to infrastructure provision in a phased plan. Whilst the East Backwell Link Road will improve access from Nailsea to the A370 it will do nothing to alleviate the current and increasing traffic through Nailsea. Developments will use existing B roads out towards Wraxall and Clevedon and Portbury Lane. Developments east of Backwell wishing to get to the M5 will travel through Nailsea. It will not reduce traffic to and from Backwell and Bristol and junctions 19 and 20 of the M5. NSC has failed to address the junctions to the north of Nailsea along the B3128 and B3130 which are already at capacity and are known accident black spots. There is no mitigation suggested, meaning an even greater volume of traffic, delays and more accidents. NSC has failed to address how they will protect the rural lanes around Nailsea and Backwell from rat-running. Traffic volumes on the lanes have steadily increased in recent years as developments to the west of Nailsea have been built. This is noticeable on The Causeway to the north, and West End Lane and Netherton Wood Lane to the west, and Chelvey Lane to the south west. This also happens on Chapel Hill leading into Backwell Bow, with people attempting to bypass queues on the A370 at Backwell Crossroads. This rat-running down rural lanes will only get worse with the proposed developments. All these lanes are single track with no pavements.			

Name: Brynley Robbins **I.D:** 62758049

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Land at Tower Farm					With Regard To The Above Subject I am - along with very many others Deeply Concerned with the proposed development of the area of Tower Farm - Portishead			

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					Down - Black Rock & Weston Big Wood North Somerset Council Has Not Properly Considered the implications of this ill-conceived project & Avoided or Ignored the opportunity to increase housing density on areas which would have Less Ecological Impact The Unwanted Increase In Traffic in the surrounding area will add even more to the current Heavily Congested Roads we have to deal with on a Daily Basis along with the potential to Further Damage our residents & our children's Health Also not considered - These areas were added in the 1980's to the Green Belt because of the High Ecological Value & this should only be altered in the Most Exceptional Circumstances - these not having yet been demonstrated - Neither site can provide safe or suitable access - these woodlands are Our Planets Lungs - don't deprive us of that The damage to the The Biodiversity Of Our Wildlife is likely to be No Less Than Catastrophic There is a current wide spread desire for more community facilities & amenities which would be further stretched by the impact of this project & it would also impact heavily on the already thin infrastructure with its lack of Healthcare - Schools - Retail Outlets & The Other Associated Facilities we lack - a Strange & Somewhat Unfathomable Use of the Recreational Space at Merlin Park only beggars belief - Why suggest The Addition of Pointless Allotments & Extra Football Pitches ? When there are just Absolutely No Facilities for Parking - Toilets or Changing Rooms for that potential number of up to One Hundred people & cars in an already crowded Small & Narrow Circular Road - What about the other folk who regularly use this space - children happily playing - the dog walkers - the exercise enthusiasts - Are their access rights taken away ? This has not been thought through very carefully at all It is also considered a Major Concern & The Potential For Flood Risk to the Lower Portishead & Gordano Valley Areas by Promoting or Undertaking even more Heavy Construction Work in the Tower Farm - Portishead Down - Black Rock & Big Wood Areas along with the inevitable Climate Change & Those Altered Weather Patterns that we will have no protection against This Proposed Development Is A Time Bomb Waiting To Be Released Upon An Unsuspecting Audience - It Must Be Reconsidered			
Black Rock, north of Clevedon Road					With Regard To The Above Subject I am - along with very many others Deeply Concerned with the proposed development of the area of Tower Farm - Portishead Down - Black Rock & Weston Big Wood North Somerset Council Has Not Properly Considered the implications of this ill-conceived project & Avoided or Ignored the opportunity to increase housing density on areas which would have Less Ecological Impact The Unwanted Increase In Traffic in the surrounding area will add even more to the current Heavily Congested Roads we have to deal with on a Daily Basis along with the potential to Further Damage our residents & our children's Health Also not considered - These areas were added in the 1980's to the Green Belt because of the High Ecological Value & this should only be altered in the Most Exceptional Circumstances - these not having yet been demonstrated - Neither site can provide safe or suitable access - these woodlands are Our Planets Lungs - don't deprive us of that The damage to the The Biodiversity Of Our Wildlife is likely to be No Less Than Catastrophic There is a current wide spread desire for more community facilities & amenities which would be further stretched by the impact of this project & it would also impact heavily on the already thin infrastructure with its lack of Healthcare - Schools - Retail Outlets & The Other Associated Facilities we lack - a Strange & Somewhat Unfathomable Use of the Recreational Space at Merlin Park only beggars belief - Why suggest The Addition of Pointless Allotments & Extra Football Pitches ? When there are just Absolutely No Facilities for Parking - Toilets or Changing Rooms for that potential number of up to One Hundred people & cars in an already crowded Small & Narrow Circular Road - What about the other folk who regularly use this space - children happily playing - the dog walkers - the exercise enthusiasts - Are their access rights taken away ? This has not been thought through very carefully at all It is also considered a Major Concern & The Potential For Flood Risk to the Lower Portishead & Gordano Valley Areas by Promoting or Undertaking even more Heavy Construction Work in the Tower Farm - Portishead Down - Black Rock & Big Wood Areas along with the inevitable Climate Change & Those Altered Weather Patterns that we will have no protection			

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					against This Proposed Development Is A Time Bomb Waiting To Be Released Upon An Unsuspecting Audience - It Must Be Reconsidered			

Name: Burrington Parish Council **I.D:** 51477249

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP3: Spatial strategy	Unsure	• Consistent with national policy	Yes	Unsure	On previous drafts of the local plan we expressed concern that a wider range of sites for housing would be needed to avoid challenges to the supply of housing land and the ad hoc addition of sites through planning appeals, especially in view of the substantial increase in housing requirements arising from the new standard method of calculating housing requirements. We can see that North Somerset Council has now made significant changes to the settlement strategy to include new large sites for housing which now include a substantial urban extension south west of Bristol ('Woodspring'), a number of strategic housing sites at Nailsea and Backwell, some of which already have planning consent, the 'Wolvershill' strategic allocation north of Banwell and strategic sites at Pill and Easton-in-Gordano, as well as continuing development adjoining Weston-super-Mare (Parklands Village and Winterstoke Village), new site allocations at Clevedon and Portishead and redevelopment sites within Weston, some of which are carried forward from the Site Allocations Plan of 2018.It seems to us that the Council has thus sought to identify a realistic and as wide as possible range of options to accommodate the increased housing requirement. Some rural settlements like Churchill and Winscombe are also making significant contributions to housing land supply, although some sites were committed through planning appeals which means that they are not always well integrated with the existing settlement (or other appeal sites). Committed housing sites in the larger villages do not therefore always achieve the aims set in the Core Strategy for 'Service Villages' in terms of more self-containment in jobs and services, protecting the character of the settlement, or achieving improvements in public transport.	More detail is required about the allocated housing sites to demonstrate their feasibility, desirability and consistency with other planning policies– in the form of a development brief		
SP7: Green Belt	No	• Justified • Effective	Yes	Unsure	The Local Plan proposes to remove from the Green Belt land required by the airport as 'operational land' which is currently defined in the planning permission granted on appeal in 2022 that permits growth of the airport to accommodate up to 12 million passengers per annum (mppa). However, the airport adopted a new Masterplan in June 2025 to increase capacity from 12 to 15 mppa. A planning application is expected early in 2026. Will that Masterplan require a further release of land from the Green Belt to accommodate the operational requirements of the expansion to 15 mppa? If so, that should be clarified in the local plan.	The airport adopted a new Masterplan in June 2025 to increase capacity from 12 to 15 mppa. A planning application is expected early in 2026. Will that Masterplan require a further release of land from the Green Belt to accommodate the operational requirements of the expansion to 15 mppa? If so, that should be clarified in the local plan.		
SP8: Housing	Unsure	• Consistent with national policy	Yes	Unsure	On previous drafts of the local plan we expressed concern that a wider range of sites for housing would be needed to avoid challenges to the supply of housing land and the ad hoc addition of sites through planning appeals, especially in view of the substantial increase in housing requirements arising from the new standard method of calculating housing requirements. We can see that North Somerset Council has now made significant changes to the settlement strategy to include new large sites for housing which now include a substantial urban extension south west of Bristol ('Woodspring'), a number of strategic housing sites at Nailsea and Backwell, some of which already have planning consent, the 'Wolvershill' strategic allocation north of Banwell and strategic sites at Pill and Easton-in-Gordano, as well as continuing development adjoining Weston-super-Mare	More detail is required about the allocated housing sites to demonstrate their feasibility, desirability and consistency with		

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					(Parklands Village and Winterstoke Village), new site allocations at Clevedon and Portishead and redevelopment sites within Weston, some of which are carried forward from the Site Allocations Plan of 2018.It seems to us that the Council has thus sought to identify a realistic and as wide as possible range of options to accommodate the increased housing requirement. Some rural settlements like Churchill and Winscombe are also making significant contributions to housing land supply, although some sites were committed through planning appeals which means that they are not always well integrated with the existing settlement (or other appeal sites). Committed housing sites in the larger villages do not therefore always achieve the aims set in the Core Strategy for 'Service Villages' in terms of more self-containment in jobs and services, protecting the character of the settlement, or achieving improvements in public transport.	other planning policies– in the form of a development brief		
Policy LP1: Strategic location: Wolvershill (north of Banwell)	Unsure	‣ Consistent with national policy	Yes	Unsure	On previous drafts of the local plan we expressed concern that a wider range of sites for housing would be needed to avoid challenges to the supply of housing land and the ad hoc addition of sites through planning appeals, especially in view of the substantial increase in housing requirements arising from the new standard method of calculating housing requirements. We can see that North Somerset Council has now made significant changes to the settlement strategy to include new large sites for housing which now include a substantial urban extension south west of Bristol ('Woodspring'), a number of strategic housing sites at Nailsea and Backwell, some of which already have planning consent, the 'Wolvershill' strategic allocation north of Banwell and strategic sites at Pill and Easton-in-Gordano, as well as continuing development adjoining Weston-super-Mare (Parklands Village and Winterstoke Village), new site allocations at Clevedon and Portishead and redevelopment sites within Weston, some of which are carried forward from the Site Allocations Plan of 2018.It seems to us that the Council has thus sought to identify a realistic and as wide as possible range of options to accommodate the increased housing requirement. Some rural settlements like Churchill and Winscombe are also making significant contributions to housing land supply, although some sites were committed through planning appeals which means that they are not always well integrated with the existing settlement (or other appeal sites). Committed housing sites in the larger villages do not therefore always achieve the aims set in the Core Strategy for 'Service Villages' in terms of more self-containment in jobs and services, protecting the character of the settlement, or achieving improvements in public transport.	More detail is required about the allocated housing sites to demonstrate their feasibility, desirability and consistency with other planning policies– in the form of a development brief		
Policy LP3: Strategic location: Nailsea and Backwell	Unsure	‣ Consistent with national policy	Yes	Unsure	On previous drafts of the local plan we expressed concern that a wider range of sites for housing would be needed to avoid challenges to the supply of housing land and the ad hoc addition of sites through planning appeals, especially in view of the substantial increase in housing requirements arising from the new standard method of calculating housing requirements. We can see that North Somerset Council has now made significant changes to the settlement strategy to include new large sites for housing which now include a substantial urban extension south west of Bristol ('Woodspring'), a number of strategic housing sites at Nailsea and Backwell, some of which already have planning consent, the 'Wolvershill' strategic allocation north of Banwell and strategic sites at Pill and Easton-in-Gordano, as well as continuing development adjoining Weston-super-Mare (Parklands Village and Winterstoke Village), new site allocations at Clevedon and Portishead and redevelopment sites within Weston, some of which are carried forward from the Site Allocations Plan of 2018.It seems to us that the Council has thus sought to identify a realistic and as wide as possible range of options to accommodate the increased housing requirement. Some rural settlements like Churchill and Winscombe are also making significant contributions to housing land supply, although some sites were committed through planning appeals which means that they are not always well integrated with the existing settlement (or other appeal sites). Committed housing sites in the larger villages do not therefore always achieve the aims set in the Core Strategy for 'Service Villages' in terms of more self-containment in jobs and services, protecting the character of the settlement, or achieving improvements in public transport.	More detail is required about the allocated housing sites to demonstrate their feasibility, desirability and consistency with other planning policies– in the form of a development brief		
Policy LP4: Strategic location: Pill and Easton-in-Gordano	Unsure	‣ Consistent with national policy	Yes	Unsure	On previous drafts of the local plan we expressed concern that a wider range of sites for housing would be needed to avoid challenges to the supply of housing land and the ad hoc addition of sites through planning appeals, especially in view of the substantial increase in housing requirements arising from the new standard method of calculating housing requirements. We can see that North Somerset Council has now made significant changes to the settlement strategy to include new large sites for housing which now include a substantial urban extension south west of Bristol ('Woodspring'), a number of strategic housing sites at Nailsea and Backwell, some of which already have planning consent, the 'Wolvershill' strategic allocation north of Banwell and strategic sites at Pill and Easton-in-Gordano, as well as continuing development adjoining Weston-super-Mare (Parklands Village and Winterstoke Village), new site allocations at Clevedon and Portishead and redevelopment sites within Weston, some of which are carried forward from the Site Allocations Plan of 2018.It seems to us that the Council has thus sought to identify a realistic and as wide as possible range of options to accommodate the increased housing requirement. Some rural settlements like Churchill and Winscombe are also making significant contributions to housing land supply, although some sites were committed through planning appeals which means that they are not always well integrated with the existing settlement (or other appeal sites).	More detail is required about the allocated housing sites to demonstrate their feasibility, desirability and consistency with other planning policies– in the form of a development brief		

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					Committed housing sites in the larger villages do not therefore always achieve the aims set in the Core Strategy for ‘Service Villages’ in terms of more self-containment in jobs and services, protecting the character of the settlement, or achieving improvements in public transport.			
Policy LP5: Housing, employment and mixed use allocations	Unsure	‣ Consistent with national policy	Yes	Unsure	On previous drafts of the local plan we expressed concern that a wider range of sites for housing would be needed to avoid challenges to the supply of housing land and the ad hoc addition of sites through planning appeals, especially in view of the substantial increase in housing requirements arising from the new standard method of calculating housing requirements. We can see that North Somerset Council has now made significant changes to the settlement strategy to include new large sites for housing which now include a substantial urban extension south west of Bristol (‘Woodspring’), a number of strategic housing sites at Nailsea and Backwell, some of which already have planning consent, the ‘Wolvershill’ strategic allocation north of Banwell and strategic sites at Pill and Easton-in-Gordano, as well as continuing development adjoining Weston-super-Mare (Parklands Village and Winterstoke Village), new site allocations at Clevedon and Portishead and redevelopment sites within Weston, some of which are carried forward from the Site Allocations Plan of 2018.It seems to us that the Council has thus sought to identify a realistic and as wide as possible range of options to accommodate the increased housing requirement. Some rural settlements like Churchill and Winscombe are also making significant contributions to housing land supply, although some sites were committed through planning appeals which means that they are not always well integrated with the existing settlement (or other appeal sites). Committed housing sites in the larger villages do not therefore always achieve the aims set in the Core Strategy for ‘Service Villages’ in terms of more self-containment in jobs and services, protecting the character of the settlement, or achieving improvements in public transport.	More detail is required about the allocated housing sites to demonstrate their feasibility, desirability and consistency with other planning policies– in the form of a development brief		
Policy LP7: Settlement boundaries	Unsure	‣ Consistent with national policy	Yes	Unsure	On previous drafts of the local plan we expressed concern that a wider range of sites for housing would be needed to avoid challenges to the supply of housing land and the ad hoc addition of sites through planning appeals, especially in view of the substantial increase in housing requirements arising from the new standard method of calculating housing requirements. We can see that North Somerset Council has now made significant changes to the settlement strategy to include new large sites for housing which now include a substantial urban extension south west of Bristol (‘Woodspring’), a number of strategic housing sites at Nailsea and Backwell, some of which already have planning consent, the ‘Wolvershill’ strategic allocation north of Banwell and strategic sites at Pill and Easton-in-Gordano, as well as continuing development adjoining Weston-super-Mare (Parklands Village and Winterstoke Village), new site allocations at Clevedon and Portishead and redevelopment sites within Weston, some of which are carried forward from the Site Allocations Plan of 2018.It seems to us that the Council has thus sought to identify a realistic and as wide as possible range of options to accommodate the increased housing requirement. Some rural settlements like Churchill and Winscombe are also making significant contributions to housing land supply, although some sites were committed through planning appeals which means that they are not always well integrated with the existing settlement (or other appeal sites). Committed housing sites in the larger villages do not therefore always achieve the aims set in the Core Strategy for ‘Service Villages’ in terms of more self-containment in jobs and services, protecting the character of the settlement, or achieving improvements in public transport.	More detail is required about the allocated housing sites to demonstrate their feasibility, desirability and consistency with other planning policies– in the form of a development brief		
Policy LP8: Town centre hierarchy	Unsure	‣ Consistent with national policy	Yes	Unsure	On previous drafts of the local plan we expressed concern that a wider range of sites for housing would be needed to avoid challenges to the supply of housing land and the ad hoc addition of sites through planning appeals, especially in view of the substantial increase in housing requirements arising from the new standard method of calculating housing requirements. We can see that North Somerset Council has now made significant changes to the settlement strategy to include new large sites for housing which now include a substantial urban extension south west of Bristol (‘Woodspring’), a number of strategic housing sites at Nailsea and Backwell, some of which already have planning consent, the ‘Wolvershill’ strategic allocation north of Banwell and strategic sites at Pill and Easton-in-Gordano, as well as continuing development adjoining Weston-super-Mare (Parklands Village and Winterstoke Village), new site allocations at Clevedon and Portishead and redevelopment sites within Weston, some of which are carried forward from the Site Allocations Plan of 2018.It seems to us that the Council has thus sought to identify a realistic and as wide as possible range of options to accommodate the increased housing requirement. Some rural settlements like Churchill and Winscombe are also making significant contributions to housing land supply, although some sites were committed through planning appeals which means that they are not always well integrated with the existing settlement (or other appeal sites). Committed housing sites in the larger villages do not therefore always achieve the aims set in the Core Strategy for ‘Service Villages’ in terms of more self-containment in jobs and services, protecting the character of the settlement, or achieving improvements in public transport.	More detail is required about the allocated housing sites to demonstrate their feasibility, desirability and consistency with other planning policies– in the form of a development brief		
Policy LP9: Extent of the Green Belt	No	‣ Justified	Yes	Unsure	The Local Plan proposes to remove from the Green Belt land required by the airport as ‘operational land’ which is currently defined in the planning permission granted on appeal in 2022 that permits growth of the airport to accommodate up to 12 million passengers per annum (mppa). However, the airport adopted a new Masterplan in	The airport adopted a new Masterplan in June 2025 to		

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		• Effective			June 2025 to increase capacity from 12 to 15 mppa. A planning application is expected early in 2026. Will that Masterplan require a further release of land from the Green Belt to accommodate the operational requirements of the expansion to 15 mppa? If so, that should be clarified in the local plan.	increase capacity from 12 to 15 mppa. A planning application is expected early in 2026. Will that Masterplan require a further release of land from the Green Belt to accommodate the operational requirements of the expansion to 15 mppa? If so, that should be clarified in the local plan.		
Policy LP9: Extent of the Green Belt	Unsure	• Consistent with national policy	Yes	Unsure	On previous drafts of the local plan we expressed concern that a wider range of sites for housing would be needed to avoid challenges to the supply of housing land and the ad hoc addition of sites through planning appeals, especially in view of the substantial increase in housing requirements arising from the new standard method of calculating housing requirements. We can see that North Somerset Council has now made significant changes to the settlement strategy to include new large sites for housing which now include a substantial urban extension south west of Bristol ('Woodspring'), a number of strategic housing sites at Nailsea and Backwell, some of which already have planning consent, the 'Wolvershill' strategic allocation north of Banwell and strategic sites at Pill and Easton-in-Gordano, as well as continuing development adjoining Weston-super-Mare (Parklands Village and Winterstoke Village), new site allocations at Clevedon and Portishead and redevelopment sites within Weston, some of which are carried forward from the Site Allocations Plan of 2018.It seems to us that the Council has thus sought to identify a realistic and as wide as possible range of options to accommodate the increased housing requirement. Some rural settlements like Churchill and Winscombe are also making significant contributions to housing land supply, although some sites were committed through planning appeals which means that they are not always well integrated with the existing settlement (or other appeal sites). Committed housing sites in the larger villages do not therefore always achieve the aims set in the Core Strategy for 'Service Villages' in terms of more self-containment in jobs and services, protecting the character of the settlement, or achieving improvements in public transport.	More detail is required about the allocated housing sites to demonstrate their feasibility, desirability and consistency with other planning policies– in the form of a development brief		
Policy LP10: Strategic gaps	Unsure	• Consistent with national policy	Yes	Unsure	On previous drafts of the local plan we expressed concern that a wider range of sites for housing would be needed to avoid challenges to the supply of housing land and the ad hoc addition of sites through planning appeals, especially in view of the substantial increase in housing requirements arising from the new standard method of calculating housing requirements. We can see that North Somerset Council has now made significant changes to the settlement strategy to include new large sites for housing which now include a substantial urban extension south west of Bristol ('Woodspring'), a number of strategic housing sites at Nailsea and Backwell, some of which already have planning consent, the 'Wolvershill' strategic allocation north of Banwell and strategic sites at Pill and Easton-in-Gordano, as well as continuing development adjoining Weston-super-Mare (Parklands Village and Winterstoke Village), new site allocations at Clevedon and Portishead and redevelopment sites within Weston, some of which are carried forward from the Site Allocations Plan of 2018. It seems to us that the Council has thus sought to identify a realistic and as wide as possible range of options to accommodate the increased housing requirement. Some rural settlements like Churchill and Winscombe are also making significant contributions to housing land supply, although some sites were committed through planning appeals which means that they are not always well integrated with the existing settlement (or other appeal sites). Committed housing sites in the larger villages do not therefore always achieve the aims set in the Core Strategy for 'Service Villages' in terms of more self-containment in jobs and services, protecting the character of the settlement, or achieving improvements in public transport.	More detail is required about the allocated housing sites to demonstrate their feasibility, desirability and consistency with other planning policies– in the form of a development brief		
Policy LP11: Transport infrastructure, allocations and	Unsure	• Consistent with national	Yes	Unsure	On previous drafts of the local plan we expressed concern that a wider range of sites for housing would be needed to avoid challenges to the supply of housing land and the ad hoc addition of sites through planning appeals, especially in view of the substantial increase in housing requirements arising from the new standard method of calculating housing requirements. We can see that North Somerset Council has now made significant changes to the settlement strategy to include new large sites for housing which now include a substantial urban	More detail is required about the allocated housing sites to demonstrate their		

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safeguarding		policy			extension south west of Bristol ('Woodspring'), a number of strategic housing sites at Nailsea and Backwell, some of which already have planning consent, the 'Wolvershill' strategic allocation north of Banwell and strategic sites at Pill and Easton-in-Gordano, as well as continuing development adjoining Weston-super-Mare (Parklands Village and Winterstoke Village), new site allocations at Clevedon and Portishead and redevelopment sites within Weston, some of which are carried forward from the Site Allocations Plan of 2018.It seems to us that the Council has thus sought to identify a realistic and as wide as possible range of options to accommodate the increased housing requirement. Some rural settlements like Churchill and Winscombe are also making significant contributions to housing land supply, although some sites were committed through planning appeals which means that they are not always well integrated with the existing settlement (or other appeal sites). Committed housing sites in the larger villages do not therefore always achieve the aims set in the Core Strategy for 'Service Villages' in terms of more self-containment in jobs and services, protecting the character of the settlement, or achieving improvements in public transport.	feasibility, desirability and consistency with other planning policies– in the form of a development brief		
Policy LP11: Transport infrastructure, allocations and safeguarding	No	‣ Justified ‣ Effective	Yes	Unsure	There is remarkably little information in the Transport Policies chapter about new road schemes, their justification, their relationships with land-use proposals and their impacts on existing routes and settlements. There is a list of transport schemes in Schedule 7, which forms part of policy LP11, the justification for which relies on another document 'The Local Transport Plan' (JLTP4) which was adopted in 2020 and is 'the adopted strategic transport policy for the West of England authorities, including North Somerset.' This disconnect between the Local Plan and the Local Transport Plan is unsatisfactory as it fails to show the relationship between land use policies and transport planning proposals. There are also references to an 'Infrastructure Delivery Plan' which 'North Somerset is preparing.' Within the Wolvershill and Woodspring strategic development locations and around Nailsea and Backwell and Pill and Easton-in-Gordano 'there are additional transport requirements that are not yet identified on the Policies Map.' It is hard to reconcile such statements with the requirements of Planning Practice Guidance on Transport evidence bases in plan making and decision taking' which states: 'It is important for local planning authorities to undertake an assessment of the transport implications in developing or reviewing their Local Plan, Key transport issues for settlements along the A38 include: •implications of the continuing expansion of Bristol Airport, including •the implications of a Mass Transit Scheme between Bristol Airport and Bristol City Centre and •connections to the western towns and villages along the M5 and A370. It is remarkable that there is no information about a 'Mass Transit Scheme between Bristol Airport and Bristol City Centre' or even improvements to the A38 to accommodate road traffic generated by growth of the airport. One of the key issues for settlements along the A38 corridor is the lack of good, safe, east-west routes to the A370, the M5 and the coastal towns. Stock Lane is narrow, frequently congested with large lorries and it lacks the road space for continuous pedestrian routes. Policy LP23 refers to 'improved pedestrian access between the (Monaghan Mushrooms) site and Langford and Churchill and highway safety measures along Stock Lane' . It is hard to see what improvements and highway safety measures are envisaged without explicit guidance in the local Plan. The Banwell Bypass will improve east-west connections, but there is little information about its projected impacts on traffic flows through villages along the A368 including Sandford, Churchill, Upper Langford and Burrington, including the proposed new roundabout at Churchill Gate (A368/A38) which has been justified as part of a 'bus service improvement plan' rather than in response to the growth in road traffic, which seems disingenuous.	More details about transport schemes, their impacts on existing settlements and routes and their relationships to proposed developments		
Policy LP12: Bristol Airport	No	‣ Justified ‣ Effective	Yes	Unsure	The Local Plan proposes to remove from the Green Belt land required by the airport as 'operational land' which is currently defined in the planning permission granted on appeal in 2022 that permits growth of the airport to accommodate up to 12 million passengers per annum (mppa). However, the airport adopted a new Masterplan in June 2025 to increase capacity from 12 to 15 mppa. A planning application is expected early in 2026. Will that Masterplan require a further release of land from the Green Belt to accommodate the operational requirements of the expansion to 15 mppa? If so, that should be clarified in the local plan.	The airport adopted a new Masterplan in June 2025 to increase capacity from 12 to 15 mppa. A planning application is expected early in 2026. Will that Masterplan require a further release of land from the Green Belt to		

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						accommodate the operational requirements of the expansion to 15 mppa? If so, that should be clarified in the local plan.		

Name: Butcombe Parish Council **I.D:** 39261985

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP12: Bristol Airport	No	• Positively prepared	Unsure	Unsure	Since the Local Plan (Reg 19) was published, Bristol Airport has announced plans to place lighting and fencing on Felton Common. The Airport has launched a consultation on this only a few months after the publication of its Master Plan in Jult 2015. The Masterplan has informed Policy LP12. The current Runway Approved Lighting Consultation and its proposal for replacement land to mitigate the loss of Felton Common constitutes a significant change to the Airport's development Strategy as it affects Common Land. Butcombe Parish Council consider this to be a significant alteration in the future development of Bristol Airport, and as such it should be considered within the 2040 Local Plan.	Bristol Airport plans set out in its Runway Approach Lighting Consultation should be reflected and considered in amendments to Policy LP12		

Name: C Attwood **I.D:** 58529345

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Nailsea has over the last decade had significant residential development. This to date has not been supported by infrastructure and service provision. The additional 1193 homes now proposed across 4 sites is again with no firm plans for infrastructure provision, either in funding and identified sites. The residential developments proposed (582 homes) near Backwell Lake are on an identified floodplain, which does regularly flood. The new link road identified from the A370 to join Station Road near Backwell Lake is across a floodplain, uses up high quality productive agricultural land, crosses minor roads that are used in cycling, walking, horse riding and other leisure pursuits. I cannot see in the Draft Plan any indication of costs and how these will be met for the road construction nor any timescale for construction. The proposed route would increase traffic movements on Station Road both ways into Backwell and Nailsea. A proportion of the traffic into Nailsea would drive past the primary schools of St Francis and Golden Valley. This at school opening and home time would cause significant additional congestion and risk of injury to pedestrians and pupils. The route of this proposed new road will not assist traffic movements towards the M5 at junctions, 20, 19 and 21. My previous comments on proposed development sites to the land near Backwell Lake commented on the underestimation of traffic movements from those proposed houses, both in number of vehicles per home and number of journeys per day. The consultants report with that planning proposal did contain, from my reading of that proposal at that time some rather unrealistic assumptions on likely traffic movements to lessen the impact. The proposed residential developments around Nailsea will see increased traffic movements on the rural lanes around Nailsea, bringing increased danger to pedestrians, cyclists, walkers, hose riders and wildlife. When looking at all the development proposed around Nailsea, this town does look to be taking a new homes number well in			

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					excess of its current footprint when compared to other areas in North Somerset, whilst there is no coordinated infrastructure plan, both regarding funding and timely provision. The proposed number of new homes will bring a total over development of the town. The present facilities at Nailsea and Backwell station are not at the level you would expect at an important transport hub. There appears a lack of a joined up approach in the plan of how to provide more homes around Nailsea, whilst making the town a sought after place to live for all residents and families, both existing and new, in the 2030s - 2050s.			

Name: C Ball **I.D:** 21325153

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	1. Summary Position I strongly object to the proposed Strategic Growth Location in Backwell and the allocation of approximately 1,000 additional dwellings and associated highway infrastructure. Backwell has already been subject to significant housing approvals totalling around 800 homes, amounting to a 40% increase in the village's size. The further expansion proposed is disproportionate, unjustified, and constitutes overdevelopment that would fundamentally alter the character, function and sustainability of the settlement. The proposal is unsound under the NPPF tests: • Not justified (no needs assessment, viability evidence, or proportionality in settlement hierarchy). • Not effective (infrastructure, transport and service delivery constraints). • Not consistent with national policy (failure to protect best agricultural land, biodiversity, and avoid flood risk; conflict with sustainable development principles). _____ 2. Disproportionate Growth Contrary to Settlement Hierarchy Backwell has been allocated more houses than any other village in North Somerset, and a higher proportional level of growth than several towns. Backwell is expected to take 7% of the district's total new housing, compared with Clevedon's 2%, despite Clevedon being a fully serviced town. This results in: • An 80% projected increase in Backwell's population, compared with 22% in Weston-super-Mare and 6% in Clevedon. • A scale of development completely inconsistent with the role of a rural service village. • No needs assessment, viability analysis, or evidence base demonstrating a requirement for another 1,000 homes in this location. This renders the allocation unjustified. _____ 3. Road Proposal and Transport Impacts 3.1 Ineffectiveness of the Proposed Relief Road The proposed new road would not meaningfully relieve traffic pressures on: • Station Road • Backwell Common • Chapel Hill There is no evidence that it provides a strategic solution to Nailsea's congestion. Instead, it risks creating additional traffic flows through sensitive areas. 3.2 Engineering and Environmental Harm Constructing a bridge over the railway will be: • Hugely expensive • Disruptive and visually intrusive • Harmful to wildlife habitats, including deer and hare corridors No engineering feasibility assessment or funding certainty is provided. 3.3 Increased Traffic from Additional Residents Backwell is not an employment hub, meaning most new residents will commute. This will: • Increase car dependency • Add pressure to already constrained routes • Place additional burden on the rail station, which is already at capacity during peak hours Backwell Station itself is not fit for purpose as a transport hub:			

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					• No step-free access • Platforms inadequate for modern commuting demand • Significant problems for mobility-impaired passengers, and those travelling with children This makes the growth ineffective and inconsistent with sustainable transport goals. _____ 4. Lack of Infrastructure, Services and Community Provision The Plan provides no secured or costed mitigation for the increased pressure on: 4.1 Education No provision is made for the required expansion of secondary school places, despite the development generating significant pupil numbers. 4.2 Healthcare Local GP and health services are already overstretched. No investment, land allocation, or funding mechanism is identified. 4.3 Leisure and Retail Facilities There is no proposal to enhance local leisure, community or retail services. The inevitable result is increased driving to other towns, compounding congestion and emissions. 4.4 Funding Certainty The Plan lacks detailed costings, phasing, and guaranteed funding for any of the infrastructure required to make the development sustainable. The proposal is therefore not effective. _____ 5. Harm to High-Quality Agricultural Land The proposed road would cross Grade 1 agricultural land used for crops and grazing. Only 7% of such land remains in North Somerset. Government policy states that we must protect the best and most versatile land, yet this allocation contradicts that policy and undermines local food security. _____ 6. Environmental, Ecological and Biodiversity Harm 6.1 Loss of Habitat and Wildlife The development would destroy significant areas of greenfield habitat at a time when the UK is already one of the most nature-depleted countries in the world. 6.2 Impact on Protected Species The proposals threaten: • The Brockley Maternity Roost • An SSSI containing rare Greater and Lesser Horseshoe bats These species rely on the surrounding landscape for feeding, and disruption from construction, lighting and noise would be catastrophic. 6.3 Ineffective “Eco-Area” Proposals The Plan references new ecological mitigation areas but provides no long-term funding, management strategy, or delivery mechanism. Experience in Portishead demonstrates that such areas become neglected and unused without guaranteed investment — eventually failing both wildlife and agricultural function. This makes the ecological strategy not credible or effective. _____ 7. Flood Risk and Water Management Backwell Common is already prone to flooding — and worsening annually — with frequent interventions by Wessex Water. Additional hard surfaces from: • The proposed road • 1,000 new homes • Associated infrastructure …will significantly increase surface runoff and overwhelm small watercourses. Backwell Lake (a reservoir) and adjacent fields sit on a frequently flooded floodplain, yet the Plan provides no mitigation, modelling, or funding for waterway improvements. This is contrary to national policy, which requires avoiding flood risk and providing evidence-based mitigation. _____ 8. Heritage Impacts Near Backwell Common, the proposed road would pass in close proximity to three Grade II listed buildings. The tranquillity, setting, and historic character of these heritage assets would be directly and irreversibly harmed. No Heritage Impact Assessment is provided, making the Plan incomplete and unjustified. _____ 9. Loss of Green Belt and Character The proposed Strategic Growth Location results in substantial loss of:			

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					• Green Belt • High-quality agricultural land • Open rural landscape fundamental to the character of Backwell This level of harm is not offset by clear evidence of exceptional need or locational justification. _____ 10. Affordable Housing and Infrastructure Funding Government policy requires 50% affordable housing on Green Belt releases. While this may be desirable, it also significantly reduces developers' contributions toward: • Infrastructure • Schools • Roads • Public transport improvements This creates a delivery gap, with no guarantee that essential services will be funded. _____ 11. Missing Evidence and Assessments The Plan fails to provide or reference: • A cohesion / community impact assessment • A full transport assessment • A flood risk strategy • A heritage assessment • Detailed costings and delivery plans • Long-term maintenance funding for ecological mitigation • A needs or viability assessment for >1,000 additional homes in Backwell The lack of evidence means the allocation fails the “justified” and “effective” tests of soundness. _____ 12. Conclusion The proposed allocation for Backwell is unsound, unjustified, and disproportionate. It would result in: • Overdevelopment of a rural village • Severe environmental and biodiversity loss • Loss of nationally important agricultural land • Increased flood risk • Unmanageable strain on transport, education, health and community services • Harm to heritage assets and village character • Significant infrastructure funding gaps with no certainty of delivery For these reasons, the Strategic Growth Location at Backwell should be removed from Schedule 1 of the Local Plan.			

Name: C Barlow **I.D:** 51054945

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP11: Historic and natural environment	No	‣ Effective ‣ Consistent with national policy	Yes	Yes	The reference to swift bricks in the justification to the policy is welcome, but it is not effective nor consistent with national policy because it does not include the content of NPPG Natural Environment 2025 paragraph 017, with regard to numbers of swift bricks, nor swift bricks being a universal nest brick for a range of bird species, nor the best-practice guidance references.	To make the text effective and consistent with national policy, please add the text from NPPG Natural Environment 2025 paragraph 017, especially with regard to at least one swift brick per dwelling for new developments, swift bricks being a universal nest brick for small bird species, and the sources of best-practice guidance referenced in this paragraph of the NPPG.		National Planning Practice Guidance.docx
Policy DP35: Nature conservation	No	‣ Effective ‣ Consistent with national policy	Yes	Yes	Policy DP35 Nature Conservation: The references in the policy to swift bricks and swift nesting features are welcome, but they are not effective nor consistent with national policy because they do not include the content of NPPG Natural Environment 2025 paragraph 017, with regard to numbers of swift bricks, nor swift bricks being a universal nest brick for a range of bird species, nor the best-practice guidance references.	To make the text effective and consistent with national policy, please add the text from NPPG Natural Environment 2025 paragraph 017, especially with regard to at least one swift brick per dwelling for new developments, swift bricks being a universal nest brick for small bird species, and the sources of best-practice guidance referenced in this paragraph of the NPPG.		National Planning Practice Guidance.docx

Name: C Blenkinsop **I.D:** 62832385

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	These plans clearly represent overdevelopment for Backwell. The village is already ill-equipped to accommodate the influx of new residents, with 800 houses already approved, a 40% increase for the village. Adding even more homes with these additional numbers, would be both overwhelming and unsustainable. Backwell is repeatedly described as a “sustainable location” - but this is simply not true. It is not an employment hub; the vast majority of residents commute elsewhere for work. As someone who commutes regularly to Bristol and London, I see firsthand that the trains cannot cope with the current demand. Platforms are too short, many train doors do not open, and it is often impossible to move through the train once on board. Even without the additional approved homes, let alone this proposal, the station is unfit as a transport hub, in fact, the claim feels laughable. Access is entirely unsuitable for those with mobility issues or parents with young children / prams due to the steep step onto the train. Unsurprisingly, most Backwell residents drive, and nothing can realistically be done to improve the village roads. A new road is proposed, but there is far from guaranteed funding for it, and even if built, congestion will remain on Station Road and it's proposed on a floodplain. It would not effectively serve Nailsea’s traffic or relieve the gridlock we already experience on Station Road, Backwell Common, and Chapel Hill. Engineering a road under or over the railway seems unfeasible. Backwell has been allocated far more houses than any other village in North Somerset, and I cannot understand why. There appear to be based on ill-considered assumptions about its sustainability and the suitability of earmarked sites, assumptions that are absurd. No needs or viability analysis has been carried out for an extra 1,000 homes. Turning to the land itself: government policy clearly states that “we must protect our best and most versatile land” to safeguard food security. Yet Grade 1 agricultural land - currently used for crops and grazing - is proposed for development. Only 7% of such high-quality land remains in North Somerset. These proposals directly contradict government policy and are therefore are clearly unsound. As a Backwell resident, I regularly witness flooding in this area, particularly on Backwell Common. This will inevitably worsen with more housing. Backwell Lake (reservoir) and the adjacent fields - where new roads and housing are planned - sit on a floodplain that floods regularly. Building here is not just unwise; it is unsafe and wholly unsustainable. This scale of growth, combined with the lack of infrastructure investment, is destabilising, unsustainable, and undeliverable. Our lived experience as residents should carry significant weight in this decision. Backwell is already absorbing substantial growth and doing its fair share, it's now expected to absorb 7% of the district’s housing allocation compared to just 2% for Clevedon, this is based entirely on assumptions that are neither correct nor tested. To impose further development without any viability or needs analysis, and without addressing fundamental infrastructure and sustainability issues, is unreasonable, unsafe, contradicts Government policy, and is clearly contrary to sound planning principles.			

Name: C Brewster **I.D:** 62863521

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell is already planning to see a 40% increase in housing with the approval for 800 new homes, significantly more growth than in other villages or towns in North Somerset. This means that 7% of the district’s total planned housing will be concentrated in a small village, placing strain on local infrastructure already stretched, including shortages in school places, healthcare, and leisure amenities (not to mention current roads and flooding). The planned development would also result in the destruction of important greenbelt and loss of farmland, threatening food security and contradicting government commitments to protect high-quality agricultural land. The disappearance of these open spaces, coupled with increased risk of flooding and insufficient infrastructure planning, would cause lasting harm to Backwell’s rural character and natural environment.			

Name: C Burnett Rae **I.D:** 62747777

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Lodway Farm	No	• Positively	Unsure	Unsure	I believe the Plan isn’t sound and it doesn’t appear to be legally compliant or in line with the duty to co-operate. My views are below:			

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		prepared • Justified • Effective • Consistent with national policy			Consultation / Community involvement The way the consultation was handled feels inadequate for the scale of development being pushed onto Easton-in-Gordano. There were no local exhibitions here, even though five sites in this area were under consideration. The response numbers ended up far lower than in other places that did get proper engagement. Given the size of what's proposed, that lack of proportional and local consultation doesn't seem compliant with the Council's Statement of Community Involvement, and I'm not convinced the equality duties have been met either. It's hard to argue that local voices have been properly represented. Green Belt release and doubtful 'exceptional circumstances' The Plan assumes that removing Green Belt here is justified. But the evidence for 'exceptional circumstances' doesn't seem solid. It isn't clear that the Council has fully explored reasonable alternatives, such as genuinely maximising brownfield land, applying higher density standards in urban areas, or working with neighbouring nearby authorities. Without that work being clearly demonstrated, I don't see how the Green Belt release can be justified. On top of that, the viability addendum itself says 50% affordable housing would be 'challenging'. This undermines the idea that these sites can deliver the NPPF golden rules for Green Belt release. Traffic and transport issues M5 Junction 19 already has a significant traffic issue, and the Plan doesn't address this big issue. National Highways has already said that proper transport modelling is needed for developments in this area. But I can't see evidence that this has been done or that the Council has engaged properly with them. There's also a heavy reliance on the proposed railway link, but no real clarity that public transport will actually be sufficient for the number of homes planned. The transport assumptions don't feel robust at all. Environment and wildlife These sites are in sensitive areas, including zones linked to the bats SAC and not far from the Severn Estuary SSSI. The Plan doesn't give me confidence that wildlife corridors, habitats, or biodiversity impacts have been fully accounted for or that there are funded, specific mitigation measures. The Green Belt release also appears to ignore the value of the best agricultural land around the village. Policies are referenced, but the detail and certainty aren't there.			

Name: C Butler **I.D:** 27395649

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Vision, Strategic Priorities and Sustainability Objectives	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	Unsure	NSC is unable to comply with any duty to cooperate in regards to the use of agricultural land as the land is already being used for food production. Loss of land will affect local, regional and national food security as debated in Westminster on 18 November 2025. As stated in the debate by Robbie Moore MP Shadow Minister (Environment, Food and Rural Affairs), "... WE ARE, QUITE SIMPLY, IN A FOOD AND FARMING EMERGENCY" Any cooperation should be restricted non-agriculture related brownfield use.	Create protective farming, food production and food security policies, related across all NSC policies. Ensure any NSC decision or policy has been considered in relation to farming, food production and food security. Create strategic gaps around all urban areas to protect rural agriculture/ farming communities.		Local Plan response 12DEC25.pdf
Policy LP10: Strategic gaps	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	Unsure		NSC state that strategic gaps are defined to help retain the separate identity, character and/or landscape setting of settlements. If these are not put in place e.g. between rural Bleadon and Urban Weston-super-Mare then these unique settlements will be lost. This is of particular concern as NSC draft Corporate Plan indicated that it had plans for WsM to be the second largest settlement behind Bristol, which may only happen if it sacrifices		

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						the agricultural land in rural and semi-rural areas, jeopardising local, regional and national farming, food production and security. Urban/ city expansion into rural communities is losing food productive and will ultimately affect those ‘city’ populations as less food is produced and food shortages increase. Housing should be limited to ability to produce a base level of food in secure way. All building must recognise that farming needs to be in balance. This proposed Local Plan is not sound – Create a Strategic Gap between Bleadon and Weston-super-Mare from the A370 direction. Create strategic gaps around all urban areas to protect rural agriculture/ farming communities.		
Policy DP8: Efficient use of land	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	Unsure	As seen in section 4 of this response, the proposed Local Plan doesn’t reference farming, food production or security, not even in relation to “help increase the effectiveness of existing [farming/ food production] infrastructure”, as indicated that it can do in DP8. The proposed Local Plan is not sound. Create protective farming, food production and food security policies. Ensure any decision or policy has been considered in relation to farming, food production and food security.			
Policy DP53: Best and most versatile land	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	Unsure	Poorly protected food production land under DP53 (Best and most versatile land) vs better protected DP52 (Protection of open space and recreation). DP52 states, “Development on open space will only be permitted provided: • The open space is clearly shown through an assessment to be surplus to local requirements and will not be required for current or future needs; or • The loss of open space is to be replaced by at least equivalent or better in terms of quantity, quality and accessibility and there will be no overall negative impact on the provision of open space; or • The development is for alternative sports and recreational provision, which meets locally identified needs and clearly outweighs the loss of the current or former use”. These minimum protections are needed in the Local Plan for essential food producing land. Backwell is an example of how NSC is currently not protecting prime agricultural land, nor does it appear to intend to do so in the future. The village of Backwell is making a strong appeal to North Somerset Council to reconsider plans that would see precious grade one farmland developed for housing. https://somersetdaily.co.uk/village-urges-council-to-protect-grade-one-farmland from-development/ The use of currently used, productive agricultural land for housing, solar and other green initiatives doesn’t reflect the work that would be required to restore that land to a productive state in the future, if that is at all possible. NSC policies do not clearly indicate the environmental (mining, water pollution, disposal, recycling) and social costs (slave labour) Protecting and keeping the land is fundamental to our future ability to support our future food needs. The next generation of farmers must be recognised, encouraged and supported. The proposed Local Plan is not sound. Create protective farming, food production and food security policies. Ensure any decision or policy has been considered in relation to farming, food production and food security. The proposed Local Plan is not sound. Create a farming, food production and food security policies. Ensure any decision or policy has been considered in relation to farming, food production and food security. Create strategic gaps around all urban			

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					areas to protect rural agriculture/ farming communities. In Full Council, 19 September 2023, a NSC Cabinet member stated, "… so in the absence of government action we have no choice but to face these challenges ourselves, this will mean making bold decisions as we prepare, adapt and make the most of the opportunities a green transition will bring North Somerset through new job opportunities… " So it seems that NSC can be bold enough to tackle very real local farming, food production and security issues. However, despite being its power, the current proposed Local Plan does not address the critical, life affecting, issues of farming, food production or security, It does not protect the future physical, emotional or economic health and wellbeing of our residents and communities at local, regional or national levels. This proposed Local Plan is not sound. The proposed Local Plan is not sound. Create protective farming, food production and food security policies. Ensure any decision or policy has been considered in relation to farming, food production and food security. Create strategic gaps around all urban areas to protect rural agriculture/ farming communities.			

Name: C Cox **I.D:** 30659041

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell Common and the whole of the surrounding area is prone to flooding. This housing would further aggravate the problem and make everything even worse. Chapel Hill has already been on the news a few times for being flooded and impassable. Further housing would make this worse., and this isn't even allowing for worse weather conditions that have been predicted for the future. Where there isn't flooding there is high quality agricultural land which would be lost for ever. Only 7% of all of North Somerset's land is high quality agricultural, and you are intending to use it for housing? Government policy actually states that we must protect our best and most versatile land to safeguard food security. These proposals contradict this policy. Backwell is not an employment hub. People living there would have to commute to Bristol or Weston-Super-Mare and the roads are already at capacity, as is the railway. The railway station itself is not fit for purpose as a transport hub. After all these years, it is still inaccessible for people with mobility issues and dangerous for people travelling with young children. The proposed road would not serve its purpose of relieving traffic on Station Road or Nailsea, and would be extremely costly. The Infrastructure Delivery Plan lacks analysis and costings, and there are no funding guarantees for this new road, even if it were to prove to be useful. Backwell does not have the infrastructure to support such a development, and the village has already had an increase of 40% in its housing numbers with no improvement. It makes no sense to build another 1000 houses in that area. The whole proposal is unsustainable and undeliverable.			
Land off Pound Lane, Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell Common and the whole of the surrounding area is prone to flooding. This housing would further aggravate the problem and make everything even worse. Chapel Hill has already been on the news a few times for being flooded and impassable. Further housing would make this worse., and this isn't even allowing for worse weather conditions that have been predicted for the future. Where there isn't flooding there is high quality agricultural land which would be lost for ever. Only 7% of all of North Somerset's land is high quality agricultural, and you are intending to use it for housing? Government policy actually states that we must protect our best and most versatile land to safeguard food security. These proposals contradict this policy. Backwell is not an employment hub. People living there would have to commute to Bristol or Weston-Super-Mare and the roads are already at capacity, as is the railway. The railway station itself is not fit for purpose as a transport hub. After all these years, it is still inaccessible for people with mobility issues and dangerous for people travelling with young children. The proposed road would not serve its purpose of relieving traffic on Station Road or Nailsea, and would be extremely costly. The Infrastructure Delivery Plan lacks analysis and costings, and there are no funding guarantees for this new road, even if it were to prove to be useful. Backwell does not have the infrastructure to support such a development, and the village has already had an increase of 40% in its housing numbers with no improvement. It makes no sense to build another 1000 houses in that area. The whole proposal is unsustainable and undeliverable.			

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Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell Common and the whole of the surrounding area is prone to flooding. This housing would further aggravate the problem and make everything even worse. Chapel Hill has already been on the news a few times for being flooded and impassable. Further housing would make this worse., and this isn't even allowing for worse weather conditions that have been predicted for the future. Where there isn't flooding there is high quality agricultural land which would be lost for ever. Only 7% of all of North Somerset's land is high quality agricultural, and you are intending to use it for housing? Government policy actually states that we must protect our best and most versatile land to safeguard food security. These proposals contradict this policy. Backwell is not an employment hub. People living there would have to commute to Bristol or Weston-Super-Mare and the roads are already at capacity, as is the railway. The railway station itself is not fit for purpose as a transport hub. After all these years, it is still inaccessible for people with mobility issues and dangerous for people travelling with young children. The proposed road would not serve its purpose of relieving traffic on Station Road or Nailsea, and would be extremely costly. The Infrastructure Delivery Plan lacks analysis and costings, and there are no funding guarantees for this new road, even if it were to prove to be useful. Backwell does not have the infrastructure to support such a development, and the village has already had an increase of 40% in its housing numbers with no improvement. It makes no sense to build another 1000 houses in that area. The whole proposal is unsustainable and undeliverable.			
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell Common and the whole of the surrounding area is prone to flooding. This housing would further aggravate the problem and make everything even worse. Chapel Hill has already been on the news a few times for being flooded and impassable. Further housing would make this worse., and this isn't even allowing for worse weather conditions that have been predicted for the future. Where there isn't flooding there is high quality agricultural land which would be lost for ever. Only 7% of all of North Somerset's land is high quality agricultural, and you are intending to use it for housing? Government policy actually states that we must protect our best and most versatile land to safeguard food security. These proposals contradict this policy. Backwell is not an employment hub. People living there would have to commute to Bristol or Weston-Super-Mare and the roads are already at capacity, as is the railway. The railway station itself is not fit for purpose as a transport hub. After all these years, it is still inaccessible for people with mobility issues and dangerous for people travelling with young children. The proposed road would not serve its purpose of relieving traffic on Station Road or Nailsea, and would be extremely costly. The Infrastructure Delivery Plan lacks analysis and costings, and there are no funding guarantees for this new road, even if it were to prove to be useful. Backwell does not have the infrastructure to support such a development, and the village has already had an increase of 40% in its housing numbers with no improvement. It makes no sense to build another 1000 houses in that area. The whole proposal is unsustainable and undeliverable.			

Name: C Evans **I.D:** 62854913

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Lodway Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Not enough consideration has been given to the amount of traffic it will generate in an area that is already struggling with rush hour congestion at junction 19 on the M5 and on bridge road heading over the suspension bridge. Not enough consideration has been given on the environmental impact of building on green belt land, which will have an effect on nature and the metal wellbeing of the current residents. I am in favour of building homes within existing communities however the current plans for sprawling housing estates in the Pill and EinG area are excessive and not in proportion to the current population. The village will nearly double in size without the necessary infrastructure it needs. Please reconsider.			

Name: C Garment **I.D:** 62848257

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Proposed road linking the development site to Station Road 1. This will create a major safety issue. There are already 8 junctions on this short and narrow section of Station Road where here have been many accidents, particularly to pedestrians. Large numbers of school children regularly use this section, often spilling onto the road. An additional junction and substantial increase in traffic will make this danger significantly worse and put lives at risk. In addition, there is another proposed development of 582 new houses in the valley (within Nailsea's jurisdiction). This will also have a major impact on the level of traffic trying to use Station Road. 2. Traffic trying to exit onto Station Road at the proposed junction would be unable to do so, owing to vehicles backing up from the traffic lights by the railway bridge. The congestion would be chaotic. 3. The new road would become a 'rat run' for commuters looking for a shortcut to Nailsea avoiding the traffic lights at the A370. This will create chaos at the junction opposite Backwell Lake, particularly as HGVs will use it as they currently have difficulty negotiating Station Road through Backwell. Creating a through road used by heavy vehicles of all sizes in a residential area, poses an unacceptable danger and nuisance to the residents. The road will not be of an appropriate standard nor size for such a volume of traffic. 4. The proposed exit onto the A370 would be adequate if used only by the residents of the new development. They will almost certainly regularly commute to Bristol as the only source of employment and do not need to go towards Nailsea. Consequently the new section linking to Station Road is unnecessary, and levels of traffic within the estate dramatically reduced. 5. The proposed link from the development to Station Road represents a considerable drain on public funds which would be better spent on improving facilities and infrastructure for existing Backwell residents. Proposed development of an additional 1,000 houses 6. The proposal to build 1,000 houses on this site is a gross over-development within a small village, particularly as 800 new houses have already been approved elsewhere in Backwell. 7. There is a total lack of infrastructure such as shops, inadequate health service provision, a lack of school places and a lack of leisure facilities. The railway station is also not fit for purpose as a transport hub. It is inaccessible for people with mobility issues and has serious issues for travelling with young children. 8. The roads in any new housing development need to be wide enough to allow for residents on-street parking on at least one side (to supplement off street driveways), whilst leaving adequate room for emergency vehicles and large delivery vans and lorries. Consequently there is insufficient space for anywhere near 1,000 houses. 9. Backwell Common and surrounding areas are prone to flooding. The proposed development and roads are on a flood plain which floods regularly. The developers may be able to build houses above this, but the water has to go somewhere. This will exacerbate flooding elsewhere in the valley to the detriment of other residents and wildlife. Furthermore, the local storm drains can barely cope with existing water levels. 10. The proposed housing development and associated access/egress roads would be on Grade1 Agricultural land. This is currently used for crops and grazing, which is in desperate decline in North Somerset and should be protected in accordance with Government policy. There is only 7% of this high quality land left in the whole of North Somerset. 11. Backwell Common and the fields up to Station Road provide the last remaining green corridor for local wildlife. It links Backwell Lake with the surrounding countryside and provides a valuable food source.			

Name: C Jones **I.D:** 58347361

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP7: Green	No		Yes	Yes	My stance relates to the release of Green Belt. In particular that relating to the lifting of it for the 100 houses at Black Rock, North Weston, Portishead.	Remove Black Rock housing plans (100) from		

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Belt					North Somerset Council members have at it's central chambers expressed they do not agree with the governments calculations for the number of new dwellings in our area (North Somerset). Therefore, I deem this release of Green Belt at Black Rock unjustified from a top down view. Can I encourage North Somerset Council to challenge this pressure on calculated quantity of dwellings needed in North Somerset with central government. Black Rock development would disproportionally impact the recreational space locals have for access to fields for mental and physical well being. Equally, and potentially more importantly, the impact on the local sensitive ecosystem would be irreversible. Weston Big Woods is an area of ancient woodland and an SSSI. A small corridor of protected land will not mitigate the impacts of the development. The green corridor from the field here will be lost for the local wildlife and drainage network. None withstanding the impact from additional noise and light. More specifics found here including the contradiction to wider policy: https://www.avonwildlifetrust.org.uk/news/nature-threatened-north-somerset-local-plan Access into the site would be restricted and impact local residents disproportionately. The congestion due to this will increase localised pollution both for local residents and wildlife.	the local plan. Listen to local feedback and reputable organisations such as Avon Wildlife Trust before any irreversible damage is caused. Seek alternative locations in brownfield sites or away from sensitive SSSIs.		
Land at Tower Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	Not Justified: reasonable alternatives have not been fully considered NPPF 36(b) requires the Plan to be “an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.” The evidence base does not demonstrate that brownfield opportunities within Portishead—particularly around Wyndham Way and other underutilised areas—have been properly explored or optimised at higher densities. These brownfield sites offer the potential to regenerate Portishead’s high street and town centre, which has seen little investment despite significant residential growth, and is now tired and depressing. Directing development towards brownfield land, with increased housing density, would support sustainable regeneration and avoid the unnecessary loss of green belt. It could also reinvigorate a tired High Street. Because reasonable alternatives clearly exist but have not been robustly assessed, the allocation is not justified. Not Positively Prepared: failure to meet development needs without unnecessary environmental harm The NPPF requires the Plan to meet development needs as far as possible. A strategy that knowingly selects a highly constrained green belt site, despite reasonable brownfield capacity, does not represent a positively prepared approach. Sacrificing Portishead’s last major natural landscape, where alternatives remain available, indicates the Plan has not been shaped by a genuinely objective assessment of where development is most appropriate. Not Consistent with National Policy: Conserving and enhancing the natural environment NPPF 187 require plans to protect and enhance valued landscapes, priority habitats, and ecological networks, and to prevent harm to irreplaceable habitats. The Tower Farm / Portishead Down site borders Weston Big Wood SSSI and forms part of the Gordano Valley Green Corridor. Natural England, the Woodland Trust and Avon Wildlife Trust all emphasise that ancient woodland and associated ecosystems cannot be recreated once lost. The Plan’s reference to an “ecological buffer” is vague, unenforceable, and does not address indirect impacts such as root-zone compaction, hydrological change, increased recreational pressure, or disturbance to wildlife. The allocation is therefore inconsistent with national environmental policy and the NPPF’s requirement to protect irreplaceable habitats. Not Effective: the site is not sustainably accessible and would increase car dependency NPPF 109(e) requires plans to promote walking and cycling. This site is neither accessible nor capable of supporting sustainable travel patterns. The hill is long and steep; even as a physically fit runner, I need to drive to the bottom before running. Only the fittest residents could realistically walk or cycle. Public transport to the top of Portishead is infrequent, and essential services are not within practical walking distance. The local shops that are within walking distance are small convenience stores, you would need to travel by car to do anything other pick up a few essential items.			

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					The site would therefore be overwhelmingly car-dependent, directly contrary to NPPF 110 - 111, which require development to promote sustainable transport and reduce reliance on the private car. Not Effective: severe unresolved transport impacts Traffic in this area is already heavily constrained, particularly around the school at peak times, where congestion is well known to residents. Adding a large development in this constrained location would significantly worsen an already severe problem. No robust or deliverable mitigation has been provided, contrary to NPPF 115, which require developments to be safe, suitable for all users, and supported by appropriate mitigation. Because the transport impacts cannot realistically be mitigated, the allocation is not effective. By developing the brown field sites within Portishead, and not an inappropriate green field site, all of the NPPF guidelines could be met. This site is inappropriate for development and should be removed from the plan in favour of fully developing the brown field sites that have been identified. I do not support the the North Somerset Local Plan 2041 for the Tower Farm location.			

Name: C Melton **I.D:** 21461921

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	My concerns are based on over overdevelopment, inadequate infrastructure, environmental impact, and inconsistency with national planning policies. 1. Overdevelopment of Backwell Backwell has already seen approval for 800 new homes, representing a 40% increase in the village’s size. The proposed allocation of additional houses would result in unsustainable and disproportionate growth. Backwell has been allocated a higher number of homes than any other village in North Somerset, without a clear needs or viability analysis to justify this level of expansion. 2. Inadequate Infrastructure and Services There is insufficient evidence that the necessary infrastructure can support this growth. • The proposed new road would not effectively relieve congestion on Station Road, Backwell Common, or Chapel Hill and may be technically and financially unfeasible if it requires crossing the railway. • Schools in the area already face a deficit of places, and there are no clear plans for investment in health services, leisure facilities, or social infrastructure. • The railway station is small and currently inaccessible for people with mobility issues and presents challenges for families, meaning it cannot function as a reliable transport hub. • The Infrastructure Delivery Plan lacks detailed costings and funding guarantees; whether essential services and roads can be delivered alongside housing growth is seriously questionable. 3. Environmental and Heritage Concerns The proposals threaten valuable natural assets and biodiversity: • Development would impact Grade 1 agricultural land, of which only 7% remains in North Somerset. National policy emphasises protecting our best and most versatile land to safeguard food security. This is so important and once the land is built on, it is lost for ever. • Significant wildlife habitats would be destroyed, including areas relied upon by the Brockley Maternity Roost and rare Lesser and Greater Horseshoe Bats. • Backwell Common and surrounding fields, including the site of the proposed Backwell Lake (Reservoir) adjacent housing and new roads, are on a flood plain which floods regularly. New development would exacerbate flood risks. • The plan threatens the character of the village and the Greenbelt. 4. Unsustainable Growth The sheer scale of proposed development in Backwell is unrealistic: • Backwell is not an employment hub, meaning most residents would commute, increasing traffic pressures.			

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					• Government policy requires 50% affordable housing on Greenbelt land, reducing developer contributions available for critical infrastructure. • The speed and volume of growth proposed are unlikely to be deliverable or sustainable within the plan period. Conclusion For these reasons, I strongly object to the allocation of additional housing in Backwell as proposed in the North Somerset Local Plan 2041. The plan, in its current form, fails to demonstrate that the development is justified, deliverable, or consistent with national policy regarding sustainable growth, protection of agricultural land, biodiversity, and flood risk. I urge the Council to reconsider Backwell's allocations.			

Name: C Miles **I.D:** 58043905

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP3: Spatial strategy	Yes		Yes	Yes				
SP7: Green Belt	Yes		Yes	Yes				
SP8: Housing	Yes		Yes	Yes				
Policy LP9: Extent of the Green Belt	Yes		Yes	Yes				
Policy LP20: Wyndham Way	No	• Justified • Consistent with national policy	No		Housing need must be met and the plan needs to allocate sufficient land that is capable of meeting that need over the plan period. NSC's report on this aspirational development reinforces the fact that it is highly unlikely to deliver any significant housing within the plan period. Additional land at this important Town should be allocated.	Remove or significantly reduce the Wyndham Way housing allocation. Identify alternative land to make up the shortfall.		
Wyndham Way Broad Location		• Justified				Wyndham way development area is aspirational the land has not been assembled it is under multiple ownerships and the Town has resisted loss of employment.		
Black Rock, north of Clevedon Road	Yes		Yes	Yes			Portishead desperately needs additional housing particularly starter homes, small 2-3bed family homes and affordable housing to meet the needs of families.	
Corridor extending 10 metres either side of the railway land boundary fence to allow for access and double track	Yes		Yes	Yes				
Wick Road to Yeo Bank Lane (Tutshill Ear). Strategic cycle route between Weston-super-Mare and Clevedon.	Yes		Yes	Yes				
Strawberry Line Extension: Clevedon/	Yes		Yes	Yes				

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Kenn/Yatton								
Gordano Greenway: Strategic cycle link between Clevedon and Portishead	Yes		Yes	Yes				
Lower Strode road to Hazel Close. Path to connect Strawberry Line to Clevedon	Yes		Yes	Yes				

Name: C Riches **I.D:** 29285601

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Backwell already has development sites which will result in an increase in housing numbers of 40%. A further 1000 new houses is a higher growth percentage than any other town or village in North Somerset and would completely destroy the character of the village community and overwhelm infrastructure. There has been no needs assessment for these houses, and Backwell is not an employment hub. The A370 is already a very busy road, and is one of the few alternative options when the M5 is shut. Further building on the scale proposed will seriously exacerbate the volume of traffic using the road. The narrow local lanes cannot safely take more. The proposed cross rail road would just move traffic congestion on to the A370 at a different point and is a very costly and possibly unfeasible project which is unlikely to be completed before housing development. Constructing it retrospectively would present further challenges in terms of the land required. The land is Grade 1 agricultural, and proposals to build on this limited resource goes against Government policy. The plan gives little consideration to agriculture and associated employment in North Somerset. We need to retain our best quality land for agricultural/horticultural use, and to manage it effectively for the food security and biodiversity of this nature-depleted country. Our railway station is not fit for designation as a transport hub. In spite of campaigns over the past twenty years it remains inaccessible for those with mobility issues and challenging for those with small children or bikes. More housing would further aggravate flood risks in the area which is very close to the floodplain. I consider the proposed allocation of Land East of Backwell to be contrary to many of the priorities and policies laid out by North Somerset and as such, unsound.			

Name: C Sansum **I.D:** 62851521

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Churchill Avenue	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	Penny Field should be formally protected as a Local Green Space. It is one of Clevedon’s last remaining true areas of open greenspace, offering an irreplaceable haven for wildlife and a vital breathing space for local residents. As a designated Nature Recovery priority site, it plays a crucial role in supporting biodiversity, providing habitat for a wide range of species, and strengthening the town’s ecological network. Beyond its environmental importance, Penny Field contributes significantly to community wellbeing. It offers opportunities for people of all ages to experience nature, enjoy informal recreation, and benefit from the physical and mental health advantages that green spaces provide. Once lost, spaces like this cannot be restored. More suitable locations for development already exist across Clevedon, particularly on brownfield and greyfield sites that would allow growth without sacrificing valuable natural assets. Protecting Penny Field ensures that the town can meet its future needs while safeguarding the landscape and wildlife that make the community unique.			

Name: C Stone **I.D:** 62658785

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Grove Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	Unsure	House building proposals would almost double the size of Backwell - an unreasonable increase leading to complete overdevelopment Current road systems would be unable to cope with the increase in traffic especially station road which is already congested . This would further endanger the students using the narrow pavements. A complete new road system would be required at great expense as the road would have to go over or under the railway line. An increase in housing of this magnitude would necessitate provision of school places both for nursery , primary and secondary students. Current health service and leisure provision would be inadequate Most residents commute - not find employment in the village Grade 1 agricultural land currently used for food production - development contradicts government policy to protect land used in food production Damage wild life habitats, including the important bat colonies Not financially viable and lack of costings			

Name: C Turner **I.D:** 62568897

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	There is no needs or viability analysis for a further 1,000 houses, both of which are very serious issues given existing pressures on local services and infrastructure Backwell and nearby Nailsea are already building hundreds of new houses on farmland Transport links for commuters to places of work (mainly Bristol) are already inadequate with many bottlenecks, pinchpoints and inadequate parking provision Proposals to develop roads and houses in the Backwell Common and Backwell Lake area suggest a complete lack of knowledge of the regular flooding in the area	The plan should contain a much more detailed explanation of the decision making process in allocating so many houses in such a small area Detailed analysis and costings must be included for the Infrastructure Delivery Plan		

Name: C Walkington **I.D:** 62830209

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified	Yes	Unsure	The major problem is that the existing infrastructure is not adquate to cope with the existing population let alone a further 1000 homes. Very little is proposed to cope with the increased traffic requirement, which would require a masive supporting investment to build new roads giving an alternative direct access to Bristol and also a new alternative way into Bristol itself which would bypass the Cumberland Basin Bottleneck. These matters may need taking up at Government level. but until a soultion is found the proposed development should not be consideed.			

Name: C Welch **I.D:** 58650209

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared • Justified	Unsure	No	1 Backwell already has 800 new houses approved, a 40% increase for the village. These additional numbers would lead to complete overdevelopment. 2 The proposed road would not effectively serve Nailsea's traffic or relieve congestion on Station Road, Backwell Common, or Chapel Hill. Engineering the road under or over the railway would be highly expensive and possibly unfeasible. 3 Despite this increase, there is a deficit in school places and no investment in health services or leisure facilities. The lack of infrastructure and services cannot support another 1,000 houses. 4 Backwell is allocated a higher number of houses than any other village in North Somerset, and even a higher growth percentage than towns. Backwell is expected to take 7% of the district's housing allocation, compared to Clevedon's 2%. 5 There is no needs or viability analysis for an extra 1,000 houses. 6 Backwell is not an employment hub, most residents commute 7 No social cohesion impact assessment has been provided. 8 Grade 1 Agricultural Land currently used for food crops and grazing. There is only 7% of this high quality land left in the whole of North Somerset. 9 Government policy states that "we must protect our best and most versatile land" to safeguard food security. The proposals contradict this policy and undermine food security. 10 Development would destroy valuable wildlife habitats and further harm biodiversity in one of the world's most nature-depleted countries. 11 The proposals threaten the Brockley Maternity Roost and SSSI, with rare Lesser and Greater Horseshoe Bats relying on the land for food. 12 The Infrastructure Delivery Plan lacks analysis and costings, and there are no funding guarantees for the new road or services. 13 Backwell Common and surrounding areas are prone to flooding, which would be aggravated by more housing. 14 Concerns regarding the strategic growth location designation include the impact on the area's character, the loss of Greenbelt and high-quality agricultural land, the risk of flooding, and uncertainty over whether the road can be funded and delivered on time to support the proposed housing. 15 Backwell Lake (Reservoir) and adjacent fields, where the new roads and housing is planned and are on a floodplain, which floods regularly. 16 Government policy requires 50% affordable housing on Greenbelt Land, but this reduces the funds developers contribute towards infrastructure. 17 The sheer volume of growth with the required investment infrastructure and services over such a short period is destabilising, unsustainable and undeliverable. 18 The railway station is not fit for purpose as a transport hub; it remains inaccessible for people with mobility issues and presents serious challenges when travelling with young children.	Reject it in entirety. NO new houses.		BPC LP Leaflet Nov 2025.pdf

Name: C Wheeler **I.D:** 58562753

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP7: Green Belt	No	• Justified	No	Unsure	This planning process is not inclusive. Most people aren't aware of it and most people wouldn't have enough understanding to participate in it. I therefore believe that it isn't democratic. All the developments listed contradict the noble opening statement about the Green Belt ie protecting the green land around Bristol and containing its sprawl. Generally the developments are principally about PROFIT. The land isn't just for people. I believe that the measure put in place to protect wildlife are lip service only. I have direct experience of the devastating loss of habitat that occurs due to housing development. How can we not prioritise nature at this pivotal time of the world. It completely beggars belief.	I am not qualified to respond to this. This is why we have experts who we hope we can rely on.		
Policy LP9: Extent of the Green Belt	No	• Justified	No	Unsure	This planning process is not inclusive. Most people aren't aware of it and most people wouldn't have enough understanding to participate in it. It isn't democratic.	I am not qualified or experienced enough to respond. We need to be		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					All the developments listed contradict the noble opening statement about the Green Belt ie "The North Somerset Green Belt is highly valued by local communities and is an effective planning tool in preventing the urban sprawl of Bristol and shaping the pattern of development in North Somerset. It keeps land permanently open, prevents towns merging together and protects the countryside." In truth the developments are principally about PROFIT. The statement above would be laughable if it wasn't so tragic. The land isn't just for people. I believe that measures put in place to protect wildlife are lip service only. I have direct experience of the devastating loss of habitat that occurs due to housing development. How can we not prioritise nature at this pivotal time of the world. It completely beggars belief. The further encroachment of the airport on green space can only again be about PROFIT. For the health of the planet and local people we must take fewer flights.	able to trust the experts who represent us to do this.		
Policy LP12: Bristol Airport	No	‣ Justified	Unsure	Unsure	I don't understand how the proposed developments at the airport can possibly align to the objectives outlined above regarding environment, air quality, noise, biodiversity and landscape and greenbelt impact. Are these noble sentiments just lip service? I am also completely at a loss to understand how it can conceivably be logical to expand the airport when the world is facing such climate change problems. In the Summer 2021 issue of “North Somerset Life” (the Council’s information magazine for residents) the Council set out a climate emergency challenge to encourage all North Somerset residents to change and reduce their carbon footprint. One of the key challenges set by the Council was to: “Cut back on flying - holiday closer to home and use video conferencing for work.” So again, the proposals do not align with the Council's stated objectives. I believe that I live in a region that takes its responsibilities regarding climate change seriously and very much hope that I am represented by leaders who have the courage to act on them.			
Policy DP43: Affordable housing (including rural exception schemes)	No	‣ Justified	Unsure	Unsure	I would like to think that housing will be provided for those in most need. Unfortunately I am not confident that this will be the case. Most developments that I have seen are for people on high incomes and the developments are driven my profits for the developers who rarely fulfil the community benefit requirements. Lip service seems to be generally paid to affordable housing provision.			

Name: C Widd **I.D:** 62849185

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I believe it would be ridiculous to allow another 1000 houses to be built in Backwell after 800 new houses have already been approved. That nearly doubles the size of the village turning it into a town with a lack of infrastructure to support so many extra people. The doctors, schools and other services would be over whelmed & there are no plans to build more. Even the roads could not cope with so many extra people, they are already congested. No social cohesion impact assessment has been provided. This land is agricultural land of which there is only a small percentage left in NS, we should be protecting this for food security and protect these valuable wildlife habitats which host a wide biodiversity.			

Name: C Williams **I.D:** 39317601

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No		Unsure	Unsure	These proposals would represent a massive and unsustainable increase in the houses in Backwell, almost doubling the population when taken together with the recent housing approvals in the last 5 years. The current proposals would destroy a notable amount of valuable grade 1 farmland, of which there is only 7% left in the area. Other land noted in this proposal for development is already prone to flooding and this will exacerbate the issue. Backwell Common regularly becomes impassible due to flooding and sometimes dangerously so. The roads, especially Station Road are already dangerous for children with its narrow pavements considering the number of children attending the schools in the village. These proposals are bound to significantly increase the volume of traffic, increasingly the risk of harm to the children. The proposal allocates Backwell with a 80% population growth whereas towns, which have employment huns such as Clevedon and Portishead only have a 6% and 14% allocation in terms of population growth.	More detail on infrastructure and delivery Plan required. A viability analysis for the additional 1,000 houses. Seems much more sensible to increase housing stock within towns and nearer to Bristol where the employee not hubs are located rather than villages such as Backwell.		

Name: C Willis **I.D:** 58572641

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared	No	No	No infrastructure to support the new housing. One road in, one out Portishead-Bristol causing horrendous traffic chaos Impact greatly on GP surgeries, Dentists and schools which are already struggling to meet present Portishead residents needs	I can think of none. The areas allocated in Portishead will cause absolute chaos for present residents		
Black Rock, north of Clevedon Road	No	• Positively prepared	No	No	No infrastructure to support the new housing. One road in, one out Portishead-Bristol causing horrendous traffic chaos Impact greatly on GP surgeries, Dentists and schools which are already struggling to meet present Portishead residents needs	I can think of none. The areas allocated in Portishead will cause absolute chaos for present residents		

Name: C Winward **I.D:** 62848801

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Effective	No	No	I do not believe this plan is compliant or justified due to the location of the site. The site has poor access through small roads which are only suitable for the houses that they feed. The access at The Downs is a dead end and for years traffic from the school has been impacted by it being a no through road. During the period where there were increased intakes at Highdown school the traffic situation was unsafe for road users and pedestrians. Bearing in mind that this was a probable increase of around 100 cars (as most overspill classes were to provide spaces from the village quarter) and the area was bumper to bumper everyday because of the lack of access to travel through or choose alternative routes. Even if every house planned has only one car there is absolutely no way that the school, The Downs and surrounding roads would be able to support that level of usage. The plan claims that the site is close to local amenities and reasonable distance to transport links but the bus links on Down Road are not linked to Clevedon-WsM, the bus to Cribbs is over a handful of services per day and the x4 bus does not head directly to the town centre therefore not making it a time efficient service. As to the train station and amenities we are nearly 400 foot higher than the town centre. It is not reasonable to believe that people will consider walking or using e- bikes over this distance. The distances spoken of in the plan are more of a ‘as the crow flies’ measurement. The area considered is a poor choice due to the scientific and ecological interest attatched to the land and woodlands at Weston Big Wood. The animals we see in our area will be massively impacted by this development and every consideration should be made to protect the birds, animals and flora and fauna. The land surrounding the woods allow the woods to grow and breath. The introduction of habitation will result in animals not being able to access surrounding fields and the woods not being able to expand as it must to regenerate. The loss of rare wild orchids and primroses as well as other plants will be likely as their preferred home ground is taken away. The solution to supplying housing to Portishead needs to start with proper consideration of amenities and facilities. We are now a town without banking services, with only one chemist, with poor road access in and out of Portishead. The development			

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					should be built on brown land, closer to the train station, in order to make the traffic flow around the town as affected as little as possible. Regenerating brown sites, such as Old Mill Road could provide added amenities, serviceable roads as well as the train station being within realistic walking distance from the train station.			

Name: CJ Waite **I.D:** 26060801

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP1: Sustainable Development	No	• Positively prepared • Justified • Effective	Unsure	No	If the stated aim is to encourage walking and cycling to local amenities then siting the proposed Tower Farm development on the top of the hill is not the best location. Local Transport is not regular and the site is a 120m elevation from the High St which is a minimum 20 minute walk for a fit and healthy person.	Consider the Brown Field sites within Portishead that are on the level and closer to amenities. Similar grean field sites off Sheepway/Portbury Hundred.		
SP4: Placemaking		• Positively prepared • Justified	No	No	The choice of proposed Tower Farm development as a site has not undergone a robust and credible process. Clearly it was a 'desk top' exercise that did not consider the realities of the location and a visit to the area would have provided clarity and a 'Not Suitable Location' decision. The access to the area will be via The Downs, off Down Rd, by the entrance to Highdown Infant and Junior Schools. There are currently approx. 180 properties in The Deans and The Downs that are accessed via this junction, this will increase threefold to approx. 600 should the houses be built creating a cul de sac of 600 houses. It should be noted that the current residents are essentially prisoners in their homes during School Start and Finish times due to excessive parking in The Downs and along Down Rd, aggravated by the staggered times of the 2 schools. Adding double yellow lines will not resolve the problem, it will only move it elsewhere. An additional 400 homes will significantly increase the problem. As it is, access to either the The Deans or The Downs by the Emergency Services during these periods is severely compromised. Should the 'go ahead' be given there will also be very significant issues caused by construction traffic.	Consideration to be choosing a site of this size with at least 2 access points		
Policy LP9: Extent of the Green Belt	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The release of Green Belt land to accommodate the proposed Tower Farm development is not exceptional as alternatives exist. The environmental importance of the fields that comprise the proposed development should not be underestimated, they act as an essential buffer to Weston Big Wood, a SSSI. Building on this land will lead to the inevitable degradation of the Wood and probable deselection as a SSSI. It should be noted that the area under consideration is currently Green Belt, a status achieved in the late 1980's, it is difficult to see why this has now changed. If it was considered vitally important to protect the area then, why is this not so now? By placing it under Green Belt protection then it preceded the Natural & Environmental and Rural Communities Act of 2006 Section 40 that places a duty on Public Bodies to contribute to the coherence and resilience of valuable ecological networks. It also seems to be in contradiction to the North Somerset Local Nature Recovery Strategy that defines how the Act of 2006 will be met.	If it is inevitable that green belt land must be used then choose land that is not so environmentally important, for example Sheepway or off the Portbury 100		
Policy DP34: Green infrastructure	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The selection of the proposed Tower Farm development in Portishead is in direct contravention of the aims set out above. By choosing this site it will have a significant negative impact on the Environmental resilience of the area and Weston Big Wood, a SSSI, in particular. The fields are an essential element in the green corridor from the Bristol Chanel to the Mendip Hills. One of the criteria for the proposal to be judged against is 'does it enhance biodiversity and/ or protect high quality land', in this case 'high quality' means beneficial for nature. Clearly this proposed site does not as it will negatively impact on WBW in both constraining the interaction of nature with the surrounding fields and encourage greater footfall to the detriment of the wood. The area under consideration is currently Green Belt, a status achieved in the late 1980's, it is difficult to see why this has now changed. If it was considered vitally important to protect the area then, why is this not so now? By placing it under Green Belt protection then it preceded the Natural & Environmental and Rural Communities Act of 2006 Section 40 that places a duty on			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					Public Bodies to contribute to the coherence and resilience of valuable ecological networks. It also seems to be in contradiction to the North Somerset Local Nature Recovery Strategy that defines how the Act of 2006 will be met. The revised Planning Regulations allow land to be taken out of Green Belt, however the criteria is that it may only be in exceptional circumstances. The Tower Farm proposal is not an exceptional circumstance,			
Land at Tower Farm	No	• Positively prepared • Justified • Consistent with national policy	No	No	Considering the proposed Tower Farm development, I believe it contravenes the National Policy that allows land to be taken out of Green Belt in exceptional circumstances. The proposed site is situated alongside Weston Big Wood (WBW), a nationally recognised SSSI. The fields are an essential element in the green corridor from the Bristol Chanel to the Mendip Hills. One of the criteria for the proposal to be judged against is 'does it enhance biodiversity and/ or protect high quality land', in this case 'high quality' means beneficial for nature. Clearly this proposed site does not as it will negatively impact on WBW in both constraining the interaction of nature with the surrounding fields and encourage greater footfall to the detriment of the wood. The area under consideration is currently Green Belt, a status achieved in the late 1980's, it is difficult to see why this has now changed. If it was considered vitally important to protect the area then, why is this not so now? By placing it under Green Belt protection then it preceded the Natural & Environmental and Rural Communities Act of 2006 Section 40 that places a duty on Public Bodies to contribute to the coherence and resilience of valuable ecological networks. It also seems to be in contradiction to the North Somerset Local Nature Recovery Strategy that defines how the Act of 2006 will be met. The revised Planning Regulations allow land to be taken out of Green Belt, however the criteria is that it may only be in exceptional circumstances. The Tower Farm proposal is not an exceptional circumstance, Brown Field Sites and other less ecologically import sites exist within the area and must be reconsidered prior to formal submission of the Plan. The selection of the Tower Farm site is not justified, I do not believe a robust and credible investigation was undertaken prior to selecting this site. The access to the area will be via The Downs, off Down Rd, by the entrance to Highdown Infant and Junior Schools. Currently there are approx. 180 properties in The Deans and The Downs that are accessed via this junction, this will increase threefold to approx. 600 should the houses be built, essentially a cul de sac with 600 houses! It should be noted that the current residents are virtual prisoners in their homes during School Start and Finish times due to excessive parking in The Downs and along Down Rd, aggravated by the staggered times of the 2 schools. An additional 400 homes will significantly increase the problem. As it is, access to either the The Deans or The Downs by the Emergency Services during these periods is severely compromised. Should the 'go ahead' be given there will also be very significant issues caused by construction traffic. The Council is seeking to encourage Walking, Cycling and Public Transport, an admirable aim. The site however is on the top of the ridge, approx. 120m elevation above the Portishead High St. I am fit and able whose hobbies include Hill Walking, should I wish, it takes me 20-25 minutes to walk from the High St to my house, 6 The Downs. The Public Transport is intermittent so as it currently stands a Car is the only option if you wish to access the High St or the local Super Markets.	Consider Brown Field sites, where identified possible increase the density. Additionally consider other green field sites that do not currently act as a buffer for a nationally important SSSI. In choosing a site ensure that there is more than one access road to minimise congestion, ideally one that that does not have 2 schools at the entrance.		

Name: CPRE Avon and Bristol **I.D:** 51557281

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and	No				1. Unsound - contrary to vision and strategy: Policy LP3 is unsound because it is contrary to specific items in the plans vision and strategic objectives and policies 1.1 Contrary to Strategic Priorities: LP3 is contrary to the following strategic priorities	4 Requested changes to the plan 4.1 Preferred changes The preferred change to the plan is the removal the designation of "Strategic Location" from Nailsea and Backwell and transfer of the associated capacity to the		CPRE representation LP3 Strategic location-Nailsea and Backwell.odt

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Backwell					• To promote sustainable development and address the climate emergency. • To deliver the zero carbon ambition by maximising the opportunities for low carbon development and the use of renewable energy. • To increase the number and range of job opportunities across the district, particularly at the towns to give people the opportunity to work near to where they live. • To prioritise the location of new development close to places with a wide range of … job opportunities. • To reduce car use, encourage walking and cycling, and high quality and effective public transport. • To deliver essential new strategic transport infrastructure to support new development and enable more sustainable travel options. 1.2 Contrary to Sustainable development objectives: • The purpose of the planning system is to contribute to the achievement of sustainable development. This is delivered through the preparation and implementation of plans which seek to balance economic, social and environmental objectives. The Local Plan will set out what sustainable development means for North Somerset. • A Sustainability Appraisal (SA) is prepared in parallel with the plan-making process and provides a mechanism through which sustainability effects can be described, analysed and compared. The process of undertaking a SA involves the identification of sustainability objectives which are used to measure and monitor the success of the plan. The SA objectives which are used to assess the local plan are: • 1.1 Ensure a range of job opportunities are easily accessible without having to use a car. • 1.2 Provide opportunities to improve economic wellbeing and reduce inequalities by providing good access to education and training opportunities. • 1.3 Promote the optimal use of land which supports regeneration, maximise re-use of previously developed (brownfield) land and protects the rural economy. • 1.4 Promote development which requires a deliverable level of high quality and sustainable infrastructure. • 2.1 Boost delivery and meet the housing need identified within the plan period. • 2.2 Deliver affordable or specialist housing where it is most needed 1.3 Contrary to SP1: Sustainable development: • “Make a positive contribution to addressing and demonstrating resilience to the impacts of climate change and delivering the net zero target; • Prioritise walking and cycling, maximise the use of effective public transport and encourage the creation of liveable neighbourhoods; • Support the delivery of opportunities for economic growth and job creation at accessible locations; • Protect valued natural and historic assets and support green infrastructure and biodiversity; • Support the efficient use of land, including prioritising previously developed land; • Avoid adverse environmental impacts which, on their own or cumulatively, would result in air, water or other pollution or harm to living conditions, health or safety. 1.4 Contrary to SP2: Climate change: “Development proposals must demonstrate how they will mitigate the impacts of climate change and adapt to its effects, encourage the decarbonisation of energy and transport, and support the delivery of carbon neutrality in North Somerset by 2030. In order to reduce the overall environmental impact of development, proposals will be expected to demonstrate how they: Reduce greenhouse gas emissions and provide carbon storage; Are designed to adapt and be resilient to the impacts of climate change; Minimise energy use and deliver a net zero energy standard in new buildings; Prioritise active travel and effective public transport over car use; Encourage the reuse of existing buildings and structures.” 1.5 Contrary to SP3: Spatial strategy:	more sustainable strategic location at the border with Bristol where advantage can be taken of the proximity to Bristol’s existing urban area, employment and public transport network. 4.2 Essential changes If, despite the strategic policy contradictions, the decision is made to retain Nailsea and Backwell as a strategic location, it is essential that the Site Requirements in Schedule 1 should include in for the Land East of Backwell and Land South of Nailsea the Site Requirement that permission should not be granted unless a credible funded plan for all aspects of completion of the cross rail link, including the railway bridge has been approved by all parties.		

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					“Priority will be given to locating new residential development in or close to urban areas where there is an existing or proposed wide range of jobs, and there are opportunities to encourage active and sustainable travel, particularly at locations which are currently, or have the potential to be, well served by public transport. Employment opportunities will be encouraged at accessible locations well-related to the urban areas and where sustainable transport opportunities can be maximised”. 1.6 Contrary to SP5: Towns: “Support and enable walking, cycling and improved public transport, particularly in relation to connecting residential areas to the town centre, local centres, employment areas, educational establishments and other destinations; Optimise the use of other land, particularly at town centres and at accessible locations such as transport hubs; and Can be successfully served by infrastructure such as transport, Town centres will be the primary focus for a wide range of employment services which support, maintain or enhance their viability and vitality and their role and function” 1.7 Contrary to SP10 Transport: "New development must be located and designed to minimise the carbon impact of transport through limiting the need to travel and prioritising walking and the use of public transport opportunities. In order to facilitate the delivery of net-zero emissions and reduce the adverse environmental effects of transport, development proposals ... must address the following principles in line with the following hierarchy: Delivery of attractive, safe, and inclusive routes for walking and cycling which are well integrated into existing networks and provide access to effective and frequent public transport; Delivery of better local bus, rail and infrastructure supporting uptake in public transport use for journeys to work, leisure and other purposes. This includes journeys within and between towns in North Somerset and further afield including, better connections to, from and within the rural areas, journeys to and from public transport connections, new and improved bus stops and the reallocation of highway space" 2 Hollow justification The following aspects of LP3’s justification are mistaken: • The plan proposes so little employment development that the effect of the plan is almost certain to be to raise the current high levels of net out-commuting. • Given the level of imbalanced development proposed in LP3, proximity to Nailsea and Backwell railway station is an inappropriate justification because, although platform improvements are proposed in LP11/schedule 7, the railway line is already very close to its passenger carrying capacity during rush hours and the plan proposes no improvement to that capacity. Consequently, rather than boosting the proportion of rail commuters, the proportion of commuters who use the railway will fall below its 2011 census value of 5% due to the inability of the line to handle more passengers. • The combination of increased net out-commuting and inadequate and unimproved rail capacity will result in most of the new working residents commuting by car, elevating carbon emissions that are attributable to the town, contrary to Vision and strategic policies as listed above. 3. A more sustainable alternative: 1.The potential strategic location that performs best against to criteria in the Plan’s Strategic Priorities, Sustainable Development Objectives and strategic policies is at the border with Bristol where advantage can be taken of the proximity to Bristol’s existing urban area, employment and public transport network. That area has the best environmental performance relative to North Somerset’s poor environmental performance that emerges from 2011 census data represented in tables 1 and 2 below. For all of North Somerset’s towns and larger villages, the average commuting distance exceeds 15km and two thirds of those in employment commute to work by			

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					car. Long Ashton has the lowest average commuting distance, the lowest proportion of working residents commuting by car and by far the highest proportion of residents commuting by bus and by bike. That relatively good performance is attributable to its proximity to Bristol, where most of North Somerset's resident commuters work. For a sample of North Somerset's "Built-up areas including sub-divisions", tables 1 & 2 (see attached document) show percentages derived from on 2011 census tables. The colour scheme has the worst values in red fading through yellow to the lower values in green: 2.The observation that Long Ashton's proximity to Bristol gives it a lower environmental impact from commuters suggests that, to limit the Plan's environmental impact, the numbers of homes close to Bristol's SW border should be substantially increased. A precedent for proposing a larger number of homes at SW Bristol is set in the 2006 South West Regional Spatial Strategy, which proposed a SW Bristol extension of 9,000 homes ("Section 4, Sub Regional Strategy Statements and Housing Distribution", para 4.2.11). That plan was abandoned when the change of Government in 2007 resulted in a revised planning system. 3.Considerations in support increased housing numbers close to Bristol's SW border: • A much larger number of homes was proposed in the 2006 South West Regional Spatial Strategy and tested at the examination. • The Council has the power to declare a wider "SW Bristol Borders Development Area" to increase the number of homes significantly above the 3,500 that is proposed in LP2 Woodspring (south west of Bristol) • The reduction in commuting by car would contribute to Plan's objectives for carbon emissions reduction • As fewer of the smaller sites would be required, the infrastructure costs associated with those smaller sites would not be incurred. For example, the new road between Nailsea and the A370 (including its bridge under the railway east of Backwell) would not be required if sites at Nailsea were deleted. Modelling, including traffic modelling and representation of Government infrastructure funding support thresholds, should be used to assess the infrastructure cost trade-off between housing at SW Bristol vs housing at smaller sites. • More appropriate infrastructure funding could make the Plan more deliverable as there would be reduced pressure on infrastructure funding sources. • The reduced commuting by car would limit ongoing highway maintenance cost increases • Bus services are cost effective in large urban areas because there are sufficient homes and destinations close to bus stops. Homes and destinations are more sparse in rural and small urban areas, requiring local authorities to provide subsidies. With an increased Bristol conurbation at SW Bristol, bus operators would introduce new services in the expanded SW Bristol development because they would be profitable, reducing the call on Council subsidies. • Work on Epic's employment site has already started. It offers at least 2,000 local jobs, which makes the SW Bristol strategic location an even more sustainable location for more homes.			

Name: Cameron Wood **I.D:** 62558817

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national	Unsure	Unsure	Backwell already has 800 new homes approved which represents a massive (40%) increase already. The additional numbers contained in this plan would lead to complete overdevelopment. The proposed road would fail to serve Nailsea's traffic or relieve congestion on Station Road in Backwell, Backwell Common or Chapel Hill. The road would also hit the rail line, requiring massive expense to go under or over the rail. Despite the planned increase, there is already a deficit in school places and no planned investment in health or leisure facilities. Existing infrastructure and services cannot support another 1000 homes.			

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		policy			Backwell has been allocated a higher number of houses than any other village in North Somerset, with a higher growth percentage than towns. Backwell is expected to take 7% of the county's housing allocation, compared with Clevedon at 2%, despite Clevedon being much larger and with significant existing infrastructure. No needs or viability analysis is in place for 1000 more houses. Backwell isn't an employment hub, and most residents commute to Bristol and surrounding towns. No social cohesion impact assessment has been provided. Grade 1 agricultural land,currently used for crops and grazing, is included in the plan. Only 7% of this land remains in the whole of North Somerset. Government policy dictates that our best and most versatile land should be protected to safeguard food security. The proposals contradict this policy and undermine food security. Development would significantly harm and destroy wildlife habitats, negatively impacting biodiversity. The proposals threaten Brockley Maternity Roost and SSSI. Further threatening lesser and greater horseshoe bats. The infrastructure delivery plan lacks analysis and costings, with no funding guarantees for the new road or services. The area, including Backwell Common and surrounds, are prone to flooding. This would be aggravated by more houses. The designation of this site as a strategic growth location would negatively impact the character of the local area, the loss of greenbelt and high quality agricultural land, risk flooding, and create uncertainty concerning whether the planned road can be funded and delivered on time to support the proposed housing. Backwell Lake and adjacent fields, where the new roads and housing is planned, are on a floodplain which floods regularly. Government funding requires 50% affordable housing on Greenbelt land, but this reduces the funds developers will contribute towards infrastructure. The sheer volume of growth planned is significantly destabilising, unsustainable and undeliverable. The train station isn't fit for purpose as a transport hub. It is inaccessible and presents serious challenges for families travelling with young children.			

Name: Carl Bax **I.D:** 62732993

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Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The significant development either underway or due to commence for the area means a 40% increase for the village is already agreed. This additional proposal exacerbates how disproportionate this is within North Somerset, certainly for a village – as an example, Clevedon (town) taking 2% of the allocation, vs Backwell's 7%. It equates to overdevelopment in relation to roads and public transport - trains and buses area already overcrowded at key times, and timetabling provides an insufficiently frequent or reliable service; roads are already busy, only worsened by the addition of 24hr rather than peak time bus lanes. Trains in particular are already problematic when travelling with children or with mobility issues where accessibility at the station is a live issue. The lack of employment opportunities here in Backwell and the surrounding areas makes that all the more concerning as residents tend to need to use these links to commute. The proposed road will not support alleviation of congestion and there is a lack of certainty as to the funding and timely delivery of such a route, not least the chaos and cost associated with any road in the environs (over/under) the railway. What's more, there is no planned investment in education, health or leisure services to accommodate such a significant population increase. The continued development on our green spaces and agricultural land are of real long term concern. We are continually seeing worsening impacts from heavy rainfall, with areas around Backwell Common amongst others as already prone to			

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					flooding – its visibly worse since the commencement of some of the building work underway at approved development sites. Indeed, Backwell Lake and the fields surrounding it suffer in the same way, already part of a floodplain area. We continue to knowingly build on land which enables soakaway activity to occur across the whole county. Our Government policy states that “we must protect our best and most versatile land” in order to safeguard food security; this proposal undermines that policy. Only 7% of Grade 1 Agricultural land remains in the whole of North Somerset. Whilst policy dictates that affordable housing (50%) be delivered on Greenbelt land, this further minimises developer contribution to the required infrastructure.			
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	The significant development either underway or due to commence for the area means a 40% increase for the village is already agreed. This additional proposal exacerbates how disproportionate this is within North Somerset, certainly for a village – as an example, Clevedon (town) taking 2% of the allocation, vs Backwell’s 7%. It equates to overdevelopment in relation to roads and public transport - trains and buses area already overcrowded at key times, and timetabling provides an insufficiently frequent or reliable service; roads are already busy, only worsened by the addition of 24hr rather than peak time bus lanes. Trains in particular are already problematic when travelling with children or with mobility issues where accessibility at the station is a live issue. The lack of employment opportunities here in Backwell and the surrounding areas makes that all the more concerning as residents tend to need to use these links to commute. The proposed road will not support alleviation of congestion and there is a lack of certainty as to the funding and timely delivery of such a route, not least the chaos and cost associated with any road in the environs (over/under) the railway. What’s more, there is no planned investment in education, health or leisure services to accommodate such a significant population increase. The continued development on our green spaces and agricultural land are of real long term concern. We are continually seeing worsening impacts from heavy rainfall, with areas around Backwell Common amongst others as already prone to flooding – its visibly worse since the commencement of some of the building work underway at approved development sites. Indeed, Backwell Lake and the fields surrounding it suffer in the same way, already part of a floodplain area. We continue to knowingly build on land which enables soakaway activity to occur across the whole county. Our Government policy states that “we must protect our best and most versatile land” in order to safeguard food security; this proposal undermines that policy. Only 7% of Grade 1 Agricultural land remains in the whole of North Somerset. Whilst policy dictates that affordable housing (50%) be delivered on Greenbelt land, this further minimises developer contribution to the required infrastructure.			

Name: Carl Harrell **I.D:** 62800129

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Policy LP4: Strategic location: Pill and Easton-in-Gordano					I strongly object to any diminution of the existing Green Belt in Pill and Easton-in-Gordano parish, I am particularly concerned for the land that lies between the village and the A369 (referred to as Pill Green) and the land at Pill Road. It is well recognised that Green Belt boundaries should only be altered under exceptional circumstances, and then only when justified and fully evidenced. Therefore changes to our Green Belt should only be considered when evidence has been produced showing that all brown field sites and under utilised land in the district and surrounding area have been exhausted. Our parish has always had the natural restraint of River Avon, but the advent of the M5 motorway, and the development of Royal Portbury Dock has imposed further boundaries and restrictions on our community. For example what was once the open area of Long shore is now a vast sprawling car park at Portbury Dock. The importance of maintaining the Green Belt between the village and the A369 cannot be underestimated. This area needs to be kept an open space to preserve the character and identity of the village. Currently anyone visiting the village has to leave the A369 to do so. The open space distances the village from the noise and pollution caused by the traffic using the A369. Traffic using the A369 has been identified as the third highest in the district in terms of pollution generation. The A369 is a major commuter route to our nearest city, Bristol, and has links to the M5 motorway. It carries large volumes of traffic with estimates of up to 20,000			

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					vehicles a day. These current levels of traffic are likely to increase with new developments proposed at Ashton Gate, and the Longmoor Village project, on our side of Bristol. I understand North Somerset Council adopted the Abbots Leigh, Ham Green, Pill and Easton-in-Gordano Neighbourhood Plan in Nov 2021, and will therefore be aware of the concerns of our community regarding the risk of traffic accidents on the A369, and the dangers within our village where the roads and narrow and where visibility is poor. In the Neighbourhood Plan adopted by North Somerset Council in Nov 2021 under the section 'transport and movement' the plan sets out its primary objective, this being to minimise the impact of road traffic on congestion, parking, safety and pollution. The impact of the additional traffic that would be generated by building 1000+ new homes on our Green Belt land, would I believe, be contrary to the objectives previously set out, and adopted by North Somerset Council.			

Name: Carol Hunt **I.D:** 50788801

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Policy LP3: Strategic location: Nailsea and Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I believe the plan causes significant detrimental visual and character impact to the surrounding area and properties. We already have 800 new houses approved in a small village. There is already a deficit in school places and health services plus few leisure facilities. Backwell is not an employment hub....most residents commute and the bus routes into Bristol are already struggling to serve us. We are already losing open spaces which damages wildlife and farming. Backwell common and the surrounding areas are already prone to flooding which I have encountered on my local walks			

Name: Carole Barnes **I.D:** 30425057

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	‣ Positively prepared ‣ Justified ‣ Effective	No	No	Tower Farm was declared Green Belt in 1988 and the same reasons for it being declared Green Belt, then, still stand. Obviously, Brown Belt sites should be used instead, Old Mill Road being the most practical; it is on flat ground and appropriate for all age groups and close to all the scant amenities Portishead has to offer, shops, health centres, dentists, train station (in due course) etc. People now prefer to live in the town, itself, and not at the top of the hill. It has been suggested that people, in the proposed new builds, will be able to scooter or cycle down to the station - this will not happen! Portishead does not have the infrastructure: schools, medical centres, bus routes, roads to take in anymore people and cars. Then, there is the beautiful Weston Big Wood, which houses deer, badger, birds of prey and many other creatures. Buildings in the Tower Farm fields will destroy their habitats and take away a very precious place for the people of Portishead. PLEASE DO NOT ALLOW THESE FIELDS TO BE BUILT UPON. I do not believe Tower Farm fields should be built upon under any circumstances.			

Name: Caroline Bennett **I.D:** 57251201

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP3: Spatial strategy	Yes		Yes	Yes			The plan has taken a pragmatic, reasonable and sensible approach to the planning process. It recognises the need to build houses for the benefit of current and future communities while recognising and managing their impact on local infrastructure. The focus on growth around existing locations which have access to existing transport, employment and social infrastructure is the most sustainable approach to take in local authority that has such mix of urban and rural areas.	

Name: Caroline Knight **I.D:** 51449505

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Backwell already has around 800 new houses approved to be built making it 40 % bigger the layout of the village cannot cope There is a lack of infrastructure, insufficient roads and public transport -services such as doctors , schools etc cannot support the increase in population			

Name: Cassie and Brian Allsop **I.D:** 21468225

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	My home has been in Backwell village for 35 years, and I am opposed to the poorly thought out additional 1000 house for development in Backwell for the following reasons: Destruction of Grade 1 Agricultural Greenbelt which is currently used for crops. If this goes ahead, it will reduce the paltry 7% of Grade 1 land left in North Somerset. As we concrete over fields like this, more food will need to be imported with additional costs to the environment and the UK's food security. Destruction of our current friendly village into an unwanted small town: Backwell already has planning approval for an additional 800 houses which will increase Backwell by 40%! Even with this increase already approved, Backwell village will not be able to copy with no plans or funds for road improvements, another comprehensive , infant and junior schools, more large grocery stores or other medical centres. The current residents will suffer from the increased congestion and demands of too many people too quickly, as will the proposed new residents who will probably regret buying in the area. If this goes ahead, Backwell will increase by 80% which is grossly unfair to the current residents here who will no longer be able to enjoy walking in the fields. Fresh air, patients drivers on the rural roads will be gone! Increases in building in the adjacent small town of Nailsea impacts Backwell and vice versa: It is extremely important that the Planning Inspector take note that significant development has taken place in the adjoining small town of Nailsea with more homes planned, including one proposed development of 582 houses right next to Backwell Lake which will join the already congested Station Road. The Roads: The A370, the main A access road out of Backwell (and also used by Nailsea residents and all the other towns and villages along it from Weston to Bristol) used for commuting, is going to have even more severe problems coping with the additional traffic. A couple of the already approved large developments on Farleigh Fields are going to spill out on Dark Lane, then to the A 370, with the other development spilling out directly on the A 370. It is going to be quite difficult getting out of the village. Also, the proposed road across Backwell Common in the new applications to the East of Backwell will simply NEVER be funded given the state of the economy for a very, very long time. Plus, ridiculously, this plan also shows the proposed road joining the congested Station Road and the A 370. Schools: I do not see any plans for more schools and the good schools that Backwell currently has will have serious problems absorbing so many new families with children which these developments are designed for. The planners need to be aware that Backwell Comprehensive also is the school for teenagers from Yatton.			

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					Medical Facilities: The medical centre is already under pressure as are other practices in the area, and the facilities currently available are not sufficient for the proposed developments to the East of Backwell, nor for those large developments already approved. Why are there no plans for medical centres? Are we to go without medical care as a result of this excessive building in our immediate area? And we all know about the shortage of GP's in the country. Active Travel Emphasis over Autos ignores all the seniors in Backwell (and Nailsea) and is unrealistic for a significant number of younger commuters to work: I do not know the exact number of seniors and elderly in Backwell (and Nailsea), but when we go around our village and Nailsea, I see an enormous number of them, most of whom cannot safely get on a bicycle or walk very far for shopping and other errands, including my husband and myself. Auto vehicles will remain an essential part of transport. I do not envisage that all the Active Travel Improvements will result in significant numbers of younger people cycling into Bristol for work or taking buses or trains to the limited end locations in Bristol. As a former working mother, I used to collect my children after work from different schools, grocery shop, or other stops en route home. This is still the case for many mothers and fathers. Also, I worked in the Thornbury area. We work where there is employment! Cycling and walking will not suit a broad swathe of workers.			

Name: Cat Abel **I.D:** 30597761

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Pill Green	No	‣ Justified ‣ Consistent with national policy	Unsure	Unsure	This site was named “Pill Green” in previous development proposals, however, in this version of the proposed Local Plan, this site SHOULD NOT and does not include the Pill & Easton-in-Gordano Village Green. Locally the site is often referred to as the Markham fields. This area has been under organic farming management for decades, by a local farm which sells directly to local customers as well as local markets. The land is partly grade 2 or 3a, thus BMV land which should not be taken out of the greenbelt and used for development of housing. Footpaths criss-cross the site and provide invaluable open green space for local people as well as walkers of longer distance using the Gordano Round footpath. Another great concern is that the proposed site abuts the Markham brook ancient woodland SNCI, not even allowing for the minimum required root protection zone of 15 m along the woodland edge. As the site is on a slope, downwards towards the stream, there will also be a threat of sediment fallout into the stream during the construction phase as well as continous fallout of other pollution from all hard surfaces of the development. The site itself also features ancient trees and hedgerows, all supporting good biodiversity. Notable species include Linnets, Skylarks, at least 12 species of bats including both Lesser and Greater Horseshoe. Development of the suggested scale on this site would also contribute to increased speed of water flowing into the stream already marked on NSC maps of floodrisk, which drains alongside the Brookside playing fields and into the village center near the fire station. There would be serious cumulative effect as drains from the hillside above the A369 already enter the site and are slowed down and partly dispersed on way towards the village. Further contribution of increased speed of water from the proposed smaller site on the opposite (East) side of Markham brook (called “Land at Pill Road”), which also runs into the village centre, under the fire station.	Limit the site to small clusters of housing, much lower number of dwellings and with large areas of greenbelt farmland retained between. Relocate the proposed active travel link crossing the Markham brook and Ancient woodland, to avoid harm and damage to this very sensitive site. Introduce a wide root protection and buffer zone along the woodland, veteran open field-grown trees and hedgerows, creating joined-up wildlife corridors between any potential areas of housing development.		
Land at Pill Road	No	‣ Justified ‣ Consistent with national policy	Unsure	Unsure	This site includes part of the Markham Brook Ancient Woodland SNCI within the proposed site boundary. The Woodland itself should be excluded from development and a buffer zone of at least 15m should be inserted between the woodland and the proposed site. Including this Ancient riparian woodland in site proposed for housing contradicts the National Planning Police Framework (Dec 2024), which states in paragraph 193c (page 56) that: "development resulting in	The Woodland itself should be excluded from development and a buffer zone of at least 15m should be inserted between the woodland and the proposed site.		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons (70) and a suitable compensation strategy exists." Exceptional reasons do not apply to this site. Inclusion of the Markham woodland in this site also contradicts other policies within this Local Plan itself, such as DP35, DP37 (which states that “Development proposals affecting existing trees and hedges must demonstrate that: ... Ancient woodland and veteran/ancient trees are protected.”) and DP38 Moreover, an active transport link is proposed to cross the woodland and the stream, linking the 2 development sites on either side (labelled Pill Green with 600 dwellings and Land at Pill Road with 100 dwellings). This is not a realistic proposal, with the very steep banks of the stream (approximately 4-8 meters drop from top of the bank to the water) and a highly fluctuating depth of water in the stream) Not all ancient woodland features ancient trees, but Markham bottom features trees of a great age span, from young to mature to veteran specimens, along with both standing and fallen dead wood. These all contribute to a diverse ecosystem of plants, fungi, lichens, insects and other invertebrates, birds and mammals, including a specialist species only found in this habitat. Some of these (like greater and lesser horseshoe bats which are both present) are also protected	The proposed active travel link must be relocated to where it does not interfere with or cause damage to the woodland or the stream.		

Name: Cat Hawkins **I.D:** 29242593

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Policy LP3: Strategic location: Nailsea and Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	No	This plan is not supported with any infrastructure to improve the area with nearly 4,000 new homes planned. The chaos that will ensue is going to be awful. Please make sure that you have the roads and other infrastructure in place first and don't build on valuable farmland and get rid of our lovely green belt. We need this land for food production. Much better to build on the land near Bristol by Long Ashton as most of the people in these new homes will be commuting into Bristol for work. 1 The proposed figure of 1,817 new homes in Nailsea would lead to a total over development of the town. 2 The proposed new road would not serve Nailsea’s traffic or relieve congestion on Station Road, nor would it help traffic travelling from Backwell towards the M5. 3 The new link road, under rail crossing is likely to be extremely expensive and the engineering problematic due to the proximity to the River Kenn. 4 Although three new primary schools are proposed for Nailsea and Backwell, they will be funded through developer contributions and will be phased, with no locations identified as yet.	Infrastructure first, A link from the M5 at Clevedon to Nailsea so that all the traffic for Nailsea and Clevedon and Yatton and sometimes Portishead doesn't need to go through Clevedon at Junction 20. A new by pass for Yatton at the North end area where the road almost meets the A370 at Congresbury. Make this happen. Get rid of the absolutely ridiculous bus lane on the long Ashton by pass forcing people to once again drive through Long Ashton. Improve the A 370 from Congresbury to Bristol dont make it narrower make it wider and forget the bus lanes. Improve public transport and make it cheaper first not last then maybe look at where you can build. This is what they do in Portugal and Spain and it so much better than here.	Its not legally compliant. The consultation is flawed as questions as usual are fixed and you don't listen to public feedback in any event. You haven't looked at Biodiversity properly and have forgotten that animals and insects need corridors to move. .	

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					5 Additional development will place immense pressure on the town's existing health and leisure provision. There will be no direct investment to combat this pressure. 6 Land to the north of Nailsea is proposed to be removed from the Green Belt and will be replaced to the south. Positively, the new section of Green Belt to the south is greater in size than the area being removed and will replace the Strategic Gap. 7 Greenfield Crescent Playing Field is not protected under Local Green Space Policy LP15. 9 Grade 2 Agricultural Land which is high yielding and of very good quality, will be lost permanently through housing development to the south of Nailsea. 10 One hundred homes are proposed adjacent to Moor End Spout Nature Reserve, a site hosting many protected species. Development would destroy valuable wildlife habitats and further harm biodiversity in our area. 11 Transport modelling shows there will be notable increases in vehicle movements on the network of rural lanes around Nailsea. There are no clear, workable plans to mitigate against this. The lanes will become congested and unsafe for pedestrians, cyclists and horse riders. 12 There are no plans in place to improve the accidents blackspots at Stone Edge Batch, Wraxall Hill or Portbury Lane all of which will see a marked increase in vehicle movements. 13 Development is proposed west and south of Backwell Lake (Reservoir). The new roads and housing will be in the floodplain, which actually does flood regularly. 14 The railway station is not fit for purpose as a transport hub; it remains inaccessible for people with mobility issues and presents serious challenges when travelling with young children.			

Name: Catesby Estates **I.D:** 58664673

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SP3: Spatial strategy	Unsure				Policy SP3 sets out the proposed Spatial Strategy. The Spatial Strategy has been altered and new justification added. The Spatial Strategy includes that: "Priority will be given to locating new residential and mixed-use development in or close to urban areas where			333102712 A3 AA SS 251212 FINAL North Somerset Publication Plan Consultations

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					there is an existing or proposed wide range of facilities, services and jobs, and there are opportunities to encourage active and sustainable travel, particularly at locations which are currently, or have the potential to be, well served by public transport. Employment opportunities will be encouraged at accessible locations well-related to the urban areas and where sustainable transport opportunities can be maximised. Residential development in areas at risk of flooding now or in the future will be minimised outside the towns. Beyond strategic development areas the amount of development at villages and in the countryside will relate to local community needs". Policy SP3 continues to contain a sensible and rational approach to the location of new developments in sustainable locations that are close to facilities, services, jobs, and (most importantly) public transport. Previous representations identified conflicts within policy wording related to strategic development sites and their locations not having been appropriately taken represented as part of Policy SP3. It was previously proposed that to ensure Policy SP3: Spatial Strategy is found sound, that the policy reverts back to prior versions of this policy or acknowledge the growth and contribution that can be made at sustainable villages. Whilst Catesby supports the spatial strategy in principle, there may well be a need for greater growth in North Somerset over the Plan period in line with the spatial strategy, as per comments within Section 3.4 of these representations and related to joint-working requirements with other Local Planning Authorities in the region.			Reps-Appx_compressed.pdf
SP7: Green Belt	No	• Justified • Consistent with national policy			Policy SP7 correctly identifies that there exist exceptional circumstances to release land from the Green Belt and identifies the sustainable development opportunity that land at Pill Green represents. However, both policy wording and related Policies Map designation boundaries require review and amendment. Policy SP7 as presented in the Pre-Submission Plan 2041 for consultation is not ‘justified’ or ‘positively prepared’, or ‘consistent with national policy’ as required by NPPF paragraph 36 and requires amendment to be found sound. It is noted that figures shown within Policy SP7 do not accord with Locational Policy wording that requires ‘up to’ or ‘approximate’ housing delivery expectations for sites or indeed the sites’ capacities presented in representations. National policies require a Local Plan to be clearly written, unambiguous, and avoid duplication of policies, as set out within NPPF Paragraph 16. However, the inclusion of figures as presented within Policy SP7 can result in confusion for a decision-maker. Policy SP7 includes, where applicable, dwelling numbers based on ‘indicative’ capacities and presents these as definitive, whereas Policy LP5 and associated Schedule 1 are the relevant policies to ascertain and guide decision-making on capacities. The inclusion of figures within Policy SP7 as a result can obscure expected delivery of homes and conflict with Policy LP5 and Schedule 1. Separately, Catesby support the intention of the Council within Policy SP7 to explore opportunities to enhance the beneficial use of Green Belt, however, the policy wording lacks detail for what the Council envisions, and no further detail is provided within explanatory text.Moreover, it is not apparent from the evidence base that any such measures have been taken into account to date. To ensure Policy SP7 is justified and consistent with national policy, inter alia, NPPF Paragraph 149 and 16, and therefore to meet the tests of soundness it is required that the Policies Map is updated in accordance with the Council’s evidence base and it is proposed policy wording is amended as shown in the attached document below.	The Policies Map is updated in accordance with the Council’s evidence base and it is proposed policy wording is amended as shown in the attached document below.		Appendix to representations - compressed.pdf
SP8: Housing	Unsure				Policy SP8 states that: "Land will be identified to secure the delivery of a minimum of 23,700 dwellings within North Somerset 2026-2041, equivalent to 1,580 dwellings per annum". Explanatory text to the strategic housing policy further clarifies that the Council has assessed North Somerset’s local housing need within the Local Housing Needs Assessment (2025) and that the calculation for North Somerset results in the minimum requirement set out within Policy SP8. The Pre-submissions Plan 2041 consequently sets out a strategy and policies to meet the minimum housing needs of North Somerset, which is supported in principle. It is noted that the minimum housing requirement does not include additional housing provision in the form of a buffer, typically ranging between 10%-20% depending on local circumstances, which has become widespread plan-making practice to allow for flexibility and to ensure			Appendix to representations - compressed.pdf

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					minimum targets are met where uncertainty arises. North Somerset has set out clear allocations following the Council's evidence base in order to meet its own housing needs, however, should external considerations arise, it is recommended that the principle of a buffer to housing delivery requirements is considered. Explanatory text to Policy SP8 further clarifies that: "The overall distribution of housing reflects the spatial strategy, constraints and the assessment of potential development opportunities. These figures include the anticipated small scale windfall over the plan period which has been forecast using trends from the previous plan period along with a modest uplift accounting for anticipated increases in delivery to take account of national policy and permitted development changes". It is acknowledged that the minimum housing requirement set within Policy SP8 has also been reached via the uplift of densities at one of the strategic allocations to deliver 500 more dwellings as a result of the Site having more capacity available, as set out within the Report to the Placemaking, Economy and Sustainable Communities Policy and Scrutiny Committee (July 2025). In this context it is noted that proposals for Pill Green as shown in the Vision Document provided at Appendix B has an expected capacity capable to easily deliver up to 1,000 homes applying the same principles that underpin Policy DP8 and throughout the Pre-submission Plan 2041 policies. It is clear that the Pre-Submission Plan 2041 makes provisions for the minimum housing needs of North Somerset. The Council's Duty to Cooperate Statement of Compliance (October 2025) sets out the engagement undertaken with neighbouring Councils and at Paragraph 2.4 reconfirms that North Somerset Council, Bristol City Council, South Gloucestershire Council and Bath and North East Somerset Council together comprised the West of England Functional Economic Market Area (FEMA). Responses included from the West of England Combined Authority within the compliance statement set out that: "At the time of writing, government has made clear to the West of England Combined Authority that they are expected to produce a Spatial Development Strategy by the end of the current parliamentary term and that North Somerset Council are expected to be a part of this. Governance processes and arrangements are yet to be confirmed and put in place, however an update will be submitted along with the plan for examination". It is noted that Bristol City Council previously requested whether neighbouring authorities could accommodate some of its unmet needs for housing and North Somerset Council assessed at that time that it did not have the capacity available. Bristol City Council's Local Plan is at Examinations and is now at an advanced stage, and heading towards adoption. North Somerset should be seeking to meet both its own local housing needs (as set by the standard method calculation) and working with Bristol City Council (and other West of England authorities) to agree on how and where the unmet needs of Bristol can be delivered. If the Bristol Local Plan is adopted as submitted, with main modifications outstanding, the remaining unmet need of housing of Bristol that cannot be accommodated within its own boundaries, at the time of writing, is set out by Bristol City Council to be a need of 1,132 homes per annum. In the circumstance where North Somerset Council is required to consider any unmet need as a result of the duty to cooperate, any need to maintain effective cooperation, as part of future procedures associated with the Spatial Development Strategy, or as part of North Somerset's own Plan-making requirements to allow for flexibility and to ensure minimum targets are met where uncertainty arises it should be recognised that Pill Green has the additional housing capacity to contribute to any such purposes due to its location and potential to deliver sustainable development where it is needed. Pill Green has capacity to deliver up to 1,000 new homes in accordance with the sound principles already established to underpin the North Somerset Pre-Submission Plan 2041 and assist North Somerset in the delivery of much needed homes.			
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Justified • Consistent with			Locational Policy LP4 is principally supported, subject to amendments that ensure the soundness of the policy. The allocation of growth to Pill and Easton-in-Gordano is supported, as the area has represented a sustainable location for development throughout the Local Plan-making process, as demonstrated within representations on behalf of the Site to date and have only been improved by the			Appendix to representations - compressed.pdf

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		national policy			Council's lauded progress to reopen the railway station at Pill to provide an initial hourly passenger service as part of Metrowest Phase 1. Pill Green represents the key strategic scale site to be designated as part of Policy LP4 and will be recognised to deliver the most benefits for existing and new communities at Pill and Easton-in-Gordano. The Site will deliver the new homes and associated required infrastructure, open space and habitat improvements necessary to support communities in a location with links to major employment hubs including the Port of Bristol, Avonmouth and Severnside, and on the doorstep of a major bustling urban area of Bristol City and its Centre and the Temple Quarter. Proposals for Pill Green, as promoted to date, have demonstrated the site's connectivity and the Vision Document provided at Appendix B illustrates active travel routes that enable suitable connection to facilities and locations at Pill. As set out within Policy LP4, it is clear that Land at Pill Green will be key to enable the main benefits set out, including: • A new 420 place primary school within the Site (including early years provision in line with government requirements), along with financial contributions towards post 16, special educational needs provision and family centre services; • Delivery of 50% affordable housing, which Pill Green would provide the highest proportion number of Affordable Housing towards in this location; • Improvements to local infrastructure to improve connectivity, such as contributions towards an off-site new mobility hub in the centre of Pill; and • Active travel improvements. Explanatory text to Policy LP4 states that: "[…] [T]he quantum of proposed development presents regeneration opportunities for Pill and Easton-in-Gordano in terms of securing contributions towards enhancing services and facilities within the village, providing new green spaces accessible to the local community and providing new and improved active travel routes between the new development sites and the village centre significantly increasing connectivity across the village between essential services and facilities. It is clear that Policy LP4 and the allocation of Pill Green therein represent a potential to deliver substantial benefits overall, as well as further benefits associated with the Site such as open space provisions, a mobility hub within the Site, and biodiversity improvements where all of the requirements set out within policy and for the Site demonstrably meet the tests within NPPF Paragraph 58. Policy LP4 is principally supported on the basis of the above. However, the Policy relates to the supporting Policies Map and the associated boundary allocation does not match the Pill Green site boundary and excludes land that would form part of landscape, biodiversity, and active travel improvements to be delivered on-site. This fails to be justified throughout the evidence base and consequently Policy LP4, as presented in the context of the Policies Map and Schedule 1, fails to meet the tests of soundness as set out in NPPF Paragraph 36. The intention of Policy LP4 to improve active travel routes is supported. It is noted that the policy includes measures for 'Provision of an active travel connection between the Pill Green and Land at Pill Road sites over Markham Brook'. This is not supported due to the absence of evidence that justifies such a requirement in accordance with NPPF Paragraph 36. The connection sought by Policy LP4 and by North Somerset Council over the Markham Brook would constitute engineering operations through Ancient Woodland either side and above the Markham Brook. The draft policy requirement is also contrary to the North Somerset SHLAA 2025 Appendix 2: Further Site Assessment (October 2025), which identifies Ancient Woodland and Markham Bottom and continues on to state that this should be avoided and that development be mindful of any impact development elsewhere may have on the Ancient Woodland. There exist suitable alternative active travel connection opportunities to the north of the Site that provide walking distance connection to local facilities and destinations. The relatively short distances within Pill present a strong opportunity to encourage active travel and challenges in movement can be mitigated			

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					through the combination of mobility hubs and the promotion of ebikes and e-scooters, which offer a practical and accessible alternative for a wider range of users. Proposals for Land at Pill Green, as proposed for a sustainable strategic scale extension, has always been sensitively designed and promoted to avoid impacts on the Ancient Woodland, as well as the environment and habitats associated with the Markham Brook. It is not evident from supporting published documents to the Pre-Submission Plan 2041 that this policy requirement has been justifiably tested, consulted or agreed with Natural England and set out within a Statement of Common Ground (SoCG), consulted with promoters of the land, nor that it has been accounted for in cost assessments as indicated in the Infrastructure Delivery Plan Schedule (scheme reference TR87; October 2025). This also applies to the active travel requirement set within Policy LP4 for Bridleway LA8/33/40 to be continued over Markham Brook. Should the Council wish to include any such consideration, the steps and agreements listed, particularly the SoCG with Natural England, will be required to be in place ahead of submission. It is a requirement for the Council to ensure policies within the plan meet the tests of soundness and in the absence of the aforementioned, Policy LP4 within the Pre-submission is not found sound as required by NPPF Paragraph 36 and requires the removal of policy requirement for connection via the Ancient Woodland over Markham Brook. Catesby support the Council in the allocation of Pill Green, the decision to identify Pill and Easton-in-Gordano as a sustainable strategic development location, and acknowledge the key role the Site plays in the delivery of the ambitions set out within the Pre-Submission Plan for the area. If required, following establishing of a sound Policy LP4 and Policies Map and any further discussion where required, a suitably worded SoCG could be progressed setting out agreed principles.			
Policy LP5: Housing, employment and mixed use allocations	No	• Justified • Consistent with national policy			Policy LP5 sets out that: "Residential sites of 10 or more units and employment sites are shown on the Policies Map and set out in Schedule 1 and Schedule 2 which form part of this policy. Development must take account of the site-specific requirements set out in the schedules". Explanatory text provided clarifies that it is the schedules that allocate sites to be developed over the plan period and that these indicate potential capacity and any high-level principles and considerations which will need to be addressed. Within Schedule 1 it is reconfirmed that the schedule forms part of Policy LP5, identifies indicative capacities for each site, subject to detailed consideration and clarifies that: "figures are given as a guide, the final capacities may be higher or lower". The identification and allocation of Pill Green within Schedule 1 and as part of Policy LP5 is supported. Whilst this approach to identifying requirements for allocations within the Pre-Submission Plan is acknowledged and supported, where this relates to Pill Green both the indicative capacity, associated policies map with allocation boundary, as well as specific ‘high level principles’ have not been sufficiently ‘justified’. Pill Green represents a sustainably located development opportunity able to accommodate up to 1,000 dwellings, a new primary school, local centre, and a range of high quality green infrastructure to be used by new and existing communities. The assumption of capacity set out within Schedule 1 remains unclear. The North Somerset Strategic Housing Land Availability Assessment (SHLAA) Main Report (October 2025) includes section 2.3 ‘Estimating development capacity’. Section 2.3 of the SHLAA Main Report (October 2025) provides that the indication of development capacity provides estimates based upon density multipliers, capacities indicated by respondents, and further site appraisals wherein it is stated that for larger sites it is important to understand realistic dwelling capacity across the plan period. It is unclear as a point of consistency within the evidence base how the indicative capacity for Pill Green is arrived at when it has been promoted for a new sustainable community since the early Joint Spatial Plan (JSP) and beyond for a new sustainable community capable of delivering up to 1,000 much needed homes and underpinned by various technical assessments to date avoiding impact on sensitive constraints, such as Ancient Woodland. Moreover, in this context indicative capacities shown for Pill Green should be uplifted within Policy LP5 and			Appendix to representations - compressed.pdf

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					associated Schedule 1 which forms a part of the policy to avoid conflicts with the Pre-Submission Plan Policy DP8. Policy DP8 requires that all new development proposals that effective and efficient use of land is made and that the minimum target density will be 40 dwellings per hectare. Pill Green, as submitted to the most recent Call for Sites, has an area of 46.34 hectares. Applying the Council's methodology to capacity set out within Section 2.3 and all information provided to date result in a minimum 'achievable' capacity of more than 700 new homes with potential of up to 1,000 within the plan period, that also takes account of any sensitivities (hard constraints) and in the context of Pill. It remains unjustified within the Pre-Submission Plan 2041 and supporting evidence base that density uplifts are included elsewhere, where detailed site information can be found for development proposals currently limited to a total of 'up to' 2,655 homes in comparison to notably higher total figure in the policies of the Pre-Submission Plan 2041. For clarification purposes, no comment is made on the achievability of density uplifts, as detailed information not currently publicly available may well support such principles. Commentary provided is made to show that, whilst it is acknowledged within relevant Policy LP5 and Schedule 1 that final capacities may be higher or lower, the guide figure for Pill Green is not based on robust evidence and therefore not found to be justified. It is recommended Policy LP5 and Schedule 1 are amended to allocate the Site's full site boundary and capacity to deliver homes and could be presented as indicative capacity 'up to' 1,000 homes and can be robustly justified via matters set out within section 3.4 of these representations.			
Policy LP7: Settlement boundaries	No	• Justified • Consistent with national policy			Draft Policy LP7 within the Pre-Submission Plan for consultation states that: "Settlement boundaries for towns and villages are defined on the Policies Map and set out in Schedule 5 of this plan which forms part of this policy. New development within the settlement boundaries will be acceptable in principle subject to the relevant policies within this plan". The Policies Map available for consultation has not been prepared in in accordance with proportionate and robust evidence and is not consistent with national policy and therefore does not meet the tests of soundness as require by NPPF Paragraph 36. These matters are further elaborated upon within section 4 'Evidence and Supporting Documents' of these representations. As stated in the Pre-Submission Plan 2041 consultation document, the Policies Map forms part of Policies LP7 and consequently would not be found sound in circumstances where the map is not found sound. The revisions to Policy LP7 and settlement boundaries appear to be set out on the basis set out within the following document. • Settlement Boundary Review Update Assessment of Reg 18 consultation responses and revised boundaries for Pre-submission Reg 19 Plan (October 2025) The review of settlement boundaries, where in respect of settlements within the Green Belt, will be closely related to evidence and decisions made in respect to the Green Belt. As detailed in section 4 of representations, no evidence is provided to demonstrate that the Policies Map, Green Belt designation, and resulting settlement boundaries have been reviewed in light of overall requirements set within NPPF Paragraph 149 and specifically 149b). The criteria set out within the Settlement Boundary Review (October 2025), Policies Map and corresponding settlement boundaries should be updated following revisions to ensure these are consistent with national policy as required by NPPF Paragraph 36.			Appendix to representations - compressed.pdf
Policy DP5: Climate change adaptation and resilience	No	• Justified			Policy DP5 has been subject to review from the technical expertise within the Sustainability Team at Stantec. • Policy DP5 as proposed within the Pre-Submission Plan 2041 requires evidence of how climate related risks will be addressed and reduced to accompany development and specifically major development, including: o Flooding; o High temperatures; o Water efficiency; o Construction material selection; and o Air quality. The policy also includes provisions for Nature-based solutions to also be demonstrated, for carbon storage	In the absence of detailed guidance of implementation, the following policy wording amendment is proposed - see attached document.		Appendix to representations - compressed.pdf

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					and flood resilience benefits. The policy is noted to align with the Council's 2019 climate emergency declaration and 2030 carbon neutrality target. The policy broadly aligns with the NPPF and links to Policy SP2 in the Reg 19 plan. However, the policy lacks clarity that would make evident how a decision maker should react to development proposals, as required by NPPF Paragraph 16d). In the review of Policy DP5, it is concluded that the policy lacks specific metrics or targets for what constitutes adequate resilience. No clear guidance is provided on how 'adaptation' will be measured, enforced or managed over the long term. Supporting evidence on climate projections and water stress assessments for North Somerset is limited or absent and therefore appropriate measures for the locality cannot be identified and requirements are not justified. In the absence thereof, the review of Policy DP5 could not determine that the policy meets the tests of soundness as set out in NPPF Paragraph 36. There is no apparent evidence base document identified as part of the review undertaken that takes into account the cumulative effect of the adaptation and resilience policies. Overall, there is a lack of information and evidence on what might constitute compliance monitoring mechanisms. The policy aims to support climate objectives but lacks specificity in terms of requirements, targets and methodologies. A more robust evidence base should be provided on local climate risks and appropriate responses to ensure that the policy implementation achieves the policy intent – that is, that the measures that applications will seek to deploy are appropriate to the local circumstances and risks. The requirement in respect to nature-based solution is vague, with little or no information about how the expected solutions would be required to demonstrate or monitor achievement of the intended benefits. It is noted in explanatory text that a Supplementary Planning Document (SPD) will be prepared to set out the detail for how these policy requirements will be implemented, and that such clarification would be welcome. However, such guidance will need to be closely aligned with the evidence base and indeed the Local Plan's assumptions on viability or any more robust and up-to-date assessment to be consulted upon alongside a draft SPD. In the absence of detailed guidance of implementation, the following policy wording amendment is proposed - see attached document.			
Policy DP6: Net zero construction	No	• Justified			Policy DP6 has been subject to review from the technical expertise within the Sustainability Team at Stantec. Policy DP6 policy requirements are summarised as follows: • new residential development achieves net zero for operational emissions (regulated and unregulated). Energy statements must demonstrate: ■ No onsite use of fossil fuels; ■ Ultra low energy use: – Space heating demand of less than 15-20 kWh/m2/yr; – Overall operational energy use of less than 35 kWh/m2/yr; ■ Onsite renewable energy generation maximised, equivalent to at least the onsite energy demand. • For new non-residential developments, the following must be achieved: ■ No use of onsite fossil fuels; ■ Energy use minimised appropriate to end use; ■ Onsite renewable generation is maximised, equivalent to at least onsite energy demand; and ■ BREEAM 'Excellent' level is acceptable as certification, with outstanding level of energy use. • Residual energy demand should be met through generation of onsite renewable energy. If not technically feasible, the requirement may be met elsewhere through offsite renewable energy generation. • Energy use intensity and space heating demand should be prioritised regardless of any district heating connection. All reasonable efforts should be made to meet these requirements prior to connecting to a heat network.			Appendix to representations - compressed.pdf

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					• Residential water consumption must comply with the Building Regs Optional standard of 110 litres per person per day. • Embodied carbon (upfront and whole life carbon) for developments of more than 50 dwellings, or more than 5,000m2 non-residential floor space must not exceed 750kg CO2e/m2 supported by an embodied carbon assessment. Operational Energy: The use of energy-based metrics may be prohibitive to deliver at a time when there is considerable ambiguity over energy policy and targets. Building Regulations are expected to be updated in Winter 2025 to the Future Homes Standard, requiring an improvement on Part L 2021. However, the Future Homes Standard is a framework based on largely carbon emissions targets. Energy-based metrics take a different approach, requiring achievement of energy efficiency targets alone. The draft policy does not set a methodology for the Energy Use Intensity (EUI) metric, there is currently no government approved methodology or software and LETI identifies many tools which can be used. This introduces uncertainty in the monitoring of the policy as well as the uncertainty in how the upcoming regulation changes may impact EUI performance. A Written Ministerial Statement made in December 2023 required any LPA proposing targets more ambitious than Building Regulations to express the targets in improvements in carbon emissions terms. This requirement would impact the North Somerset draft policies, which express targets in energy terms. There are currently various legal challenges to the WMS and the impact on the draft North Somerset Local Plan is not yet known. The current summary position is that LPAs do retain powers to set policies that exceed Building Regulations standards. However, it is uncertain yet whether it is justified to set these policies based on energy targets rather than carbon emissions targets. It is recognised that any proposed policies that go beyond Building Regulations must be robustly justified by local circumstances and supported by evidence. North Somerset Council within the Pre-Submission Plan supporting documents have made references to studies prepared within the West of England (2021) and a South Gloucestershire Report (2025) as evidence. Indicative costs of achieving net zero buildings are also linked to studies undertaken by Cornwall County Council to support their energy-based policies, with a cost of achieving net zero construction for a range of typologies at a cost uplift of 2 to 4%. North Somerset Council highlight that the increased development costs driven by implementing Policy DP6 are included in the local plan's Viability Assessment. This includes a 4% cost uplift for flats, 9% cost uplift for houses and 7% cost uplift for house/flat mixed developments. The Pre-submission Plan 2041 consultation documents appear to recognise that the cost estimates were provided some time ago and refer to the more recent cost assessments produced for South Gloucestershire Council's emerging policy, which sets the same targets for space heating, energy use intensity and balancing onsite generation with use as the North Somerset policy DP6. The signposted South Gloucestershire Council evidence reports additional costs for 5 house types, all of which would be expected to appear in North Somerset. This evidence shows: • Additional costs of £99 - £138m2 from the Part L 2021 baseline. Percentage cost increases are between 4.5% and 8.5%. • Additional costs of £53 to £76/m2 from the Future Homes Standard Option 1 baseline (used as a baseline as it is due to come into force in 2025. Percentage cost increases are between 2.9% and 4.7%. Detached houses and bungalows are at the higher end of the cost increase, with mid terrace at the lower end. Flats are the most efficient. The percentage cost increases are similar to those reported by Cornwall County Council and included in the evidence base assessments. The report highlights that the uplifts are largely a reflection of differences in base build costs rather than the policy impacts themselves. The analysis highlights that for bungalows and terraced houses, the renewable energy requirement can be met without additional cost uplift.			

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					For the Part L 2021 baseline scenario, cost uplifts result from improvements to fabric, systems, and renewable energy generation. For the Future Homes Standard baseline scenario, cost uplifts result from improvements to building fabric (as it is expected that solar PV, waste water heat recovery and mechanical ventilation will form part of the FHS baseline specification). The evidence on cost concludes that the energy-based targets present a proportionate cost uplift consistent with the need to transition to a national net zero standard for buildings. Other evidence bases from Local Planning Authorities progressing with Local Plan preparation have suggested a 5-10% cost uplift to design and construct to operational net zero standards. We would expect the evidence base is ensured to consider a range of development types, including brownfield and greenfield, apartments and houses, strategic sites and smaller sites, and implications for affordable housing and that these fully underpin any version of evidence that is to be submitted for Examination as part of the North Somerset Local Plan 2041. Embodied Carbon: The whole life carbon approach is recognised to be more comprehensive in comparison to other local plans. The embodied carbon limit provides a measurable threshold. The evidence for embodied carbon is based on the West of England Authorities study authored by WSP in 2021 which provides justification for the policy. This evidence also signposts the use of the 'RICS Professional Standards' as a methodology. Four main building typologies were assessed, including an office, school, and semi-detached house. The report assessed cost uplifts for the achievement of embodied carbon ratings aligned to the LETI Embodied Carbon Target Alignment document (considered industry best practice guidance). Rating E was identified as the average building design, and rating C represented good design. Rating A represented the LETI 2030 exemplary design. The report found that achievement of a C rating was possible without a cost impact – the target is less than 800kg CO2e/m2 for a semi-detached house. It was identified that zero cost uplift was incurred when moving from an E rating to an embodied carbon impact of between 800kg CO2e/m2 (C rating) and 625kg CO2e/m2 (B rating). The C rating is considered to be consistent with good construction practice. For both operational energy and embodied carbon, no evidence has been found on deliverability, including supply chain availability and skills, and timelines for delivery, including any transition arrangements. There is no evidence that alternative options have been considered. There is limited information on methodologies, tools and reporting mechanisms that would be required for applications to demonstrate compliance with the policy requirements, and mechanisms for monitoring the performance gap. It is expected that these would form part of an accompanying Supplementary Planning Document. Similarly, there is limited information on the offsetting process in terms of timescales, pricing and legal mechanisms. Such guidance within a forthcoming SPD will need to be closely aligned with the evidence base and indeed the Local Plan's assumptions on viability or any more robust and up-to-date assessment to be consulted upon alongside a draft SPD. It may be necessary to include reference to suitable evidence base to be required as part of consultations toward such a forthcoming SPD.			
Policy DP12: Development in the Green Belt	No	• Justified • Consistent with national policy			Policy DP12 sets out extensive criteria and considerations to be given to proposed development in the Green Belt and replicates much of the Local Plan Policy DM12 within the North Somerset Development Management Policies Sites and Policies Plan Part 1 (adopted July 2016), however, policy wording has been adapted. Explanatory text to Policy DP12 states that: "This policy augments national policy set out in the NPPF by setting out local definitions and criteria for assessing the appropriateness of any proposal for new building or development within the Green Belt". Policy DP12 includes an assessment criteria that states:	Policy DP12, as drafted, presents a risk for legal challenge that would cause unnecessary delay due to reference to visual impact. An appropriate		Appendix to representations - compressed.pdf

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					"The overall aim of Green Belt policy is to preserve the openness of the Green Belt in terms of both its spatial and visual aspects. When determining the impact on the openness of the Green Belt from proposed development regard will be taken of the form (including bulk, height and floorspace), siting and overall scale of the development on the site, the location, visual character of the site and surroundings. In addition, the effect of the proposal on the open and rural character of the area in general, prominence, visual and physical impact and plot size will need to be taken into account. The impact of lighting schemes can harm openness and schemes should minimise obtrusive light in terms of sky glow, glare and light trespass". Wording and requirements raise significant concern as it replicates and adapts wording from policy that predates and can also be identified to conflict with relevant case law. Policy DP12 erroneously states that the aim of the Green Belt is to preserve the openness of the Green Belt in terms of 'both' its spatial and visual aspects and furthermore that the visual character and visual impact will 'need' to be taken into account. As established in Supreme Court decision on R (on the application of Samuel Smith Old Brewery (Tadcaster) and others) (Respondents) v North Yorkshire County Council (Appellant) [2020] UKSC 3 at Paragraph 22 and as described within the 'Reasons for the Judgement' of the associated judgement's press release: "Openness is the counterpart of urban sprawl and is also linked to the purposes to be served by the Green Belt […] it is not necessarily a statement about the visual qualities of the land, though in some cases this may be an aspect of the planning judgement involved in applying this broad policy concept. Nor does it imply freedom from any form of development". The Supreme Court's decision clearly sets out that the consideration of the visual impact is neither expressly nor impliedly mandated for assessing the 'openness' of Green Belt. None of the criteria listed within Policy DP12 are inherently applicable to or potentially always relevant to the assessment of Green Belt development. Relevant PPG Paragraphs in respect to Green Belt were updated 27th February 2025 taking the broad nature of the policy concept and established case law into account. PPG is clear to set out features as 'illustrative' and matters that could be taken into account, however, this does not mean that these aspects 'need' to be taken into account as a matter of law, policy, or indeed to reach a planning judgement on the 'openness' of Green Belt. Provisions within Policy DP12 are cause for concern and no commentary is provided within the Green Belt Review Background Paper (October 2025) or anywhere else within the evidence base that could demonstrate this policy to be 'justified' and in accordance with case law established to date. Policy DP12, as drafted, presents a risk for legal challenge that would cause unnecessary delay towards the adoption of a sound Local Plan for North Somerset that, in the interest of all, should be avoided. Consequently, the proposed Pre-submission Plan Policy DP12 as worded is not identified as justified and therefore not sound as required by NPPF Paragraph 36 and an appropriate review by North Somerset Council is encouraged before submission for Examination.	review by North Somerset Council is encouraged before submission for Examination.		
Policy DP43: Affordable housing (including rural exception schemes)	No	• Justified • Consistent with national policy			Policy DP43 has been revised to take into account the change in national policy that now, in effect, results in sites that are identified to be released from the Green Belt to often play the biggest contributing factor capable of addressing affordable housing need and delivery within local areas. Explanatory text provided states that: "The Dixon Searle viability study (2025) illustrated how challenging affordable housing delivery is in North Somerset. While the viability evidence is the starting point for considering overall delivery, the policy reflects the importance of maximising opportunities to maximise affordable housing delivery". The ambition of North Somerset Council to deliver affordable housing is recognised and shared. It is noted that such ambition cannot extend beyond the unachievable, thereby also risking failing the tests of soundness as set out at Paragraph 36. The Dixon Searle viability study (2025) sets out the challenges associated with the Council's ambitions. However, it is considered that policy wording is made suitably clear for what is expected but also appropriate flexibility is made to account for changing circumstances, thereby taking on board most recommendations as made within the evidence base underpinning the Pre-Submission Plan 2041. An evidence based approach is supported. At this stage Catesby do not principally raise issue with Policy DP43 as set out			Appendix to representations - compressed.pdf

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					within the Pre-Submission Plan 2041 consultation document. It is however noted that draft Policy DP43 states that: "The precise size and type of affordable housing to be provided on individual sites will be determined through negotiation, guided by the Local Housing Needs Assessment, data from the housing needs register and local housing needs surveys where these are robustly evidenced. This will include provision on appropriate sites for housing to meet specialist needs. The affordable housing mix should be 75% social rented and 25% shared ownership". Provisions within Policy DP43 allow for determination of affordable housing mix to be based on up-to-date evidence at the time of determination. Once again, a robustly informed and evidence based approach is supported. However, requirements for affordable housing mix to be expected to be 75% social rented and 25% shared ownership is not justified or consistent with national policy and therefore does not meet the tests of soundness as set out in NPPF Paragraph 36. The North Somerset Local Housing Needs Assessment (September 2025) referred to within Policy DP43 does not justify the mix set out but instead concludes that for an Affordable Housing need of a total of 10,600 households over the 15-year Local Plan period 2026-2041 this would result in a need for 59% Social Rent, 17% Affordable Rent, and 24% Affordable Home Ownership. It remains unclear how the affordable housing mix presented within DP43 has been justified for the purposes of soundness and it is encouraged Policy DP43 is revised in light of supporting Pre-Submission Local Plan evidence outcomes.			
Policy DP46: Housing Type and Mix	No	• Justified • Consistent with national policy			Draft Policy DP46 sets out that all new dwellings will be required to meet Building Regulations M4(2), where these are not included within the minimum of 5% all new dwellings (market and affordable) in developments of 10 or more dwellings that would be required to be designed to meet Building Regulations M4(3) compliance. Whilst the principle of providing a range of house types and sizes is accepted, provisions therein are not identified to be justified and may required amendment to be found sound as required by NPPF paragraph 36. It is noted that Policy DP46 wording is intended to align with the Government's proposed changes to the Building Regulations Part M following the consultation document "Raising Accessibility Standards for New Homes". Assuming the Government decides all new homes need to be M4(2) compliant, then this will be determined through updates to the building regs and these will ultimately supersede local policies. There is also a possibility that it could be delivered through the introduction of National Development Management policies, which will not be available ahead of close of consultation. There is no need to pre-empt changes to the building regulations or the introduction of non-statutory National Development Management policies and enshrine/duplicate the requirement in local policy. There is no evidence that all new dwellings need to be M4(2) compliant, and as set out within the Pre-Submission Plan 2041 with reference to the Dixon Searle Study (October 2025) it is acknowledged that there exist challenges that require flexibility where appropriate and accuracy where necessary. The housing type and mix to be set out within the Local Plan requires support from appropriately robust evidence. The North Somerset Local Housing Need Assessment (September 2025) identifies that: "Based on the evidence, it would be appropriate for at least 45% of homes on new developments to comply with Requirement M4(2) Accessible and Adaptable Dwellings and 5% to comply with Requirement M4(3) Wheelchair User Dwellings. […]" Whilst it is acknowledged that the Assessment prepared on behalf of North Somerset Council notes that percentages could be set higher to ensure flexibility, this would not provide sufficient basis for requirements for M4(2) compliance expectations to be more than doubled when evidence suggests 45% would be appropriate to meet assessed needs over the plan-period.			Appendix to representations - compressed.pdf
Pill Green	No	• Positively prepared • Justified			These representations are submitted by Stantec on behalf of Catesby Estates ('Catesby') in response to the North Somerset Council 'Pre-submission Plan 2041' (October 2025) in respect of land at Pill, North Somerset, representing a sustainably located development opportunity able to accommodate up to 1,000 dwellings, a new primary school, local centre, and a range of high quality green infrastructure to be used by new and existing communities.			Appendix to representations - compressed.pdf

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		• Consistent with national policy			Pill Green represents a sustainable strategic development location immediately at Pill and on the close edge of Bristol. The area has direct connections to major employers and historic movement and travel patterns by residents demonstrate a strong connection between Pill and Bristol to exist. Pill/ Easton-in-Gordano is served by a significant range of already existing facilities and is acknowledged to be one of the settlements considered to be sustainable in their own right (Consultation Paper Paragraph 3.12 (February 2025)). Pill Green has been underpinned by an expansive history of technical assessments demonstrating there are no overriding constraints preventing the Site from coming forward and capable to deliver early in the plan period supplying 150 homes a year from 2027/28 to 2034. The reopening of the railway station at Pill has not been given serious and appropriate consideration in the Plan-making context for some time. Since the last time Pill and the railway station was considered, the project saw the Development Consent Order be made and the Council and its partners have made laudable progress in securing funding and agreements that will set opening of the Metrowest Phase 1 Portishead Branch Line and Pill station reopening for 2027. Pill Green represents a location with one of the highest prospects to locate sustainable growth in North Somerset outside of already built-up areas. Our representations continue to promote the land at Pill, North Somerset, for sustainable development and demonstrated that Pill can and should be considered in its own right. It is supported that the Council include the Site at Pill Green within allocations where it will be capable of forming the centrepiece strategic allocation for a new neighbourhood at Pill, as well as a part of a coherent vision to meet the needs of North Somerset and the sub-region. Catesby has been fully supportive of the Council's revised approaches and making the decision to reconsult and advance a Local Plan that meets the minimum housing and overall needs of the area in full. These representations are provided to both express support for relevant policies and identify or raise any concern as to the 'soundness' of policies to ensure a 'positively prepared', 'justified', 'effective', Local Plan for North Somerset that is 'consistent with national policy' is submitted for Examination and towards adoption. Catesby support the Council's decision to include and propose allocation of Land at Pill Green and the recognition of the sustainability credentials of Land at Pill Green and the opportunities for a new sustainable neighbourhood it presents. The remainder of this report is structured as follows: • Section 2: Legal & Procedural Matters • Section 3: Response to Pre-Submission Plan • Section 4: Evidence and Supporting Documents • Section 5: Conclusion These representations should be read in conjunction with the following documents enclosed as appendices: • Appendix A: Site Location Plan • Appendix B: Vision Document • Appendix C: Landscape Visual Appraisal • Appendix D: Regulation 19 Consultation Response – Transport Technical Note Catesby recognise that in addressing the minimum housing needs of North Somerset and adjoining authorities unmet needs, decisions will need to be made regarding the release of Green Belt and Grey Belt land for housing and other types of development. All areas of North Somerset at varying scales will need to play their respective parts to ensure a 'deliverable' and 'sound' housing strategy to provide sustainable development that is supported by the needed infrastructure. These representations towards the current consultation do not focus on previously raised issues, but respond to the current consultation matters and any resultant issues needing to be addressed. Legal & Procedural Matters			

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					Duty to Cooperate & National Policy On the 27th November 2025 Matthew Pennycook, Minister of State for Housing and Planning, published a Written Ministerial Statement (WMS) stating that the Government have decided not to 'save' the Duty to Cooperate, thereby removing this requirement for plans in the current system. The WMS clarifies that: "Local planning authorities should continue to collaborate across their boundaries, including on unmet development needs from neighbouring areas, and we expect Planning Inspectors to continue to examine plans in line with the policies in the NPPF on 'maintaining effective co-operation'." At the time of writing Section 33A of the Planning and Compulsory Purchase Act 2004 has yet to be repealed, amended or new legislation to have come into force. Whilst the November 2025 WMS does not constitute legislation, it represents a statement of national policy similar to Planning Practice Guidance (PPG) and the National Planning Policy Framework (NPPF), and would be expected to be taken into account during examination of the North Somerset Local Plan 2041 once submitted. In all instances it remains key for emerging Local Plans to demonstrate that they are 'effective' as set out within National Planning Policy Framework (NPPF) Paragraph 36c, which requires plans to be effective. Where relevant, these representations provide commentary and suggestions to support North Somerset Council to address matters of soundness as set out in NPPF Paragraph 36 as shown below and to ensure a sound Local Plan is submitted to Examination. "36. Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are: a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant". Green Belt and Policies Map: The evidence base and papers that underpin the Pre-Submission Plan and particularly Policy SP7 Green Belt include: • Green Belt Review Background Paper (October 2025); • Strategic Green Belt Assessment Interim Report: Assessment of Green Belt land in North Somerset (SGBA Interim Report; October 2025); and • Stage 2 Green Belt Assessment Pre-submission (Regulation 19) plan (October 2025). Following a review of the evidence base consisting of the SGBA Interim Report (October 2025) and the Stage 2 Green Belt Assessment (October 2025) these are concluded to form a broadly proportionate assessment following an approach that is overall consistent with national policy and addresses the issues previously raised in representations to a very reasonable extent. The Council should be commended for the preparation of the documents, as these appear as proportionate evidence in the plan-making context. Whilst the evidence is considered proportionate and correctly identifies parcels relevant to Pill Green as Grey Belt land, it is noted that neither the strategic nor the Stage 2 assessment outcomes directly reflect an assessment of the Pill Green site and its boundaries in terms of Green Belt. A site-specific Green Belt Review considering the			

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					outcomes of the evidence supporting the Pre-Submission Plan 2041 consultations is provided within the Landscape Visual Appraisal at Appendix C. It is however noted that Policy SP7, the Policies Map, and the Green Belt Review Background Paper (October 2025) are inconsistent with the findings of the evidence base. The SGBA Interim Report (October 2025) identifies and assesses strategic parcel P-010, which encompasses Pill Green and land beyond the site boundary, to make an overall weak contribution towards Green Belt purposes. The Stage 2 Green Belt Assessment (October 2025) provides assessment of 'Parcel 4: Land south east of western part of Easton-in-Gordano adjoining the A396' (Parcel 4) to make weak contributions to all purposes of the Green Belt, excluding the 'neutral' contribution made to purpose e). Notwithstanding the evidenced weak contribution Parcel 4 makes to the purposes of the Green Belt, Parcel 4 is not proposed within the Pre-Submission Plan 2041 for release from the Green Belt. No justification has been provided why neither the extents of the Site boundary for Pill within the parcel or the wider Parcel 4 has not been released from the Green Belt policy designation. The Green Belt Review Background Paper (October 2025) states at paragraph 5.11 that: "Further amendments have been made around Easton-in-Gordano and Pill, beyond the proposed allocations, primarily around Gordano motorway service station, St Katherine's Secondary School and the Ham Green area which was developed from a former hospital into a residential development over previous plan periods". Whilst it is agreed that these further amendments follow a coherent rationale, these do not fulfil the requirements set by NPPF Paragraph 149, which requires that: "When defining Green Belt boundaries, plans should: a) ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development; b) not include land which it is unnecessary to keep permanently open; [...] The Green Belt Review Background Paper (October 2025) does not refer to requirements set out within NPPF Paragraph 149 other than in the context of 'limited infilling in villages'. NPPF Paragraph 149 is clear that there are separate considerations to be undertaken when defining Green Belt boundaries, which includes consistency to meet identified requirements for sustainable development but also whether land should be released where it is unnecessary to keep such a designation. The requirement set by 149b) represents a part of national policy to ensure Green Belt policy remains effective in the long-term. Where Green Belt boundaries are drawn excessively tightly around existing built-up areas it may not be possible to maintain the degree of permanence that Green Belts should have. This would devalue the concept of the Green Belt and also reduce the value of Local Plan preparation if needing revision in subsequent plan reviews. NPPF Paragraph 149 exists to ensure this concept of permanence. In undertaking the review of Green Belt evidence in respect of NPPF Paragraph 149b), Parcel 4 and any other such land that is unnecessary to keep permanently open, and presents a risk to the concept of permanence that is expected of Green Belt policy should be released from the Green Belt. Consequently, the Policies Map and in turn Policy SP7 and Policy LP5 which integrate reference to the map are not justified or consistent with national policy and require amendment to meet the tests of soundness as set out in NPPF Paragraph 36. In order for the Pre-Submission Plan 2041 to be found sound, Parcel 4 should be removed from Green Belt boundary mapping and the full site boundary of land at Pill Green shown as allocation. Sustainability Appraisal: We have previously raised inconsistencies or errors in relation to the Sustainability Appraisal supporting prior consultations. Responses provided within the Sustainability Appraisal (SA; October 2025) are noted. Whilst we continue to note some risks associated with the methodology in respect to Objective 2.2, as previously set out within prior representations, it is acknowledged that the GIS-based criteria set out has its limitations. Therefore, we note the acknowledgement at paragraph 5.19 that up-to-date assessments record significant positive effects for the site options in areas, including Pill, toward the delivery of affordable housing where it			

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					is most needed. Pill Green, which has a capacity to deliver up to 1,000 new homes, in accordance with policy-compliant affordable housing requirement is capable to make a substantial contribution towards affordable housing delivery at Pill, North Somerset, and beyond within the close context of the Bristol urban area. It is noted that there appear to be clerical errors or inconsistencies with Tables (Table 5.1 and 'Site allocations listed in Schedule 1 of the Local Plan) within the main SA report when compared to site assessments within proformas. Such errors show different assessment outcomes for objectives for the same site. These do not immediately appear to be consequential to the soundness of the plan, and the Council is encouraged to review the SA ahead of submission for Examination to address any clerical matters. Conclusions Catesby fully support the Council's approach and overall direction sought and set out within The Pre-Submission Plan 2041 to ensure the needs of North Somerset are met in a sustainable way and the resulting inclusion of Pill Green as a housing or mixed use allocation within the Plan. We support the Council in advancing a Local Plan that meets the minimum housing needs of the area in full and will support a Pre-Submission Plan 2041 that accords with matters of soundness as required by national policies and set out within these representations. These representations respond towards the current 'North Somerset Local Plan 2041 – Pre-submission Plan (Reg 19)' consultations and any matters requiring the Council's attention and do not focus on previously raised and remaining issues. We have summarised key matters raised within these representations below: 1. Legal & Procedural Matters: Section 33A of the Planning and Compulsory Purchase Act 2004 setting out the Duty to Cooperate continues to apply up to the point the plan is submitted (Reg 22). The statutory requirement is for authorities to cooperate in 'maximising' the effectiveness of the Plan-making process. Whilst legal obligations remain in place the WMS dated 27th November 2025 stating the Governments intent not 'save' the Duty to Cooperate and for this to apply to the 'current system' will be expected to form a material consideration as necessary at any future Examination of the emerging North Somerset Local Plan. The national policy requirement to demonstrate 'effectiveness', as set out within NPPF Paragraph 36 is not expected to change and remain in place. 2. Spatial Strategy: Policy SP3 continues to contain a sensible and rational approach to the location of new developments in sustainable locations that are close to facilities, services, jobs, and (most importantly) public transport. The inclusion of Pill Green within the Pre-Submission Plan is justified as this accords with the Spatial Strategy, which is in principle supported. It is however noted that there may well be a need for greater growth in North Somerset over the Plan period in line with the spatial strategy subject to outcomes and requirements resulting from Local Plan and Spatial Development Strategy preparations and subsequent agreements. See section 3.1 for more detailed commentary. 3. Housing Requirement: The housing requirement for the Pre-Submission Plan 2041 is set at a minimum of 23,700 dwellings within North Somerset over the 2026-2041 period, equivalent to 1,580 dwellings per annum. The requirement is based on the standard method for calculating housing need, as required. The approach to plan for and meet the housing needs of North Somerset in full is supported. It is noted that no buffers are applied to ensure flexibility and ensure greater certainty that minimum targets are met. The application of buffers by increasing the quantum of housing within allocations by a percentage above minimum requirements has become common plan-making practice to strengthen robustness, albeit this is not mandated. It is acknowledged that processes associated with the Spatial Development Strategy (SDS) and neighbouring authorities is an on-going matter up to the point of submission of the North Somerset Local Plan 2041 for Examination. Pill Green is currently not allocated for its potential capacity of up to 1,000 homes and can support North Somerset Council where any of these matters may raise the need to identify additional housing capacity. See section 3.3 for more detailed commentary. 4. Green Belt, Settlement Boundaries and Policies Map:			

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					Policy SP7 includes a correct approach to refer to but not repeat national policy. Policy SP7 also correctly identifies that there exist exceptional circumstances to release land from the Green Belt and identifies the sustainable development opportunity at land at Pill Green. However, policy wording requires updating to be consistent with national policy as required by NPPF Paragraph 36. Moreover, whilst Green Belt Assessments prepared appear robust and in accordance with national policy requirements, the resultant allocation boundaries, the Policies Map, and the partial allocation of Pill Green are not found sound. No evidence is provided that demonstrates that NPPF Paragraph 149 requirements have been taken into account, nor assessment within evidence or justification within topic papers for the removal of part of the Site for Pill Green. Therefore, the Policies Map, Policy LP7, and Policy LP5 are not sound and require amendment as set out within representations. See section 3.2, 3.4, 3.6, and 4.1 for more detailed commentary. Policy DP12 sets out statements which are erroneous and includes criteria which go beyond established case law on the matters to assess 'openness' and national policy guidance set out within the NPPF and PPG. Policy DP12 raises concern for the potential of legal challenge and unnecessary delay to the adoption of a sound Local Plan. North Somerset Council are encouraged to review Policy DP12 meticulously and potentially with Counsel. See section 3.9 for more detailed commentary. 5. Strategic Development Location at Pill: It is clear that Policy LP4 and the allocation of Pill Green therein represent a potential to deliver substantial benefits overall, as well as further benefits associated with the Site such as open space provisions, a mobility hub within the Site, and biodiversity improvements where all of the requirements set out within policy and for the Site demonstrably meet the tests within NPPF Paragraph 58. Locational Policy LP4 is principally supported, subject to amendments that ensure the soundness of the policy. Whilst the draft requirements of Policy LP4 are not 'justified' and 'not consistent with national policy' as required by NPPF Paragraph 36, amendments and comments are set out within these representations to ensure a sound version of the policy can be submitted for Examination in future. Pill Green, as shown within the Vision Document at Appendix B, and its associated site boundary and proposals avoid impact on the Ancient Woodland and Markham Bottom /Markham Brook environment. Policy requirements set out within Policy LP4 for an active travel route over the Markham Brook are neither supported by robustly justified evidence, nor by appropriate written agreements with Natural England that accept such a policy requirement or with any other relevant party. See section 3.4 for more detailed commentary. If required, following establishing of a sound Policy LP4 and Policies Map and any further discussion where required, a suitably worded SoCG could be progressed setting out agreed principles. 6. Climate Change: Climate Change policies within the Pre-Submission Plan have been subject to review from the technical expertise within the Sustainability Team at Stantec. Climate change policies aim to support climate objectives but are recognised to lack specificity in terms of requirements, targets and methodologies. In the absence of a more robust evidence base and detail set out within documents available for consultation, it will be important for any forthcoming SPDs that are referenced in respective policies to provide clarity on local climate risks and appropriate responses to ensure that the policy implementation achieves the policy intent. Recommendations for policy adjustments or requirements of details to be robustly clarified within any forthcoming SPD will need to: • Include measurable resilience metrics and monitoring mechanisms; • Require the publication of local climate risks assessments and evidence to inform locally-relevant adaptation and resilience measures; • Demonstrate up-to-date viability testing for the cumulative policy impacts; • Provide evidence on deliverability for skills and supply chain; • Develop a monitoring and reporting framework to address the performance gap; • Consider alternative options and transition arrangements; • Address legal uncertainty on adoption of energy-based targets with comprehensive viability and a contingency approach; and • Address uncertainty in methodology and monitoring of energy-based targets. See sections 3.7 and 3.8 for more detailed commentary. 7. Affordable Housing, Housing type and Mix: The ambition of North Somerset Council to deliver affordable housing is recognised and shared. It is noted			

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					that such ambition cannot extend beyond the unachievable, thereby also risking failing the tests of soundness as set out at Paragraph 36. The relevant policies take into account the Dixon Searle viability study (October 2025) outcomes and take on board most recommendations as made within the evidence base underpinning the Pre- Submission Plan 2041. It is however noted that the precise size and type of affordable housing, as well as expectations for the housing mix set out within draft Policies is not supported by the Council's published evidence base and is therefore not justified as required by NPPF Paragraph 36. See sections 3.10 and 3.11 for more detailed commentary.			

Name: Cath Bees **I.D:** 62783617

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I am writing to object to the proposals in the North Somerset Local Plan that allocate a further 1,000 houses to Backwell, along with the additional development next to Backwell Lake. Backwell already has approval for around 800 new homes, which represents a very large increase for a village of this size. Adding another 1,000 homes on top of this would push the total growth to more than 80 percent, which is entirely out of proportion. There is no matching investment in health services, school places, transport, or leisure facilities, and the current infrastructure cannot support development on this scale. The proposed site sits on Grade 1 agricultural land. Only a small amount of this high quality land remains across North Somerset, and national policy is clear that it should be protected to support long term food security. Using it for housing would cause irreversible harm and would conflict with that guidance. There are also serious environmental concerns. The land supports important habitats, including protected bat species connected with the Brockley SSSI. The Backwell Common area already floods, and further building will make this worse. The fields around Backwell Lake also sit on a floodplain and already experience significant flooding. The plan relies heavily on a new road across the Common. No detailed plans, studies or funding information have been provided. It is unclear whether it can be delivered at all, let alone in time or at a cost that represents good value. Without this road, the development would place even more pressure on Station Road, Backwell Common and Chapel Hill, all of which already experience congestion. Backwell has been asked to take a higher proportion of new housing than any other village in North Somerset, and a higher percentage increase than several towns. There is no clear evidence that this allocation is justified, nor is there a needs or viability assessment for the additional 1,000 homes. For these reasons, I do not believe the plan is sound. It does not reflect local conditions, it is not proportionate, it does not protect important environmental assets, and it relies on infrastructure that appears uncertain or undeliverable. I ask that the proposals for Backwell East and the development next to Backwell Lake are removed from the plan.			
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I am writing to object to the proposals in the North Somerset Local Plan that allocate a further 1,000 houses to Backwell, along with the additional development next to Backwell Lake. Backwell already has approval for around 800 new homes, which represents a very large increase for a village of this size. Adding another 1,000 homes on top of this would push the total growth to more than 80 percent, which is entirely out of proportion. There is no matching investment in health services, school places, transport, or leisure facilities, and the current infrastructure cannot support development on this scale. The proposed site sits on Grade 1 agricultural land. Only a small amount of this high quality land remains across North Somerset, and national policy is clear that it should be protected to support long term food security. Using it for housing would cause irreversible harm and would conflict with that guidance. There are also serious environmental concerns. The land supports important habitats, including protected bat species connected with the Brockley SSSI. The Backwell Common area already floods, and further building will make this worse.			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					The fields around Backwell Lake also sit on a floodplain and already experience significant flooding. The plan relies heavily on a new road across the Common. No detailed plans, studies or funding information have been provided. It is unclear whether it can be delivered at all, let alone in time or at a cost that represents good value. Without this road, the development would place even more pressure on Station Road, Backwell Common and Chapel Hill, all of which already experience congestion. Backwell has been asked to take a higher proportion of new housing than any other village in North Somerset, and a higher percentage increase than several towns. There is no clear evidence that this allocation is justified, nor is there a needs or viability assessment for the additional 1,000 homes. For these reasons, I do not believe the plan is sound. It does not reflect local conditions, it is not proportionate, it does not protect important environmental assets, and it relies on infrastructure that appears uncertain or undeliverable. I ask that the proposals for Backwell East and the development next to Backwell Lake are removed from the plan.			

Name: Cath Fuidge **I.D:** 62852609

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Churchill Avenue	No	• Justified	Unsure	Unsure	Penny Field should be protected as a Local Green Space. It's one of Clevedon's last true greenspaces, a Nature Recovery priority site, and vital for wildlife, community wellbeing, and access to nature. Better brownfield and greyfield sites across the town exist for development	Penny Field should be protected as a Local Green Space. It's one of Clevedon's last true greenspaces, a Nature Recovery priority site, and vital for wildlife, community wellbeing, and access to nature. Better brownfield and greyfield sites across the town exist for development		

Name: Catherine Dixon **I.D:** 1190049

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Justified	No	No	re Tower Farm and Black Rock areas these are in Green Belt. If they have been taken out of Green Belt why is this and why was there no public consultation? If these two pieces of land are built on it will set a precedent for the rest of the Gordano Valley and the ripping up of Green Belt sites across the country. The sites are too close to Weston Big Wood, a SSSI. The Gordano Valley is a wildlife corridor and should stay that way. That is why it is protected by Green Belt. Access to both sites would be by unsuitable local roads. Alternative brownfield sites should be considered first with lower ecological impact, both in Portishead and across North Somerset.			
Black Rock, north of Clevedon Road	No	• Justified	No	No	re Tower Farm and Black Rock areas these are in Green Belt. If they have been taken out of Green Belt why is this and why was there no public consultation? If these two pieces of land are built on it will set a precedent for the rest of the Gordano Valley and the ripping up of Green Belt sites across the country. The sites are too close to Weston Big Wood, a SSSI. The Gordano Valley is a wildlife corridor and should stay that way. That is why it is protected by Green Belt.	Alternative brownfield sites should be considered first with lower ecological impact, both in Portishead and across North Somerset.		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					Access to both sites would be by unsuitable local roads.			

Name: Catherine Obrien **I.D:** 60964321

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Comment relates to sites: HE2015, HE201097 There has been very limited consultation, no public meetings. The details of what is planned was not publicised until late in the process. The planned number of houses is disproportionate increasing the community size by approx 40%. Other options such as brownfield sites are not evidently explored. The use of Green Belt is not justified.	Full consultation after other options such as brownfield sites have been explored and reasons they are not suitable are transparent. Legal justification for using good agricultural land for building purposes. Transparent assessment of population housing need in the future. Evidence of adequate transport links.		

Name: Catherine Robson **I.D:** 62778017

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Consistent with national policy	Unsure	Unsure	Section 40 of Natural Environment and Rural Communities Act 2006 places a duty on public bodies to contribute to the coherence and resilience of ecological networks. I am concerned that some of the allocations currently set out in the draft plan will adversely affect the coherence and resilience of valuable ecological networks in North Somerset. The plan for 400 houses on the borders of Weston Big Wood will have a significant detrimental effect on thus important SSSI. The Gordano Valley is a nationally significant site for wildlife with a mosaic of habitats. The SSSI at Weston Big Wood has already deteriorated as a result of footfall, and if the adjacent sire is allowed to be developed it will degrade further. Please remove this allocation from the draft plan.			

Name: Cathy Caola **I.D:** 58555681

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	There has already been approval for 800 new houses in Backwell, equating to a 40% increase. Backwell is a small village surrounded by Green Belt, agricultural land which needs to be protected. Adding any more houses will make Backwell a town and will stretch its amenities to breaking point. Backwell is allocated a higher number of houses than any other village in North Somerset, and even a higher growth percentage than towns. Backwell is expected to take 7% of the district's housing allocation, compared to Clevedon's 2%. The lack of infrastructure and services will not support an extra 1,000 houses, and the whole character of our small village would be affected immensely. The existing infrastructure is inadequate, yet the proposal of a new road (expensive and possibly unfeasible) would not solve the problem of a potential increase of 2,000 vehicles. Those extra vehicles would be pushed onto Station Road causing severe congestion and may cause drivers to choose Backwell Common or Chapel Hill instead, neither of which is suitable for more vehicles, being narrow lanes with an absence of sufficient passing places. Both of these lanes are part of the Festival Way and are used by many cyclists and walkers. Adding more vehicles would make these roads more			

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					dangerous to these road users, particularly to dog walkers and children. Having an exit onto the A370 would cause more traffic problems on an already busy road. The Developers' proposed contribution towards infrastructure and services is inadequate. There is not employment locally for all these residents, so they will be commuting to work. It would be better to build nearer employment hubs thus reducing the emissions produced by commuting. Where are the proposals for the support of this influx to the community? Adding 1,000 houses could add a potential 3,000 people to the area. Are there sufficient places available at the schools and doctor's surgery? How will young people be supported? Building the proposed housing development on a flood plain is only going to increase the risk of flooding. The development would be on Green Belt land, this is not a Brown Field site. It would destroy wildlife habitats, going against the Government's policy of protecting such sites. It would provide a threat to Brockley Maternity Roost and the population of lesser/greater horseshoe bats. Backwell Lake will be threatened. The extra traffic pouring out onto Station Road by the lake will disturb the resident birds. Prime agricultural land will be lost. The Nailsea & Backwell railway station is not fit for purpose as a transport hub. It is not accessible for people with mobility issues, and presents serious challenges for people travelling with young children. All in all, the already approved 800 new houses, plus 1,000 more in the proposed timescale is unsustainable, destabilising, undeliverable and dangerous – to people, wildlife and nature. It is a foolhardy proposal.			

Name: Ceridwen Roberts **I.D:** 62832033

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I am a local Backwell resident and a disabled wheelchair user. I already struggle with accessibility, traffic, and limited local services, and I rely heavily on functioning community infrastructure. I am deeply concerned that the Backwell Local Plan proposals do not reflect the lived reality of people like me, nor the limits of what our village can reasonably cope with. I am submitting the following comments in the hope that the council will reconsider the scale, pace, and location of development planned for Backwell 1. Overdevelopment Backwell already has around 800 new homes approved — a 40% increase. Adding another 1,000 homes would overwhelm the village and completely change its character. The increase in development and population will inevitably impact upon on the security of Backwell residents, particularly for those with disabilities and mobility issues. We are especially vulnerable. 2. Road proposals are inadequate and unrealistic The new road would not ease congestion on Station Road, Backwell Common, or Chapel Hill. I already experience delays that make daily journeys difficult as a wheelchair user. Engineering a road under or over the railway is likely to be prohibitively expensive and possibly unachievable. 3. Severe lack of infrastructure There are already too few school places, and no investment has been made in GP services or leisure facilities. Disabled residents are particularly affected by lack of services. Infrastructure simply cannot support another 1,000 homes. 4. Disproportionate burden on Backwell Backwell is being asked to take more new housing than any other village in North	For all of the reasons above, I object to the proposed Backwell Strategic Growth Location and the allocation of an additional 1,000 homes in Backwell. The plan is not deliverable, is not supported by evidence, and will significantly harm the community, infrastructure, environment, and accessibility for disabled residents like myself. I specifically object to: • The excessive housing allocation in Backwell. • The loss of Grade 1 agricultural land and Greenbelt. • The absence of credible infrastructure funding or delivery plans. • The unacceptable flood risks. • The impact on wildlife, protected species, and biodiversity. • The lack of accessibility improvements to Backwell Station. • The disproportionate burden placed on a village that is not an employment centre and already overstretched. I urge the council to reconsider this allocation and to adopt a more balanced, evidence-based, and sustainable approach to future development.		

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					Somerset — even proportionally more than the towns. Backwell's share (7%) compared with Clevedon's (2%) is unjustifiable. 5. No evidence of need or viability There is no needs assessment or viability study demonstrating why Backwell should accommodate this extra development. 6. Backwell is not an employment centre Most residents commute, increasing traffic and congestion. More houses here simply push more people onto already overstretched transport routes. 7. No social cohesion impact assessment There is no assessment of how such a sudden population increase will affect community life and integration. The increase in development and population will inevitably impact upon on the security of Backwell residents, particularly for those with disabilities and mobility issues. We are especially vulnerable. 8. Loss of Grade 1 Agricultural Land The proposed site includes Grade 1 land used for food production. Only 7% of North Somerset's land is this quality. Once built on, it cannot be replaced. 9. Contradiction of national food security policy Government guidance requires protection of "best and most versatile" land. This proposal directly undermines food security. 10. Harm to wildlife and biodiversity Development would destroy valuable habitats in a country already suffering severe biodiversity loss. 11. Threat to protected bat species and SSSI The Brockley Maternity Roost and surrounding SSSI rely on this land for feeding. Lesser and Greater Horseshoe Bats are endangered and should be fully protected. 12. No credible Infrastructure Delivery Plan The plan has no proper analysis, costings, or guaranteed funding. Without firm funding commitments, the claimed infrastructure is speculative. 13. Flood risk will increase Backwell Common and surrounding land already flood. More development will worsen this, putting homes and vulnerable residents — including disabled people — at risk. 14. Strategic growth location concerns The designation ignores impacts on village character, loss of Greenbelt and agricultural land, flood risks, and doubts about whether the road can be funded or delivered. 15. Building on a floodplain near Backwell Lake The fields around Backwell Lake flood regularly. Building homes and roads here is unsafe and unsustainable. 16. Affordable housing on Greenbelt reduces infrastructure funding Requiring 50% affordable housing on Greenbelt reduces developers' contributions, leaving Backwell with more residents but fewer resources. 17. Pace and scale of growth are unrealistic Delivering this level of development and the required supporting infrastructure in such a short period is destabilising, unsustainable, and likely undeliverable. 18. Backwell Station is not accessible As a wheelchair user, I cannot use Backwell Station independently. It is not fit for purpose as a transport hub and should not be relied upon to support large-scale development.			

Name: Charles Cook **I.D:** 21471105

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Subject: Formal Objection to the NSC Local Plan - Backwell I am writing to express a strong objection to the proposed NSC Local plan especially in relation to Backwell. The scale, location, and supporting infrastructure for this scheme are wholly inappropriate and pose significant risks to the environment, the character of the area, and the wellbeing of existing and future residents. My concerns are outlined below. 1. Backwell is already under exceptional development pressure, with 800 new houses recently approved—representing a 40% increase in the size of the village. Adding the proposed further allocation would result in complete and unsustainable overdevelopment. 2. The proposed new road would not resolve existing traffic issues in Nailsea or Backwell. It would fail to relieve congestion on Station Road, Backwell Common, or Chapel Hill. Engineering a road across, under, or over the railway would be prohibitively expensive and potentially unfeasible. 3. Infrastructure is already inadequate. There is a shortage of school places and no parallel investment in health services or leisure facilities. Current services cannot support an additional 1,000 homes. 4. Backwell has been disproportionately targeted for growth, being allocated more housing than any other village in North Somerset—and even a higher proportional increase than some towns. Backwell is expected to take 7% of the district's housing allocation, compared with Clevedon's 2%, which is unjustifiable. 5. There is no needs assessment or viability analysis supporting the case for an extra 1,000 houses. 6. Backwell is not an employment hub, and most residents commute. Increasing housing without corresponding employment provision is unsustainable and increases traffic and carbon emissions. 7. No social cohesion impact assessment has been provided, despite the dramatic scale of growth proposed. 8. The development would destroy Grade 1 Agricultural Land, which is currently used for food crops and grazing. Only 7% of such high-quality land remains in North Somerset and should not be sacrificed. 9. Government policy explicitly states that "we must protect our best and most versatile land" to ensure food security. These proposals contradict national policy and jeopardise long-term food supply. 10. The scheme threatens biodiversity, destroying valuable wildlife habitats in a country already recognised as one of the most nature-depleted in the world. 11. The Brockley Maternity Roost and SSSI are at risk, with rare Lesser and Greater Horseshoe Bats dependent on this land for foraging. This development would irreparably damage protected species' habitats. 12. The Infrastructure Delivery Plan is incomplete, lacking analysis, costings, and any guaranteed funding for essential roadworks or community services. 13. Backwell Common and surrounding areas are prone to flooding, and further development would exacerbate this risk. 14. Designation of the area as a strategic growth location raises serious concerns, including loss of Greenbelt and high-quality agricultural land, increased flood risk, harm to the village's character, and uncertainty about road funding and deliverability. 15. Backwell Lake (Reservoir) and adjacent fields lie on a floodplain, where flooding is already frequent. Building roads and houses here is irresponsible and unsafe. 16. Government policy requires 50% affordable housing on Greenbelt land, but this reduces developer contributions toward crucial infrastructure, leaving gaps in funding for vital services. 17. The sheer scale and speed of the proposed growth are destabilising, unsustainable, and undeliverable, given the amount of infrastructure and service investment required. 18. The railway station is not fit for purpose as a transport hub, being inaccessible for people with mobility issues and extremely challenging for families with young children. Expanding housing numbers without improving station access contradicts sustainable-transport goals. _____ In light of the above, I urge you to reconsider the proposals. It is neither sustainable nor justified, and it fails to meet the standards required for responsible planning, environmental protection, and community wellbeing.			

Name: Charles Hatcher **I.D:** 62832513

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared	Unsure	Unsure	There are already almost 1000 new homes either being built or planned in Backwell. The new homes proposed in the Plan constitute complete overdevelopment for which there is no suitable infrastructure such as roads and schools adequately planned. The government expects new developments to be close to effective transport hubs. The new developments proposed are too far away from a station which is not fit for purpose in that the			

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		• Justified • Effective • Consistent with national policy			westbound platform is not suitable for any passengers with limited mobility. A new link road is proposed but the infrastructure development plan does not have proper analysis and costings. There are no guarantees for funding a bridge under the main railway line and it is unlikely to be built.			

Name: Charles Herring **I.D:** 62857921

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Pill Road	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The amount of traffic travelling through Ham Green, Haberfield Hill and Pill Road - is already significant and unsustainable. Currently If you wish to exit Ham Green onto the A369 onto the Markham Rd you can be waiting up to 10 minutes to exit for a space in traffic to get out. If you try to exit the village in the other direction, the other exit means you have to negotiate Ham Green Hill where residents park on the road on both sides, turning the road into a one way thorough fare. This can also be the case through the village precinct, especially when buses are there, and through the remaining narrow roads throughout the village. It makes no sense to add another 100 properties which will exit onto ham green and further add to the already erroneous traffic situation. Combine that with school pick up times for st catherines school, and the traffic parked on both sides of the road outside the school going past the cricket pitch, makes this a totally unrealistic site for this number of properties. I understand this state is currently designated as green belt and to my knowledge there has been no consultation with the residents on the removal of this land protection. Parts of which are designated as ancient woodland. Green Belt No resident Consultation with residents.			

Name: Charlie Crooks **I.D:** 29066945

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The land next to Backwell Lake (resevoir) is a floodplain which floods frequently. Building houses or a road on this would increase the flooding risk to homes on Station Close. It would also effectively remove the strategic gap between Nailsea and Backwell, removing the independent character of the two settlements. The very narrow green corridor adjacent to Backwell Lack connects populations of wildlife, such as greater and lesser horseshoe bats. Building homes or roads in this area will distrupt the wildlife connectivity and potentialy make the populations unsustainable.			
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent	Unsure	Unsure	The scale of the development will have a disproportionate impact on Backwell as it represents an 80% population growth. This is significantly higher than other North Somerset settlements and considered alongside the 55% growth planed for Nailsea (second highest in North Somerset after Backwell) will place an unmanagible increase on local resources. The proposed road linking Nailsea and the A370 would be highly expensive and probably unfeasible. No social cohesion impact has been included. The destructive impact on rare animal habitats has not been properly considered, particularly by seperating the Brockly roost for greater and lesser horseshoe bats from other populations.			

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		with national policy			The land surounding Backwell common is prone to flooding which will be agrivated by more housing. The land adjacent to Backwell Lake (resevoir) is a floodplain which flood frequently (several times most winters).			
Nailsea Backwell railway station	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	The Nailsea & Backwell Station car park already fills most of the strategic gap between the two settlements. It is difficult to see how it could be expanded without filling the strategic gap which would remove the independent character of the two settlements, have to be built on the floodplain adjacent to Backwell Lake (reservoir) and disrupt the travel routes of greater and lesser horseshoe bats which feed in the area.			

Name: Charlie Evans **I.D:** 62777057

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	‣ Effective	No	No	The Tower Farm and Black Rock proposals in Portishead would create unacceptable transport impacts, failing national soundness tests. Neither site can provide safe or suitable access. Portishead does NOT have the infrastructure to support more housing. The services, schools and shopping area cannot absorb any more people. NSC has NOT considered the strategic ecological importance of these sites in protecting Weston Big Wood (SSSI) and the Gordano Valley Green corridor. National planning policy allows Green Belt changes ONLY in exceptional circumstances - and these have NOT been demonstrated. Do NOT build on green belt sites.			

Name: Charlie Sayer **I.D:** 30784769

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Pill Green	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	1. Sustainability Appraisal Fails SEA Directive – No Assessment of Brownfield Alternatives to Pill Green (Quote Reg 12 / 2024 Brownfield Register 2,800+ units ignored) 2. No Duty to Cooperate on Bristol's 8,000 Unmet Need (No statement of Common Ground; unilateral 1,100-home dump in PLEG) 3. Green Belt Exceptional Circumstances Not Evidenced (NPPF 147)	Delete the Pill Green Site (600 homes) from the North Somerset Plan Schedule of Sites or amend Policy as follows: "No development on Pill Green until exceptional circumstances are independently verified (NPPF para 147) and sequential testing confirms no viable non-Green Belt alternatives are available, prioritizing brownfield sites in Weston-super-Mare, Portishead and Bristol fringe. Cap total allocation across all sites; require full funding (via s106/CIL agreements) for flood school and GP places alongside associated additional communal infrastructure before granting outline permission; add new para 6.79: 'Allocations must demonstrate no disproportionate impact on village populations, defined as <5% increase per site without evidenced need. Allocations in villages with a population under 10,000 must not result in a population increase of more than 5% from any single site unless exceptional circumstances are independently verified and full infrastructure delivery (transport, education, health, drainage) is secured upfront via s106/CIL. Cumulative impacts across all sites within a settlement must not exceed 20% without a master-planned, funded delivery strategy.'"	N/A	

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					(Parcel identified as high-performing agricultural land; no sequential test) 4. 44% Population Bomb on Pill & Easton-in-Gordano – Disproportionate & Unjustified (600 homes = 24% rise on core site alone) 5. No Deliverability Plan for A369, M5 J19, Schools, GP Access or Drainage by 2041 (Pill Green Undeliverable & Ineffective) 6. Urban First Policy Ignored – 2,500+ Viable Urban Units Still Available (Weston, Portishead, Bristol fringe) 7. Pill Green Breaches NPPF 159 – No Sequential Test for Non-Green Belt Sites (Sequential test places urban/ brownfield viable options above urban/unbrownbelt) 8. Request Independent Verification of “Exceptional Circumstances” Before Any Pill Green Consent 9. Cap Village Growth at <5% Per Site. (Reference: 1. 2017 JSP and previous Local Plan allocations, 2. NPPF 11 & 130(f): plans must be “deliverable” and avoid “adverse impacts” on local character and services. 3. Inspector decisions: Local Plan examinations have found allocations causing >10% population increase to be unsound unless supported by exceptional infrastructure evidence, which is absent here.)			

Name: Charlotte Knight **I.D:** 62560417

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	‣ Positively prepared ‣ Justified	No	No	The proposed allocation of Land at Tower Farm (≈ 400 homes) lies immediately beside Weston Big Wood — an ancient woodland and Site of Nature Conservation Interest (SNCI) managed by Woodland Trust and supported by Avon Wildlife Trust. The woodland forms part of the Gordano Valley ecological network and a nationally important habitat mosaic of open grassland, wetland and woodland.			

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		• Effective • Consistent with national policy			Not Justified There is no robust published alternatives assessment demonstrating that this sensitive site is the only or most appropriate option for growth. The loss of best and most versatile (BMV) farmland (Grade 2/3a by reference to the ALC dataset) and the risk of irreversible damage to the ancient woodland make this allocation unsuitable. Not Consistent with National Policy The allocation conflicts with the National Planning Policy Framework (NPPF) paragraphs 180–182, which require that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland) should be refused unless wholly exceptional reasons exist. The Council's reference to an "ecological buffer" is vague, unenforceable and insufficient to address indirect impacts such as root-zone damage, hydrological change or wildlife disturbance. The Woodland Trust and Avon Wildlife Trust state that ancient woodland is irrecoverable once damaged. Moreover the Framework requires delivering biodiversity net gain, yet the allocation offers no clear mechanism for ensuring that outcome. Not Positively Prepared The location intensifies existing pressures in Portishead: schools, healthcare and transport infrastructure are already under strain (for example the A369 corridor). This peripheral site would likely increase private vehicle usage and pollution rather than support sustainable travel patterns, contrary to NPPF paragraphs 104–106. Not Effective Delivery depends on multiple unresolved dependencies: new school provision, bus service contributions, off-site biodiversity management, and upgrades to rights-of way/buffer zones. No phasing plan, funding mechanism or legal agreement is published to secure these. Without such mechanisms the allocation cannot be considered deliverable within the plan period (NPPF paragraph 35(c)). Landscape & Connectivity The farmland/woodland edge acts as a critical ecological and landscape transition zone. Development here would fragment habitat, diminish the Gordano Valley wildlife corridor and erode the rural fringe character. Even with a buffer the visual and ecological intrusion into the woodland and surrounding landscape would be significant. Drainage & Hydrology Construction and built development would alter surface-water run-off and soil compaction on the former farmland, potentially affecting the hydrological regime that sustains the adjacent ancient woodland. The risk of nutrient runoff, altered infiltration and woodland root zone damage is material. Cumulative Impact When considered alongside other allocations in the Portishead area (such as Black Rock north of Clevedon Road), the combined pressure on ecology, infrastructure and transport is significant and undermines the Council's commitments to nature recovery and sustainable growth No modification short of removing the allocation entirely would make this site appropriate. Given its direct adjacency to ancient woodland, its loss would be and cannot be mitigated sufficiently. The land should instead be retained as undeveloped green space, managed to enhance biodiversity and provide sustainable public access, in line with the Avon Wildlife Trust's 2030 Strategy and national "30 by 30" nature-recovery goals. I do not support the the North Somerset Local Plan 2041 for the Tower Hill Farm location. The proposed allocation of Land at Tower Farm is unsound. It sits adjacent to Weston Big Wood —a high-value ancient woodland. Development would irreversibly damage habitats, fragment the Gordano Valley ecological network and undermine nature recovery ambitions. No mitigation or buffer can render this site suitable. The			

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					land should be managed as open countryside to support biodiversity, landscape quality and sustainable community use.			
Black Rock, north of Clevedon Road	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	Not Justified – Unsuitable location requiring off-site ecological mitigation The allocation of approximately 100 dwellings at Black Rock is not justified because the Council itself acknowledges that key environmental and ecological requirements cannot be met on-site, and must instead be located “off-site on land to the south-west”. This approach directly conflicts with NPPF paragraph 180(a), which requires avoidance of impact before remediation or off-site compensation is considered. The need for offset land demonstrates the inherent unsuitability of the site for development. There is no published evidence of less sensitive alternative sites being considered and discounted. Not Consistent with National Policy - Failure to protect and enhance biodiversity The approach of relying on off-site mitigation and a “suitable ecological buffer” illustrates a reactive rather than preventative approach to biodiversity protection. NPPF paragraphs 180–182 require Local Plans to conserve habitats, prevent deterioration of irreplaceable habitat, and deliver net gains for biodiversity. The allocation fails this by offloading its ecological burden onto unspecified land, without securing long-term management or legal protection for compensatory habitats. It also conflicts with the Avon Wildlife Trust’s 2030 Strategy, which emphasises restoration of 30 per cent of land for nature and enhancing landscape connectivity in the Gordano Valley. Not Positively Prepared – Unsustainable pattern of growth The site lies on the western approach to Portishead along Clevedon Road, where public transport is limited and local services are minimal. Residents would be heavily reliant on private vehicles to access schools, health care and employment. The fact that footways and new bus stop contributions are required underlines existing infrastructure inadequacy. This car-dependent pattern of development conflicts with the sustainable transport objectives of NPPF paragraphs 104–106. Not Effective – Unclear delivery and infrastructure dependencies The site depends on multiple off-site and third-party mitigations including ecological offset land, new footway construction, bus service contributions and delivery of a section of the Gordano Greenway. No clear funding mechanism, responsible delivery body, or phasing plan is identified in the Plan. Consequently, the allocation lacks deliverability and fails the effectiveness test under NPPF paragraph 35(c). Landscape & Setting The site lies within open countryside forming part of the rural setting of Portishead and the Gordano Valley. The expansion westwards into this part of the countryside would diminish the settlement edge, reduce landscape openness, and risk urbanising what should remain a transitional zone between town and countryside. Agriculture & Soils The farmland in question is likely to be of best and most versatile quality (Grade 2/3a) and its loss for housing is not justified when less sensitive land could be used. The Plan does not robustly demonstrate why this agricultural land must be released. Hydrology & Ecology Development on this edge farmland may affect surface-water drainage, soil compaction and wildlife connectivity into the adjoining woodlands and wetland systems associated with the Gordano Valley. The cumulative effect of development pressure in the area further stresses the ecological network. Cumulative Impact Combined with the Tower Farm allocation and other nearby proposals, the Black Rocksite would add to cumulative ecological, transport and infrastructure burdens around Portishead – contrary to the Council’s	Modifications required to make the Plan sound No modification would make this allocation acceptable. The need for off-site mitigation and multiple infrastructure dependencies shows the site is environmentally and logistically unsuitable for housing. The allocation should be removed entirely from Schedule 1. Instead, the land should remain open countryside, contributing to biodiversity and landscape value, in line with the Avon Wildlife Trust’s 2030 Strategy, Woodland Trust guidance and national biodiversity objectives.		

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					stated nature-recovery and sustainable growth objectives I do not support the the North Somerset Local Plan 2041 for the Black Rock location.			

Name: Charmaine Furlong **I.D:** 58643105

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	The proposed allocation of Land at Tower Farm (400 homes) lies immediately beside Weston Big Wood - an ancient woodland and Site of Nature Conservation Interest (SNCI) managed by Woodland Trust and Avon Wildlife Trust. The woodland forms part of the Gordano Valley ecological network and a nationally important habitat mosaic of open grassland, wetland and woodland. Before including he Tower Farm site in the local Plan, NSC has not properly considered: Alternative brown and green field sites with much less ecological impact both in Portishead and across North Somerset. The opportunity to increase housing density on proposed brown field sites across North Somerset which would mean these sites are not required to meet local housing targets. The strategic ecological contribution of these specific sites in protecting the unique environment of Weston Big Wood (SSSI) and the Gordano Valley strategic green corridor. These sites were specifically added to the Green Belt in the late 1980s because of their high ecological value. For the above reasons, the Local Plan is unsound because National Planning Policy states that sites can only be removed from Green Belt development under exceptional circumstances and these exceptional circumstances are not proven. In addition, the site is not sustainable or capable of providing safe and suitable access, and would give rise to unacceptable transport impacts, which fails the soundness tests set out in National Planning Policy. Therefore, the Tower Farm site should be removed from the Local Plan. No modification short of removing the allocation entirely would make this site appropriate. Given its direct adjacency to ancient woodland, its loss would be irreversible and cannot be mitigated sufficiently. The land should instead by retained as undeveloped green space, managed to enhance biodiversity and provide sustainable public access, in line with Avon Wildlife Trust's 2030 Strategy and national "30 by 30" nature-recovery goals. I do not support the North Somerset Local Plan 2041: Pre-submission Plan for the Tower Farm location.			

Name: Cherry Leake **I.D:** 62855553

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Proposed road would create even more congestion along Station Road Backwell Common and Chapel Hill causing immense suffering to local residents added pollution and dangerous for school children. There is no guarantee we would attract extra funding for school provision/ health services or leisure facilities. Green belt Grade One agricultural land will be lost forever affecting food security biodiversity flood plain and distort the nature of Backwell which has already lost agricultural land to developers. The railway station is not made for high volumes of commuters - Backwell has few local job opportunities so many people commute. The local roads are already overcrowded with traffic. Developers are not interested in brown field sites but ruin Grade On agricultural land instead.			

Name: Chestnut Property Developments Ltd (Chestnut Farm, Yatton) **I.D:** 51643457

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP6: Villages and rural areas	No	• Positively prepared • Justified • Effective • Consistent with national policy			Please refer to attached letter. Existing Core Strategy Policy CS32 supports residential development of up to 25 dwellings within or adjoining settlement boundaries subject to certain criteria being met. Draft Policy SP6 removes this provision and only supports new residential development outside settlement boundaries in the form of replacement dwellings, residential subdivision, residential conversion of buildings where alternative economic use is inappropriate or unfeasible, or dwellings for essential rural workers. The supporting text states that new greenfield development or infilling is not acceptable as this would lead to a more dispersed, unsustainable pattern of development. Core Strategy Policy CS32 requires specific criteria to be met to ensure that only development appropriate to the location and settlement would be supported, whereas Policy ST6 prevents any new residential development coming forward adjacent to the settlement. The removal of the policy support for appropriate sites to come forward for development adjacent to the settlement boundaries is not consistent with paragraph 83 of the National Planning Policy Framework which states that 'Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services'. The development of appropriate sites adjoining settlement boundaries would contribute towards the Council's housing land supply. Given the Council's undersupply of housing in recent years, at a time where current policy supports housing outside of settlement boundaries, it would be counterproductive for a replacement policy to prevent these windfall sites coming forward in appropriate locations. We object to draft Policy ST6 on the basis that it is not positively prepared, justified, effective or consistent with the NPPF and is therefore unsound. It is recommended that the policy is amended to provide opportunities for villages such as Yatton to grow and thrive by supporting residential development on appropriate sites adjacent to the settlement boundary, in the same way as existing CS Policy CS32 currently does.	It is recommended that the policy is amended to provide opportunities for villages such as Yatton to grow and thrive by supporting residential development on appropriate sites adjacent to the settlement boundary, in the same way as existing CS Policy CS32 currently does.		Chestnut Properties Ltd.pdf Representation form Part B SP6.pdf
Policy LP7: Settlement boundaries	No	• Justified			Please refer to attached letter. Draft Policy LP7 relates to the settlement boundaries defined on the draft Policies Map. The policy supports new development within the settlement boundaries in principle, subject to the relevant policies within the plan. The plan below shows the existing Core Strategy settlement boundary for Yatton in black and the proposed Local Plan boundary in purple. The proposed settlement boundary excludes the site and the adjoining buildings but runs adjacent to it along its western and southern boundary. The 2025 SHLAA assessment discounted the site during the baseline assessment because it falls within flood zone 3 (site ref: HE20630) The site is not located within flood zone 3 on the Environment Agency mapping but is identified in the Council's SFRA as being at risk of tidal flooding in the undefended scenario in the future. A Flood Risk Assessment (FRA) has recently been prepared in support of the development of the site which includes up to date modelling and confirms that the site is fully within, and will remain within, Flood Zone 1 outside of the defended 1 in 200-year flood extents over the lifetime of the development. The relevant extract from the FRA is attached. The inspector of appeal decision ref: APP/D0121/W/24/3343144 (Land at Rectory Farm Yatton, 18 March 2025) considered the existing flood defenced and concludes 'There is no prospect of the existing defences being removed. Consequently, for the purposes of this site-specific FRA, I consider that it is reasonable to take the defended scenario as the design event' (paragraph 77) and 'conclude that the design event is the 1 in 200 year defended scenario with the Higher Central CCA' (paragraph 81). The site should not therefore be excluded from the settlement boundary on the basis of flood risk because, as determined in the above appeal decision, the defended scenario is considered the appropriate design event and subject to an FRA, development of the site would be safe from flooding for its lifetime. The exclusion of the site from the proposed settlement boundary is not justified on flood risk grounds. We therefore recommended that the boundary be amended to include the site in order to enable appropriate development to come forward on a sustainable site which is already surrounded by residential development on three sides.	Please refer to attached letter. The exclusion of the site from the proposed settlement boundary is not justified on flood risk grounds. We therefore recommended that the boundary be amended to include the site in order to enable appropriate development to come forward on a sustainable site which is already surrounded by residential development on three sides.		Representation form Part B LP7.pdf Chestnut Properties Ltd.pdf FRA Extract.pdf Location Plan.pdf

Name: Chew Stoke Parish Council **I.D:** 62864769

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SP7: Green Belt	Unsure		Unsure	Unsure				CSPC - North Somerset Local Plan consulation response.pdf

Name: Chris Ambrose **I.D:** 17854273

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP7: Green Belt	No				North Somerset Council Local Plan 2025 - 2041 Strategic Green belt Assessment response Objection to the methodology and proposed Greenbelt release- The Land Yeo Valley, Wraxall and Failand Parish, North of Nailsea I am submitting this response to challenge the reliance on “Professional Judgement” in the Strategic Greenbelt Assessment (SGA) (Arup, 2025) used to justify the release of Greenbelt at The Land Yeo Valley, (TLYV) north of Nailsea. The SGA is methodologically consistent but inherently flawed. Labels such as “moderate” or “weak contribution” are opinion based. Its reliance on professional judgement produces subjective outcomes, excludes critical environmental and social evidence and fails to demonstrate the exceptional circumstances required by national policy. (NPPF-155) I therefore suggest that the proposed local plan is unsound and request that the proposed release of TLYV land be rejected, and that the site remain within the Greenbelt. Arup’s Strategic Green Belt Assessment (SGBA) acknowledges that it was prepared in line with “the particular instructions and requirements of our client” This admission undermines the independence of the evidence base. It demonstrates that the methodology was shaped by the commissioning authority’s brief, which prioritises identifying parcels for potential release rather than safeguarding the Green Belt’s (GB) ecological integrity and community wellbeing and needs. Reliance on such consultant outputs risks prioritising development pressures over the statutory purposes of Green Belt Policy set out in NPPF 2024 (NPPF-155). A sound Local Plan (LP) must rest on impartial evidence, not reports constrained by client instructions. The Arup SGA is methodically consistent but inherently subjective. The assessment methodology considers only the five statutory Greenbelt (GB) Purposes. It ignores wider values: ecological corridors, food production, climate resilience, flood plain and community wellbeing. The omission undermines the claim that the evidence is balanced or objective. (NPPF-160) The Tits LYV corridor supports biodiversity, agriculture and recreation. None of these functions are adequately reflected in the assessment. The result is a skewed picture that undervalues the site’s real contribution. Arup applied the five national GB purposes from (NPPF-143) preventing sprawl, preventing towns merging, safeguarding countryside, preserving historic towns, encouraging regeneration. Each land parcel was assessed against these purposes with descriptors like strong, moderate or weak contribution. The “requirements” were to test for potential release, not to defend the GB per se. These descriptors are not based on measurable data (like biodiversity counts or soil productivity) but on professional opinion and interpretation. Such subjectivity cannot meet the (NPPF-155) requirement for exceptional circumstances to justify Green Belt release. The methodology considers only five statutory green Belt Purposes. It ignores wider values: ecology corridors, food production and its security, climate resilience, and community wellbeing, mental health, recreation and infrastructure. Councils are under government pressure to deliver housing numbers and the evidence must be independent and robust, not shaped by housing targets, not biased by release rather than genuine objectivity. It presents itself as balanced, yet its reliance on professional judgement means it can be challenged as flawed or incomplete. NPPF, Paragraph 44, (published on 12 December 2024) states that: “the right information is crucial to good decision-making particularly where formal assessments are required. The parcels will actually make a stronger contribution to GB purposes than the Council might expect. This can only conclude that the SGBA was tailored to Council’s instructions, to meet the Council’s planning needs, not impartial analysis. It prioritises development pressures over NPPF purposes, undermining its reliability as evidence. The	I request that the proposed release of The Land Yeo Valley land north of Nailsea be rejected, and that the site remain within the Greenbelt.		

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					“requirements” were to test for potential release, not to defend the GB per se. NPPF 2024 Para 155 and the 5 GB purposes stress “exceptional circumstances” must be demonstrated not assumed. Client shaped evidence isn’t independent – Please, don’t let profit override GB. Selecting parcels P005, P006, P024, and P025 as they border the potential development site all identified as potential areas for release, are wrongly scored as moderate contributors to Green Belt purposes. In reality they are critical in preventing sprawl, maintaining separation between settlements and safeguarding countryside character. The assessment’s parcel table underplays these functions, reflecting the client–led instructions rather than impartial evidence. Releasing these parcels would undermine NPPF 2024 para 155 and set a precedent for further erosion of the Green Belt. A number of parcels form the same corridor, whilst the assessment basis treats it as fragmented land with limited openness. This corridor is a wild life corridor comprising a river, trees and hedges, and flood plain and continues horseshoe-like from Clevedon to Thornbury and around Bristol and Bath, safeguarding countryside for agriculture and from encroachment and providing the green lung between Portishead, Bristol, Bath, Failand and Nailsea to Clevedon through Thornbury to the sea supporting food production. The Arup SGA is methodically consistent but inherently subjective. It presents itself as balanced yet its reliance on professional judgement means it can be challenged as flawed or incomplete as each parcel will have weaknesses in the way the assessment scores their GB purposes. For example, P024 woodland enhances openness by screening development, not reducing GB function. The parcel table uses relative scores. The scoring system is low, med, and high, without transparent weighting this is highly subjective and clearly shaped by client instructions. Even if one parcel is scored moderate releasing several adjacent parcels creates a strategic breach. Each parcel contributes to the settlement separation. The function of Green Belt is far stronger than the tables suggest. Fragmentation increases vulnerability, making protection more important. If released, P025 would create a precedent for further erosion. Wraxall, Long Ashton and Bristol would virtually merge, (GB Purpose 2, Prevention of merging). P006 edge of Nailsea, the report tends to down play openness because of existing road. Linear infrastructure does not negate openness and the parcel still prevents coalescence between it and Bristol fringe. It should be judged on permanence not convenience for development. Each assessment should have an Environmental Impact Assessments (EIA) which responds to the environment, balanced against the needs of development, ensuring that effects of development on the environment are understood and are taken into account in the planning process. Urbanisation and economic growth must be balanced with environmental and social impacts to ensure a sustainable future for all. NPPF 160 requires plans to promote sustainable patterns of development considering transport, climate change, and the natural environment. By reducing complex ecological, agricultural, and wellbeing functions to labels such as “moderate” or “weak contribution, the assessment excludes critical evidence and undermines the objectivity demanded by the NPPF.” Environmental Impact Assessment (EIA) plays a crucial safeguarding role in recognising the potential for effects on the environment and humans, informing design development, and identifying measures to protect and enhance our world, and your consultant (Arup) is well placed at the forefront of EIA practice to inform and communicate a clear understanding of the issues and opportunities, to enable the right decisions to be made at the right time, to undertake this requirement, as Arup’s web site explains, they are shaped by their engineering heritage, informed by their diverse skills, and powered by technology. They further state that, EIA is a decision-making tool to inform both project design and the consenting process. For many projects it is a legal requirement. It is an important part of ensuring that the likely effects of developments on the environment, including people, are understood, mitigated, and fully considered in the planning process. EIA is an iterative process that can ultimately be used to reduce the negative effects of a project and enhance the positive through design and assessment. The foregoing is concise, policy grounded and directly challenges the credibility of the evidence base. CPRE, the countryside charity, provides information on understanding the quality of countryside and greenbelt, contributing detailed information for an EIA. The following are extracts from CPRE’s publications.			

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					“Hedgerows are the vital stitching in the patchwork of our countryside and particularly The Land Yeo Valley. Not only are they beautiful, with shifting seasonal colours, but they also benefit wildlife and the wider environment. They store carbon and help slow climate change. The grass slows falling rain as it runs to The Land Yeo River”. The lines of hedges crisscrossing the valley and our countryside act as wildlife corridors, linking habitats together and providing safe movement for many scurrying, flying and scuttling animals such as endangered dormice…” You can find out more about the history and habitats of hedges from CPRE. Finally, I find it beyond comprehension that this area of Green Belt, which since its inception, has been serving to support the first, second, fourth and fifth core purposes of the Green Belt, and was rigorously enforced by the Council as supported by the earlier local draft plans which clearly recognised its value. So why the sudden change? Could it be the absurd pressure on housing numbers from a failing government? (They will never be built). Or am I to believe that the Council was swayed by money on offer from developers?			

Name: Chris Bensted **I.D:** 30358657

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Consistent with national policy	No	No	The addition of 900 houses changes Backwell from a village to a small town. No thought has been given to how this will affect the people of Backwell nor it's community. No thought has been given to the existing traffic infrastructure other than the proposal for a road linking the A370 to Station road. this road allows Nailsea to further expand, but will never be built. Part of the road will be funded by the developers, whilst the majority funding will be funded by NSC and the government. Neither party has any money. Therefore considerable additional traffic will be inflicted on the existing Station Road. The proposals do not provide details of the way surface water will be disposed of , in the case of flooding	Provide details of funding for the new road. Provide details of drainage and it's affect on existing water courses and Backwell lake. Provide details of the affect of new road proposals on Backwell Common.		

Name: Chris Dobbs **I.D:** 62863649

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I consider the Local Plan to be unsound in its current form for the following reasons: Failure to Select the Most Sustainable Sites The sites allocated do not represent the most sustainable development locations. They carry disproportionate environmental, heritage and flooding impacts and do not best meet identified housing needs. More appropriate and sustainable alternatives exist elsewhere in North Somerset, yet these have not been adequately considered. Failure to Properly Consider Flood Risk The Council has not adequately considered the flood risks associated with	The allocation of land South of Long Ashton would almost entirely compensate for the deletion of the Nailsea and Backwell strategic location for development. The site lies adjacent to the £400 million approved EPIC employment campus and would have excellent transport links. Feels like a no-brainer…. In addition, efforts should be focused on identifying deliverable mitigation schemes along the B3130 and B3128 corridor that are essential to safeguarding travel into and out of Nailsea for current residents.		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					development in Nailsea and Backwell—particularly at land west of Nailsea (Poplar Farm), land east of Backwell, land south of Nailsea, and the proposed road infrastructure serving these sites. Consequently, Policy LP3 is unsound. Non-Compliance with Walkable-Neighbourhood and Accessibility Principles The housing allocations in Nailsea are all located far beyond the 800-metre walkable-neighbourhood standard. They do not prioritise access to services, facilities or employment opportunities, contrary to the Plan's stated objectives. Furthermore, the Plan provides no strategy for improving job provision within Nailsea. Overreliance on a Railway Station Acknowledged as Inadequate Although the Plan relies heavily on the presence of the railway station, it simultaneously recognises substantial deficiencies—lack of step-free access, insufficient shelters, unsafe routes and limited cycle parking—yet proposes no solutions. The station is also situated outside any realistic active-travel catchment, and cycling access is further constrained by the accident black spot at Buckland Batch. Lack of Evidence for Transport Mitigation and Infrastructure Delivery Nailsea's ability to accommodate additional development sustainably is already restricted by existing transport infrastructure. The Plan provides no evidence for the design, funding or deliverability of the proposed "strategic rail link." Even if feasible, it would not be delivered in advance of development, meaning it cannot be relied upon as mitigation. This renders the proposals unsound. Use of Vague, Aspirational Commitments Instead of Defined Measures Across the proposals for Nailsea and Backwell, the Plan relies on broad, aspirational statements with no specific schemes, timelines, costings or responsible bodies identified. This lack of clarity is unacceptable given the significant risks posed to current and future residents and fails to meet the tests of soundness.			
Land at North West Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I consider the Local Plan to be unsound in its current form for the following reasons: Failure to Select the Most Sustainable Sites The sites allocated do not represent the most sustainable development locations. They carry disproportionate environmental, heritage and flooding impacts and do not best meet identified housing needs. More appropriate and sustainable alternatives exist elsewhere in North Somerset, yet these have not been adequately considered. Failure to Properly Consider Flood Risk The Council has not adequately considered the flood risks associated with development in Nailsea and Backwell—particularly at land west of Nailsea (Poplar Farm), land east of Backwell, land south of Nailsea, and the proposed road infrastructure serving these sites. Consequently, Policy LP3 is unsound. Non-Compliance with Walkable-Neighbourhood and Accessibility Principles The housing allocations in Nailsea are all located far beyond the 800-metre	The allocation of land South of Long Ashton would almost entirely compensate for the deletion of the Nailsea and Backwell strategic location for development. The site lies adjacent to the £400 million approved EPIC employment campus and would have excellent transport links. Feels like a no-brainer…. In addition, efforts should be focused on identifying deliverable mitigation schemes along the B3130 and B3128 corridor that are essential to safeguarding travel into and out of Nailsea for current residents.		

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					walkable-neighbourhood standard. They do not prioritise access to services, facilities or employment opportunities, contrary to the Plan's stated objectives. Furthermore, the Plan provides no strategy for improving job provision within Nailsea. Overreliance on a Railway Station Acknowledged as Inadequate Although the Plan relies heavily on the presence of the railway station, it simultaneously recognises substantial deficiencies—lack of step-free access, insufficient shelters, unsafe routes and limited cycle parking—yet proposes no solutions. The station is also situated outside any realistic active-travel catchment, and cycling access is further constrained by the accident black spot at Buckland Batch. Lack of Evidence for Transport Mitigation and Infrastructure Delivery Nailsea's ability to accommodate additional development sustainably is already restricted by existing transport infrastructure. The Plan provides no evidence for the design, funding or deliverability of the proposed "strategic rail link." Even if feasible, it would not be delivered in advance of development, meaning it cannot be relied upon as mitigation. This renders the proposals unsound. Use of Vague, Aspirational Commitments Instead of Defined Measures Across the proposals for Nailsea and Backwell, the Plan relies on broad, aspirational statements with no specific schemes, timelines, costings or responsible bodies identified. This lack of clarity is unacceptable given the significant risks posed to current and future residents and fails to meet the tests of soundness.			

Name: Chris Foggin **I.D:** 62681025

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Youngwood Lane	No		Unsure	Unsure	The current infrastructure does not support the Pre-submission plan; I do not consider it sound at all. Reason 1. For example, last Friday I phoned Brockway Surgery at 8.00 a.m. to try to make an appointment and was informed that I was number 22 in the queue. Reason 2. Youngwood lane's extension will cause a bottleneck, probably in many places, but certainly where it meets the Backwell/Nailsea railway station. Reason 3. The other lanes, Chelvey lane, Netherton Wood lane, Brockley lane, Brockley way, Lower Claverham lane are already fiendishly dangerous already as they are all very narrow lanes and are a nightmare at times for motorists, walkers, horse riders and cyclists. As an avid and regular user of these lanes, both as a motorist and cyclist I can attest to the truth of the above statements. These are not opinions but fact. Anyone who wishes to conduct research into these statements will find what I have written about their narrowness and concomitant congestion to be factual. Reason 4: Although three new primary schools are planned they do not, of course, address the problems of congestion which are getting worse. Take a look at Mizzymead Road for example particularly at peak times and at the start and close of schools especially Nailsea and Backwell High schools but also the primary schools, Reason 5. Grade 2 agricultural land will be lost permanently. Reason 6. The intersection of Wraxall Hill and the B3128 (Clevedon Road) is already quite a tricky intersection to navigate for vehicles approaching the Clevedon Road and wanting to turn left or right. North Somerset Council staff , after receiving information about this intersection, conducted their own research into this intersection but as yet, no action was deemed			

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					necessary. This intersection will only become more problematic as more and more vehicles converge on it. Reason 7. Backwell/Nailsea railway station is already a risky spot with school children moving all too casually through and around the tunnel. There are already too many vehicles crowding the roads and lanes in and around Nailsea and Backwell. Reason 8. The rural nature of this area, the ability to access green fields will be completely destroyed. To lose green space is massively important. The " green and pleasant land" is slowly but surely being destroyed. The demolition of fields and the resultant loss of spaces near to homes for leisure activities and the like will impact negatively on the mental health of residents. Access to fresh air, walks, nature, these activities are being lost. Reason 9. There are two huge estates being built in Nailsea. Already occupants are neglecting to maintain these houses and the gardens; it is both depressing and disappointing to see rubbish discarded in and around the houses. Reason 10. The impact of the additional houses on the shopping precinct will also be felt; the library in Nailsea is now much smaller than its former home.			

Name: Chris Hammond **I.D:** 62682273

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm		• Consistent with national policy			I am writing to formally object to the inclusion of Tower Farm and Black Rock Portishead within the current planning proposal. My objection is based on the following grounds: Availability of Alternative Sites There are suitable brownfield and alternative greenfield sites locally which would deliver housing with far lower ecological impacts. Increasing housing density on already proposed brownfield sites would remove the need to develop Tower Farm and Black Rock, ensuring more sustainable land use. Ecological Importance and Green Corridors The proposed sites form part of strategic green corridors that connect directly to Sites of Special Scientific Interest (SSSIs), including Weston Big Wood and the wider Gordano Valley. Development here would fragment habitats and undermine biodiversity, contrary to both local and national ecological priorities. Green Belt Designation Both Tower Farm and Black Rock were added to the green belt in the 1980s due to their recognised high ecological value. Current national planning policy permits changes to green belt boundaries only in exceptional circumstances. No such exceptional circumstances have been demonstrated in this case. Access and Infrastructure Concerns Neither site can provide suitably safe or viable access routes. This raises significant concerns about traffic safety, congestion, and the practicality of servicing the developments. Noise and Environmental Standards Development of these sites would generate unacceptable noise levels, failing to meet national sound tests and thereby breaching environmental standards designed to protect residents’ wellbeing. Conclusion In summary, the proposed development of Tower Farm and Black Rock is unnecessary, hugely ecologically damaging,			

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					and inconsistent with both national planning policy and local sustainability objectives. I urge the Council to reject these proposals and instead prioritise housing delivery through existing brownfield opportunities and less sensitive sites.			
Black Rock, north of Clevedon Road		• Consistent with national policy			I am writing to formally object to the inclusion of Tower Farm and Black Rock Portishead within the current planning proposal. My objection is based on the following grounds: Availability of Alternative Sites There are suitable brownfield and alternative greenfield sites locally which would deliver housing with far lower ecological impacts. Increasing housing density on already proposed brownfield sites would remove the need to develop Tower Farm and Black Rock, ensuring more sustainable land use. Ecological Importance and Green Corridors The proposed sites form part of strategic green corridors that connect directly to Sites of Special Scientific Interest (SSSIs), including Weston Big Wood and the wider Gordano Valley. Development here would fragment habitats and undermine biodiversity, contrary to both local and national ecological priorities. Green Belt Designation Both Tower Farm and Black Rock were added to the green belt in the 1980s due to their recognised high ecological value. Current national planning policy permits changes to green belt boundaries only in exceptional circumstances. No such exceptional circumstances have been demonstrated in this case. Access and Infrastructure Concerns Neither site can provide suitably safe or viable access routes. This raises significant concerns about traffic safety, congestion, and the practicality of servicing the developments. Noise and Environmental Standards Development of these sites would generate unacceptable noise levels, failing to meet national sound tests and thereby breaching environmental standards designed to protect residents' wellbeing. Conclusion In summary, the proposed development of Tower Farm and Black Rock is unnecessary, hugely ecologically damaging, and inconsistent with both national planning policy and local sustainability objectives. I urge the Council to reject these proposals and instead prioritise housing delivery through existing brownfield opportunities and less sensitive sites.			

Name: Chris Hayes **I.D:** 39304481

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	1. Traffic and Commuting Issues: The A370 is already congested during rush hour. Given the distance from the train station and the absence of local employment opportunities, residents would have to rely on increasingly busy roads for commuting. 2. Impact on Wildlife and Biodiversity: The proposed development would destroy valuable wildlife habitats, further harming biodiversity in a country already facing significant nature depletion. 3. Concerns about Strategic Growth Location: o Loss of Greenbelt and high-quality agricultural land, specifically Grade 1 agricultural land, of which only 7% remains in North Somerset. o Potential flooding risk and uncertainty regarding timely funding and delivery of necessary road infrastructure to support the new housing. 4. Food Security: Building on fertile fields undermines food security, particularly as farmland is already being lost			

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					on the other side of Backwell. Preserving agricultural land is essential for local food production.			

Name: Chris Hollebon **I.D:** 25526817

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP2: Climate Change	No	• Justified	Unsure	Unsure	The council should not be wasting any public money on the following as there is no climate crisis: How does the Local Plan respond to climate change and the nature emergency and North Somerset Council's pledge to be carbon neutral by 2030? All money planned to be spent on this should be returned to Council Tax Payers immediately, and all plans abandoned.	Scrap all the fake climate change activities.		

Name: Chris Hopcraft **I.D:** 61070593

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy DP43: Affordable housing (including rural exception schemes)	No	• Effective	Yes	Yes	There is little or no regards given to Social or shared ownership housing. Affordable housing for a big portion of the local population is not a small discount on expensive housing developments, as they do not have the ability to save for deposits while paying private rents. Social housing estates can work very well, as both my wife and myself grew up in them in the Midlands. These were not sink estates where people were dumped, buy communities of people who respected the opportunity to have a decent home at an affordable price. We also started our married life in a shared ownership property, it gave us the step up to ownership - it worked. The future is quite bleak for the growing number of people growing older, who will have a low level of pension and still having to pay high private rents. I see nothing that addresses this in the plans.	There needs to be much more provision of social housing and proportion of shared ownership in the plans in all North Somerset.		

Name: Chris Jenks **I.D:** 62843233

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	We already have new houses scattered around Nailsea off young Wood Lane, engine lane, the perrings, treadle wood way, new houses behind causeway view, we do not have infrastructure here for all the new houses, schools, doctor surgery, and roads around Nailsea this particular site north of Nailsea is green belt land that is on a floodplain land, our train station is not fit for purpose for the disabled or elderly and car park is even now getting full with no availability to expand, this land has been known to have rare species of bats, the entrance and exit to the proposed site will be on to a main road out of Nailsea which is already struggling with amount of traffic coming in and out,main roads around Nailsea are already struggling and has a river flowing through the proposed site, how much more are the council prepared to lose our green belt land to profit from more housing when Nailsea only has B roads surrounding it enough is enough we are full.			

Name: Chris Lowe **I.D:** 58628161

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP12: Bristol Airport	No	• Effective		Unsure	The airport claims it is compliant with the government policy as set out below, however none of its local staff can get to or from the airport on public transport as it is not available, no regular bus service apart from the Bristol Flyer is available, during all of the operating hours, to any passengers or Staff from any town or village in North Somerset, BANES, or any other part of WECA, let alone Wales, Devon or Cornwall or farther afield. The resulting traffic, congested lay-bys, dangerous, unsafe and at times illegal parking over acres of land around Lulsgate makes the claim of zero carbon by the Airports owners a travesty In accordance with Government policy, all proposals for airport development must be accompanied by clear surface access proposals that demonstrate how the airport will ensure easy and reliable access for passengers, increase the use of public transport by passengers and staff and minimise congestion and other local impacts. Bristol Airport will be expected to define and deliver a low carbon, accessible, integrated, and reliable transport network, for both staff and passengers to access the airport when they need to and support the delivery of infrastructure that prioritises lower emission vehicles. The airport is also expected to limit the increase in demand for additional car parking provision, by increasing public transport mode share and reducing the proportion of car journeys that result in the need for parking at the airport. Integration with the existing rapid transit network and creating a new mass transit link directly to the airport are key elements towards achieving net zero by 2050. Any future off-site park and ride provision must accord with Policy DP20: Airport Parking.	If the Airport is to be allowed to carry on operating in the way set out, there must be public transport links put in place BEFORE any more expansion as none of the Government policies are being followed or implemented. Evidence of the number of passengers and staff arriving by public transport and those arriving by other means should be provided before any further expansion of services or other changes to night flights, incursions into Green belt land are even considered		

Name: Chris Miles **I.D:** 62753217

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	There are already 800 houses approved for construction in Backwell which is a 40% increase with no new services or amenities planned. This is already overdevelopment and another 1000+ houses would be total overdevelopment for this village (the clue is in the title 'village'). Such rapid growth would lead what is a lovely community to struggle and no social cohesion impact assessment has been provided to prove otherwise. The area being put forward is grade 1 agricultural land of which there is only 7% left in North Somerset! What will we do to feed ourselves when the next covid crisis comes along or another war overseas impacts food importation? As a country we need to be able to feed ourselves. This is without even looking at the destruction of wildlife habitats for local flora and fauna and further harm to biodiversity in the area. Nature and being able to walk in the countryside were things we were reminded were a huge help to people's mental health during the pandemic. We destroy these places at our peril. Backwell is a village of commuters and not an employment hub. None of these developments have done anything to create jobs or places or work they are just adding to the traffic on already overburdened roads such as Station Road and the A370. On 1 December the M5 was closed due to a fatality and this meant that the A370, Station Road, Dark Lane and all roads throughout Backwell were gridlocked for several hours. The A370 cannot cope with more traffic at the best of times and Station Road is a route that hundreds of children use each day to walk to the local schools. I repeat my comment from earlier that no developer is suggesting they stump up the cash for new roads and there appears to be no money coming from anywhere central to fund this 'back of napkin' idea so we will be left to rely on the current creaking network of roads and bus and train services.			

Name: Chris Segar **I.D:** 30975873

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP1: Sustainable Development	Yes		Yes	Yes			I agree to the policy on sustainable development. Villages such as where I live in Wrington are totally unsuitable for housing estate development because there is little employment and almost no public transport to stations and bus stops for commuters to Weston or Bristol. Local lanes are narrow and prone to flooding, therefore unsuitable for the extra road traffic and, particularly HGVs	

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							that would be engendered. The village school is already at capacity and we have no doctors surgery, so travel by car to get further afield is essential. Walking and cycling are not an option.	
SP2: Climate Change	Yes		Yes	Yes			I fully support the reuse of existing buildings and structures. I support all measures to reduce flooding. The area around me floods often and the situation is only getting worse with the run off from large housing development in the area. We need to preserve our green field sites for agriculture and biodiversity.	
SP3: Spatial strategy	Yes		Yes	Yes			I completely support SP3 Spatial Strategy as outlined in the document.	
SP4: Placemaking	Yes		Yes	Yes				
SP5: Towns	Yes		Yes	Yes				
SP6: Villages and rural areas	Yes		Yes	Yes			Villages such as where I live in Wrington are totally unsuitable for housing estate development because there is little employment and almost no public transport to stations and bus stops for commuters to Weston or Bristol. Local lanes are narrow and prone to flooding, therefore unsuitable for the extra road traffic and, particularly HGVs that would be engendered. The village school is already at capacity and we have no doctors surgery, so travel by car to get further afield is essential. Walking and cycling are not an option.	
SP7: Green Belt	Yes		Yes	Yes			I support the policy on green belt. It should be preserved except as a last resort in order to maintain the distance between towns and villages and preserve our green fields.	
Policy LP12: Bristol Airport	Yes		Yes	Yes	I do not support the airport's move to acquire part of Felton Common for very intrusive runway landing lights. This common land is valuable to the local community in terms of recreation and biodiversity.		I support the plan to limit traffic and parking in and around the airport. I do not support the airport's move to acquire part of Felton Common for very intrusive runway landing lights. This common land is valuable to the local community in terms of recreation and biodiversity.	
The Old Quarry off Wrington Hill, Wrington	Yes		Yes	Yes				
Land at the junction of Alburys with West Hay Road, Wrington			Yes	Yes				
Land at Redhill (Church Road/ Redhill (A38) junction)	Yes		Yes	Yes				
Land at Redhill (Church Road/ Redhill (A38) junction)	Yes		Yes	Yes				
Recreation ground next	Yes		Yes	Yes				

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to village hall, Redhill								

Name: Chris Tucker **I.D:** 62861121

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Effective	Unsure	Unsure	With regard to LP4. The plan provides a wonderful vision of what could be achieved however it is extremely short on actual detail. This plan will have a very negative effect on the road systems both internally within the villages and on the A369 creating massive issues of overcrowding. There is little detail on new services for example medical, dental, community care, schools, retail facilities. LP4 in its full version especially HE2015 will have a detrimental effect on the environment especially Markham woods and its wild life. The only part of LP4 that I would support is HE201065.	The LP4 needs to be drastically reduced to develop in small areas already contained within the village boundaries.	I do not wish to support	

Name: Chris Welch **I.D:** 62830337

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell						My main concerns in Nailsea and Backwell are that there seem to be too many houses being built on, but there doesn't seen to be any infrastructure - roads, schools, doctors, car parking to support them. There are only 2 roads out of Nailsea and these can get congested if travelling at rush hour. If there is a accident on the M5, then the A370 gets gets very congested as happened a week or two back. A number of these houses are being build on fields, grassland that once it is built over has gone forever. Some of these green fields are on flood land, with rhynes there to support drainage. A number of these house will be liable to flood. With climate change, extreme weather is becoming more frequent. There seem to be very few 2/3 bedroom houses or flats which young people looking for their first home could afford. There is also the environmental aspect that wildlife will lose their natural habitat and again - once gone, lost forever. The green spaces between Nailsea and Backwell seem to be getting smaller, soon it will be one urban sprawl.		

Name: Chrissy Weidner **I.D:** 63076385

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-					I write to share my comments on the proposed North Somerset Local Plan 2041, in particular regarding Policy LP4 and the proposed developments on 5 Green Field sites around Pill and Easton-in-Gordano. I am wholly opposed to the LP4 proposal, for the following reasons • The five proposed LP4 sites were not included in the Local Plan 2041 until June 2025, and therefore did not allow for any local consultation. The	I completely endorse the comments presented by the Pill and Easton-in-Gordano Parish Council and similarly ask that you remove LP4 from the Local Plan 2041. I would also ask you to consider the 'reasonable alternative' as presented by WildHome, to produce a locally supported, appropriate and sustainable plan that meets the needs of local residents, the natural world and the needs of future generations on this planet.		

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Gordano					Cabinet's claim that there was 'general support' (para 3.21) is also completely erroneous or even deliberately misleading. • The availability of all non-Green Belt sites has not been fully examined or exhausted. There is no justification for the inclusion of 5 large, and significantly important, Green Belt sites around our villages. • These Green Belt sites are areas of important areas of ancient woodland, wildlife habitat and corridors, and rich in biodiversity. Skylarks, bats, dormice, important veteran trees for habitat and floodplains, and the Markham Brook would all be permanently lost. • The proposed building of 1,100 new homes would nearly double the present population of Pill and Easton-in-Gordano. This is a completely disproportionate increase in population, and would result in massive increases in traffic and community needs and would completely change the feel of the local community. • The most recent Neighbourhood Plan does not appear to have been taken into consideration whatsoever. The local community recognises the need for additional housing, but in a way that complements and supports the existing community, not a last minute, poorly thought out plan to cover more than 1,000 new homes. • The proposal does not appear to have taken account of the massive increase in traffic that the developments would create. The roads around Lodway Farm in particular are narrow and unsuitable for such increases in traffic volume. Junction 19 of the M5 is also horrendous most times of the day, and consultation with Highways England etc to make changes to the motorway junction and the major routes leading to the junction do not appear to have taken place at all. • The proposed sites are important green spaces for the local community, and are essential for our health and well-being, as well as a buffer from urban sprawl. I do not believe that the Local Plan 2041, specifically policy LP4, is sound, legally compliant or followed a duty to cooperate with the relevant neighbourhoods or authorities.			

Name: Christina Greene **I.D:** 61238337

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I am greatly concerned about the decision to increase the size of the village of Backwell out of all proportion. To build on Agricultural Green Belt land is unnecessary and inexcusable. Land under Green Belt was designated for a purpose and once it is built upon, it will be lost forever for future generations. There seems to have been very little consideration given as to how a further proposal to increase the size of the village will impact on the pressure on roads, railway, schools and medical centre, not to mention current residents. One example; the railway station is not fit for purpose. It is almost impossible for families with young children to access the platforms and also anyone with mobility issues. The access by car when meeting or dropping anyone off at the station is dangerous. The roads in Backwell are busy and dangerous and Station Road which joins Backwell to Nailsea is already impossible with school and rush-hour traffic. Whilst it is understood that there is a demand for new housing, Backwell already has 800 new houses approved which means a 40% increase for the village.			

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					I sincerely hope that NSC will come to its senses and really consider the impact that the proposed overdevelopment will have on current and future residents.			

Name: Christina Lawlwy **I.D:** 62788865

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm						I would like to lodge an objection to the development of the above mentioned sites on the grounds that NSC has not properly considered: • Alternative brownfield or greenfield sites with far lower ecological impact, both in Portishead and across Somerset. • Opportunities to increase housing density on proposed brownfield sites, which could remove the need to develop Tower Farm and Black Rock. • The strategic ecological importance of these sites in protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor. • The fact that both areas were added to the Green Belt in the late 1980's due to their high ecological value. • National planning policy allows Green Belt changes only in exceptional circumstances - and these have not been demonstrated. In addition • Neither site can provide safe or suitable access. • Development would create unacceptable transport impacts, failing national soundness tests. For these reasons, Tower Farm and Black Rock should be removed from the Local Plan.		
Black Rock, north of Clevedon Road					I would like to lodge an objection to the development of the above mentioned sites on the grounds that NSC has not properly considered: Alternative brownfield or greenfield sites with far lower ecological impact, both in Portishead and across Somerset. Opportunities to increase housing density on proposed brownfield sites, which could remove the need to develop Tower Farm and Black Rock. The strategic ecological importance of these sites in protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor. The fact that both areas were added to the Green Belt in the late 1980's due to their high ecological value. National planning policy allows Green Belt changes only in exceptional circumstances - and these have not been demonstrated. In addition Neither site can provide safe or suitable access.			

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					Development would create unacceptable transport impacts, failing national soundness tests. For these reasons, Tower Farm and Black Rock should be removed from the Local Plan.			

Name: Christine Suanders **I.D:** 62846401

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm					I am emailing to object to the plan to build more houses on Tower Farm and Black Rock because this is a greenbelt area. Further developments in this area will impact on transport, school, GP surgeries, pharmacies and more. I object to this development and wish to protect the local environment.			
Black Rock, north of Clevedon Road					I am emailing to object to the plan to build more houses on Tower Farm and Black Rock because this is a greenbelt area. Further developments in this area will impact on transport, school, GP surgeries, pharmacies and more. I object to this development and wish to protect the local environment.			

Name: Christine Tottle **I.D:** 39145889

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I am writing to formally object to the proposed development of 1000 residential units on precious Grade 1 Agricultural Greenbelt land in Backwell. This plan poses a significant threat to our community and environment for several reasons: Overdevelopment Concerns Currently, 800 houses have already been approved, which would increase Backwell's population by 40%. The additional 1000 houses would result in an over 80% increase in our population without any accompanying infrastructure. This is a clear case of overdevelopment. Loss of Agricultural Land Only 7% of Grade 1 Agricultural land remains in the whole of North Somerset. While governments urge us to combat climate change, North Somerset's plan to develop housing on agricultural land contradicts this by necessitating increased food imports and transportation. By taking away valuable land for crops and grazing, we are undermining food security and sustainability. Government policy clearly states that ‘we must protect our best and most versatile land.’ Yet, this proposal seeks to give it away to housing, which is unnecessary in Backwell given the existing housing developments. Lack of Infrastructure The plans show inadequate infrastructure to support the influx of new families. While a new road is proposed, funding is expected to come from North Somerset Council, which has already stated it lacks the necessary funds. Schools: Our existing schools are already nearing capacity, and there are no plans for new educational facilities to accommodate the additional children.			

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					Healthcare: The Tytentensfield Medical Centre has indicated it cannot service the anticipated increase in residents, further straining our already limited healthcare resources. Transportation Issues Backwell is not an employment hub, and most residents commute. The primary road, the A370, is already congested, especially during busy summer months or when the M5 experiences closures. Public transport, including buses and trains, is often full during peak commuting times, making it difficult for residents to travel. Additionally, there is no access for disabled individuals at the train station, despite numerous reports highlighting this issue, leaving many without viable travel options. Character of Backwell The proposed development is out of character with the existing community. Backwell is already allocated a higher percentage of housing than any other village in North Somerset (7% compared to Clevedon’s 2%). This disproportionate allocation undermines the village's character and community integrity. Conclusion In conclusion, I urge you to reconsider the implications of this development on our community and the environment. We cannot sacrifice our agricultural land and community resources for unchecked housing growth. Thank you for considering my objection.			

Name: Christopher Barrett **I.D:** 62832545

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	There are already 800 houses approved for Backwell, which would be a 40% increase on the size of the village with no investment in health services, schools or leisure facilities. There is a higher number of houses allocated in BAckwell than any other village in North Somerset and the plan doesn't look at the viability of the extra 1000 houses. The proposed road, does not effectively reduce traffic on the already congested station road and in fact puts more reliance on it. The land to the East of Backwell is grade 1 agricultural land and green belt. Government policy at the moment is to protect the most versatile land and safeguard food security. There is also already flooding that happens towards the end of Backwell Common and Backwell Bow housing would significantly increase the risk of flooding. There is a lack of costing analysis and funding gurantees for the new road or services. The railway station that would be increased has no disabled access and for anyone using a push chair. If this was to be used more frequently there should be sigificant investment to sort these issues.			

Name: Christopher Charles **I.D:** 58602305

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with	Unsure	Unsure	Planning Objection I strongly object to the planning applications on this site on the local plan for the reasons detailed below: 1. Increased Traffic. The volume of traffic will be significantly more, not least during the development of the site. The congestion during school pick up and drop off times is already significant, and will only get worse. The A370 is regularly gridlocked at peak times. This will get worse with this development. 2. Road safety. Children walk to school on all the local roads to West Leigh, Backwell Juniors and Backwell Seniors. The A370, Dark lane, Station road and Church lane already do not feel safe at school drop off times, and I do not wish to let my			

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		national policy			children walk along these roads unsupervised. More houses in the surrounding areas and the wider Backwell area will make these roads more dangerous. 3. Pollution. Increased traffic results in more pollution and poor air quality. Specifically in the area where children walk to the local schools. 4. Massive disruption during building, including noise pollution, pollution with the building materials and the vehicles. 5. Food security – removing arable farming land and replacing with houses reduces the food security two-fold, as there is less food being produced, and more houses consuming food. 6. Increased carbon emissions with more traffic, central heating, electricity and gas usage. 7. Loss of Greenbelt- destruction of habitats, loss of green space, disruption to local wildlife including bats, birds of prey, mammals, birds, insects, lizards. Replacing the local green space with concrete. The Brockley maternity roost and SSSI with rare lesser greater horseshoe bats relying on this area for food. 8. Increased risk of flooding, the A370 regularly floods already – more rainwater runoff, on an industrial scale with the new development at Grove Farm already will make this many times worse. The new developments planned to the East of Backwell will make this far worse again. 9. Disproportionate building sites already approved, such as Grove Farm. This is already outrageously disproportionate to the size of the existing village, it is appalling that even more sites are even being considered. There is already 800 houses approved, a 40% increase in the village size. This is completely outrageous and totally unfair to the residents of Backwell. Further developments would be completely disproportionate to the community of Backwell. Backwell has been allocated far higher houses than any other village in North Somerset, and higher than any towns! 10. Pressure on local services such as the swimming pool, doctors, and dentists. I work at Backwell Dental Care and a massive influx of new houses would put massive pressure on the availability of dental and hygiene appointments. 11. Confusing and inaccessible nature of the consultation. It was very challenging to find this site to raise my objection. 12. A deficit of school places already in the Backwell schools and surrounding areas. What developments would be planned to alleviate this? 13. Backwell will lose its village character, if it hasn't already after the Grove farm approval. 14. Backwell is a commuter village, very few services are provided in Backwell. It is not an employment hub. There is already limited parking at the station, what will people do when they need to park at the station for a train? 15. No funding guarantees for any infrastructure. In summary, the planned development is disproportionate, dangerous to local residents with traffic, pollution and to local biodiversity. It is detrimental to food security and flood risk, and should be rejected. Christopher Charles			

Name: Christopher Dunford **I.D:** 51450017

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The proposed development of 582 homes on land next to Backwell Lake is vastly out of proportion with development elsewhere in the county, it compounds a shortfall in infrastructure and services following recent overdevelopment, and it depletes our vital and dwindling green space. This rapid overdevelopment is vastly out of proportion with the rest of the county. Whilst Backwell and Nailsea (which would essentially become one) would experience an 80% and 55% increase in population respectively, other towns in the county are not receiving anywhere near that scale of development. Portishead and Pill have a new railway station and yet they are only taking 14% growth. Clevedon is only taking 6% growth. And why not build more at the new Ashton Vale location which is strategically close to employment opportunities? The housing number that North Somerset is trying to meet has been imposed by central government. The number set by central government is based upon an algorithm that DOES NOT take into account flood risk to the area. Flood protection for North Somerset due to climate change shows a significant loss if land, therefore the housing allocation for North Somerset should be decreased accordingly. The UK is home to three of the best climate research institutes in the world (Cabot Institute, Tyndall Centre, and Priestly Centre) so it seems bizarre that the UK's planning of housing development is not taking into account these climate impact predictions. The new road proposed is not guaranteed. If the new road does not go ahead then traffic congestion on station road will be unworkable. Station road is narrow, has a single pavement, and takes foot traffic for two primary schools and a secondary			

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					school. The risk of harm is already high and pushing traffic from these 889 new homes onto it is unjustifiably dangerous. Even if the new road does somehow go ahead in this short timescale and at considerable cost, the traffic problems will shift onto Backwell Common. Backwell Common forms part of National Cycle Route 33, losing this has a significant impact on those trying to travel into Bristol on bicycle and will result in them switching to less sustainable forms of transport. A 55% increase in the size of population in such a timescale will mean that essential services cannot keep up. You would not double the size of Bristol or London in less than 15 years. There will be significant shortage of schooling, retail and leisure, and medical services. A shortage of health services can be life threatening and a shortage of schooling significantly impacts the life outcomes of young people. Once the housing developers have moved on, who will be left to solve these problems? And they will be serious problems. Rapid growth on this scale is not strategic. There are few employment opportunities in Nailsea. Everyone will need to travel into Bristol for work. The issues around congestion on station road are already detailed above. The rail station in Nailsea has no ramp access and rail services at rush hour are already at capacity, people are already standing packed in the carriages and vestibules, I do not know how all these new people are supposed to get on a train. As mentioned in, the proposed new road will impact National Cycle Route 33, and few cyclists are brave enough to cycle along the A370 at rush hour, so residents of those 889 new homes are inevitably going to be commuting by car. This is not a good location for sustainable transport – simply having a train station does not mean than an area can somehow absorb endless housing without creating serious problems. Loss of this much green space will result in a drop in biodiversity. North Somerset Council has declared an ecological emergency, as has the neighbouring Bristol City Council. I do not understand how a local authority can declare an ecological emergency and then eradicate green space that provides previous biodiversity, including hunting grounds for the lesser horseshoe bat and the greater horseshoe bat. No doubt the new housing development will come with 'biodiversity features', but any ecologist can tell you then these are just tokenistic compared to the damage caused by loss of green belt at this scale. This area is prone to flooding. Climate change will increase the frequency and severity of this flooding. Building 889 new homes is going to place these residences, and those adjacent to them, at greater risk of flooding. Thank you for taking the time to read this.			
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The proposed development on land east of Backwell is vastly out of proportion with development elsewhere in the county, it compounds a shortfall in infrastructure and services following recent overdevelopment, and it depletes our vital and dwindling grade 1 agricultural land. Planning permission has already been granted for a 40% increase in the size of Backwell. Building a staggering 889 homes on grade 1 agricultural land east of Backwell would be an 80% increase in the size of the village. This rapid overdevelopment is vastly out of proportion with the rest of the county. Whilst Backwell and neighbouring Nailsea (which would essentially become one) would experience an 80% and 55% increase in population respectively, other towns in the county are not receiving anywhere near that scale of development. Portishead and Pill have a new railway station and yet they are only taking 14% growth. Clevedon is only taking 6% growth. And why not build more at the new Ashton Vale location which is strategically close to employment opportunities? Almost doubling the size of Backwell seems to be pushed by the market forces of house builders and does not represent a sound or fair decision when seen in the context of the county. The housing number that North Somerset is trying to meet has been imposed by central government. The number set by central government is based upon an algorithm that DOES NOT take into account flood risk to the area. Flood protection for North Somerset due to climate change shows a significant loss if land, therefore the housing allocation for North Somerset should be decreased accordingly. The UK is home to three of the best climate research institutes in the world (Cabot Institute, Tyndall Centre, and Priestly Centre) so it seems bizarre that the UK's planning of housing development is not taking into account these climate impact predictions. The new road proposed is not guaranteed. If the new road does not go ahead then traffic congestion on station road will be unworkable. Station road is narrow, has a single pavement, and takes foot traffic for two primary schools and a secondary school. The risk of harm is already high and pushing traffic from these 889 new homes onto it is unjustifiably dangerous. Even if the new road does somehow go ahead in this short timescale and at considerable cost, the traffic problems will shift onto Backwell Common. Backwell Common forms part of National Cycle Route 33, losing this has a significant impact on those trying to travel into Bristol on bicycle and will result in them switching to less sustainable forms of transport.			

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					Almost doubling the size of population in such a timescale will mean that essential services cannot keep up. You would not double the size of Bristol or London in less than 15 years. There will be significant shortage of schooling, retail and leisure, and medical services. A shortage of health services can be life threatening and a shortage of schooling significantly impacts the life outcomes of young people. Once the housing developers have moved on, who will be left to solve these problems? And they will be serious problems. Rapid growth on this scale is not strategic. There are no employment opportunities in Backwell. Everyone will need to travel into Bristol for work. The issues around congestion on station road are already detailed above. The rail station in Backwell has no ramp access and rail services at rush hour are already at capacity, people are already standing packed in the carriages and vestibules, I do not know how all these new people are supposed to get on a train. As mentioned in, the proposed new road will impact National Cycle Route 33, and few cyclists are brave enough to cycle along the A370 at rush hour, so residents of those 889 new homes are inevitably going to be commuting by car. This is not a good location for sustainable transport – simply having a train station does not mean than an area can somehow absorb endless housing without creating serious problems. The land proposed for development is Grade 1 agricultural land. Government policy states that this must be protected to provide food security for the UK. We live in uncertain times. Globally democracy is in decline whilst autocracy is on the increase. The risk of economic disruption and global conflict is increasing. The Ministry of Defence is moving to a ‘war fighting’ capability. During the last two world wars, adversaries of the United Kingdom sought to defeat it by targeting its food supplies from overseas, and so home-grown food supplies became vital. The economic, health and military importance of UK food security cannot be overestimated. Once this agricultural land is lost, it is gone forever. Please do not risk the security of current and future generations. I do not believe this argument to carry much weight, but there is something to be said for protecting the heritage and identify of an area and the importance of cultural and social cohesion. Transforming a village into a town in less than 15 years will inevitably impact social cohesion and end a village way of life that has lasted for hundreds of years. Loss of this much green space will result in a drop in biodiversity. North Somerset Council has declared an ecological emergency, as has the neighbouring Bristol City Council. I do not understand how a local authority can declare an ecological emergency and then eradicate green space that provides previous biodiversity, including hunting grounds for the lesser horseshoe bat and the greater horseshoe bat. No doubt the new housing development will come with ‘biodiversity features’, but any ecologist can tell you then these are just tokenistic compared to the damage caused by loss of green belt at this scale. This area is prone to flooding. Climate change will increase the frequency and severity of this flooding. Building 889 new homes is going to place these residences, and those adjacent to them, at greater risk of flooding. If the tone of my statement is one of exasperation, then there is a reason for that. As a resident of Backwell trying to raise a family, over the last few years this small village has seen planning permission approved for 94 new homes on Foreign Fields, 125 homes on land off Dark Lane, 60 homes off Rodney Road, 515 homes at Grove Farm, and multiple large housing developments in Nailsea, which essentially merge it and Backwell into one. I do recognise the need to build new homes, and I accept that all areas within North Somerset will have to take a fair share of new house building. But to now propose an additional 889 new homes for Backwell on top of what is already being built seems hugely unfair, cannot be sustained, and is vastly out of proportion with what other locations in North Somerset are experiencing. Please can Backwell have a reasonable number of new homes, and some of this new development be allocated to other areas in North Somerset instead, especially to its larger towns, so that the impact and disruption of development is felt more evenly across the county rather than focusing the largest amount on this one small village of Backwell. My hope is that this consultation process will see this precious grade 1 agricultural land protected for future generations, and new homes being allocated more evenly and sustainability across the county. Thank you for taking the time to read this.			

Name: Christopher Elliott **I.D:** 29307521

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively	Unsure	Unsure	It is wrong to build upon Grade 1 farmland which is being used annually to produce food for consumption in our nation. As geopolitical tensions rise it is vital that our nation retains all the highly productive agricultural land that it has in order to feed its inhabitants, so not relying on volatile imports.			

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		prepared • Justified • Effective • Consistent with national policy			In addition NPPF para 188 states: Where significant development of agricultural land is demonstrated to be necessary; areas of poorer quality land should be preferred to those of a higher quality. The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development. This piece of land being deemed Grade 1 should not be used as there are other sights with a lower designation that could be made available.			

Name: Christopher Haire **I.D:** 63122945

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Black Rock, north of Clevedon Road	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	NSC has not properly considered: Alternative brown and green field sites with much less ecological impact both in Portishead and across North Somerset. The opportunity to increase housing density on proposed brown field sites across North Somerset which would mean these sites are not required to meet local housing targets. The strategic ecological contribution of these specific sites in protecting the unique environment of Weston Big Wood (SSSI} and the Gordano Valley strategic green corridor The fact that these sites were specifically added to the Green Belt in the late 1980's because of their high ecological value. For the above reasons, the Local Plan is unsound because National Planning Policy states that sites can only be removed from Green Belt for development under exceptional circumstances and these exceptional circumstances are not proven. No modifications short of removing the allocation completely is appropriate for this site. The land should be retained as undeveloped green space and potentially used for biodiversity net gain purposes. North Somerset Council should instead increase housing density on already known and new brown field sites in Portishead and North Somerset and look to develop on other green field sites in Portishead and the rest of the district which will have much less ecological impact. (please see supporting paper for details).			Attachment.pdf

Name: Christopher Watkins **I.D:** 39220001

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The plan proposed is not consistent with strategic priorities of North Somerset Council. Yes, it will provide additional houses, but Backwell and Nailsea do not have an adequate road system, primary health care facilities and schools to support such a massive increase in population. The houses will be built on prime agricultural land of which there is a national shortage. Backwell is unable to provide job opportunities locally so most residents will have to travel into other areas, principally Bristol, which provide jobs. With this development Backwell will become a dormitory and cease to be a community. The bus and rail services are at present inadequate to such a large increase in population and the railway station is inadequate. Furthermore housing around the lake will be prone to flooding and the proposal of the road linking Backwell and Nailsea is inadequate, highly expensive to put in and of questionable feasibility.	I do not have the expertise to comment.	I do not have the expertise to comment.	

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	The plan proposed is not consistent with strategic priorities of North Somerset Council. Yes, it will provide additional houses, but Backwell does not have an adequate road system, primary health care facilities and schools to support such a massive increase in population. The houses will be built on prime agricultural land of which there is a national shortage. Backwell is unable to provide job opportunities locally so most residents will have to travel into other areas, principally Bristol, which provide jobs. With this development Backwell will become a dormitory and cease to be a community. The bus and rail services are at present inadequate to such a large increase in population and the railway station is inadequate. Backwell is allocated a higher number of houses than any other village in North Somerset and even a higher growth percentage than towns. For example, Backwell is expected to take 7% of the district's housing allocation, compared to Clevedon's 2%, There has been no impact assessment of the proposals.	I do not have the expertise to comment.	I do not have the expertise to comment	
Grove Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	The plan proposed is not consistent with strategic priorities of North Somerset Council. Yes, it will provide additional houses, but Backwell does not have an adequate road system, primary health care facilities and schools to support such a massive increase in population. The houses will be built on prime agricultural land of which there is a national shortage. Backwell is unable to provide job opportunities locally so most residents will have to travel into other areas, principally Bristol, which provide jobs. With this development Backwell will become a dormitory and cease to be a community. The bus and rail services are at present inadequate to such a large increase in population and the railway station is inadequate.	I do not have to knowledge or expertise to comment.	I do not have to knowledge or expertise to comment.	

Name: Christopher Wills **I.D:** 51044353

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Re: The North Somerset Local Plan 2041 I object strongly to ideas raised in the above Plan, especially with regard to the massive urbanisation east of Backwell on this precious grade 1 agricultural land. The proposed dumping of thousands of new houses en-masse in this delicate rural area is not justified. North Somerset Council have not properly assessed the alternatives to this. We need to have an urgent re-assessment of the Green Belt around Bristol. This is desperately needed. North Somerset Council have failed to carry out such a re-assessment. Land immediately alongside Bristol which is nominally Green Belt would be far better suited for the 'honest and logical' extension of Bristol, causing far less environmental damage. Encouraging the wholesale us of cars, in out-of-town dormitory settlements, with the progressive saturation of the road system is plainly bad planning. It is laughable to suggest any significant number of new commuters will us the sadly inefficient public transport. The dumping of an extra 889 new houses on our country village, following another 800 new houses already approved is the exact opposite of 'sustainable development'. The delicate balance of our community is in imminent danger. The proposed Plan 'pencils in' a totally un-costed and bizarre new road, through the flood plain, under the railway, to join the A370 at some as yet unspecified point, causing further traffic chaos as it does. I believe that this road will never be built. It is accepted by all parties that there is an immediate and very dangerous overcrowding on the existing road network. How can North Somerset Council be party to this 'pie-in-the-sky' planning? I believe that they feel powerless to defend against huge political pressure for mass development. If this road were to built, bringing as it would, traffic from Nailsea heading for Bristol, it would only make the situation worse for any new entrance onto the A370 from the 889 extra new houses suggested east of Backwell. In years to come, when people look back to the planning errors of the past that have destroyed our precious community, who will they blame?			

Name: Churchill Parish Council **I.D:** 1190177

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy DP9: Flood risk	Yes		Yes	Yes		Flooding appears to have low significance in the plan, due to the issues in the county it was expected that it has its own section. North Somerset Council need to acknowledge we are a very low-level lying region, prone to flooding. This needs much more in-depth analysis presented here, mitigation plans developed, and local infrastructure and deployment plans put in place. These mitigation strategies need to form part of each planning application - and not just another capture pond that pushes the problem downstream.		
Policy DP14: Highway safety, traffic and provision of infrastructure associated with development	Yes		Yes	Yes		While Policy DP14, talks about highway safety at a high level, there is no quantifiable impact present. Principally our parish is made up of villages that do not have streetlights, pavements, or traffic calming, and in most cases lacks any maintenance (or investment). NSC need to acknowledge that a development of x houses in a village will result in a y- additional vehicles, and z- additional traffic movements, either in that Parish itself, or impacting a neighbouring Parish, and thus deprecating the quality of life of residents. This needs to form part of the planning application itself. Mitigation for each development must be included in the planning application, and a direct contribution to the Parishes impacted - be this monetary or additional infrastructure.		
Policy DP17: Public transport accessibility	Yes		Yes	Yes		Churchill Parish Council welcomes the aspiration described under DP17 - Public Transport Accessibility - that states "All residential development should be within reasonable distance of a direct and frequent bus service providing access to a good range of facilities, services and jobs via a direct, safe and attractive pedestrian route." Churchill and Langford villages, however, have seen a vast increase in new housing in the past 6 years whilst at the same time public transport has declined. The road network has got busier and some of the main roads have no footpaths so it has become increasingly dangerous for pedestrians. We note that this has led to vulnerable people being less inclined to leave their homes leading to isolation related health issues.The social housing, whilst important, is often allocated to people whose family network is in Weston super mare and so transport to and from there is an issue.These rural villages are not geographically linked in a way that allows for one through service to provide its needs. Churchill now has an hourly service to Bristol and Weston super Mare. While links to Banwell, Winscombe, Wrington, Wells and Weston super Mare are not on regular frequencies. The Rural Link service, Yatton to Bristol Airport requires pre-booking and ceases at 1530 hrs.Churchill Parish has been covered by the Demand Responsive Transport project which provides facilities at what must be a substantial loss to the taxpayer and only satisfies 50 percent of the requests made (Smallwood, 2025). It is suggested the service is unlikely to survive long term as it seems unaffordable. At the same time significant funds are being spent on public transport capital projects such as bus lanes and even in one case a major roundabout enhancement where very few buses operate. Importantly, there are many funds available from different sources which are not coordinated. Sums currently being spent on local bus and health transport should be examined together, to assess whether this can be organised better locally through common budgets. There is the need to ensure that there is a regular frequency of services around the villages and feeding into Bristol, Weston super mare, Wells, the major railway station and main arteries. Smallwood T (2025). Report to Transport Select Committee by Trevor Smallwood OBE, DL (Somerset), past Executive Chairman of Badgerline Group and FirstGroup, OBE in 1994 for services to public transport.		
Land east of Ladymead Lane	Yes		Yes	Yes		North Somerset Local Plan 2041 (Pre-submission Plan, pp 301-302) lists housing site allocations for 191 houses within the areas of Ladymead, Jubilee and Pudding Pie lanes yet there is scant detail on how the area will be made safer for active travel particularly to and from schools. Please also consider the proposed new SEND school in Ladymead Lane. Pavements and crossing points do not exist along many stretches of these narrow lanes. Ladymead Lane provides the key north-south link to A38 yet it has no pavements, it is very narrow and a 30-mph speed limit. The proposal states sites should be “master planned together and consider cumulative traffic impacts and access arrangements particularly in relation to Ladymead Lane” but the aspirations seem vague and lack detail. Cumulative traffic impacts from recent		

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						developments (300+ houses which have doubled the size of the two villages of Churchill and Langford) in the wider area have rendered these lanes too dangerous for active travel at many times of the day and action is required. There is an urgent need for a comprehensive review of road safety for active travel and for safety measures to be implemented before any further housing development commences at these locations.		
Land north of Pudding Pie Lane	Yes		Yes	Yes		North Somerset Local Plan 2041 (Pre-submission Plan, pp 301-302) lists housing site allocations for 191 houses within the areas of Ladymead, Jubilee and Pudding Pie lanes yet there is scant detail on how the area will be made safer for active travel particularly to and from schools. Please also consider the proposed new SEND school in Ladymead Lane. Pavements and crossing points do not exist along many stretches of these narrow lanes. Ladymead Lane provides the key north-south link to A38 yet it has no pavements, it is very narrow and a 30-mph speed limit. The proposal states sites should be “master planned together and consider cumulative traffic impacts and access arrangements particularly in relation to Ladymead Lane” but the aspirations seem vague and lack detail. Cumulative traffic impacts from recent developments (300+ houses which have doubled the size of the two villages of Churchill and Langford) in the wider area have rendered these lanes too dangerous for active travel at many times of the day and action is required. There is an urgent need for a comprehensive review of road safety for active travel and for safety measures to be implemented before any further housing development commences at these locations.		
Pudding Pie Lane (West)	Yes		Yes	Yes		North Somerset Local Plan 2041 (Pre-submission Plan, pp 301-302) lists housing site allocations for 191 houses within the areas of Ladymead, Jubilee and Pudding Pie lanes yet there is scant detail on how the area will be made safer for active travel particularly to and from schools. Please also consider the proposed new SEND school in Ladymead Lane. Pavements and crossing points do not exist along many stretches of these narrow lanes. Ladymead Lane provides the key north-south link to A38 yet it has no pavements, it is very narrow and a 30-mph speed limit. The proposal states sites should be “master planned together and consider cumulative traffic impacts and access arrangements particularly in relation to Ladymead Lane” but the aspirations seem vague and lack detail. Cumulative traffic impacts from recent developments (300+ houses which have doubled the size of the two villages of Churchill and Langford) in the wider area have rendered these lanes too dangerous for active travel at many times of the day and action is required. There is an urgent need for a comprehensive review of road safety for active travel and for safety measures to be implemented before any further housing development commences at these locations.		
Land south of Jubilee Lane, Churchill	Yes		Yes	Yes		North Somerset Local Plan 2041 (Pre-submission Plan, pp 301-302) lists housing msite allocations for 191 houses within the areas of Ladymead, Jubilee and Pudding Pie lanes yet there is scant detail on how the area will be made safer for active travel particularly to and from schools. Please also consider the proposed new SEND school in Ladymead Lane. Pavements and crossing points do not exist along many stretches of these narrow lanes. Ladymead Lane provides the key north-south link to A38 yet it has no pavements, it is very narrow and a 30-mph speed limit. The proposal states sites should be “master planned together and consider cumulative traffic impacts and access arrangements particularly in relation to Ladymead Lane” but the aspirations seem vague and lack detail. Cumulative traffic impacts from recent developments (300+ houses which have doubled the size of the two villages of Churchill and Langford) in the wider area have rendered these lanes too dangerous for active travel at many times of the day and action is required. There is an urgent need for a comprehensive review of road safety for active travel and for safety measures to be implemented before any further housing development commences at these locations.		

Name: Ciara Donegan-Davies **I.D:** 30898817

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SP1: Sustainable Development	Yes		Yes	Yes				
SP2: Climate Change	Yes		Yes	Yes				
SP3: Spatial	Yes		Yes	Yes			I absolutely believe that this is the right approach to development - building in areas which	

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strategy							can support it with the correct infrastructure, transport links and amenities. Not on flood plains or in small villages without the correct services and access.	
SP4: Placemaking	Yes		Yes	Yes				
SP5: Towns	Yes		Yes	Yes				
SP6: Villages and rural areas	Yes		Yes	Yes				
SP7: Green Belt	Yes		Yes	Yes				
SP8: Housing	Yes		Yes	Yes				
SP9: Employment	Yes		Yes	Yes				
SP10: Transport	Yes		Yes	Yes				
SP11: Historic and natural environment	Yes		Yes	Yes				

Name: Claire Cave **I.D:** 58602369

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Failure to consider reasonable alternative sites The Council has not adequately assessed alternative brownfield or greenfield locations within Portishead and across the wider district that would have far lower ecological impact. National planning policy requires that all appropriate alternatives be examined before releasing Green Belt land, yet there is no clear evidence that such alternatives have been fully explored. Insufficient assessment of increased density on brownfield sites Opportunities to deliver higher-density development on the proposed brownfield allocations have not been considered in any meaningful way. A modest increase in density on these sites could avoid the need to release Tower Farm and Black Rock from the Green Belt, thus preventing harm to valuable landscapes and ecosystems. Strategic ecological importance of the sites Both locations form an integral part of the ecological network supporting Weston Big Wood (SSSI) and the wider Gordano Valley green corridor. These areas provide habitat connectivity, protect biodiversity, and buffer the SSSI from disturbance. Developing these sites would cause irreversible ecological harm inconsistent	Take Tower Farm and Black Rock out of the allocations Neither site meets the bar for Green Belt release. The plan should keep both areas in the Green Belt unless the Council can show truly exceptional circumstances — and at present, it hasn’t. Do a proper look at the alternatives The plan needs a fresh review of other sites, including brownfield land and lower-impact greenfield areas. This should also include a serious look at increasing density on the brownfield sites already identified. Without this work, the plan isn’t justified. Revisit the ecological evidence A clearer, updated assessment is needed that recognises how important these sites are for Weston Big Wood (SSSI) and the wider Gordano Valley green corridor. This	There are parts of the North Somerset Local Plan 2041 that I do support. The overall aim to focus development on sustainable locations, make better use of brownfield land, and protect important natural areas is the right direction for the district. I also support the plan’s emphasis on improving walking, cycling and public transport, and reducing the need to travel by car. These priorities will benefit both residents and the environment. However, to stay consistent with these principles, the Green Belt should not be changed. Protecting the Green Belt is essential for safeguarding wildlife, maintaining green corridors, and preventing unnecessary loss of valued landscapes. The plan’s general approach aligns with national policy, but it should follow through fully by keeping existing Green Belt boundaries intact. My supportive comments reflect the fact that the broad strategy is sound — but it must be applied consistently, which means no release of Green Belt land.	

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					with national policy on nature recovery. Green Belt purposes and historic justification Tower Farm and Black Rock were added to the Green Belt in the late 1980s specifically because of their high ecological and landscape value. The plan does not provide evidence that these qualities have diminished. National policy allows Green Belt alterations only in exceptional circumstances, and no such circumstances have been demonstrated. Transport and access constraints Neither site can deliver safe or suitable access. Significant highways constraints remain unresolved, and any development would generate unacceptable transport impacts, contrary to the National Planning Policy Framework's requirement that plans be effective and deliverable. These failures mean the plan does not meet the tests of soundness.	should then feed directly into how sites are selected or rejected. Keep the Green Belt boundaries as they are These boundaries were set for good reasons in the late 1980s, and nothing has changed to weaken those reasons. Unless the Council can show solid evidence that the situation is different now, the boundaries should stay in place. Sort out the access and transport problems before allocating anything At the moment, neither site has safe or workable access, and the transport impacts look unacceptable. If these issues can't be resolved, the sites simply shouldn't be allocated. Make the plan fit the national tests of soundness For the plan to be credible, it needs to show that: it has chosen the most suitable sites; Green Belt release is a last resort, not a first step; access and transport issues have actual solutions; and ecological evidence has been properly taken into account.		

Name: Claire Jones **I.D:** 58613217

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Land at Tower Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	I don't understand how this site has been selected when it is part of the green belt and other brown field site in Portishead have not been selected or further developed. This is the last open green area of any size left for Portishead residents, and building here before fully developing all brown field sites cannot be justified. Everyone is calling this site Tower Farm, but its Portishead Down and should remain there for wildlife. To my understanding it is not consistent with planning policy to build here. It is a vital green area for wildlife and supports Weston big wood. Deer live in the woods and I regularly see them with there fawn in these fields. The buffer zone proposed would remove too much of the area they use. The buffer zone would not be used by the deer as it will be busy with dog walkers who will now not have a large area to walk in. I live by the school that will be increased in size as part of the development. Roads at school time around this area are already a nightmare, increasing the size of the school and the number of cars using the roads will make this significantly	None, its just not suitable		

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					worse. It will have a significant negative impact on the lives of those already living in that area, it has not been positively prepared. I don't believe the site has been fully evaluated for this of development, if it had it would not be proposed. The site is at the top of Portishead. It is impossible for me to walk, yet alone cycle, to the high street or the large supermarkets, it is too long and steep to allow me to get there other than by care. When there are sites in Portishead that are much closer to the town amenities these should be developed first. The only way to access this site is via car. This is not consistant with planning policy I do not support the the North Somerset Local Plan 2041 for the Tower Hill Farm location.			

Name: Claire Miller **I.D:** 62810977

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared	No	No	NSC has not properly considered: Alternative brownfield or greenfield sites with far lower ecological impact, both in Portishead and across North Somerset. Opportunities to increase housing density on proposed brownfield sites, which could remove the need to develop Tower Farm and Black Rock. The strategic ecological importance of these sites in protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor. The fact that both areas were added to the Green Belt in the late 1980s due to their high ecological value. National planning policy allows Green Belt changes only in exceptional circumstances — and these have not been demonstrated. In addition: Neither site can provide safe or suitable access. Development would create unacceptable transport impacts, failing national soundness tests. For these reasons, Tower Farm and Black Rock should be removed from the Local Plan.			
Black Rock, north of Clevedon Road	No	• Positively prepared	No	No	NSC has not properly considered: Alternative brownfield or greenfield sites with far lower ecological impact, both in Portishead and across North Somerset. Opportunities to increase housing density on proposed brownfield sites, which could remove the need to develop Tower Farm and Black Rock. The strategic ecological importance of these sites in protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor. The fact that both areas were added to the Green Belt in the late 1980s due to their high ecological value. National planning policy allows Green Belt changes only in exceptional circumstances — and these have not been demonstrated.			

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					In addition: Neither site can provide safe or suitable access. Development would create unacceptable transport impacts, failing national soundness tests. For these reasons, Tower Farm and Black Rock should be removed from the Local Plan.			

Name: Claire Pickard-Cambridge **I.D:** 62833089

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Consistent with national policy	Unsure	Unsure	This is on greenbelt land and that kind of development should only be a last resort. Greenbelt is important in distinguishing Bristol from surrounding villages and should only be considered under very special circumstances. Allowing such a large development on greenbelt land will create a precedent which will open up a Pandora's box that will include future approvals along the A370 connecting Backwell to Flax Bourton. The local plan makes a clear statement that permanent building should not happen on grade 1, grade 2 and even grade 3A land. The NSC's own report identifies the 50ha site on the land east of Backwell as the most exceptional land quality, i.e. grade 1. This quality land only amounts to 7pc of our county's land. The local plan tries to justify the destruction of this prime agricultural land on the basis that it will be used to create the link road to the A370. But if you are going to build a link road you don't need 50ha of prime land to do so. Thirdly this will help to double to size of our village, and the local plan provides no estimates of the capital costs and feasibility of the necessary infrastructure upgrading and, in particular, the costs of the proposed link road to the A370. The local plan glosses over the costs and potential difficulty of building this link road. This would involve creating a tunnel under a raised railway embankment. The developers have suggested that they may contribute to the costs of such a road as a third phase in their operations. We understand the national government has no funds available for covering the costs of such a scheme. There are a number of cases where property developers suggest generous capital support but renege on their commitments once the work has started. Huge numbers have been mooted regarding the cost of this infrastructure scheme, including a range of £75mn to £150mn. It appears that the local plan is putting out a smoke-and-mirrors justification for the housing and that the most likely outcome is that the houses will be built with cul de sacs opening onto the A370 as phase 1 and phase 2 of their programme but that in practice phase 3 (building of the link road) will not happen. The consequence of that is that 50ha of our best land will be destroyed and the existing traffic congestion will be exacerbated. 1.	1. Provide a costing and feasibility assessment for the required infrastructure necessary in Backwell 2. Review the justification for ignoring the LPs statement of protecting Grade 1 and 2 land 3. Consider the link road as a stand alone investment, and secure jn advance irrevocable commitment from developers / national Goverment		

Name: Claire Williams **I.D:** 62864065

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I am a local Backwell resident living on the A370 next to one of the proposed junctions for the area known as "Land East of Backwell". The highly speculative plan for this area is flawed and unjustifiable for a number of reasons which I experience first-hand as a long-standing resident of the area. 1) Inadequate provision for major junction infrastructure The proposed link road between A370 and Station road would not ease traffic on A370 but increase it - the road is not wide enough for the feeder lane junction or roundabout that would be required and cause long queues. It is also very close to Backwell Secondary school and Leisure Centre, as well as popular bus stops, which all increases the risk of pedestrian and child injury - as highlighted in the developers own drawing (with children crossing in front of buses).	Please remove the Land East of Backwell from the local plan.		

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					There are no guarantees for the link road development either. By their own admission, the developer has said they would build the road in stages - the priority being the one to the houses, not to the station end. The link road under the railway would be highly expensive and unlikely to be paid for by the developers once it is fully costed. 2) Flood risks The level of regular run-off and flooding over the 15 years I have lived on A370 is notable. For every period of heavy rain, the drains overflow and the road floods. This has been well documented by local residents. Further development from A370, including Farleigh Fields, which build on green spaces will compound this issue. Instead of future proofing and securing the A370, this will ensure an increased flooding risk. 3) Environmental green spaces The Green Belt fields around Backwell and in between the railway, provide a natural development buffer, an active recreation area for walkers and an area rich in wildlife (deer and birds of prey are regularly seen). These are precious assets to protect. We do not need a developer to pretend to 'create' more recreation or wildlife areas packaged up with a large housing scheme. We already have them! 4) Significant Development without additional Infrastructure Backwell already has a huge number of houses approved for development - a 40% increase for our small village over a very short period of time. There are a shortage of school places, pressures on the doctors surgery and pressure on local roads. We have taken our fair share of the housing allotted to North Somerset through Grove Farm, Farleigh Fields, Rodney Road.. enough is enough! Other areas, such as established towns like Clevedon, need to take more share of the burden. 5) Valuable - Grade 1 - Agricultural land Having lived next to the fields in question for development, we know the land is highly fertile and has provided successive crops in the years we have lived here. I understand that government policy states 'we must protect our best and most versatile land' to safeguard food security.			

Name: Clare Hartley-Hodge **I.D:** 58647905

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	BAckwell already has over 800 new properties being developed and no new infrastructure or services to support this. The traffic will be abhorant in terms of back up, pullution and smooth running of the roads, not to mention a danger to children walking/cycling to and from sch along narrow lanes. Flooding already a significant issue - largely unmonitored and under repoerted so not necessarily "on record" to be considered. All this development will make this worse. Using Grade 1 agricultural land compromises our food security for the future and thsi is agricultural land. The road proposal position will never work - I explained this to them and why at the F2F consult and they agreed!!!! The other areas being developed in N.Somerset are all towns. BACKWELL IS A VILLAGE!!! Not a	Unsure of legal logistics, but using 1st grade agricultural land and compromising food security with a growing population sounds criminal to me. Sounds like controlling food security and forcing it's loss of growth will increase costs to import food and thus the cost of living, pushing recession and then what? Oh! You realise you failed to have that insight...but it's too late now, you'll never be able to bring that land back!	F2F consultations would be useful to do this.	

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					town! Yet it is being treated like a town and will lose it's identity, community and village spirit which if you don't live here, you cannot possibly appreciate!			

Name: Clare Smith **I.D:** 62859713

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The consultation on lasted for 6 weeks . It was only after the consultation that Pill and EinG was categorised as a Strategic Location for the large residential development. Many, many local residents are opposed to the scale of the propsed development.	There needed to be a public exhibition in Pill/E-in-G considering the numbers of houses proposed. Local people just didn't know what was happening. I am not in favour of the release of Green Belt land. Further exploration of Brownfield sites across the county is needed. The loss of green spaces and inpact on wildlife, air quality, water quality is too great. The increase risk to flooding in the village is also of concern. I don't beleive there is any space in local schools, we'd need more local shops, better water treatment works....there just isn't anywhere enough consideration on local resources. The transport issues from J19 on the M5 concern me - this is not fit for purpose as is, let alone with a huge population increase.		

Name: Claudia Oakes **I.D:** 58530753

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm					I am writing to you about the fields off The Downs surrounding Weston Wood. I will list my reasons for strongly opposing the development of these fields. Traffic congestion which is really bad already at school times. Proximity to Weston Wood which is an SSI and home to wildlife who graze on the surrounding fields..including deer and birds of prey. There is a working farm here and that in itself is precious.			

Name: Cleeve Parish Council **I.D:** 62846721

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP2: Climate Change	No	• Positively prepared • Justified • Effective			We do not consider the North Somerset Local Plan 2041: Pre-Submission Plan to be sound. Based on the detailed representations of Cleeve Parish Council, we believe the Plan fails three of the tests of soundness set out in NPPF paragraph 36: Positively Prepared, Justified, and Effective. 1. Positively Prepared The Plan does not adequately address the needs of young people or newly forming households, nor does it ensure that new development will be properly supported by essential infrastructure. The repeated use of discretionary language (“will be expected”, “should have regard to”) leaves critical requirements—such as drainage, healthcare capacity, active travel connections, affordable housing percentages, biodiversity measures, renewable energy deployment, and sustainable design—insufficiently guaranteed. The Plan also	Policy SP2: Climate change: In our view there are a number of very strong factors that have to be reckoned with. Climate change will continue and the impacts will increase. It is almost certain to lead to major health impacts, particularly on the elderly and the very young. It will increase stress on food production, on water supply and on drainage. Flooding impacts may become increasingly large. Sea level rise is likely to threaten our coastal communities. Immigration pressure will impact on all areas of housing, health and welfare.		Submission on behalf of Cleeve Parish Council in respect of Pre.docx Submission on behalf of Cleeve Parish Council in respect of Pre.docx

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					fails to provide a clear and sustainable policy position on future growth at Bristol Airport, or on how Green Belt releases will be compensated or justified. As a result, the Plan does not convincingly meet the district's needs in a sustainable and deliverable way. 2. Justified The policy choices taken in the Plan do not always represent the most appropriate strategy when tested against reasonable alternatives. The evidence base appears inadequate or incomplete in several areas, including: (a) the justification for Green Belt releases at Bristol Airport; (b) the robustness of climate-adaptation measures given the known risks of flooding, sea level rise, extreme heat, and pressure on water resources; (c) the lack of evidence demonstrating that non-mandatory design guidance will achieve sustainable outcomes; (d) the omission of low-rise flats in existing towns as a viable and necessary option for delivering affordable housing for young people; and (e) insufficient assessment of the landscape, safety, environmental and carbon impacts of airport-related growth, including the absence of a cumulative emissions assessment. In each case, reasonable and more sustainable policy alternatives have not been adequately explored. 3. Effective The Plan's delivery mechanisms are weak and do not provide confidence that its policies will be realised. Critical infrastructure (roads, drainage, healthcare, active travel routes, mass transit provision and energy resilience) is not tied to development in a sufficiently enforceable manner. Policies that rely on voluntary interpretation or "expectations" are unlikely to secure required outcomes, particularly in relation to affordable housing percentages, design quality, biodiversity net gain, native woodland expansion, protection of commons, and the safeguarding of Best and Most Versatile agricultural land. Policies concerning Bristol Airport do not demonstrate effective cross-boundary working or credible mitigation strategies, while the approach to flood-risk management does not provide sufficient assurance that developments requiring the Exception Test would be safe, sustainable, or financially deliverable. As drafted, there is insufficient certainty that the Plan can be implemented as intended.	All of these impact on the location and design of housing and industrial infrastructure. Consequently requirements for design consistent with SP1 & SP2 need to be made mandatory for developers. Residents and businesses should not pay the cost of corner-cutting by developers who are looking for short-term profit. It is not good enough to say (DP1) "Where relevant, development proposals should have regard to the design guidance set out in Supplementary Planning Documents and other documents." To be absolutely clear, Cleeve Parish Council believes that this statement should read "Where relevant, development proposals must have regard to the design guidance set out in Supplementary Planning Documents and other documents."		
SP7: Green Belt	No	• Positively prepared • Justified • Effective			We do not consider the North Somerset Local Plan 2041: Pre-Submission Plan to be sound. Based on the detailed representations of Cleeve Parish Council, we believe the Plan fails three of the tests of soundness set out in NPPF paragraph 36: Positively Prepared, Justified, and Effective. 1. Positively Prepared The Plan does not adequately address the needs of young people or newly forming households, nor does it ensure that new development will be properly supported by essential infrastructure. The repeated use of discretionary language ("will be expected", "should have regard to") leaves critical requirements—such as drainage, healthcare capacity, active travel connections, affordable housing percentages, biodiversity measures, renewable energy deployment, and sustainable design—insufficiently guaranteed. The Plan also fails to provide a clear and sustainable policy position on future growth at Bristol Airport, or on how Green Belt releases will be compensated or justified. As a result, the Plan does not convincingly meet the district's needs in a sustainable and deliverable way. 2. Justified The policy choices taken in the Plan do not always represent the most appropriate strategy when tested against reasonable alternatives. The evidence base appears inadequate or incomplete in several areas, including: (a) the justification for Green Belt releases at Bristol Airport; (b) the robustness of climate-adaptation measures given the known risks of flooding, sea level rise, extreme heat, and pressure on water resources; (c) the lack of evidence demonstrating that non-mandatory design guidance will achieve sustainable outcomes; (d) the omission of low-rise flats in existing towns as a viable and	Policy SP7: Green Belt Cleeve Parish Council believes that the release of land from the Green Belt to Bristol Airport is entirely unacceptable and entirely unjustifiable. There is no sustainability benefit in this proposal and we think it should be removed from the Local Plan. In any case it clearly conflicts with Policy SP11.		Submission on behalf of Cleeve Parish Council in respect of Pre.docx

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					necessary option for delivering affordable housing for young people; and (e) insufficient assessment of the landscape, safety, environmental and carbon impacts of airport-related growth, including the absence of a cumulative emissions assessment. In each case, reasonable and more sustainable policy alternatives have not been adequately explored. 3. Effective The Plan's delivery mechanisms are weak and do not provide confidence that its policies will be realised. Critical infrastructure (roads, drainage, healthcare, active travel routes, mass transit provision and energy resilience) is not tied to development in a sufficiently enforceable manner. Policies that rely on voluntary interpretation or "expectations" are unlikely to secure required outcomes, particularly in relation to affordable housing percentages, design quality, biodiversity net gain, native woodland expansion, protection of commons, and the safeguarding of Best and Most Versatile agricultural land. Policies concerning Bristol Airport do not demonstrate effective cross-boundary working or credible mitigation strategies, while the approach to flood-risk management does not provide sufficient assurance that developments requiring the Exception Test would be safe, sustainable, or financially deliverable. As drafted, there is insufficient certainty that the Plan can be implemented as intended.			
SP11: Historic and natural environment					We do not consider the North Somerset Local Plan 2041: Pre-Submission Plan to be sound. Based on the detailed representations of Cleeve Parish Council, we believe the Plan fails three of the tests of soundness set out in NPPF paragraph 36: Positively Prepared, Justified, and Effective. 1. Positively Prepared The Plan does not adequately address the needs of young people or newly forming households, nor does it ensure that new development will be properly supported by essential infrastructure. The repeated use of discretionary language ("will be expected", "should have regard to") leaves critical requirements—such as drainage, healthcare capacity, active travel connections, affordable housing percentages, biodiversity measures, renewable energy deployment, and sustainable design—insufficiently guaranteed. The Plan also fails to provide a clear and sustainable policy position on future growth at Bristol Airport, or on how Green Belt releases will be compensated or justified. As a result, the Plan does not convincingly meet the district's needs in a sustainable and deliverable way. 2. Justified The policy choices taken in the Plan do not always represent the most appropriate strategy when tested against reasonable alternatives. The evidence base appears inadequate or incomplete in several areas, including: (a) the justification for Green Belt releases at Bristol Airport; (b) the robustness of climate-adaptation measures given the known risks of flooding, sea level rise, extreme heat, and pressure on water resources; (c) the lack of evidence demonstrating that non-mandatory design guidance will achieve sustainable outcomes; (d) the omission of low-rise flats in existing towns as a viable and necessary option for delivering affordable housing for young people; and (e) insufficient assessment of the landscape, safety, environmental and carbon impacts of airport-related growth, including the absence of a cumulative emissions assessment. In each case, reasonable and more sustainable policy alternatives have not been adequately explored. 3. Effective The Plan's delivery mechanisms are weak and do not provide confidence that its policies will be realised. Critical infrastructure (roads, drainage, healthcare, active travel routes, mass transit provision and energy resilience) is not tied to development in a sufficiently enforceable manner. Policies that rely on voluntary interpretation or "expectations" are unlikely to secure required outcomes, particularly in relation to affordable housing percentages, design quality, biodiversity net gain, native woodland expansion, protection of commons, and	Policy SP11: Historic and natural environment: Cleeve Parish Council welcomes the development of Nature Parks, recognising also that the management of the parks provides job opportunities. Where such Nature Parks are proposed by developers as mitigation, such proposals should require independent and expert reporting to justify the benefit of the mitigation. Cleeve Parish Council would like the policy to acknowledge the importance of the Western Forest, and NSC's role in working with landowners to increase the amount of native species tree cover, both in joining up existing blocks of woodland and in increasing the density of trees in field boundaries. See also Policy DP37: Trees, woodlands and hedges:		Submission on behalf of Cleeve Parish Council in respect of Pre.docx

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Policy LP11: Transport infrastructure, allocations and safeguarding	No	• Positively prepared • Justified • Effective			We do not consider the North Somerset Local Plan 2041: Pre-Submission Plan to be sound. Based on the detailed representations of Cleeve Parish Council, we believe the Plan fails three of the tests of soundness set out in NPPF paragraph 36: Positively Prepared, Justified, and Effective. 1. Positively Prepared The Plan does not adequately address the needs of young people or newly forming households, nor does it ensure that new development will be properly supported by essential infrastructure. The repeated use of discretionary language (“will be expected”, “should have regard to”) leaves critical requirements—such as drainage, healthcare capacity, active travel connections, affordable housing percentages, biodiversity measures, renewable energy deployment, and sustainable design—insufficiently guaranteed. The Plan also fails to provide a clear and sustainable policy position on future growth at Bristol Airport, or on how Green Belt releases will be compensated or justified. As a result, the Plan does not convincingly meet the district’s needs in a sustainable and deliverable way. 2. Justified The policy choices taken in the Plan do not always represent the most appropriate strategy when tested against reasonable alternatives. The evidence base appears inadequate or incomplete in several areas, including: (a) the justification for Green Belt releases at Bristol Airport; (b) the robustness of climate-adaptation measures given the known risks of flooding, sea level rise, extreme heat, and pressure on water resources; (c) the lack of evidence demonstrating that non-mandatory design guidance will achieve sustainable outcomes; (d) the omission of low-rise flats in existing towns as a viable and necessary option for delivering affordable housing for young people; and (e) insufficient assessment of the landscape, safety, environmental and carbon impacts of airport-related growth, including the absence of a cumulative emissions assessment. In each case, reasonable and more sustainable policy alternatives have not been adequately explored. 3. Effective The Plan’s delivery mechanisms are weak and do not provide confidence that its policies will be realised. Critical infrastructure (roads, drainage, healthcare, active travel routes, mass transit provision and energy resilience) is not tied to development in a sufficiently enforceable manner. Policies that rely on voluntary interpretation or “expectations” are unlikely to secure required outcomes, particularly in relation to affordable housing percentages, design quality, biodiversity net gain, native woodland expansion, protection of commons, and the safeguarding of Best and Most Versatile agricultural land. Policies concerning Bristol Airport do not demonstrate effective cross-boundary working or credible mitigation strategies, while the approach to flood-risk management does not provide sufficient assurance that developments requiring the Exception Test would be safe, sustainable, or financially deliverable. As drafted, there is insufficient certainty that the Plan can be implemented as intended.	Policy LP11: Transport (Schedule 7): Cleeve Parish Council has made representations that there should be an active travel route between Cleeve / Claverham and Backwell, in particular to enable school students to travel to and from school in Backwell. Cleeve Parish Council would like this to be written into Schedule 7 of the Plan.		Submission on behalf of Cleeve Parish Council in respect of Pre.docx

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Policy LP12: Bristol Airport		• Positively prepared • Effective			We do not consider the North Somerset Local Plan 2041: Pre-Submission Plan to be sound. Based on the detailed representations of Cleeve Parish Council, we believe the Plan fails three of the tests of soundness set out in NPPF paragraph 36: Positively Prepared, Justified, and Effective. 1. Positively Prepared The Plan does not adequately address the needs of young people or newly forming households, nor does it ensure that new development will be properly supported by essential infrastructure. The repeated use of discretionary language (“will be expected”, “should have regard to”) leaves critical requirements—such as drainage, healthcare capacity, active travel connections, affordable housing percentages, biodiversity measures, renewable energy deployment, and sustainable design—insufficiently guaranteed. The Plan also fails to provide a clear and sustainable policy position on future growth at Bristol Airport, or on how Green Belt releases will be compensated or justified. As a result, the Plan does not convincingly meet the district’s needs in a sustainable and deliverable way. 2. Justified The policy choices taken in the Plan do not always represent the most appropriate strategy when tested against reasonable alternatives. The evidence base appears inadequate or incomplete in several areas, including: (a) the justification for Green Belt releases at Bristol Airport; (b) the robustness of climate-adaptation measures given the known risks of flooding, sea level rise, extreme heat, and pressure on water resources; (c) the lack of evidence demonstrating that non-mandatory design guidance will achieve sustainable outcomes; (d) the omission of low-rise flats in existing towns as a viable and necessary option for delivering affordable housing for young people; and (e) insufficient assessment of the landscape, safety, environmental and carbon impacts of airport-related growth, including the absence of a cumulative emissions assessment. In each case, reasonable and more sustainable policy alternatives have not been adequately explored. 3. Effective The Plan’s delivery mechanisms are weak and do not provide confidence that its policies will be realised. Critical infrastructure (roads, drainage, healthcare, active travel routes, mass transit provision and energy resilience) is not tied to development in a sufficiently enforceable manner. Policies that rely on voluntary interpretation or “expectations” are unlikely to secure required outcomes, particularly in relation to affordable housing percentages, design quality, biodiversity net gain, native woodland expansion, protection of commons, and the safeguarding of Best and Most Versatile agricultural land. Policies concerning Bristol Airport do not demonstrate effective cross-boundary working or credible mitigation strategies, while the approach to flood-risk management does not provide sufficient assurance that developments requiring the Exception Test would be safe, sustainable, or financially deliverable. As drafted, there is insufficient certainty that the Plan can be implemented as intended.	Policy SP1: Sustainable development: Cleeve Parish Council emphasises that it is essential for new housing and industrial developments to proceed only if there are cast-iron agreements in place that the necessary infrastructure — including roads, drainage, power, and essential services such as food and healthcare — is established either prior to or concurrently with the development. Failure to uphold this requirement would undermine the fundamental principles of sustainable development, leaving the residents of these new developments exposed to undue and avoidable hardships, as well as increasing stress on surrounding communities.		Submission on behalf of Cleeve Parish Council in respect of Pre.docx Submission on behalf of Cleeve Parish Council in respect of Pre.docx
Policy DP7: Large scale renewable and low carbon renewable energy	No	• Positively prepared • Justified • Effective			We do not consider the North Somerset Local Plan 2041: Pre-Submission Plan to be sound. Based on the detailed representations of Cleeve Parish Council, we believe the Plan fails three of the tests of soundness set out in NPPF paragraph 36: Positively Prepared, Justified, and Effective. 1. Positively Prepared The Plan does not adequately address the needs of young people or newly forming households, nor does it ensure that new development will be properly supported by essential infrastructure. The repeated use of discretionary	Cleeve Parish Council welcomes the commitment to solar and wind energy generation. Given that a well-positioned solar array of approx. five acres is needed to generate 1 MW at peak, we strongly suggest that the emphasis for solar generation should be moved to retrofitting arrays on existing buildings rather than utilising field space. A further benefit of rooftop solar arrays is that it provides additional resilience at a time when power may be cut – for example when a storm blows a tree onto the power lines.		Submission on behalf of Cleeve Parish Council in respect of Pre.docx

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Policy DP8: Efficient use of land	No	• Positively prepared • Justified • Effective			We do not consider the North Somerset Local Plan 2041: Pre-Submission Plan to be sound. Based on the detailed representations of Cleeve Parish Council, we believe the Plan fails three of the tests of soundness set out in NPPF paragraph 36: Positively Prepared, Justified, and Effective. 1. Positively Prepared The Plan does not adequately address the needs of young people or newly forming households, nor does it ensure that new development will be properly supported by essential infrastructure. The repeated use of discretionary language (“will be expected”, “should have regard to”) leaves critical requirements—such as drainage, healthcare capacity, active travel connections, affordable housing percentages, biodiversity measures, renewable energy deployment, and sustainable design—insufficiently guaranteed. The Plan also fails to provide a clear and sustainable policy position on future growth at Bristol Airport, or on how Green Belt releases will be compensated or justified. As a result, the Plan does not convincingly meet the district’s needs in a sustainable	Policy DP8: Efficient use of land: Cleeve Parish Council notes that the best places for large-scale new developments are close to existing towns, as this avoids the creation of isolated communities with poor facilities.		Submission on behalf of Cleeve Parish Council in respect of Pre.docx

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Policy DP9: Flood risk	No	• Positively prepared • Justified • Effective			We do not consider the North Somerset Local Plan 2041: Pre-Submission Plan to be sound. Based on the detailed representations of Cleeve Parish Council, we believe the Plan fails three of the tests of soundness set out in NPPF paragraph 36: Positively Prepared, Justified, and Effective. 1. Positively Prepared The Plan does not adequately address the needs of young people or newly forming households, nor does it ensure that new development will be properly supported by essential infrastructure. The repeated use of discretionary language ("will be expected", "should have regard to") leaves critical requirements—such as drainage, healthcare capacity, active travel connections, affordable housing percentages, biodiversity measures, renewable energy deployment, and sustainable design—insufficiently guaranteed. The Plan also fails to provide a clear and sustainable policy position on future growth at Bristol Airport, or on how Green Belt releases will be compensated or justified. As a result, the Plan does not convincingly meet the district's needs in a sustainable and deliverable way. 2. Justified The policy choices taken in the Plan do not always represent the most appropriate strategy when tested against reasonable alternatives. The evidence base appears inadequate or incomplete in several areas, including: (a) the justification for Green Belt releases at Bristol Airport; (b) the robustness of climate-adaptation measures given the known risks of flooding, sea level rise, extreme heat, and pressure on water resources; (c) the lack of evidence demonstrating that non-mandatory design guidance will achieve sustainable	Policy DP9: Flood risk: Cleeve Parish Council notes the high proportion of North Somerset that rated by the Environment Agency as in Flood Zone 2 & 3 and expresses our concern that national policy on housing development creates a pressure that cannot readily be safely met without applying the Exception Test. This in turn has an impact on the cost of development and so undermines the ability to provide low-cost housing to the percentages outlined in DP1. In the light of the triad of flooding pressures (sustained heavy rain causing ground saturation, rising sea levels, increasing low lows during south-western storms) there is widespread concern that recent housing developments in Weston-Super-Mare will become vulnerable to large-scale flooding in the future. It would be prudent to have some element in the local plan which ensures that, where the Exception Test has been applied, there is additional government support for underwriting the additional costs of making such developments more flood resilient.		Submission on behalf of Cleeve Parish Council in respect of Pre.docx

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Policy DP16: Active travel routes		‣ Positively prepared ‣ Justified ‣ Effective			We do not consider the North Somerset Local Plan 2041: Pre-Submission Plan to be sound. Based on the detailed representations of Cleeve Parish Council, we believe the Plan fails three of the tests of soundness set out in NPPF paragraph 36: Positively Prepared, Justified, and Effective. Positively Prepared The Plan does not adequately address the needs of young people or newly forming households, nor does it ensure that new development will be properly supported by essential infrastructure. The repeated use of discretionary language ("will be expected", "should have regard to") leaves critical requirements—such as drainage, healthcare capacity, active travel connections, affordable housing percentages, biodiversity measures, renewable energy deployment, and sustainable design—insufficiently guaranteed. The Plan also fails to provide a clear and sustainable policy position on future growth at Bristol Airport, or on how Green Belt releases will be compensated or justified. As a result, the Plan does not convincingly meet the district's needs in a sustainable and deliverable way. Justified The policy choices taken in the Plan do not always represent the most appropriate strategy when tested against reasonable alternatives. The evidence base appears inadequate or incomplete in several areas, including: (a) the justification for Green Belt releases at Bristol Airport; (b) the robustness of climate-adaptation measures given the known risks of flooding, sea level rise, extreme heat, and pressure on water resources; (c) the lack of evidence demonstrating that non-mandatory design guidance will achieve sustainable outcomes; (d) the omission of low-rise flats in existing towns as a viable and necessary option for delivering affordable housing for young people; and (e) insufficient assessment of the landscape, safety, environmental and carbon impacts of airport-related growth, including the absence of a cumulative emissions assessment. In each case, reasonable and more sustainable policy alternatives have not been adequately explored. Effective	Policy DP16: Active Travel Routes: Cleeve Parish Council has made representations that there should be an active travel route between Cleeve / Claverham and Backwell, in particular to enable school students to travel to and from school in Backwell. Cleeve Parish Council would like this to be written into Schedule 7 of the Plan.		Submission on behalf of Cleeve Parish Council in respect of Pre.docx

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Policy DP34: Green infrastructure		‣ Positively prepared ‣ Justified ‣ Effective			We do not consider the North Somerset Local Plan 2041: Pre-Submission Plan to be sound. Based on the detailed representations of Cleeve Parish Council, we believe the Plan fails three of the tests of soundness set out in NPPF paragraph 36: Positively Prepared, Justified, and Effective. Positively Prepared The Plan does not adequately address the needs of young people or newly forming households, nor does it ensure that new development will be properly supported by essential infrastructure. The repeated use of discretionary language (“will be expected”, “should have regard to”) leaves critical requirements—such as drainage, healthcare capacity, active travel connections, affordable housing percentages, biodiversity measures, renewable energy deployment, and sustainable design—insufficiently guaranteed. The Plan also fails to provide a clear and sustainable policy position on future growth at Bristol Airport, or on how Green Belt releases will be compensated or justified. As a result, the Plan does not convincingly meet the district’s needs in a sustainable and deliverable way. Justified The policy choices taken in the Plan do not always represent the most appropriate strategy when tested against reasonable alternatives. The evidence base appears inadequate or incomplete in several areas, including: (a) the justification for Green Belt releases at Bristol Airport; (b) the robustness of climate-adaptation measures given the known risks of flooding, sea level rise, extreme heat, and pressure on water resources; (c) the lack of evidence demonstrating that non-mandatory design guidance will achieve sustainable outcomes; (d) the omission of low-rise flats in existing towns as a viable and necessary option for delivering affordable housing for young people; and (e) insufficient assessment of the landscape, safety, environmental and carbon impacts of airport-related growth, including the absence of a cumulative emissions assessment. In each case, reasonable and more sustainable policy alternatives have not been adequately explored. Effective The Plan’s delivery mechanisms are weak and do not provide confidence that its policies will be realised. Critical infrastructure (roads, drainage, healthcare, active travel routes, mass transit provision and energy resilience) is not tied to development in a sufficiently enforceable manner. Policies that rely on voluntary interpretation or “expectations” are unlikely to secure required outcomes, particularly in relation to affordable housing percentages, design quality, biodiversity net gain, native woodland expansion, protection of commons, and	Cleeve Parish Council welcomes the commitment to solar and wind energy generation. Given that a well-positioned solar array of approx. five acres is needed to generate 1 MW at peak, we strongly suggest that the emphasis for solar generation should be moved to retrofitting arrays on existing buildings rather than utilising field space. A further benefit of rooftop solar arrays is that it provides additional resilience at a time when power may be cut – for example when a storm blows a tree onto the power lines.		Submission on behalf of Cleeve Parish Council in respect of Pre.docx

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					the safeguarding of Best and Most Versatile agricultural land. Policies concerning Bristol Airport do not demonstrate effective cross-boundary working or credible mitigation strategies, while the approach to flood-risk management does not provide sufficient assurance that developments requiring the Exception Test would be safe, sustainable, or financially deliverable. As drafted, there is insufficient certainty that the Plan can be implemented as intended.			
Policy DP36: Biodiversity Net Gain	No	• Positively prepared • Justified • Effective			We do not consider the North Somerset Local Plan 2041: Pre-Submission Plan to be sound. Based on the detailed representations of Cleeve Parish Council, we believe the Plan fails three of the tests of soundness set out in NPPF paragraph 36: Positively Prepared, Justified, and Effective. Positively Prepared The Plan does not adequately address the needs of young people or newly forming households, nor does it ensure that new development will be properly supported by essential infrastructure. The repeated use of discretionary language (“will be expected”, “should have regard to”) leaves critical requirements—such as drainage, healthcare capacity, active travel connections, affordable housing percentages, biodiversity measures, renewable energy deployment, and sustainable design—insufficiently guaranteed. The Plan also fails to provide a clear and sustainable policy position on future growth at Bristol Airport, or on how Green Belt releases will be compensated or justified. As a result, the Plan does not convincingly meet the district’s needs in a sustainable and deliverable way. Justified The policy choices taken in the Plan do not always represent the most appropriate strategy when tested against reasonable alternatives. The evidence base appears inadequate or incomplete in several areas, including: (a) the justification for Green Belt releases at Bristol Airport; (b) the robustness of climate-adaptation measures given the known risks of flooding, sea level rise, extreme heat, and pressure on water resources; (c) the lack of evidence demonstrating that non-mandatory design guidance will achieve sustainable outcomes; (d) the omission of low-rise flats in existing towns as a viable and necessary option for delivering affordable housing for young people; and (e) insufficient assessment of the landscape, safety, environmental and carbon impacts of airport-related growth, including the absence of a cumulative emissions assessment. In each case, reasonable and more sustainable policy alternatives have not been adequately explored. Effective The Plan’s delivery mechanisms are weak and do not provide confidence that its policies will be realised. Critical infrastructure (roads, drainage, healthcare, active travel routes, mass transit provision and energy resilience) is not tied to development in a sufficiently enforceable manner. Policies that rely on voluntary interpretation or “expectations” are unlikely to secure required outcomes, particularly in relation to affordable housing percentages, design quality, biodiversity net gain, native woodland expansion, protection of commons, and the safeguarding of Best and Most Versatile agricultural land. Policies concerning Bristol Airport do not demonstrate effective cross-boundary working or credible mitigation strategies, while the approach to flood-risk management does not provide sufficient assurance that developments requiring the Exception Test would be safe, sustainable, or financially deliverable. As drafted, there is insufficient certainty that the Plan can be implemented as intended.	Policy DP36: Biodiversity net gain: Cleeve Parish Council supports all genuine and well-researched methods of creating biodiversity net gain when developments occur. We note that swifts, swallows and martins, bats and hedgehogs are under severe population pressure and would like to see measures such as swift boxes, protected eave sites, bat access holes and hedgehog access holes made mandatory as part of the development requirements, with the flexibility to increase the type and number of requirements as further research demonstrates benefits for other species under threat.		Submission on behalf of Cleeve Parish Council in respect of Pre.docx

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Policy DP37: Trees, Woodlands and Hedges	No	‣ Positively prepared ‣ Justified ‣ Effective			We do not consider the North Somerset Local Plan 2041: Pre-Submission Plan to be sound. Based on the detailed representations of Cleeve Parish Council, we believe the Plan fails three of the tests of soundness set out in NPPF paragraph 36: Positively Prepared, Justified, and Effective. 1. Positively Prepared The Plan does not adequately address the needs of young people or newly forming households, nor does it ensure that new development will be properly supported by essential infrastructure. The repeated use of discretionary language (“will be expected”, “should have regard to”) leaves critical requirements—such as drainage, healthcare capacity, active travel connections, affordable housing percentages, biodiversity measures, renewable energy deployment, and sustainable design—insufficiently guaranteed. The Plan also fails to provide a clear and sustainable policy position on future growth at Bristol Airport, or on how Green Belt releases will be compensated or justified. As a result, the Plan does not convincingly meet the district’s needs in a sustainable and deliverable way. 2. Justified The policy choices taken in the Plan do not always represent the most appropriate strategy when tested against reasonable alternatives. The evidence base appears inadequate or incomplete in several areas, including: (a) the justification for Green Belt releases at Bristol Airport; (b) the robustness of climate-adaptation measures given the known risks of flooding, sea level rise, extreme heat, and pressure on water resources; (c) the lack of evidence demonstrating that non-mandatory design guidance will achieve sustainable outcomes; (d) the omission of low-rise flats in existing towns as a viable and necessary option for delivering affordable housing for young people; and (e) insufficient assessment of the landscape, safety, environmental and carbon impacts of airport-related growth, including the absence of a cumulative emissions assessment. In each case, reasonable and more sustainable policy alternatives have not been adequately explored. 3. Effective The Plan’s delivery mechanisms are weak and do not provide confidence that its policies will be realised. Critical infrastructure (roads, drainage, healthcare, active travel routes, mass transit provision and energy resilience) is not tied to development in a sufficiently enforceable manner. Policies that rely on voluntary interpretation or “expectations” are unlikely to secure required outcomes, particularly in relation to affordable housing percentages, design quality, biodiversity net gain, native woodland expansion, protection of commons, and the safeguarding of Best and Most Versatile agricultural land. Policies concerning Bristol Airport do not demonstrate effective cross-boundary working or credible mitigation strategies, while the approach to flood-risk management does not provide sufficient assurance that developments requiring the Exception Test would be safe, sustainable, or financially deliverable. As drafted, there is insufficient certainty that the Plan can be implemented as intended.	Policy DP37: Trees, woodlands and hedges: As per our comment on SP11, there is a striking absence of reference to the importance of the Western Forest in developing a network of linked woodlands. The importance of this development cannot be understated in terms of reversing the long-term losses of biodiversity and extinction of species. Further, it would be appropriate in this section to draw attention to the supplementary planning document on the Bat SAC, which clearly lays down the requirement for the development of new hedge systems containing native species trees.		Submission on behalf of Cleeve Parish Council in respect of Pre.docx
Policy DP43: Affordable housing (including rural exception schemes)					We do not consider the North Somerset Local Plan 2041: Pre-Submission Plan to be sound. Based on the detailed representations of Cleeve Parish Council, we believe the Plan fails three of the tests of soundness set out in NPPF paragraph 36: Positively Prepared, Justified, and Effective. 1. Positively Prepared The Plan does not adequately address the needs of young people or newly forming households, nor does it ensure that new development will be properly supported by essential infrastructure. The repeated use of discretionary language (“will be expected”, “should have regard to”) leaves critical requirements—such as drainage, healthcare capacity, active travel connections, affordable housing percentages, biodiversity measures, renewable energy deployment, and sustainable design—insufficiently guaranteed. The Plan also fails to provide a clear and sustainable policy position on future growth at Bristol	Policy DP43: Affordable housing: Cleeve Parish Council welcomes the setting of percentage figures for affordable housing within each development category. However, in the current text the words “will be expected” drastically weakens the likelihood that these percentages will be achieved. Every developer will argue that their plan is unique and will press for an exception in their case. We propose that replacing ‘expected’ with ‘required’ makes it clear to developers that these proportions are mandatory.		Submission on behalf of Cleeve Parish Council in respect of Pre.docx

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					Airport, or on how Green Belt releases will be compensated or justified. As a result, the Plan does not convincingly meet the district's needs in a sustainable and deliverable way. 2. Justified The policy choices taken in the Plan do not always represent the most appropriate strategy when tested against reasonable alternatives. The evidence base appears inadequate or incomplete in several areas, including: (a) the justification for Green Belt releases at Bristol Airport; (b) the robustness of climate-adaptation measures given the known risks of flooding, sea level rise, extreme heat, and pressure on water resources; (c) the lack of evidence demonstrating that non-mandatory design guidance will achieve sustainable outcomes; (d) the omission of low-rise flats in existing towns as a viable and necessary option for delivering affordable housing for young people; and (e) insufficient assessment of the landscape, safety, environmental and carbon impacts of airport-related growth, including the absence of a cumulative emissions assessment. In each case, reasonable and more sustainable policy alternatives have not been adequately explored. 3. Effective The Plan's delivery mechanisms are weak and do not provide confidence that its policies will be realised. Critical infrastructure (roads, drainage, healthcare, active travel routes, mass transit provision and energy resilience) is not tied to development in a sufficiently enforceable manner. Policies that rely on voluntary interpretation or "expectations" are unlikely to secure required outcomes, particularly in relation to affordable housing percentages, design quality, biodiversity net gain, native woodland expansion, protection of commons, and the safeguarding of Best and Most Versatile agricultural land. Policies concerning Bristol Airport do not demonstrate effective cross-boundary working or credible mitigation strategies, while the approach to flood-risk management does not provide sufficient assurance that developments requiring the Exception Test would be safe, sustainable, or financially deliverable. As drafted, there is insufficient certainty that the Plan can be implemented as intended.			
Policy DP46: Housing Type and Mix	No	• Positively prepared • Justified • Effective			We do not consider the North Somerset Local Plan 2041: Pre-Submission Plan to be sound. Based on the detailed representations of Cleeve Parish Council, we believe the Plan fails three of the tests of soundness set out in NPPF paragraph 36: Positively Prepared, Justified, and Effective. 1. Positively Prepared The Plan does not adequately address the needs of young people or newly forming households, nor does it ensure that new development will be properly supported by essential infrastructure. The repeated use of discretionary language ("will be expected", "should have regard to") leaves critical requirements—such as drainage, healthcare capacity, active travel connections, affordable housing percentages, biodiversity measures, renewable energy deployment, and sustainable design—insufficiently guaranteed. The Plan also fails to provide a clear and sustainable policy position on future growth at Bristol Airport, or on how Green Belt releases will be compensated or justified. As a result, the Plan does not convincingly meet the district's needs in a sustainable and deliverable way. 2. Justified The policy choices taken in the Plan do not always represent the most appropriate strategy when tested against reasonable alternatives. The evidence base appears inadequate or incomplete in several areas, including: (a) the justification for Green Belt releases at Bristol Airport; (b) the robustness of climate-adaptation measures given the known risks of flooding, sea level rise, extreme heat, and pressure on water resources; (c) the lack of evidence demonstrating that non-mandatory design guidance will achieve sustainable outcomes; (d) the omission of low-rise flats in existing towns as a viable and necessary option for delivering affordable housing for young people; and (e)	Policy DP46 Housing type and mix: We are dismayed that the only policy referring to flats is Policy DP4: Houses in Multiple Occupation, which portrays a completely negative view of flats. We would like to see an understanding that the development of low-rise new-build flats in existing towns is an appropriate way of providing low-cost housing for single people. We are very concerned that the exclusion of policies to assist in the development of such housing represents both an opportunity missed and undermines the ability to retain young people in the local economy.		Submission on behalf of Cleeve Parish Council in respect of Pre.docx

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					insufficient assessment of the landscape, safety, environmental and carbon impacts of airport-related growth, including the absence of a cumulative emissions assessment. In each case, reasonable and more sustainable policy alternatives have not been adequately explored. 3. Effective The Plan's delivery mechanisms are weak and do not provide confidence that its policies will be realised. Critical infrastructure (roads, drainage, healthcare, active travel routes, mass transit provision and energy resilience) is not tied to development in a sufficiently enforceable manner. Policies that rely on voluntary interpretation or "expectations" are unlikely to secure required outcomes, particularly in relation to affordable housing percentages, design quality, biodiversity net gain, native woodland expansion, protection of commons, and the safeguarding of Best and Most Versatile agricultural land. Policies concerning Bristol Airport do not demonstrate effective cross-boundary working or credible mitigation strategies, while the approach to flood-risk management does not provide sufficient assurance that developments requiring the Exception Test would be safe, sustainable, or financially deliverable. As drafted, there is insufficient certainty that the Plan can be implemented as intended.			
Policy DP53: Best and most versatile land	No	‣ Positively prepared ‣ Justified ‣ Effective			We do not consider the North Somerset Local Plan 2041: Pre-Submission Plan to be sound. Based on the detailed representations of Cleeve Parish Council, we believe the Plan fails three of the tests of soundness set out in NPPF paragraph 36: Positively Prepared, Justified, and Effective. 1. Positively Prepared The Plan does not adequately address the needs of young people or newly forming households, nor does it ensure that new development will be properly supported by essential infrastructure. The repeated use of discretionary language ("will be expected", "should have regard to") leaves critical requirements—such as drainage, healthcare capacity, active travel connections, affordable housing percentages, biodiversity measures, renewable energy deployment, and sustainable design—insufficiently guaranteed. The Plan also fails to provide a clear and sustainable policy position on future growth at Bristol Airport, or on how Green Belt releases will be compensated or justified. As a result, the Plan does not convincingly meet the district's needs in a sustainable and deliverable way. 2. Justified The policy choices taken in the Plan do not always represent the most appropriate strategy when tested against reasonable alternatives. The evidence base appears inadequate or incomplete in several areas, including: (a) the justification for Green Belt releases at Bristol Airport; (b) the robustness of climate-adaptation measures given the known risks of flooding, sea level rise, extreme heat, and pressure on water resources; (c) the lack of evidence demonstrating that non-mandatory design guidance will achieve sustainable outcomes; (d) the omission of low-rise flats in existing towns as a viable and necessary option for delivering affordable housing for young people; and (e) insufficient assessment of the landscape, safety, environmental and carbon impacts of airport-related growth, including the absence of a cumulative emissions assessment. In each case, reasonable and more sustainable policy alternatives have not been adequately explored. 3. Effective The Plan's delivery mechanisms are weak and do not provide confidence that its policies will be realised. Critical infrastructure (roads, drainage, healthcare, active travel routes, mass transit provision and energy resilience) is not tied to development in a sufficiently enforceable manner. Policies that rely on voluntary interpretation or "expectations" are unlikely to secure required outcomes,	Noting that there are exceptions to the protection of Best and Most Versatile Land, Cleeve Parish Council is concerned that the conditions of temporary development stated "A limited temporary use where the land and soil could be returned to its former quality and plans for its reinstatement are secured;" are insufficiently robust. We propose a more stringent formulation "A limited temporary use where the land and soil could be returned to its former quality and plans for its reinstatement are contractually and legally secured;".		Submission on behalf of Cleeve Parish Council in respect of Pre.docx

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					particularly in relation to affordable housing percentages, design quality, biodiversity net gain, native woodland expansion, protection of commons, and the safeguarding of Best and Most Versatile agricultural land. Policies concerning Bristol Airport do not demonstrate effective cross-boundary working or credible mitigation strategies, while the approach to flood-risk management does not provide sufficient assurance that developments requiring the Exception Test would be safe, sustainable, or financially deliverable. As drafted, there is insufficient certainty that the Plan can be implemented as intended.			

Name: Clement Elphick **I.D:** 62862369

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land west of Rodney Road	No	• Consistent with national policy	Yes	No	Please protect the infant school West Leigh and the green spaces surrounding the school. This is clearly house building over children’s welfare. Please allow more space.			

Name: Clive JA Pulteney **I.D:** 58593857

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Dundry	Unsure	• Effective • Consistent with national policy	Unsure	Unsure	Objection to Schedule 5: Settlements with Settlement Boundaries – LP & Dundry We object to the exclusion of the promoted land at next to Andruss Drive, Dundry from the proposed settlement boundary. This site should be included as it represents a sustainable and logical extension to the existing settlement, supporting the Local Plan’s objectives for growth and housing delivery. The settlement boundary has been too tightly drawn and exclude potential small scale development sites which are important for organic sustainable settlement growth and local builders. The land has been promoted since 1994 and was included in the settlement boundary for the village of Dundry in the 1993 and 1999 Woodspring (pre NSC) Local Plan. Importance of Small Sites and SME Developers Small sites such as Andruss Drive are vital for meeting housing needs and maintaining a diverse development market. They are particularly important for small and medium-sized enterprises (SMEs), which often lack the resources to compete for large strategic allocations. By providing opportunities for SMEs, the Local Plan can help ensure a more resilient and competitive housing sector, avoiding over-reliance on major developers and accelerating delivery. Alignment with National Planning Policy Framework (NPPF) The NPPF (2023) places strong emphasis on the role of small sites and SME builders in boosting housing supply. Paragraph 69 states that “small and medium-sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly.” It also requires local planning authorities to identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare. Andruss Drive is precisely the type of site envisaged by this policy—small, deliverable, and capable of supporting local builders. Sustainability and Accessibility The site is well-related to the built form of Dundry and offers good access to local services and transport links, reducing car dependency and supporting sustainable development principles. Its inclusion would provide flexibility to meet housing targets and respond to future demand without compromising environmental or landscape considerations. Development can be delivered	Requested Change Amend Schedule 5 to include the promoted land at Andruss Drive, Dundry within the settlement boundary. This will ensure the Local Plan remains consistent with national policy, supports SME developers, and delivers a balanced approach to growth.		Andruss Drive Upload.pdf

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					sensitively, maintaining the character of Dundry while contributing positively to the community.			

Name: Clive Wilson **I.D:** 62793857

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP7: Green Belt	No	Justified	Unsure	Yes	I am unsure as to whether the plan is legally compliant, but question the threat to the the ancient woodland outlined in LP7. Specifically Weston Big Wood.	The inclusion of the required protection boundary between the ancient woodland and the proposed development of adjacent land.		
Policy LP5: Housing, employment and mixed use allocations					Concerns relating to the Tower Farm and Black Rock development.The impact to Weston Big Wood (area of SSSI) this ancient woodland is currently protected by greenbelt status to ensure the sustainability of wildlife and the prevention of ecological disaster. Both developments appear to encroach the required ecological boundaries required to sustain the Woodland. Site access to both the proposed Tower Farm and Black Rock are of major concern as the existing roads are already continually busy, in the case of Tower Farm school drop off / pickup times see Down Road frequently in a state of gridlock. In the case of Black Rock the B3124 Clevedon Road is a busy road with a 50mph limit which will require traffic calming measures. The existing estates by the proposed Tower Farm development will be greatly impacted by the increases in traffic from the development particularly if access to the development proposes the use of existing estate roads as these are already congested with parked cars and not suitable for through traffic. The current poor state of the road surface along Down Road, despite being relatively recently resurfaced, Is indicative of how busy this road is and question its ability to cope with more traffic. Valley Road is already dangerous due to the presence of the Civic Amenity site opposite the Avon & Somerset facility situated on a blind bend which sees stationary traffic queuing for the amenity site to Open. This road currently is derestricted. Please reconsider the placement of some 400 homes at Tower Farm and 100 at Black Rock.	Please reconsider the placement of some 400 homes at Tower Farm and 100 at Black Rock.		
Land at Tower Farm					LP 7 Concerns – relating to the Tower Farm and Black Rock development. The impact to Weston Big Wood (area of SSSI) this ancient woodland is currently protected by greenbelt status to ensure the sustainability of wildlife and the prevention of ecological disaster. Both developments appear to encroach the required ecological boundaries required to sustain the Woodland. Site access to both the proposed Tower Farm and Black Rock are of major concern as the existing roads are already continually busy, in the case of Tower Farm school drop off / pickup times see Down Road frequently in a state of gridlock. In the case of Black Rock the B3124 Clevedon Road is a busy road with a 50mph limit which will require traffic calming measures. The existing estates by the proposed Tower Farm development will be greatly impacted by the increases in traffic from the development particularly if access to the development proposes the use of existing estate roads as these are already congested with parked cars and not suitable for through traffic. The current poor state of the road surface along Down Road, despite being relatively recently resurfaced, Is indicative of how busy this road is and question its ability to cope with more traffic.			

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					Valley Road is already dangerous due to the presence of the Civic Amenity site opposite the Avon & Somerset facility situated on a blind bend which sees stationary traffic queuing for the amenity site to Open. This road currently is derestricted. Please reconsider the placement of some 400 homes at Tower Farm and 100 at Black Rock.			
Black Rock, north of Clevedon Road					LP 7 Concerns – relating to the Tower Farm and Black Rock development. The impact to Weston Big Wood (area of SSSI) this ancient woodland is currently protected by greenbelt status to ensure the sustainability of wildlife and the prevention of ecological disaster. Both developments appear to encroach the required ecological boundaries required to sustain the Woodland. Site access to both the proposed Tower Farm and Black Rock are of major concern as the existing roads are already continually busy, in the case of Tower Farm school drop off / pickup times see Down Road frequently in a state of gridlock. In the case of Black Rock the B3124 Clevedon Road is a busy road with a 50mph limit which will require traffic calming measures. The existing estates by the proposed Tower Farm development will be greatly impacted by the increases in traffic from the development particularly if access to the development proposes the use of existing estate roads as these are already congested with parked cars and not suitable for through traffic. The current poor state of the road surface along Down Road, despite being relatively recently resurfaced, Is indicative of how busy this road is and question its ability to cope with more traffic. Valley Road is already dangerous due to the presence of the Civic Amenity site opposite the Avon & Somerset facility situated on a blind bend which sees stationary traffic queuing for the amenity site to Open. This road currently is derestricted. Please reconsider the placement of some 400 homes at Tower Farm and 100 at Black Rock.			

Name: Cllr Mike Dunn **I.D:** 62827489

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP2: Strategic location: Woodspring (south west of Bristol)	Unsure		Unsure	Unsure		On behalf of my constituents I would like to ensure the plan reflects the needs of the local community and the environment. We value good quality, affordable housing in a mix of sizes, positive outcomes for climate and nature, and an investment in infrastructure (e.g. public transport, active travel, doctors, nurseries/ schools) to accommodate the needs of both existing and future residents of the ward.		
Policy LP3: Strategic location: Nailsea and Backwell	Unsure		Unsure	Unsure				
Policy LP12: Bristol Airport	Unsure		Unsure	Unsure				

Name: Cllr Thomas Daw **I.D:** 51323777

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SP1: Sustainable Development	Yes		Yes	Yes		While Policy SP1 sets out a commitment to sustainable development, the current proposals in the Local Plan risk encouraging urban sprawl rather than genuinely sustainable growth. By allocating large areas of greenfield land at the edges of towns and villages, the plan undermines its own sustainability objectives. This approach disperses housing into peripheral locations, increasing car dependency, stretching infrastructure, and eroding the distinct character of rural communities. True sustainable development should prioritize compact growth, brownfield regeneration, and investment in existing urban centres where services, transport, and employment opportunities already exist. Without a stronger focus on these principles, Policy SP1 risks delivering unsustainable patterns of development that contradict the council's stated climate and placemaking priorities.		
Policy LP12: Bristol Airport	No		No	Yes	Policy LP12 proposes releasing land at Bristol Airport from the Green Belt to accommodate growth up to 12 million passengers per annum. While this reflects the consented planning application, it raises serious concerns about sustainability and climate commitments. Removing Green Belt protection undermines long-standing planning principles designed to prevent urban sprawl and protect the countryside. Expansion of the airport will inevitably increase carbon emissions, traffic congestion, and noise pollution, directly conflicting with the Local Plan's wider objectives on climate change (SP2) and sustainable development (SP1). The compensatory improvements to remaining Green Belt land are insufficient to offset the environmental harm caused by airport expansion. A truly sustainable approach would prioritize investment in low-carbon transport alternatives and regional connectivity rather than facilitating further aviation growth.	Policy LP12 should be reconsidered to ensure alignment with national net-zero targets and the council's own climate emergency declaration.		

Name: Colin Ford **I.D:** 62524769

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I find that in all cases of increase in housing that there is inadequate provision for improvement in transport, Medical facilities and Dental facilities. It should be mandatory for any planning applications to include provision for new Medical and Dental facilities i.e. new surgeries albeit connected to the existing Medical or Dental Practice. An improved transport infrastructure. should also be mandatory.. Nailsea dose not have adequate provision to Nailsea and Backwell railway station.			

Name: Colin Knowles **I.D:** 62816641

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SP7: Green Belt	No	• Positively prepared • Justified	Yes	Unsure	We do not consider the North Somerset Local Plan 2041: Pre-Submission Plan to be sound. Based on the detailed representations of Cleeve Parish Council, we believe the Plan fails three of the tests of soundness set out in NPPF paragraph 36: Positively Prepared, Justified, and Effective.			CleeveParishCouncil_LocalPlan2041_feedback.pdf

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		• Effective			1. Positively Prepared The Plan does not adequately address the needs of young people or newly forming households, nor does it ensure that new development will be properly supported by essential infrastructure. The repeated use of discretionary language (“will be expected”, “should have regard to”) leaves critical requirements—such as drainage, healthcare capacity, active travel connections, affordable housing percentages, biodiversity measures, renewable energy deployment, and sustainable design—insufficiently guaranteed. The Plan also fails to provide a clear and sustainable policy position on future growth at Bristol Airport, or on how Green Belt releases will be compensated or justified. As a result, the Plan does not convincingly meet the district’s needs in a sustainable and deliverable way. 2. Justified The policy choices taken in the Plan do not always represent the most appropriate strategy when tested against reasonable alternatives. The evidence base appears inadequate or incomplete in several areas, including: (a) the justification for Green Belt releases at Bristol Airport; (b) the robustness of climate-adaptation measures given the known risks of flooding, sea level rise, extreme heat, and pressure on water resources; (c) the lack of evidence demonstrating that non-mandatory design guidance will achieve sustainable outcomes; (d) the omission of low-rise flats in existing towns as a viable and necessary option for delivering affordable housing for young people; and (e) insufficient assessment of the landscape, safety, environmental and carbon impacts of airport-related growth, including the absence of a cumulative emissions assessment. In each case, reasonable and more sustainable policy alternatives have not been adequately explored. 3. Effective The Plan’s delivery mechanisms are weak and do not provide confidence that its policies will be realised. Critical infrastructure (roads, drainage, healthcare, active travel routes, mass transit provision and energy resilience) is not tied to development in a sufficiently enforceable manner. Policies that rely on voluntary interpretation or “expectations” are unlikely to secure required outcomes, particularly in relation to affordable housing percentages, design quality, biodiversity net gain, native woodland expansion, protection of commons, and the safeguarding of Best and Most Versatile agricultural land. Policies concerning Bristol Airport do not demonstrate effective cross-boundary working or credible mitigation strategies, while the approach to flood-risk management does not provide sufficient assurance that developments requiring the Exception Test would be safe, sustainable, or financially deliverable. As drafted, there is insufficient certainty that the Plan can be implemented as intended.			
Policy LP12: Bristol Airport	No	• Positively prepared • Justified • Effective	Yes	Unsure	We do not consider the North Somerset Local Plan 2041: Pre-Submission Plan to be sound. Based on the detailed representations of Cleeve Parish Council, we believe the Plan fails three of the tests of soundness set out in NPPF paragraph 36: Positively Prepared, Justified, and Effective. 1. Positively Prepared The Plan does not adequately address the needs of young people or newly forming households, nor does it ensure that new development will be properly supported by essential infrastructure. The repeated use of discretionary language (“will be expected”, “should have regard to”) leaves critical requirements—such as drainage, healthcare capacity, active travel connections, affordable housing percentages, biodiversity measures, renewable energy deployment, and sustainable design—insufficiently guaranteed. The Plan also fails to provide a clear and sustainable policy position on future growth at Bristol Airport, or on how Green Belt releases will be compensated or justified. As a result, the Plan does not convincingly meet the district’s needs in a sustainable and deliverable way. 2. Justified The policy choices taken in the Plan do not always represent the most appropriate			

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					strategy when tested against reasonable alternatives. The evidence base appears inadequate or incomplete in several areas, including: (a) the justification for Green Belt releases at Bristol Airport; (b) the robustness of climate-adaptation measures given the known risks of flooding, sea level rise, extreme heat, and pressure on water resources; (c) the lack of evidence demonstrating that non-mandatory design guidance will achieve sustainable outcomes; (d) the omission of low-rise flats in existing towns as a viable and necessary option for delivering affordable housing for young people; and (e) insufficient assessment of the landscape, safety, environmental and carbon impacts of airport-related growth, including the absence of a cumulative emissions assessment. In each case, reasonable and more sustainable policy alternatives have not been adequately explored. 3. Effective The Plan’s delivery mechanisms are weak and do not provide confidence that its policies will be realised. Critical infrastructure (roads, drainage, healthcare, active travel routes, mass transit provision and energy resilience) is not tied to development in a sufficiently enforceable manner. Policies that rely on voluntary interpretation or “expectations” are unlikely to secure required outcomes, particularly in relation to affordable housing percentages, design quality, biodiversity net gain, native woodland expansion, protection of commons, and the safeguarding of Best and Most Versatile agricultural land. Policies concerning Bristol Airport do not demonstrate effective cross-boundary working or credible mitigation strategies, while the approach to flood-risk management does not provide sufficient assurance that developments requiring the Exception Test would be safe, sustainable, or financially deliverable. As drafted, there is insufficient certainty that the Plan can be implemented as intended.			

Name: Connie Galsworthy **I.D:** 62842337

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Formal Objection to Proposed Allocation of 1,000 Homes East of Backwell I wish to register my objection to the proposed allocation of approximately 1,000 additional homes east of Backwell. 1. Scale of Growth • The scale of development is excessive in relation to the existing settlement. • Backwell has already experienced significant growth through several large developments recently approved. • Adding 1,000 further homes would fundamentally alter the character of the village, overwhelming its identity and sense of place. 2. Lack of Supporting Infrastructure • There is no clear evidence that the necessary infrastructure can be delivered to support development of this size.Concerns include: • Highways capacity: Existing roads are already congested, and further traffic would exacerbate safety and air quality issues. • Education: Local schools are at or near capacity, with no firm plans for expansion. • Healthcare: GP surgeries and healthcare facilities are overstretched, and no provision has been outlined for additional services. • Drainage and flood risk: Large-scale development risks worsening surface water flooding, particularly given the area’s drainage constraints. • Public transport: Current provision is limited, and there is no evidence of investment to improve sustainable transport links. 3. Environmental Concerns • The proposal is not environmentally friendly, given the lack of green space around the site. • Development would reduce biodiversity, harm local habitats, and diminish opportunities for recreation and wellbeing. • The loss of open countryside would contribute to urban sprawl and undermine climate resilience. 4. Loss of High-Quality Agricultural and Green Belt Land • The site includes Grade 1 agricultural land, which is among the highest quality farmland in the country. • National and local policy objectives emphasise protecting such land from development.			

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					• Releasing green belt sites contradicts the principle of safeguarding land for future generations, particularly when less-sensitive options exist elsewhere in North Somerset. 5. Policy Conflict • The allocation cannot be considered: • Positively prepared – it fails to demonstrate how infrastructure and environmental needs will be met. • Justified – alternative, less-sensitive sites have not been properly considered. • Effective – the scale of development is not deliverable without severe impacts on the community. • Aligned with national policy – it conflicts with policies on protecting green belt, agricultural land, and promoting sustainable development. Conclusion For these reasons, I strongly object to the proposed allocation of 1,000 homes east of Backwell. The plan is disproportionate, environmentally damaging, and inconsistent with both local and national planning policy. It would irreversibly harm the character of Backwell and fail to provide the infrastructure necessary to support such growth.			

Name: Councillor Bridget Petty **I.D:** 22638625

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Vision, Strategic Priorities and Sustainability Objectives	Unsure	• Positively prepared • Effective • Consistent with national policy	Unsure	Unsure		I support this vision statement, it is positive thinking, recognises the future will be different but plans the direction for our area. It recognises climate change and the landscape we live in and what we need to help our communities thrive.	I support this vision statement, it is positive thinking, recognises the future will be different but plans the direction for our area. It recognises climate change and the landscape we live in and what we need to help our communities thrive. I think it is in line with North Somersets commitment to the climate emergency, to our corporate strategy and that of National Government to recognise the climate emergency.	
Strategic Priorities	Yes	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure			I support this list and that a council that has a sound plan can deliver more for its residents and the landscape. This is a positive list of all that development can and must offer.	
Sustainable development objectives	Unsure		Unsure	Unsure			I support the above list as a sound and strtegic focus for a local plan.	
SP2: Climate Change	Yes		Yes	Unsure		I support the climate change policy	I support the climate change policy	
Policy LP3: Strategic location: Nailsea and Backwell	Unsure		Unsure	Unsure	I have real concerns about whether this is sustainable to put such significant growth in one village. I have real concerns about whether the supporting infrastructure will be financially deliverable or may never happen, this could include: -The road under the railway -The new schools -Increasing the size of health provision			

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					-Ciritically important improvements to Nailsea and backwell station, currently inaccessible to wheelchair users. -Nursery places The loss of agricultural land is a concern. Proximity to low-lying land, liable to flooding due to the soil type and density. This is well used open space neighbouring a secondary school, ensuring fresh air and between well being for our next generation. I support 50% affordable housing given this site is in Green Belt. I do not support building on Green Belt. Proximity to nationally important Horseshoe Bat Maternity Roost, this land is important to the protected Bat species - both Lesser Horseshoe and Greater Horseshoe bat. The leisure facilities are not future proof for more users and have been under invested in. Loss of habitat in general and significantly altering the character of the village and landscape including views from nearby churches.			
Policy LP12: Bristol Airport	Unsure	• Justified • Consistent with national policy	Unsure	Unsure	I have serious concerns that the airport with permission for 12mppa will NOT be able to mitigate the impact of their airport development. I fear that local residents will bear all the negative impact and health implications. Noise is very limited in their willing to accept however we KNOW that peoples lives are impacted much further than their contor. Is it OK that i am woken from sleep to the noise of aircraft? Impacting my sleep has the ability to shorten my life expectancy. I do not live within what the airport recognises are those impacted by the airport. So there is no compensation or mitigation for those living in central Backwell, Yatton, Congresbury. They must just experience the consequences. Airport Expansion is INCOMPATABLE with the climate emergency which is declared by both NSC and National Government. The CCC must comment and confirm no more airport expansion should take place until we have a clear Net Zero pathway INCLUDING airplane fuel emissions.			
Policy LP15: Local Green Space	Yes		Unsure	Unsure			I support the Local Green Space policy, this is important with such significant housing numbers on the landscape. A thrivinig and healthy community can only exist if they have green spaces and nature	

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							within accessible reach.	
Policy DP1: High quality design	Yes		Unsure	Unsure		On major developments, proposals for high quality public art will be requested. I think there is little need to justify, it should be clear that community inclusive public art will create better spaces and can be more inclusive for those who have lived in a place and the new residents. It can improve health and well being. It is impoartant it should not be optional. Anything over 100 houses should be participating in a proportionate way.		
Grove Farm	No	• Justified	Unsure	Unsure	The site Grove Farm is large in scale. It includes a site with planning for 515 houses, it has a construction site already taking place by Taylor Wimpey and then a small area has been included which is owners by North Somerset Council, this is an important open space used by families to walk to school and for dog walkers and other residents. This small area of green is highly valued but iss not required to meet the housing allocation for this site. I would ask that the boundary of this Grove Farm site is redrawn to remove the small area that is a green space valued by the community, and will become a green corridor as building takes place around it. It is an important environmental buffer. It meets the objective of local green space.	The site Grove Farm is large in scale. It includes a site with planning for 515 houses, it has a construction site already taking place by Taylor Wimpey and then a small area has been included which is owners by North Somerset Council, this is an important open space used by families to walk to school and for dog walkers and other residents. This small area of green is highly valued but iss not required to meet the housing allocation for this site. I would ask that the boundary of this Grove Farm site is redrawn to remove the small area that is a green space valued by the community, and will become a green corridor as building takes place around it. It is an important environmental buffer. It meets the objective of local green space.		
Backwell	Unsure		Unsure	Unsure		.	I support the village boundary that should remain protected between Backwell HWRC and Oakleigh Close. It is the perimeter to the village that is South East,and created a village boundary and then has Green Belt which delivers openness, green space and wildlife areas. As well as farming land. I agree that the Railway line makes a suitable village boundary for Backwell. I agree to the boundary edge around Grove Farm site so no further creep takes place, this site has already been given permission.	
Station Road to A370, Cross Rail Link, Nailsea and Backwell	Unsure		Unsure	Unsure	I have very serious concerns about the funding of this road, if there will be sufficent funding to make it deliverable.			
Major Road Network scheme/at A38/ Downside Road/West					It is not clear what the suggested improvement is here.			

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Lane, highway improvement scheme								

Name: Councillor Jenna Ho Marris **I.D:** 47564225

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	While there are many excellent provisions in the Local Plan, as Pill Ward district councillor, my view is the allocation of 1,100 new homes in the Pill Green Belt area is unsound as it is not sustainable development: it is excessive, will cause unreasonable traffic congestion and pollution, and would be harmful to local ecology. None of these impacts appears to be adequately mitigated by provisions in the Local Plan. Over 2,000 residents (in a population of around 5,000) have signed a petition to object to the excessive allocation. Residents have also expressed their concerns directly to me, through the two parish councils for Abbots Leigh and Pill & Easton-in-Gordano, through local groups including Sustainable Pill and District and the local wildlife groups, and at several local public meetings. I support their concerns. In particular I have read the detailed and well-evidenced comments in draft by Pill & Easton-in-Gordano Parish Council and I fully support them. No proper consultation with residents The Pill Green Belt allocations were included only after the new Government's mandatory housing targets were introduced in December 2024 and after a consultation in February-March 2025 where they were not highlighted as a "strategic growth location". Residents did not think it was likely that all five sites in Pill would be allocated leading to a low level of engagement. Over 2,000 residents of Pill, Easton-in-Gordano and Abbots Leigh have now signed a petition objecting to the excessive allocation, see: https://www.change.org/p/protect-our-community-object-to-excessive-house-building-on-green-belt-around-pill?source_location=search. The Pill Green Belt allocations do not take into account our Neighbourhood Plan 2020-2026. That plan acknowledges that there should be some development in the area, but at an appropriate scale which benefits the local community. Lack of Supplementary Planning Document (SPD) No SPD has been provided at this stage to explain how the development of the Pill Green Belt allocations will achieve a "strategic and co-ordinated approach to ensure the growth of the village provides tangible benefits for existing and future communities" as stated in the policy. Residents cannot agree to something which has no specific details. Transport infrastructure is inadequate The Transport Assessment drafted by AECOM is 131 pages long and not easily understood by people without technical expertise. Appendix F is better but still not written for a layperson. I wish to highlight paragraphs 4.64, 5.165, and 5.166. My understanding of these paragraphs is that the Pill Green Belt allocations are considered sustainable because: 1) Even though there may be an increase in congestion, residents will be able to access active travel which should not be impacted by traffic congestion; 2) There will be no congestion because residents will 'mode shift' and take the bus, train or cycle rather than drive in and out of the area;	Reduce the allocation to the four Pill green belt sites to numbers closer to the Neighbourhood Plan ie 150-200 new dwellings. Alternatively, remove the Pill Green site from the Local Plan allocation. Invest in and improve proposed and existing active travel routes to meet best practice guidelines, this is essential to achieve the mode shift that is being relied on to mitigate traffic congestion. SPD to set out in detail and with effective local input the active travel routes between any allocated sites and the train station, bus stops. The Infrastructure Delivery Plan should include a local 'shopper' minibus service that loops around the area linking to train station and shops. Complete modelling of J19 impacts so that mitigations can be proposed and scrutinised.		safer-cycling-advocate-program.pdf Netherlands Sustainable Safety policy.pdf

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					3) There is existing congestion at J19, and the Local Plan won't make much difference. There will be more congestion at the roundabout, which could have knock on impacts. However, we have not modelled this yet, so we can't say if mitigation measures are required, and we have no confirmed proposals for works to J19 that can solve this problem. In response: Active travel infrastructure is inadequate Existing active travel infrastructure in the Pill area does not meet safety standards to attract a wide level of mode shift including for older people, and children. For example, the shared cycle/ footpath between Martcombe Road-Pill Road junction, Abbots Leigh, and Ashton Court is cleaned by North Somerset Council only twice a year, and is often covered with obstacles such as wet leaves and sticks, and is narrow in places. I have cycled this path with my primary school children every day for the school run in the past few years. The condition of the foot/cycle path is acceptable to us, but several cyclists who use road bikes have told me they prefer to cycle in the traffic as it is safer with their bike. I have also seen, experienced myself and heard of others slipping and being injured particularly at the narrow steep section between Manor Cottages and Abbots Leigh Cricket Club which collects leaves and sticks and has to be regularly cleaned by local volunteers. In order to support any increased usage safely, the existing bicycle and pedestrian infrastructure needs investment and maintenance following UK and international best practice eg Netherlands Government's Sustainable Safety 3rd Edition, 2018-2030 and the European Cyclists Federation Guide, 2020 (attached). Otherwise the Local Plan will not achieve the mode shift that forms the basis of its mitigation strategy. Harm to local ecology Residents have pointed out that the Pill sites in particular Pill Green is home to a population of Linnets and Skylarks, which are UK Red Listed with Conservation Concern status meaning they are rare and protected. It is unclear how development at the scale proposed will be able to mitigate against removing their habitat. There is also a section of ancient woodland at Markham Brook on the border of the Pill Green and Land at Pill Road sites.			

Name: Craig Andrews **I.D:** 62828065

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Youngwood Lane	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	These comments are in respect of Nailsea but could be applied to any town within North Somerset. It would appear that North Somerset are so desperate to build houses that they consider this to be the 1st priority and then wave a magic wand to deal with all the infrastructure issues at a later date and if nothing is done, what the hell, we have achieved our house building goals. Without considering doctors, schools, shops, wildlife and areas of land that are prone to flooding we would like to focus initially on the road structure. Nailsea is served by many 'B' roads. Many of these 'B' roads are very narrow and are being used more and more. There seems to be one potential plan to build a proposed road to the south of Nailsea through land that could flood and under a railway line. There appears to be no funding for this and only has the potential to help one side of Nailsea. In my opinion the infrastructure should be funded and developed prior to the houses being built to ensure that something is done and not forgotten about. You are probably unaware but within Nailsea there are only a couple of what I would class as decent roads and since North Somerset introduced parking charges these roads have now started to be cluttered with cars parking. This causes annoyance and delays to anyone that is driving in Nailsea whether this is people who live there, lorries delivering, buses or emergency vehicles. If houses have to be built and further ruin the village, now town, I have lived in for 55+ years then I would implore that North Somerset sit down and work out all the infrastructure requirements and get these funded and dealt with in			Further Comments 1.png Further Comments 2.png

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					advance. I would hate for North Somerset to waste money like they have previously done on projects which ultimately we as council tax payers end up footing the bill for. Further comments have been attached below.			

Name: Crest Nicholson Operations Ltd **I.D:** 63175041

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	• Effective	Yes	Yes	This representation has been submitted by Savills on behalf of Crest Nicholson Operations Ltd (herein referred to as 'Crest Nicholson' or 'Crest'). This representation is in response to North Somerset Council's (NSC) Local Plan Regulation 19 Consultation, in the context of Crests on-going promotion of land at Poplar Farm, Nailsea for residential development, which has been identified as an allocation for 130 dwellings. Crest Nicholson strongly support the identification of Nailsea as a strategic location for growth within Policy LP3 – Strategic Location: Nailsea and Backwell. Notwithstanding, Crest has objections to the elements of Policy LP3 relating to the requirement for a development proposal to demonstrate how it will support the delivery of a package of measures. Previous Representations Crest Nicholson submitted representations to the previous Pre-submission Plan (November 2023) Regulation 19 consultation in January 2024, as part a consortium of developers in response to draft Policy SP3 (Spatial Strategy). These representations acknowledged that, whilst the content of Policy SP3 and its translation into Site Selection Methodology were not in themselves objectionable, the policy failed to articulate how the broad principles it contained could be applied to North Somerset in a manner which secures the sustainable development that the plan's vision and strategic priorities seek to achieve. One particularly important factor considered to have a bearing on strategy was the location of housing needs in North Somerset and from where the need for new housing arises. 4. Crest Nicholson also submitted omission site representations to draft Policy LP2 regarding land at Poplar Farm, in response to this consultation. These representations not only explained why the site is a suitable and sustainable location for residential development, but also, in doing so, justified why Nailsea is a sustainable settlement capable of accommodating additional housing development above that allocated in that previous Pre-submission Plan (November 2023), in a sustainable manner to address housing need. As set out in these previous representations, Nailsea offers a wide range of services and facilities that support a high degree of self-containment, which include: • Primary schools • Secondary school with sixth form college	Objections Despite the in principle support, Crest Nicholson has objections to the elements of Policy LP3, specifically the policy's lack of clarity on the requirement development proposals to set out how they will support the delivery of specified measures. While it is appreciated that a package of transport related infrastructure will be required to support development proposals and this is not objected to, the policy lacks clarity on how different elements are expected to be funded. Clarity should be provided on which infrastructure items are to be funded through S106 contributions and which are to be funded via CIL. Site-specific mitigation measures that are necessary to make a development acceptable in planning terms should be secured through S106 obligations, whereas strategic improvements intended to support growth across the wider area should be funded through CIL. The schemes identified to be funded through CIL should meet the tests set out in The Community Infrastructure Levy Regulations 2010, Section 122, which are as follows: "A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is (a) necessary to make the development acceptable in planning terms; (b) directly related to the development; and (c) fairly and reasonably related in scale and kind to the development.' Conclusions Crest strongly supports the identification of Nailsea as a strategic growth location in Policy LP3. Nailsea is a highly justified and sustainable location for accommodating future development. However, further clarity is needed on the funding	Conclusions Crest strongly supports the identification of Nailsea as a strategic growth location in Policy LP3. Nailsea is a highly justified and sustainable location for accommodating future development. However, further clarity is needed on the funding arrangements for transport-related infrastructure, and any schemes proposed to be funded through CIL should comply with the statutory tests set out in The Community Infrastructure Levy Regulations 2010, Section 122.	

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					• GP surgeries • Dentists • Veterinary surgery • Leisure centre • Library • Mizzymead Recreation Centre and The Grove Sports Centre & Social Club • Various sports clubs • High street and Crown Glass Shopping Centre • Tesco, Waitrose, Co-op and Iceland supermarkets • Restaurants, pubs and cafés • Bed and Breakfasts • Employment opportunities Whilst there is a range of employment within Nailsea, evidence shows that a number of residents travel beyond the town, principally to the major employment opportunities within the Bristol Urban Area. There are, however, various opportunities for this commute to be made via sustainable modes of travel, including by train, bus and bicycle. Nailsea and Backwell train station offers frequent and short duration train services to Bristol Temple Meads and to Weston-Super-Mare. According to website thetrainline.com there are seven services that leave Nailsea and Backwell station between 7:00am – 8:30am during the typical working week (Mon-Fri). The proposed extension and reopening of Nailsea and Backwell railway station platforms will further improve public transport accessibility for both existing and future residents of Nailsea. In addition, the X8 and X9 bus routes operate from Nailsea into Bristol City Centre. For those wishing to travel by active modes, the Festival Way cycle path provides a good quality route which, according to the Sustrans website is approximately 14km from the centre of Nailsea through to Bristol City Centre. Support for Nailsea as a Strategic Development Location In the context of previous representations, Crest Nicholson welcomes the redistribution of strategic growth within the Pre-submission Regulation 19 Plan (October 2025) and strongly supports the identification of Nailsea and Backwell as one of four strategic development locations. Nailsea is a highly justified and sustainable location for accommodating future growth, offering the capacity to deliver new homes alongside new infrastructure. The inclusion of Nailsea as a strategic development location for growth will help meet identified local housing needs while contributing to the delivery of the plan's wider objectives for sustainable development.	arrangements for transport-related infrastructure, and any schemes proposed to be funded through CIL should comply with the statutory tests set out in The Community Infrastructure Levy Regulations 2010, Section 122.		
Policy LP5: Housing, employment and mixed use allocations	No	• Effective	Yes	Yes		Objections to the Allocation Policy Wording: As explained earlier in this representation, Crest Nicholson supports the principle of the proposed allocation at Poplar Farm. In the preceding sections, explanations have been provided to support the conclusion that the proposed development to be in a suitable, sustainable and sound location. Crest, nevertheless, has objections to	Summary of Representation: • Poplar Farm, Nailsea is a justified, deliverable, and sustainable opportunity for residential development of circa 130 dwellings. • Crest Nicholson supports the allocation in principle but seeks an amendment to policy wording to	Policy LP5 (Land at Poplar Farm) for Crest (Nov 25).pdf

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						specific elements of the allocation policy. An explanation of these objections is set out below, followed by the proposed alternative wording for these aspects of the policy in 'tracked change' format in the concluding section of this representation. Nailsea and Backwell Transport Strategy Contributions: The policy requires 'proportionate' contributions to be made to schemes identified in the Nailsea and Backwell Transport Strategy. Whilst Crest agrees that contributions should be proportionate, the policy does not specify what schemes the contributions should relate to nor is this detailed within the Transport Strategy. Whilst it is noted that identifying relevant schemes and exact funding requirements may not be possible at this stage in the plan-making process, without clarifying that contributions must relate to 'relevant' schemes, there remains a risk that a development could be required to fund measures that are not directly connected to its impact. This would directly conflict with the CIL Regulation 122 tests, which sets out that: "A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is (a) necessary to make the development acceptable in planning terms; (b) directly related to the development; and (c) fairly and reasonably related in scale and kind to the development." Crest Nicholson considers that a minor but important change to policy wording to state 'relevant schemes' would sufficiently provide clarity that any contributions sought should be directly related to the development. Proposed Policy Wording: The preceding section of this representation raises concern with Schedule 1: Large sites for residential development of draft Policy LP5 Housing and employment allocations, as currently worded. Below is the proposed amendment (additional text underlined) that is considered necessary to the small section of Schedule 1, which is referenced by the policy text in LP5, to remedy the situation, overcome the objection and make the policy sound. Whilst the change proposed appears to be a modest adjustment to the policy, it is nevertheless important to ensure the	ensure soundness and deliverability. Crest has also made separate representation to Policy LP3 – Strategic Location: Nailsea and Backwell, which should be read in conjunction. • The Sustainability Appraisal (SA), Spatial Strategy, Site Selection and Capacity Paper collectively endorse Poplar Farm as a justified location. (Paragraphs 8-11). • Poplar Farm is deliverable and developable location for residential development. (Paragraphs 12-18) • Poplar Farm is a sustainable location when the 'policy on' proposals for the site are assessed against the objectives of the Sustainability Appraisal. (Paragraphs 19-23) • Despite 'in principle' support, Crest Nicholson has one area of objection to policy wording that seeks to ensure compliance with CIL Regulation 122 tests (Paragraph 24-27) • A change is proposed to the draft Policy which addresses these objections. (Paragraph 29) Introduction This representation has been submitted by Savills on behalf of Crest Nicholson Operations Ltd (herein referred to as 'Crest Nicholson' or 'Crest'). Crest has a number of land interests in North Somerset, including land at Poplar Farm, Nailsea (also referred to as 'Poplar Farm, Nailsea'), which is included as a residential allocation in the North Somerset Local Plan 2041 Pre-submission Plan, ('emerging local plan') as set out in Schedule 1 of Policy LP5: Housing and employment. Crest Nicholson strongly supports the principle of the proposed allocation. However, it does have some detailed objections to aspects of the draft policy wording, which have the potential to undermine deliverability. This representation is split into three sections. Section 'A' explains why Crest Nicholson supports the allocation of land at Poplar Farm in the emerging Local Plan and why it represents a justified, developable and sustainable	

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						soundness of it. Policy LP5 housing and Employment Allocations, Schedule 1 Large Sites for residential development, Strategic locations – Nailsea and Backwell, Nailsea – Poplar Farm 'Site requirements': • 'Proportionate contributions required to relevant schemes identified in the Nailsea and Backwell Transport Strategy.' (note: emphasis on the word relevant with it underlined)	location for residential development. In so doing, it also outlines the number and variety of benefits that development of the site would deliver, including, that Poplar Farm: a) is capable of making a valuable contribution to the delivery of the new open market and affordable homes needed in North Somerset during the plan period through a high-quality development; b) is controlled by Crest, which holds all land required to deliver residential development and there are no legal or ownership constraints. It is, therefore, demonstrably deliverable and capable of providing a meaningful addition to the open market and affordable housing stock of the District in the short to medium term; c) is in a sustainable location, providing opportunities for future residents to use non-car modes of travel, including Nailsea and Backwell train station which provides frequent, short duration train services to Bristol Temple Meads and to Weston-Super-Mare; and the X9 bus which runs from a stop less than 10 minutes' walk from the site, providing transport into Bristol City Centre; d) is located where infrastructure investment is planned, including through the Bus Service Improvement Plan (BSIP), thereby maximising the benefit of central government infrastructure investment; e) has no technical or environmental impediments, which cannot be mitigated or otherwise overcome; f) is well placed for future residents to access to a number of employment opportunities; g) represents an opportunity to deliver a multifunctional network of green spaces and corridors with the green infrastructure incorporated into development proposals; h) is capable of supporting the delivery of key transport and movement infrastructure through proportionate contributions to relevant schemes identified in the Nailsea and Backwell Transport Strategy, where such contributions meet the CIL Regulation 122 tests; i) would have direct and indirect	

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							economic benefits. Turning to the areas of objection, there are certain aspects of the allocating policy, which are not considered to be justified or consistent with national policy. Section 'B' of this representation explains why that is the case and the subsequent section 'C' shows, in tracked form, the change considered to be necessary to make the policy sound. Soundness: This section of the representation explains why the draft allocation at Poplar Farm represents a suitable, deliverable and sustainable location to deliver new homes during the plan period. It does so by reference to Paragraph 36 of the Framework and the following four tests of soundness: a) Positively prepared; b) Justified; c) Effective; and d) Consistent with national policy. These tests apply to the development plan as a whole and some elements are not, therefore, relevant to testing the soundness of individual development allocations. In so far as an individual allocation is concerned, Savills interprets these tests of soundness and the policy elsewhere within the Framework as requiring allocations to be: a) Justified when considered against all of the reasonable alternatives; b) Developable both technically and within the timeframe of the plan period; and c) Sustainable in location and form, in accordance with national policy. In the remainder of this section it is explained why the principle of the proposed allocation at Poplar Farm is consistent with all three of these tests. A) Why an allocation at Poplar Farm is 'Justified': A large number of sites have been put forward for development through the North Somerset Strategic Housing Land Availability Assessment (SHLAA)	

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							process. These sites vary from the very small areas of land, capable of accommodating a few homes, through to strategic urban extensions and new communities with the capacity to accommodate thousands of houses. It is the role of the local planning authority to analyse and filter the submitted sites to determine the most sustainable combination of sites consistent with the spatial strategy of the Local Plan. A key component of the evidence base informing this analysis is the Sustainability Appraisal (SA). Later in this section of the representation, consideration is given to the assessment of Poplar Farm against the objectives of the SA but in so doing an adapted 'policy on' analysis approach is taken, which reflects the detailed knowledge of the location, and its opportunities and constraints. In parallel with the SA, the local planning authority has been through a structured assessment of the potential sources of housing supply in order to determine which should be allocated. This assessment was contained in the Spatial Strategy, Site Selection and Capacity Paper (October 2025). The Paper sets out a sound sequential and filtering approach, which first considers sites that fall into the top tier before moving onto the next. This process of testing 'reasonable alternatives' was transparent and, whilst comments are not provided on the merits of any other site evaluated, the broad approach appears to be sound. In particular, there is satisfaction that the authority considered the 'reasonable alternatives' available for the emerging local plan, in the context of its consistency with the emerging Spatial Strategy. Based on all of the available evidence, the conclusion of the Paper, that the Poplar Farm location should be proposed for allocation, is supported. Indeed, overall the evidence available, principally within the SA, the Spatial Strategy, Site Selection and the Capacity Paper together endorses the conclusion that	

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							the proposed allocation of Poplar Farm represents a ‘justified’ location for development when considered against all of the reasonable alternatives. B) Why an allocation at Poplar Farm is ‘Developable’: The definition of ‘developable’ in the Framework and the test to be applied to this emerging allocation is whether the development is “in a suitable location for housing development with a reasonable prospect that it will be available and could be viably developed at the point envisaged”. The first part of this test, “in a suitable location for housing development”, is addressed separately in relation to the suitability and sustainability of the proposed allocation. In this sub-section, the focus is on the latter part of the ‘developable’ test; whether the site is available and could be viably developed. Poplar Farm represents an opportunity to allocate a sizeable development on land subject to an option agreement between the landowner and Crest Nicholson. The landowner has confirmed their support for development, and there are no legal constraints, offering significant advantages for the timely delivery of the site. Crest intends to exercise the option to purchase the site upon obtainment of planning permission. Second, is the duration of the planning process. Crest Nicholson has undertaken extensive survey work to ensure a sound knowledge of the site opportunities and constraints, which will ensure a robust planning application can be preparation quickly. Ownership by a single entity means there is no need for consortium agreements, which can protract matters. Since Crest controls the entire allocation, the supporting infrastructure can be coordinated and phased accordingly, and its delivery captured within a single Section 106 Agreement between a limited number	

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							of parties e.g. the developer, the Council and the landowner. Whilst sites in multiple and interdependent ownership are not, by definition, undevelopable, unless the landownerships can be developed independently, it adds complexity and challenges, which do not exist for sites such as Poplar Farm. Third, in addition to being 'developable', for an allocation of the scale envisaged within the emerging local plan, it is crucial that the development is demonstrably 'deliverable' from very early in the plan period. Due to the characteristics of the location, land ownership / control and the technical and environmental assessment work completed to date, the entire development is capable of being completed early in the plan period. Overall, Poplar Farm performs extremely well when considered against each facet of 'deliverability', relevant to the plan-making process. Not only is the land available, there are no impediments to the delivery, relevant transport infrastructure schemes will be delivered through proportionate contributions, and the development would provide housing in a sustainable location. Accordingly, there can be a great deal of certainty that Poplar Farm would make a positive contribution towards meeting the housing requirement during the plan period. C) Why an allocation at Poplar Farm is 'Sustainable': The Poplar Farm site is a sustainable location for growth in North Somerset. To demonstrate and evidence this, the site and proposed development has been assessed against the criteria used in the SA. In order to provide a true assessment of the sustainability of the site against the sustainability objectives of the SA, an assessment based upon detailed knowledge of the technical and environmental characteristics of the site has been produced. Crest	

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							Nicholson has commissioned a comprehensive suite of specialist assessments, which removes uncertainty and caution in how the site has been evaluated through the SA. This provides a more accurate understanding of the effects that development at Poplar Farm would have on the 15 SA Objectives than the SA assessment,which is based upon only a high-level understanding of the technical and environmental characteristics of the areas/locations it considers. (See table attached) On the basis of the information provided in response to the individual SA objectives, an evidenced ‘policy on’ assessment of the sustainability of the proposed allocation reveals a very positive position for Land at Poplar Farm. A summary table of the updated scoring has been provided in Figure 2 below: (See table attached) Due to land control of the site and its location, there are robust opportunities to minimise and mitigate harmful impacts associated with development and to maximise positive opportunities such as the on-site provision of green infrastructure and blue infrastructure. The combination of these affects notably enhances the sustainability scoring of the proposal against the SA objectives and provides a far more accurate and realistic interpretation of the proposed allocation’s sustainability. Conclusion The Poplar Farm allocation represents justified, deliverable and sustainable location for residential development of circa 130 dwellings. For the reasons explained within this and other representations, Crest Nicholson strongly supports the principle of its allocation for development.	
Poplar Farm, Nailsea	No	• Effective	Yes	Yes		Summary of Representation • Poplar Farm, Nailsea is a justified, deliverable, and sustainable opportunity for residential development of circa 130 dwellings. • Crest Nicholson supports the allocation in principle but seeks an amendment to policy		

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						wording to ensure soundness and deliverability. Crest has also made separate representation to Policy LP3 – Strategic Location: Nailsea and Backwell, which should be read in conjunction. • The Sustainability Appraisal (SA), Spatial Strategy, Site Selection and Capacity Paper collectively endorse Poplar Farm as a justified location. (Paragraphs 8-11). • Poplar Farm is deliverable and developable location for residential development. (Paragraphs 12-18) • Poplar Farm is a sustainable location when the 'policy on' proposals for the site are assessed against the objectives of the Sustainability Appraisal. (Paragraphs 19-23) • Despite 'in principle' support, Crest Nicholson has one area of objection to policy wording that seeks to ensure compliance with CIL Regulation 122 tests (Paragraph 24-27) • A change is proposed to the draft Policy which addresses these objections. (Paragraph 29) Introduction 1. This representation has been submitted by Savills on behalf of Crest Nicholson Operations Ltd (herein referred to as 'Crest Nicholson' or 'Crest'). Crest has a number of land interests in North Somerset, including land at Poplar Farm, Nailsea (also referred to as 'Poplar Farm, Nailsea'), which is included as a residential allocation in the North Somerset Local Plan 2041 Pre-submission Plan, ('emerging local plan') as set out in Schedule 1 of Policy LP5: Housing and employment. 2. Crest Nicholson strongly supports the principle of the proposed allocation. However, it does have some detailed objections to aspects of the draft policy wording, which have the potential to undermine deliverability. This representation is split into three sections. Section 'A' explains why Crest Nicholson supports the allocation of land at Poplar Farm in the emerging Local Plan and why it represents a justified, developable and sustainable location for residential development. In so doing, it also outlines the number and variety of benefits that development of the site would deliver, including, that Poplar Farm: a) is capable of making a valuable contribution to the delivery of the new open market and affordable homes needed in		

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						North Somerset during the plan period through a high-quality development; b) is controlled by Crest, which holds all land required to deliver residential development and there are no legal or ownership constraints. It is, therefore, demonstrably deliverable and capable of providing a meaningful addition to the open market and affordable housing stock of the District in the short to medium term; c) is in a sustainable location, providing opportunities for future residents to use non-car modes of travel, including Nailsea and Backwell train station which provides frequent, short duration train services to Bristol Temple Meads and to Weston-Super-Mare; and the X9 bus which runs from a stop less than 10 minutes' walk from the site, providing transport into Bristol City Centre; d) is located where infrastructure investment is planned, including through the Bus Service Improvement Plan (BSIP), thereby maximising the benefit of central government infrastructure investment; e) has no technical or environmental impediments, which cannot be mitigated or otherwise overcome; f) is well placed for future residents to access to a number of employment opportunities; g) represents an opportunity to deliver a multifunctional network of green spaces and corridors with the green infrastructure incorporated into development proposals; h) is capable of supporting the delivery of key transport and movement infrastructure through proportionate contributions to relevant schemes identified in the Nailsea and Backwell Transport Strategy, where such contributions meet the CIL Regulation 122 tests; i) would have direct and indirect economic benefits. 4. Turning to the areas of objection, there are certain aspects of the allocating policy, which are not considered to be justified or consistent with national policy. Section 'B' of this representation explains why that is the case and the subsequent section 'C' shows, in tracked form, the change considered to be necessary to make the policy sound. A.Soundness This section of the representation explains why the draft allocation at Poplar Farm represents a suitable, deliverable and		

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						sustainable location to deliver new homes during the plan period. It does so by reference to Paragraph 36 of the Framework and the following four tests of soundness: a) Positively prepared; b) Justified; c) Effective; and d) Consistent with national policy. These tests apply to the development plan as a whole and some elements are not, therefore, relevant to testing the soundness of individual development allocations. In so far as an individual allocation is concerned, Savills interprets these tests of soundness and the policy elsewhere within the Framework as requiring allocations to be: a) Justified when considered against all of the reasonable alternatives; b) Developable both technically and within the timeframe of the plan period; and c) Sustainable in location and form, in accordance with national policy. In the remainder of this section it is explained why the principle of the proposed allocation at Poplar Farm is consistent with all three of these tests. a) Why an allocation at Poplar Farm is 'Justified' A large number of sites have been put forward for development through the North Somerset Strategic Housing Land Availability Assessment (SHLAA) process. These sites vary from the very small areas of land, capable of accommodating a few homes, through to strategic urban extensions and new communities with the capacity to accommodate thousands of houses. It is the role of the local planning authority to analyse and filter the submitted sites to determine the most sustainable combination of sites consistent with the spatial strategy of the Local Plan. A key component of the evidence base informing this analysis is the Sustainability Appraisal (SA). Later in this section of the representation, consideration is given to the assessment of Poplar Farm against the objectives of the SA but in so doing an adapted 'policy on' analysis approach is taken, which reflects the detailed knowledge of the location, and its opportunities and constraints. In parallel with the SA, the local planning authority has been through a structured assessment of the potential sources of housing supply in order to determine which		

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						should be allocated. This assessment was contained in the Spatial Strategy, Site Selection and Capacity Paper (October 2025). The Paper sets out a sound sequential and filtering approach, which first considers sites that fall into the top tier before moving onto the next. This process of testing 'reasonable alternatives' was transparent and, whilst comments are not provided on the merits of any other site evaluated, the broad approach appears to be sound. In particular, there is satisfaction that the authority considered the 'reasonable alternatives' available for the emerging local plan, in the context of its consistency with the emerging Spatial Strategy. Based on all of the available evidence, the conclusion of the Paper, that the Poplar Farm location should be proposed for allocation, is supported. Indeed, overall the evidence available, principally within the SA, the Spatial Strategy, Site Selection and the Capacity Paper together endorses the conclusion that the proposed allocation of Poplar Farm represents a 'justified' location for development when considered against all of the reasonable alternatives. Why an allocation at Poplar Farm is 'Developable' The definition of 'developable' in the Framework and the test to be applied to this emerging allocation is whether the development is "in a suitable location for housing development with a reasonable prospect that it will be available and could be viably developed at the point envisaged". The first part of this test, "in a suitable location for housing development", is addressed separately in relation to the suitability and sustainability of the proposed allocation. In this sub-section, the focus is on the latter part of the 'developable' test; whether the site is available and could be viably developed. Poplar Farm represents an opportunity to allocate a sizeable development on land subject to an option agreement between the landowner and Crest Nicholson. The landowner has confirmed their support for development, and there are no legal constraints, offering significant advantages for the timely delivery of the site. Crest intends to exercise the option to purchase the site upon obtainment of planning permission. Second, is the duration of the planning		

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						process. Crest Nicholson has undertaken extensive survey work to ensure a sound knowledge of the site opportunities and constraints, which will ensure a robust planning application can be preparation quickly. Ownership by a single entity means there is no need for consortium agreements, which can protract matters. Since Crest controls the entire allocation, the supporting infrastructure can be coordinated and phased accordingly, and its delivery captured within a single Section 106 Agreement between a limited number of parties e.g. the developer, the Council and the landowner. Whilst sites in multiple and interdependent ownership are not, by definition, undevelopable, unless the landownerships can be developed independently, it adds complexity and challenges, which do not exist for sites such as Poplar Farm. Third, in addition to being 'developable', for an allocation of the scale envisaged within the emerging local plan, it is crucial that the development is demonstrably 'deliverable' from very early in the plan period. Due to the characteristics of the location, land ownership / control and the technical and environmental assessment work completed to date, the entire development is capable of being completed early in the plan period. Overall, Poplar Farm performs extremely well when considered against each facet of 'deliverability', relevant to the plan-making process. Not only is the land available, there are no impediments to the delivery, relevant transport infrastructure schemes will be delivered through proportionate contributions, and the development would provide housing in a sustainable location. Accordingly, there can be a great deal of certainty that Poplar Farm would make a positive contribution towards meeting the housing requirement during the plan period. Why an allocation at Poplar Farm is 'Sustainable' The Poplar Farm site is a sustainable location for growth in North Somerset. To demonstrate and evidence this, the site and proposed development has been assessed against the criteria used in the SA. In order to provide a true assessment of the sustainability of the site against the sustainability objectives of the SA, an assessment based upon detailed knowledge of the technical and environmental characteristics of the site has been		

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						produced. Crest Nicholson has commissioned a comprehensive suite of specialist assessments, which removes uncertainty and caution in how the site has been evaluated through the SA. This provides a more accurate understanding of the effects that development at Poplar Farm would have on the 15 SA Objectives than the SA assessment,which is based upon only a high-level understanding of the technical and environmental characteristics of the areas/locations it considers. (See table attached) On the basis of the information provided in response to the individual SA objectives, an evidenced ‘policy on’ assessment of the sustainability of the proposed allocation reveals a very positive position for Land at Poplar Farm. A summary table of the updated scoring has been provided in Figure 2 below: (See table attached) Due to land control of the site and its location, there are robust opportunities to minimise and mitigate harmful impacts associated with development and to maximise positive opportunities such as the on-site provision of green infrastructure and blue infrastructure. The combination of these affects notably enhances the sustainability scoring of the proposal against the SA objectives and provides a far more accurate and realistic interpretation of the proposed allocation’s sustainability. Conclusion The Poplar Farm allocation represents justified, deliverable and sustainable location for residential development of circa 130 dwellings. For the reasons explained within this and other representations, Crest Nicholson strongly supports the principle of its allocation for development. B. Objections to the Allocation Policy Wording As explained earlier in this representation, Crest Nicholson supports the principle of the proposed allocation at Poplar Farm. In the preceding sections, explanations have been provided to support the conclusion that the proposed development to be in a suitable, sustainable and sound location. Crest, nevertheless, has objections to specific elements of the allocation policy. An explanation of these objections is set out below, followed by the proposed alternative wording for these aspects of		

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						the policy in ‘tracked change’ format in the concluding section of this representation. Nailsea and Backwell Transport Strategy Contributions The policy requires ‘proportionate’ contributions to be made to schemes identified in the Nailsea and Backwell Transport Strategy. Whilst Crest agrees that contributions should be proportionate, the policy does not specify what schemes the contributions should relate to nor is this detailed within the Transport Strategy. Whilst it is noted that identifying relevant schemes and exact funding requirements may not be possible at this stage in the plan-making process, without clarifying that contributions must relate to ‘relevant’ schemes, there remains a risk that a development could be required to fund measures that are not directly connected to its impact. This would directly conflict with the CIL Regulation 122 tests, which sets out that: “A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is (a) necessary to make the development acceptable in planning terms; (b) directly related to the development; and (c) fairly and reasonably related in scale and kind to the development.” Crest Nicholson considers that a minor but important change to policy wording to state ‘relevant schemes’ would sufficiently provide clarity that any contributions sought should be directly related to the development. C.Proposed Policy Wording The preceding section of this representation raises concern with Schedule 1: Large sites for residential development of draft Policy LP5 Housing and employment allocations, as currently worded. Below is the proposed amendment (additional text underlined) that is considered necessary to the small section of Schedule 1, which is referenced by the policy text in LP5, to remedy the situation, overcome the objection and make the policy sound. Whilst the change proposed appears to be a modest adjustment to the policy, it is nevertheless important to ensure the soundness of it. Policy LP5 housing and Employment Allocations Schedule 1 Large Sites for residential development Strategic locations – Nailsea and Backwell Nailsea – Poplar Farm ‘Site requirements’:		

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						• ‘Proportionate contributions required to relevant schemes identified in the Nailsea and Backwell Transport Strategy.’		

Name: D A Gray **I.D:** 28796449

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SP8: Housing	No	‣ Justified ‣ Consistent with national policy	Unsure	Unsure	The plan is unsound because a) It gives no guidance that would assist planning control to balance the Plan’s policies against conflicts with any of the 13 National Critical Infrastructure Sectors. b) Food is one of the 13 National Critical Infrastructure Sectors but, as it stands the Plan does not protect against the PREMATURE loss of productive farmland, which would conflict with the need to maintain food production assets c) Analysis of historic build rates suggests the realistic possibility that the number of completed homes will fall so far short of the Plan's requirement leaving most of the completed homes being surrounded by the desolation of substantial ongoing building works, which would be an unwelcome outcome.	Please refer to the attached document "Proposed policy ‘Ensuring reasonable build-out time’", which proposes a development management policy to resolve that conflict		Proposed policy Ensuring reasonable build-out time.odt
Policy LP3: Strategic location: Nailsea and Backwell	No	‣ Justified ‣ Consistent with national policy	Unsure	Unsure	Please refer to the attached "LP3 Strategic location-Nailsea and Backwell.odt" This Policy is unsound because: • it is contrary to so many specific items in the plan’s vision and strategic objectives and policies • The evidence supporting the policy’s Justification is too weak • There is a reasonable and much better alternative. The potential strategic location that performs best against to criteria in the Plan’s Strategic Priorities, Sustainable Development Objectives and strategic policies is at the border with Bristol	Please refer to the attached "LP3 Strategic location-Nailsea and Backwell.odt" Preferably the plan should be changed by a strategic relocation to North Somerset's border with south west Bristol		LP3 Strategic location-Nailsea and Backwell.odt
Land at North West Nailsea	Unsure	‣ Justified	Unsure	Unsure	The requirement for a new primary school at the North West Nailsea site has not been carried forward from the adopted Sites and Policies Plan and a new primary school for Nailsea is only included in the consultation draft plan in the Site Requirements for the South Nailsea site. The scale of local residential development since adoption of the Sites and Policies plan together with that proposed in the consultation draft plan is such that there is likely to be a need for increased primary school provision for the additional children north of the center of town. Consequently the Site Requirements for one of the northern Nailsea sites should leave open the possibility of further school provision.	The Site Requirements for one of the sites in northern Nailsea should include an assessment of the need for an additional future primary school and a requirement for all of those sites to contribute to the cost of that future provision.		
Station Road to A370, Cross Rail Link, Nailsea and Backwell	No	‣ Justified	Unsure	Unsure	The existing, already congested out-commuting by car from the Nailsea and Backwell strategic location will increase substantially because the large amount of proposed local house building is not matched by any significant employment provision. Because most employment opportunities will continue to be to the east in Bristol and beyond, most of the new commuting will try to use the same already congested roads to the east. However, there is nothing in schedule 7 that is likely to alleviate that increased congestion. Comment specific to the cross rail link is that there's nothing with any certainty in schedule 7 that could relieve the increased traffic congestion that would result from the proposed house building: 1) Funding for the cross rail link is uncertain 2) This cross rail link proposal is confined withing the strategic location and consequently has no effect on the wider commuting congestion.	Schedule 7 needs to include measures to alleviate the increased rush hour congestion on roads between Nailsea and Bristol that will be caused by the unbalanced scale of development in the Nailsea and Backwell strategic location		
M5 Junction 20 buffer	Yes		No	Yes	Schedule 7 includes the following with no text elsewhere in the plan to indicate what a motorway junction buffer is. 'Motorway junction buffers • M5 Junction 19 buffer • M5 Junction 20 buffer • M5 Junction 21 buffer' Is the buffer a) an additional narrow lane to give improved access to motor cycles, b) an additional lane dedicated to providing priority access to emergency services or c) something else?			

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Nailsea Backwell railway station	No	‣ Justified	Unsure	Unsure	Proximity to Nailsea and Backwell station will not contribute to sustainable development because the railway is already so near capacity that, during rush hours, trains to Bristol often arrive at the station already full. That will not be changed by the platform extension that are included in schedule 7. In the face of the proposed level of house building in Nailsea an Backwell, a substantial increase to the railway's passenger carrying capacity is the only improvement that would enable the railway to contribute to local sustainability but that is missing from schedule 7.	An additional item to increase the passenger carrying capacity of the railway at Nailsea and Backwell station, particularly during rush hours must be added to the schedule		

Name: D Box **I.D:** 62520641

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Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Backwell has already 800 new houses approved any additional development would change the nature of a village into an urban commute. There is No industry, only local shops, mostly residential and most residents commute. Grade 2 agriculture land proposed for development will reduce N Somersets's housing allocation by 7% The present road infrastructure would be overwhelmed, All present village facilities would not be able to cope.		NO	

Name: D Cartwright-Beale **I.D:** 62744545

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SP10: Transport	No	‣ Justified	Unsure	Unsure	The speed limit on the B3124 is far too fast for allowing access for homes along the road. Even existing houses that need access from the B3124 are in danger entering and exiting their houses at all times. The area is also green belt and should not even be considered due to that fact. Weston big wood is an area of natural beauty. there are plenty of unused buildings and brownfield sites that could be used instead. I do not feel that these are exceptional circumstances to build on green belt land. No site along this route would provide safe and suitable access for people. Transport usage is already high along this road, and so further noise and light pollution would be unacceptable.	The speed limit on the B3124 is far too fast for allowing access for homes along the road. Even existing houses that need access from the B3124 are in danger entering and exiting their houses at all times. The area is also green belt and should not even be considered due to that fact. Weston big wood is an area of natural beauty. there are plenty of unused buildings and brownfield sites that could be used instead. I do not feel that these are exceptional circumstances to build on green belt land. No site along this route would provide safe and suitable access for people. Transport usage is already high along this road, and so further noise and light pollution would be unacceptable.	The speed limit on the B3124 is far too fast for allowing access for homes along the road. Even existing houses that need access from the B3124 are in danger entering and exiting their houses at all times. The area is also green belt and should not even be considered due to that fact. Weston big wood is an area of natural beauty. there are plenty of unused buildings and brownfield sites that could be used instead. I do not feel that these are exceptional circumstances to build on green belt land. No site along this route would provide safe and suitable access for people. Transport usage is already high along this road, and so further noise and light pollution would be unacceptable.	

Name: D Eglon **I.D:** 62794977

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent	Unsure	Unsure	There has already been planning for a 40% increase to our 'village' the proposed plan would lead to a totally unacceptable overdevelopment, the infrastructure is insufficient and lacks analysis and costings and could not support more houses and therefore more people and cars , there is no proposed investment in health or school facilities which at present are full and at capacity The roads are already at capacity and if there are accidents on the motorway it's completely impossible to get out of the village now! The proposed road would not alleviate the problem and is also across a known flood plain which floods regularly and further building would only increase this problem and it's supposed to cross the railway line which would be			

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		with national policy			costly to go under or over and considering it's planned to come out on station road would only increase traffic on it!! The depletion of grade 1 agricultural land for food and grazing is untenable as we need to maintain and protect it not build on it , it will destroy wildlife habitats and biodiversity and would also mean there would be virtually no green space for nature and the wellbeing of the residents Backwell is not an employment hub as most residents commute The station is not fit for purpose and could not support thousands more commuters and is already a challenge for the elderly or disabled Backwell has been allocated 7% of the districts housing, higher than any other village and a higher growth percentage than towns which is totally unsustainable			

Name: D Ellison **I.D:** 28903265

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	It is a flagrant injustice to communities (like Tickenham) surrounding the Nailsea/Backwell development plans that there has been no worthwhile or accurate assessment made of the imposition and impact of such developments resulting from traffic growth. This on top of traffic growth already happening. In particular to and through the village of Tickenham. There are 2 means of accessing Tickenham (to then get to the M5 or Clevedon) from Nailsea; either via the Causeway or via the main road through Stone Edge Batch. The Causeway is barely a narrow country lane and the main road is already a dangerous and unsafe traffic pinchpoint at various locations. Neither provide the future solution in support of significant housing development. Villagers of Tickenham already have to suffer; emissions, vibration, noise, dangerous/wreckless driving habits, cars mounting pavements/drives, congestion. If Tickenham can not have an actual bypass, then the route from Nailsea/Backwell to Clevedon and the M5 must be via an enhanced Nailsea Wall roadway. But it is very clearly that this consultation has failed to grasp (or chosen to ignore) matters such as what I have set out above. Also note that so-called Active Travel is decreasingly safely possible within Tickenham.	Ensure road safety and congestion in the communities outwith Nailsea/ Backwell but hugely impacted by development is considered professionally and with a duty of care.		

Name: D Estcourt **I.D:** 21457825

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Comments on “North Somerset Councils reg119 Local Plan 2041” from a Backwell residents point of view. Page 29. The first paragraph speaks that the "green belt of North Somerset checks the urban sprawl of Bristol" etc. How can this be when prime farming land (which grows the countries food) in the green belt of North Somerset has been chosen for an extensive urban sprawl in Backwell to house people far away from Bristol and their workplace thus encouraging longer commuting distances. The whole of the development of Nailsea and Backwell area depends on the proposed New Road Bridge under the railway East of Backwell railway station. It would seem that the North Somerset planners have been taken in by the builders saying that they will build a road through the estate to bypass the busy Station Road (from the traffic lights in Backwell down to the Nailsea side of the Station at Backwell Lake) with a new bridge to be built under the railway line and an extensive/expensive road to meet the existing road at Backwell Lake. The proposed builder has stated that they will build the road who's progress will match the estate building works down to the Railway line. Being as there are no proposed houses beyond the railway line on the Nailsea side of the railway track a lengthy road will need to be built from the new proposed bridge to the bottom of Bucklands Batch. It must be noted that the construction of this road must be of a higher spec than what a builder would construct for a housing estate as it needs to take heavy goods vehicles and will the bridge be high enough to take double decker buses and high sided HGV’s. Will it be single lane with traffic lights or more! I would be quite right to say that the Bridge and the extended road on the Nailsea side of the Railway, due to it's eye-watering expense, will not be paid for in any way by the Builder, the Council or the Government. The Local Council and the			

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					Government are broke, it will only be the Builder having built the houses who will walk away from the project with the profits from the houses for their shareholders. Are we to expect that the road and bridge will be built by British Rail? We will be left with a massive estate of 900 houses (50 % affordable) with no bridge/bypass for Station Road but with nearly 900 houses/families who need to get to a supermarket in Nailsea to do their shopping via the existing Station Road. Backwell has had more than it's fare share of private house building work granted over the last few months/years without any Council or Government money spent on any of it's infrastructure. Backwell only has convenience shops, a post office/ convenience store, a school at full capacity, a small leisure centre and a small surgery. Backwell is expected to increase it's population by 80% with Nailsea population increase of a further 55%. Is this realistic? Is the funding in place from the Council and Government to do the necessary upgrades to Backwell and Nailsea services? As Bristol is the main area of work nearly everyone who has had to purchase a house in the green belt of Backwell in North Somerset will have to use the existing road system (A370) to commute to Bristol through Flax Bourton via the Long Aston Bypass which has been reduced to a single lane.. Any sensible person would allow the boundary's of Bristol to be extended as the road infrastructure extensions would be less and the people would be nearer to their place of work and recreation, less greenhouse gas's etc. It would only mean a short extension of the Bristol Metro line from the Park and Ride in Long Ashton which would encourage people to use public transport, rather than to live outside of Bristol and have to use their cars. It's about time that the road/transport infrastructure is brought up to date with North Somerset's expansion. Back in the 1970's a road from the end of the Long Ashton bypass to the M5 junction at Clevedon was planned but regretfully forgotten about and I can see this happening with the proposed bridge under the railway. In conclusion to add the estate East of Backwell (889 houses making a 80% increase to the village) in addition to the building already passed for planning (794 houses representing a 40% increase on the village) all using the only supermarkets which are in Nailsea together with the proposed additional housing for Nailsea, all using the A370 to commute to work in Bristol will be chaotic on the existing road structure. We are all aware that the sticking plaster of a rail underpass/bypass road for Station road in Backwell will just never happen and even if it did we are still talking of the existing roads needing to carry all the additional traffic.			

Name: D Hathaway **I.D:** 62765057

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	As a longstanding Backwell resident of 55 years, I very much object to this development: it will contribute significantly to the destruction of the village I love, dragging Backwell onto an inescapable path towards total urbanisation. I therefore wish to register my objection to the current proposal for the development of 1000 new houses on "land to the East of Backwell", and consider the proposal unsound for the following reasons: When my family first came here in 1970, Backwell was very much an agricultural village, and we were surrounded by crops and cattle. Over the years this has naturally diminished, but the fields targeted for this development remain very much prime, grade 1 agricultural land. With the current state of world affairs, it would be the height of folly to use such land (here or anywhere else) for the building of houses, simply for the purpose of meeting arbitrary and arguably short-sighted targets. England needs farmland; we cannot rely on other countries to supply our food, especially in possible times of war! Backwell is already under siege from new development; far more than its current infrastructure can support, and any further developments would (in my opinion) demonstrate a failure of responsible planning. Any proposed improvements to infrastructure, particularly the new roads that would link Backwell to Nailsea, are purely hypothetical and highly unlikely to ever materialise (at least not in a reasonable timeframe) due to the very high costs of somehow crossing over or under the railway line. Facilities such as local shops, the GP Surgery, schools, and leisure facilities are all unable to support increased demand, and the roads are already gridlocked on a regular daily basis. I personally often find it can take up to ten minutes to find an opportunity to drive out of my own property due to the current traffic conditions, and it is almost impossible to cross the A370 on foot at Farleigh during "Rush-Hour". This formerly twice daily event now practically spans all of each day, every day of the week! Even so, we presently face the prospect of this being greatly exacerbated by the planning proposals already approved and under construction; a further 1000 homes on top of this would be nothing short of catastrophic.			

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					Despite the impact of recent developments, Backwell remains a place of considerable sanctuary to wildlife. As a resident whose property borders the fields threatened by this proposal, I can vouch for the diversity of nature present. I regularly see badgers, hedgehogs, roe deer, barn owls, and many species of bat, including the lesser and greater horseshoe bats. All of these frequent the fields in question, along with many other creatures including slow worms and even the occasional grass snake. Buzzards hunt daily on and over this land. Development proposals always make some weak attempt at mitigation for the loss of wildlife habitats, but nothing can ever replace what is already here; where these creatures have lived relatively undisturbed for at least the last thousand years of agriculture. Backwell (particularly the lower areas of the common, and all the fields under threat of development), is very susceptible to flooding. Even now, every time there is sustained rainfall, the main road floods badly. The housing developments currently under construction will doubtless add to this problem, but the proposed development of a further 1000 houses is simply a recipe for disaster. There is very little opportunity for employment in this area, and most residents currently commute to work. Any proposal to increase commercial activity and jobs, will undoubtedly provide minimal employment, and come at a considerable cost to the desirable appeal and nature of the area. An increase in commuters will add to the burden of public transport and the general traffic. The current train station will not be able to cope, and neither will the bus service. There is currently no way to cycle from Backwell to Nailsea without risking the very real threat of death from sharing the roads with cars, and this can only get worse with increased traffic. In summary, Backwell in my opinion is not at all suitable for the proposed 7% share of North Somerset's housing target, and has already reached a point of saturation. Any further development will result in an unforgivable loss of prime agricultural land, along with the corresponding destruction of the natural environment and quality of life for existing and future residents. This I believe to be wholly unacceptable.			

Name: D J Smith **I.D:** 21179233

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Land north of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The destruction of the Yeo Valley corridor for wild life by the construction proposed will do untold damage to the various species that I have personally witnessed using it during the last 12 months. They include deer, owls, badgers, bats, foxes, and birds (including the endangered song thrush). The proposal to replace this area with a larger green area to the east of Nailsea which has no significant water course is certainly not like for like as far as the wild life is concerned. The Nailsea road network, with its pinch points on all principal thoroughfares, despite assurances to contrary will struggle to cope with the additional volume of traffic generated by the proposed number of houses without significant improvements. To partially alleviate the situation a transport hub, in the true sense of the words, should be developed close to the railway station. It would be logical for as much housing as possible to be built as close as possible to this hub to encourage the use of public transport. I note with dismay that there appears to be no concrete proposals for expansion of schools or medical facilities and I can only hope that after the construction and occupation of the proposed additional housing that lack of commitment or funding does not leave the town unable to properly serve the needs of its increased population.			

Name: D Kinmond **I.D:** 62862817

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Land east of Backwell	No	• Positively prepared	Unsure	Unsure	I object to the plans for the following reasons: Backwell as a village already has 800 new houses approved (40% increase already), the proposed plans would be a massive overdevelopment. It is far more percentage wise than larger towns in the county that			PXL_20240103_120457870.jpg PXL_20251114_162917908.jpg

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		• Justified • Effective • Consistent with national policy			are better set up in terms of infrastructure and services to absorb an increase. The land cited is prime agricultural land that has always been used for growing crops and grazing cattle. It has never been left unused or under utilized, or considered unsuitable for agriculture so to propose this to be completely wiped out for housing seems wrong when government policy is to “protect our best and more versatile land”. We regularly walk through these fields with our children, and watched as farmers harvested the crops. Also as part of local Beaver and Cub scouts groups doing hikes suitable for younger children we walk through these areas to learn about nature, farming and the environment. Furthermore, the land is home to a wide range of increasingly under pressure wildlife from deer, buzzards, red kites, foxes, badgers, numerous bat species including lesser and greater horseshoe bats as well as the smaller mammals and life to support them. All that would be lost. Backwell as a village has little in the way of employment, certainly nothing that would support more than a handful of those that would buy houses in these new developments. Similarly, as a village the infrastructure and services would not cope with the increase in numbers. Getting GP or nurse appointments is already very difficult (I recently was sent to Clevedon minor injuries because a required appointment made a week earlier was cancelled and no care could be provided even in the wider practice for another week). There are waiting lists for local clubs like football and scouts with people already in the village on them with low chances of getting places. There are only small convenience stores, not suitable for weekly family shopping requiring travel to Nailsea or Ashton Gate, both of which aren’t really feasible on the public transport. As a resident on Backwell Common, I am very concerned about the new road plans as well. Firstly in it destroys so much agricultural land which is part of the flood plain and does regularly flood, a problem that would be increased by further loss of land, and increased runoff. Secondly the suggestion to cut us off from the rest of the village by pedestrianizing a section. The bridge on Chapel Hill floods constantly whenever there is heavy rain (three times in the last two weeks, with at least two cars written off), so to get to the A370 we have to travel towards station road. This just highlights how little consideration or care has been given to the impact on existing residents. All year, but especially during the summer months Backwell Common and the fields cited for development are used by walkers, runners, cyclists not just from Backwell but our neighboring villages and further afield. Carving up so much, and adding so much extra traffic that it will bring will destroy the character of the whole area and the benefits people get from exercising and taking time to relax in a calm and quiet area off the main roads. Backwell in under siege from property developers (Grove farm, Farleigh Fields, Rodney Road etc), it is incredibly stressful to be constantly seeing another part targeted again and again with applications until they are successful. Whilst it is just a business to these people it is our lives, it’s where we are trying to raise our children. We the residents must have some consideration when looking at these plans, they can’t be allowed to negatively affect so many people time and time again.			

Name: D Manaei **I.D:** 62831041

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Land at Leighton Crescent	No	• Positively prepared • Justified • Consistent	No	No	Site is an SSSI, there are badger runs and plentiful wildlife you cannot displace. Notes from Bleadon Parish meeting details a Church Covenant which states only 5 houses per acre which this plan would not follow. Highways England would need to deem Road safe to have foot path	Need to factor in wider road access and pedestrian foot paths, how would this happen with existing properties either side ? Bleadon Parish discussed this development 10 Years ago, nothing has changed from the many reasons why this site was rejected then to allow for this development to be suitably welcomed or		Minutes-P54.pdf

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		with national policy			installed. The drainage this site would require could have detrimental effects on the existing homes in Bleadon at the bottom of this land.	practical.		

Name: D Melton **I.D:** 21418817

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I wish to object based on concerns about excessive growth, insufficient infrastructure, environmental harm, and conflicts with national planning policy. 1. Excessive Growth in Backwell Backwell has already experienced approval for a substantial number of new homes, amounting to a significant increase in the size of the village. The proposed additional housing allocation would result in disproportionate expansion, placing pressure on the village's character and resources. Backwell is allocated more homes than any other village in the district, yet there is no robust evidence demonstrating the need or viability for such extensive growth. 2. Strain on Infrastructure and Services There is limited evidence that infrastructure and services could adequately support this level of development. • The proposed new road is unlikely to significantly reduce congestion on local routes such as Station Road, Backwell Common, or Chapel Hill, and its construction, potentially involving the railway, may be technically and financially challenging. • Local schools already face capacity issues, and there is no clear strategy to expand health services, leisure facilities, or community infrastructure to meet increased demand. • Backwell railway station remains small, inaccessible for people with mobility challenges, and impractical for families, limiting its role as an effective transport hub. • The Infrastructure Delivery Plan lacks sufficient detail on costs and funding commitments, leaving doubt over the timely delivery of essential infrastructure alongside housing growth. 3. Environmental and Heritage Impacts The plan threatens important natural and heritage assets: • Proposed development would impact high-quality agricultural land, which is scarce in North Somerset. National policy emphasises the protection of the best and most versatile land to support food security. Once lost, this land cannot be restored. • Wildlife habitats would be damaged, including areas critical for rare species such as the Lesser and Greater Horseshoe Bats and the Brockley Maternity Roost. • Sites including Backwell Common and areas near Backwell Lake lie within flood-prone areas, and further development would increase flood risks. • The scale of development risks altering the character of the village and undermining the integrity of the Greenbelt. 4. Unsustainable Nature of Proposed Development The volume of planned housing in Backwell is unrealistic and potentially unmanageable: • Backwell is not a centre for employment, so the majority of residents would need to commute, exacerbating traffic congestion. • National policy requirements for affordable housing on Greenbelt land may reduce the funds developers can contribute to essential infrastructure, creating additional pressure on local services. • Delivering such rapid and large-scale growth within the plan period appears impractical and unsustainable. Conclusion For these reasons, I strongly object to the proposed additional housing in Backwell. The current plan does not convincingly demonstrate that the development is justified, deliverable, or in line with national policy on sustainable growth, protection of high-quality agricultural land, biodiversity, and flood risk management. I urge the Council to reconsider the scale of housing allocated to Backwell.			

Name: D Morris **I.D:** 51450913

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Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	No need for additional houses as BACKWELL already has 800 new houses approved 2) The proposed road would not help to alleviate already busy traffic to and from Nailsea on to Station Road as well as BACKWELL Common Chapel Hill. A road under or over the railway line would be unfeasible and extremely expensive. 3) With the approved 800 houses the Health Services and schools are already overstretched. Lack of infrastructure cannot support another 1000 houses. 4) BACKWELL is allocated higher number of houses than any other village in North Somerset. 5) BACKWELL is not an employment hub as most residents commute. 6) The proposed site is Grade 1 Agricultural land used for food crops and grazing. 7) Government policy states we must protect our best and most versatile land. 8) Development would destroy valuable wildlife habitats and harm biodiversity. 9) No funding guarantees available for new road or services. 10) Surrounding roads of the proposed area are prone to flooding. This would destroy the character of the village and importantly loss of green belt land. 11) Fields adjacent to BACKWELL Lake are on a flood plain and regularly flood. 12) The railway station is still not accessible for disabled people as well as for children and push chairs. 13) The sheer volume of growth with the required investment infrastructure and services over a very short period is destabilising,unsuitable and undeliverable. 14) BACKWELL has been very unfairly targeted for another 1000 houses on top of the approved 800 houses.			

Name: D Neilson **I.D:** 62813601

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Response to North Somerset Local Plan 2041 1. When I moved to Backwell in the late 50’s it was a beautiful and vibrant village not a dormitory town to Bristol, and that was why I chose it as a place to live. Since that time it has been targeted many times for housing development and during that period there has been no significant infrastructure development and certainly no increase or significant investment in health services. Also, the roads and pretty well the same as in the 60’s with no major investment or improvement. Consequently, when there are problems on the M5, as was the case the other day, the tailback from the crossroads in Backwell to nearly the dual carriageway on the Long Ashton by-pass. This is without the impact of the 800 houses already approved or the proposed 1,000 houses, each of which with an average of 2 cars giving 3,600 additional vehicles on the A370. This is not sustainable this shows that the current plan is not sound. Also there has been no needs or viability study carried out for these additional 1,000 houses. 2. There appears to be a new road proposed to link A370 to Station Road but there is no information as regards cots or who will be paying for this facility, which would be extremely expensive given it its proposed route either over or under the railway line, plus disruption to rail services for may months. This proposal is completely unsound. 3. The 800 home already approved, equates to a 40% increase for the village, with no proposal for extra services or infrastructure. A further 1,000 houses would completely overwhelm the already stretched infrastructure and services and is totally unsound and taken together equates to a 90% increase in the size of the village which is not only unsound but completely unsustainable. It would in fact turn Backwell Village into a town! 4. Without any new schools, dentists or doctors the existing ones would be totally overwhelmed. In fact, North Somerset itself in a recent statement that there would be no development unless it was accompanied by the appropriate increase in the local infrastructure and services. This clearly not the case with the currently approved and the proposed developments in Backwell. So North Somerset is going back on its own proposals. 5. There is only 7% Grade 1 agricultural land left in North Somerset, and the proposed development would be situated on such land, reducing yet further the land available for food crops and grazing. In fact, Government policy states that “we must protect the best and most versatile land” to safeguard food security. These proposals clearly contradict this policy and may, therefore, be illegal. 6. Backwell Common and the surrounding area are subject to flooding, and this development would seriously aggravate the situation. Also, Backwell Lake and the adjacent fields are subject regular flooding which is where the new road and house are planned. Again, supporting the fact that the plan is unsound. 7. The railway station is completely unsuitable as a transport hub as it is inaccessible for people with mobility issues and is challenging for people travelling with young children. 8. The proposal would also have a devastating effect on the local wildlife and in particular the lesser and greater horseshoe bats at Brockley which is an SSSI.			

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					9. Why is Backwell being singled out to take the lion’s share of new housing development compared to towns such as Clevedon who are only taking 2%? 10. In view of the above factors, I object strongly to the plan as it is unsound and unsustainable.			

Name: D Payne **I.D:** 62835905

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No		Unsure	Unsure	1. Scale of Development: 40% Growth Already Underway Backwell is already experiencing a 40% increase in housing due to existing approved or in-progress developments. Adding around 1,000 more dwellings would constitute massive overdevelopment, fundamentally altering the character, scale, and sustainability of our village. 2. No Deliverable Road Infrastructure — Severe Safety Risks The proposed new road—which is critical to the safety and functionality of the development— is not funded by developers, requires major engineering works over and under the railway, is potentially unfeasible or many years away, and has no guaranteed funding or timeline. Meanwhile, traffic from construction and eventual occupation will use: Backwell Common, Station Road, and Chapel Hill These roads are already unsafe, narrow, without pavements, and unable to accommodate heavy vehicles. Schoolchildren and pedestrians are already at risk. Increasing traffic here is genuinely dangerous and irresponsible. 3. Schools, Healthcare and Leisure Services Cannot Cope The local plan does not provide guarantees of: additional school places, expanded healthcare capacity, or improved leisure facilities. Adding around 1,000 homes would place intolerable strain on services that are already stretched. 4. Disproportionate Housing Allocation — 7% for Backwell Backwell has been allocated 7% of the district’s total housing requirement, a disproportionately high figure for a small village. Comparable areas, such as Clevedon, have allocations closer to 2%. This discrepancy is unfair, unbalanced, and unjustified.			

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					5. No Viability Assessment for 1,000 Homes There has been no meaningful viability analysis to demonstrate that the required infrastructure, services, and mitigation measures can be delivered alongside this scale of development. 6. Lack of Local Employment Backwell provides limited employment opportunities. Most residents commute, increasing road congestion and contradicting sustainable development goals. 7. No Social Cohesion Impact Assessment The proposal fails to consider how such rapid expansion will impact community cohesion, social wellbeing, and Backwell's village character. 8. Loss of Grade 1 Agricultural Land (Only 7% Left in North Somerset) The development would remove Grade 1 "Best and Most Versatile" agricultural land, which is: currently used for crops and grazing, nationally recognised as essential for long-term food security, and already extremely scarce (only 7% remains in North Somerset). 9. Government Policy Contradiction National policy explicitly states the need to "protect our best and most versatile land" to safeguard food production. This proposal directly contradicts government policy and actively undermines food resilience. 10. Irreversible Harm to Wildlife and Biodiversity This area supports a wide variety of wildlife, including: owls, birds of prey, foxes, badgers, bats, mice, kingfishers, and many other bird species. England is already one of the most nature-depleted countries in the world. Further loss of habitat here is irresponsible and unnecessary. 11. Threat to Horseshoe Bat Roost and SSSI The development area includes foraging land for the Brockley maternity roost, including lesser and greater horseshoe bats. These species rely on habitat that has already been reduced by recent developments. The proposals therefore risk harming a protected species and impacting a nearby SSSI, which is contrary to environmental law and planning guidance. 12. Infrastructure Delivery Plan is Not Credible			

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					The Infrastructure Delivery Plan contains: minimal analysis, no realistic costings, and no secured funding for essential infrastructure. Without the new road and service upgrades, the development would be catastrophic for local safety and functionality. 13. Backwell Common Floods Regularly As a resident, I can confirm that Backwell Common floods frequently during heavy rainfall. More housing will increase runoff and worsen flooding risks. 14. Strategic Growth Location Designation is Flawed Concerns include: loss of greenbelt and valued local green space, destruction of high-quality agricultural land, increased flooding risks, profound changes to local character, and extreme uncertainty over the feasibility, affordability, and timescale of the essential new road. 15. Proposed Road Sits on a Floodplain Backwell Lake, the reservoir, and adjacent fields—where the road is planned—are on known floodplains and flood regularly. This undermines the viability and safety of the proposed transport solution. 16. Affordable Housing Policy Trade-Off Government policy requires 50% affordable housing on greenbelt sites. However, this significantly reduces the financial contributions developers are able to make toward infrastructure—precisely what this scheme desperately needs. This creates a funding gap that makes the proposal even less deliverable. 17. Growth Speed is Unsustainable and Destabilising The combination of: rapid growth, insufficient infrastructure, unaddressed safety concerns, loss of green space, and lack of coherent planning renders the proposal unsustainable, poorly conceived, and practically undeliverable. It appears to prioritise housing targets over the safety, wellbeing, and sustainability of Backwell.			

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					18. The Railway “Transport Hub” is Not Fit for Purpose The plan relies heavily on Backwell Station as a transport hub, yet the station is: inaccessible to people with mobility issues, prams, or young children, outdated, unlikely to be upgraded in line with the development, and not capable of mitigating the traffic impact of 1,000 new homes. Conclusion This proposal represents overdevelopment without the infrastructure, environmental protection, or community planning required to make it safe or sustainable. It threatens safety, biodiversity, food security, village character, and essential services, and fails to comply with multiple national planning principles. I respectfully urge decision-makers to reject this allocation and seek more sustainable, evidence-based alternatives for meeting housing needs			

Name: D Smart **I.D:** 62727745

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The proposed allocation of Land at Tower Farm (≈ 400 homes) lies immediately beside Weston Big Wood — an ancient woodland and Site of Nature Conservation Interest (SNCI) managed by Woodland Trust and supported by Avon Wildlife Trust. The woodland forms part of the Gordano Valley ecological network and a nationally important habitat mosaic of open grassland, wetland and woodland. Not Justified There is no robust published alternatives assessment demonstrating that this sensitive site is the only or most appropriate option for growth. The loss of best and most versatile (BMV) farmland (Grade 2/3a by reference to the ALC dataset) and the risk of irreversible damage to the ancient woodland make this allocation unsuitable. Not Consistent with National Policy The allocation conflicts with the National Planning Policy Framework (NPPF) paragraphs 180–182, which require that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland) should be refused unless wholly exceptional reasons exist. The Council’s reference to an “ecological buffer” is vague, unenforceable and insufficient to address indirect impacts such as root-zone damage, hydrological change or wildlife disturbance. The Woodland Trust and Avon Wildlife Trust state that ancient woodland is irrecoverable once damaged. Moreover the Framework requires delivering biodiversity net gain, yet the allocation offers no clear mechanism for ensuring that outcome. Not Positively Prepared The location intensifies existing pressures in Portishead: schools, healthcare and			

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					transport infrastructure are already under strain (for example the A369 corridor). This peripheral site would likely increase private vehicle usage and pollution rather than support sustainable travel patterns, contrary to NPPF paragraphs 104–106. Not Effective Delivery depends on multiple unresolved dependencies: new school provision, bus service contributions, off-site biodiversity management, and upgrades to rights-of way/ buffer zones. No phasing plan, funding mechanism or legal agreement is published to secure these. Without such mechanisms the allocation cannot be considered deliverable within the plan period (NPPF paragraph 35(c)). Landscape & Connectivity The farmland/woodland edge acts as a critical ecological and landscape transition zone. Development here would fragment habitat, diminish the Gordano Valley wildlife corridor and erode the rural fringe character. Even with a buffer the visual and ecological intrusion into the woodland and surrounding landscape would be significant. Drainage & Hydrology Construction and built development would alter surface-water run-off and soil compaction on the former farmland, potentially affecting the hydrological regime that sustains the adjacent ancient woodland. The risk of nutrient runoff, altered infiltration and woodland root zone damage is material. Cumulative Impact When considered alongside other allocations in the Portishead area (such as Black Rock north of Clevedon Road), the combined pressure on ecology, infrastructure and transport is significant and undermines the Council’s commitments to nature recovery and sustainable growth. No modification short of removing the allocation entirely would make this site appropriate. Given its direct adjacency to ancient woodland, its loss would be irreversible and cannot be mitigated sufficiently. The land should instead be retained as undeveloped green space, managed to enhance biodiversity and provide sustainable public access, in line with the Avon Wildlife Trust’s 2030 Strategy and national “30 by 30” nature recovery goals. I do not support the the North Somerset Local Plan 2041 for the Tower Hill Farm location.			
Black Rock, north of Clevedon Road	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	Not Justified – Unsuitable location requiring off-site ecological mitigation The allocation of approximately 100 dwellings at Black Rock is not justified because the Council itself acknowledges that key environmental and ecological requirements cannot be met on-site, and must instead be located “off-site on land to the south-west”. This approach directly conflicts with NPPF paragraph 180(a), which requires avoidance of impact before remediation or off-site compensation is considered. The need for offset land demonstrates the inherent unsuitability of the site for development. There is no published evidence of less sensitive alternative sites being considered and discounted. Not Consistent with National Policy – Failure to protect and enhance biodiversity The approach of relying on off-site mitigation and a “suitable ecological buffer” illustrates a reactive rather than preventative approach to biodiversity protection. NPPF paragraphs 180–182 require Local Plans to conserve habitats, prevent deterioration of irreplaceable habitat, and deliver net gains for biodiversity. The	No modification would make this allocation acceptable. The need for off-site mitigation and multiple infrastructure dependencies shows the site is environmentally and logistically unsuitable for housing. The allocation should be removed entirely from Schedule 1. Instead, the land should remain open countryside, contributing to biodiversity and landscape value, in line with the Avon Wildlife Trust’s 2030 Strategy, Woodland Trust guidance and national biodiversity objectives.		

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					allocation fails this by offloading its ecological burden onto unspecified land, without securing long-term management or legal protection for compensatory habitats. It also conflicts with the Avon Wildlife Trust's 2030 Strategy, which emphasises restoration of 30 per cent of land for nature and enhancing landscape connectivity in the Gordano Valley. Not Positively Prepared – Unsustainable pattern of growth The site lies on the western approach to Portishead along Clevedon Road, where public transport is limited and local services are minimal. Residents would be heavily reliant on private vehicles to access schools, health care and employment. The fact that footways and new bus stop contributions are required underlines existing infrastructure inadequacy. This car-dependent pattern of development conflicts with the sustainable transport objectives of NPPF paragraphs 104–106. Not Effective – Unclear delivery and infrastructure dependencies The site depends on multiple off-site and third-party mitigations including ecological offset land, new footway construction, bus service contributions and delivery of a section of the Gordano Greenway. No clear funding mechanism, responsible delivery body, or phasing plan is identified in the Plan. Consequently, the allocation lacks deliverability and fails the effectiveness test under NPPF paragraph 35(c). Landscape & Setting The site lies within open countryside forming part of the rural setting of Portishead and the Gordano Valley. The expansion westwards into this part of the countryside would diminish the settlement edge, reduce landscape openness, and risk urbanising what should remain a transitional zone between town and countryside. Agriculture & Soils The farmland in question is likely to be of best and most versatile quality (Grade 2/3a) and its loss for housing is not justified when less sensitive land could be used. The Plan does not robustly demonstrate why this agricultural land must be released. Hydrology & Ecology Development on this edge farmland may affect surface-water drainage, soil compaction and wildlife connectivity into the adjoining woodlands and wetland systems associated with the Gordano Valley. The cumulative effect of development pressure in the area further stresses the ecological network. Cumulative Impact Combined with the Tower Farm allocation and other nearby proposals, the Black Rock site would add to cumulative ecological, transport and infrastructure burdens around Portishead – contrary to the Council's stated nature-recovery and sustainable growth objectives. I do not support the the North Somerset Local Plan 2041 for the Black Rock location.			

Name: D Treeby **I.D:** 56291297

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP10: Transport	No	• Effective	Yes	Yes	I do not believe this plan to be sound. The transport/road infrastructure within N Somerset has historically been beyond inadequate. Specifically around the village of Banwell. After almost a century of horrific traffic for both commuters and residents a suitable bypass has finally been approved. However, this simply fixes a historic infrastructure issue, it does not cater for increased traffic capacity when existing roads are already significantly over. Whilst I understand, for the council to spend money it must gain development opportunities in order to justify this to Westminster, this bypass is a single lane, 30mph country road. Not a commuter trunk road capable of large traffic volume. Given the council's plans for large residential developments to the East of WSM, this will place huge strain on a solution created to fix a historic issue, it does not increase capacity significantly if at all. The new bypass will be over capacity given the councils plan, with it being the only effective access inland from the coast.	Large, congested developments do not suit the topography of N Somerset. Roads do not have the necessary bandwidth to maintain acceptable traffic flow. I suggest splitting strategic development up to alleviate this. Heavily reducing development plans Woolvershill Batch, and adding development in the vicinity of Bleadon along the A370 and to the East of Clevedon, to the north of Kenn, would alleviate hotspots of traffic, spreading out the traffic load on what are strained roads. Development to the North of Kenn would be my primary suggestion, with Clevedon clearly underdeveloped, and additional impact for far fewer existing residents. As well as a motorway junction providing great transport access. Key benefits are that this also diversifies routes inland as Davis Ln and Twickenham Rd could be more efficiently incorporated into the existing network. I suggest this would still allow the council to hit its development goals, whilst spreading out development. Which as I've explained, suits the county's historic infrastructure.		

Name: D Van Luttmer **I.D:** 58522241

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Justified	No	Unsure	NSC has not properly considered: Alternative brownfield or greenfield sites with far lower ecological impact, both in Portishead and across North Somerset. Opportunities to increase housing density on proposed brownfield sites, which could remove the need to develop Tower Farm and Black Rock. The strategic ecological importance of these sites in protecting Weston Big Wood (SSSI) and the Cordano Valley green corridor. The fact that both areas were added to the Green Belt in the late 1980s due to their high ecological value. National planning policy allows Green Belt changes only in exceptional circumstances - and these have not been demonstrated. In addition: Neither site can provide safe or suitable access. Development would create unacceptable transport impacts, failing national soundness tests. For these reasons Tower Farm and Black Rock should be removed from the Local Plan			

Name: D Watkins **I.D:** 58601089

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively	Unsure	Unsure	Backwell already has a significant number of new houses being built/approved at present and it currently does not have the infrastructure to support that number of cars, without adding any additional houses. The main route between Backwell and Nailsea is Station Road and this is already a problem area, with the secondary school exiting on to it, with narrow	The proposed new road needs to be		

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		prepared • Justified • Effective • Consistent with national policy			pavements, it already has had many accidents. There is a new road proposed in the Local Plan but would not be built until after the houses have been built and we feel the cost of putting a road either over or under the railway would be prohibitive and therefore Station Road would become even more dangerous. No houses should be approved until the new road has full funding and is built, it is essential that a new road is in place before any new permission is granted. We also feel that the local doctors would be put under extreme pressure and unable to cope with this large number of new houses with the patients that they would bring. Although Backwell has a railway station, it is not accessible for people with mobility issues and those travelling with prams and buggies, which therefore does not enable full use and travellers are forced to use their vehicles putting pressure on the already strained infrastructure. Backwell does not have many job opportunities and is mainly a commuter village and this just adds to the poor infrastructure issues. There is also a couple of fields that are detatched from the main fields and these have access onto Backwell common which is a lane and totally unsuitable for heavy traffic. These need to be removed from the plan. Until the infrastructure is improved and the proposed new road has been built, no new houses should be built or approved in Backwell for safety reasons. We fear the proposed road is not feasible due to cost and therefore these houses in Backwell need to be removed from the Local Plan.	fully funded and built before any permission for housing is granted.		

Name: D Williams **I.D:** 51428705

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Housing in this location should not be included in the Local Plan for numerous reasons to include: - Would lead to the loss of rare Grade I agricultural land at a time where food miles and safeguarding food security is of paramount importance. -This low lying area is liable to flooding in the winter months so the introduction of roads, buildings and hard standing would further exacerbate the issues. - Loss of green belt. - No planned increase in services such as doctors and schools - Very little employment in Backwell meaning everyone has to travel which creates further road congestion issues. - No guarantees a road would be funded by developers making traffic issues an even bigger problem. -Backwell is already being swamped with new housing with 800 homes already approved , increasing the population by 40% with suggested growth increasing by 55%, the highest for any village in the county. In summary, these houses must be accommodated elsewhere.			

Name: D Wilmott **I.D:** 62777793

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	This land is Grade 1 agricultural land used for crops a d grazing and should not be built on for food security. 800 new houses are already approved for Backwell and will cause local services e.g schools and health services to become overwhelmed. Another 1000 cannot be supported. Backwell is allocated far more houses than other villages in North Somerset. The proposed road over/under the railway bridge would be extremely expensive and if under would flood and not relieve congestion in Station Road. More houses will deplete the local wildlife. The railway station is inaccessible for people with mobility problems, the car park always seems quite full, many of the new houses would be too far away for people to walk, where would they park. The amount of growth over a short time would unstabilise the village and services.			

Name: DK Sayner **I.D:** 62848065

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Positively prepared	No	No	There has been a lack of community involvement and poor methods of consultation. No public meeting or exhibition has been held in Pill. Junction 19 of the M5 is fully saturated. National Highways have not completed their assessment of the motorway junction. Huge and life changing loss of greenspace and wildlife. These developments will increase the risk of flooding in Pill village nearby main roads and the M5. The A369 will not be able to cope with increased traffic to Bristol and the area of Abbots Leigh will buckle under the weight of traffic.	Public consulations with residents of Pill and surrounding areas. The Green Belt should be only released in exceptional circumstances. The plan is led by housing developers, no alternatives have been explored like Brownfield sites across the county.		

Name: DM Barter **I.D:** 62861025

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	This plan is Not Sound for several reasons, mainly the scale of the development and the devastating lack of supporting infrastructure and environmental protection. The proposal for another 1,000 houses, would take Backwell's housing growth to over an 80% total increase. With NO new infrastructure or services planned. The railway station is not currently fit for purpose as a transport hub, remaining inaccessible for people with mobility issues and challenging for those with young children. There are no propsal to improve this for the benefit of current and new residents to Backwell. The most concerning issue is that the proposed development is on precious GRADE 1 Agricultural GREENBELT Land. This land is the highest quality agricultural land, currently used for food crops and grazing. Only 7% of this Grade 1 land is left in the whole of North Somerset. Government policy clearly states we must protect our best land to safeguard food . The proposed growth for Backwell is unsustainable, and undeliverable due to the lack of infrastructure, and the unacceptable threat to our Grade 1 Greenbelt. I urge the Independent Inspector to reject this flawed plan.			

Name: DPC Contractors **I.D:** 51408961

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Corridor extending 10 metres either side of the railway land boundary fence to allow for access and	No	• Justified	Yes	Yes	The provision of a 10 metre rail safeguarding policy throughout the main line railway corridor is not supported through the evidence base. There is no reference to the need for it at all in the Transport Assessment. It is not justified, will cause planning blight and could not realistically be delivered and does not appear to have the support of the rail transport authority, Network Rail.	Removal of the safeguarding policy which extends either side of the railway from the Bristol boundary to the Somerset boundary, except as may be required to extend the passing track at		Reps on Schedule 7, Policy TR11 - Transport Infrastructure_ allocations and

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double track						Yatton.		safeguarded routes.docx Bristol to Exeter rail corridor strategic study (1).pdf

Name: Daisy Clayton **I.D:** 62833505

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Consistent with national policy	No	No	Tower Farm and Black Rock are not only home to an enormous amount of wildlife such as squirrels, birds and endless amounts of insects that are all so important to our ecosystem, but also provides a large vast green open space for cows, dogs being walked, children walking on their way to school that get to see open green spaces before sitting in a classroom all day. This area is in a Green belt area, which means changes can only happen in exceptional circumstances, these haven't been demonstrated? These fields also get extremely waterlogged, as someone who walks my dog there regularly I can tell you this first hand. If you were to build as many houses as you are proposing you would have to somehow drain the water, and what would happen to the water running down this hill along tarmac? I see no way that would not directly affect Western Big Wood below it which has so much wildlife including deer. As someone who lives on a hill in Portishead, who sees what happens to the bottom of my road after a heavy shower I do not want to get behind anymore buildings that will encourage even more flooding.	Do not build in an area that is protected. Look after the people you already have living in Portishead before adding more. Opportunities to increase housing density on proposed brownfield sites, which could remove the need to develop Tower Farm and Black Rock. Choose somewhere to develop that will have less ecological impact.		
Black Rock, north of Clevedon Road	No	• Consistent with national policy	No	No	Tower Farm and Black Rock are not only home to an enormous amount of wildlife such as squirrels, birds and endless amounts of insects that are all so important to our ecosystem, but also provides a large vast green open space for cows, dogs being walked, children walking on their way to school that get to see open green spaces before sitting in a classroom all day. This area is in a Green belt area, which means changes can only happen in exceptional circumstances, these haven't been demonstrated? These fields also get extremely waterlogged, as someone who walks my dog there regularly I can tell you this first hand. If you were to build as many houses as you are proposing you would have to somehow drain the water, and what would happen to the water running down this hill along tarmac? I see no way that would not directly affect Western Big Wood below it which has so much wildlife including deer. As someone who lives on a hill in Portishead, who sees what happens to the bottom of my road after a heavy shower I do not want to get behind anymore buildings that will encourage even more flooding.	Do not build in an area that is protected. Look after the people you already have living in Portishead before adding more. Opportunities to increase housing density on proposed brownfield sites, which could remove the need to develop Tower Farm and Black Rock. Choose somewhere to develop that will have less ecological impact.		

Name: Dan Clarke-Hall (Gibson Architecture) **I.D:** 51560705

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP1: Sustainable Development	No	• Effective	Unsure	Unsure	I believe the plan to disproprtionately affect small developers. I am unsure of the validity of the housing allocation, especially the windfall sites which I believe the plan overestimates. Windfall numbers are decreasing and flood, climate policy among others are making North Somerset incredibly unattractive to small to medium	My proposed modifications are included in the associated representation. Modification: Limit applicability to		Dan Clarke Hall.pdf

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					developers. The attached document includes all of my opinions on the plan. SP1 – Sustainable Development • Issue: Impossible for single dwellings to meet 10 overarching principles.	developments of 10 or more dwellings.		
SP8: Housing	No	• Effective	Unsure	Unsure	I believe the plan to disproprtionately affect small developers. I am unsure of the validity of the housing allocation, especially the windfall sites which I believe the plan overestimates. Windfall numbers are decreasing and flood, climate policy among others are making North Somerset incredibly unattractive to small to medium developers. The attached document includes all of my opinions on the plan.	My proposed modifications are included in the associated representation. SP8 – Housing • Issue: Windfall allowance (~3000 dwellings) is unrealistic given settlement boundaries, flood constraints, bat SAC, and conservation areas. • Modification: Reinstate the former policy permitting sites adjacent to settlement boundaries.		North Somerset Local Plan 2041 Consultation Response.pdf
Policy DP5: Climate change adaptation and resilience	No	• Effective	Unsure	Unsure	I believe the plan to disproprtionately affect small developers. I am unsure of the validity of the housing allocation, especially the windfall sites which I believe the plan overestimates. Windfall numbers are decreasing and flood, climate policy among others are making North Somerset incredibly unattractive to small to medium developers. The attached document includes all of my opinions on the plan. DP5 – Climate Change Adaptation and Resilience • Issue: Adaptation statement requirement is onerous for small sites.	My proposed modifications are included in the associated representation. DP5 – Climate Change Adaptation and Resilience • Modification: Apply only to developments of 10 or more dwellings.		Dan Clarke Hall.pdf
Policy DP6: Net zero construction	No	• Effective	Unsure	Unsure	I believe the plan to disproprtionately affect small developers. I am unsure of the validity of the housing allocation, especially the windfall sites which I believe the plan overestimates. Windfall numbers are decreasing and flood, climate policy among others are making North Somerset incredibly unattractive to small to medium developers. The attached document includes all of my opinions on the plan. DP6 – Net Zero Construction • Issue: Duplicates Building Regulations and deters developers, especially for small sites where no on-site fossil fuel use is challenging. • Modification: Delete or drastically pare back this policy to allow more flexibility for small developments, recognising practical constraints and viability issues. • Rationale: The requirement for no on-site fossil fuel use can be a significant barrier for small sites due to cost, space, and technical feasibility. A more proportionate approach would support small-scale development viability while maintaining overall energy efficiency and carbon reduction goals.	My proposed modifications are included in the associated representation. DP6 – Net Zero Construction • Modification: Delete or drastically pare back this policy to allow more flexibility for small developments, recognising practical constraints and viability issues.		Dan Clarke Hall.pdf
Policy DP9: Flood risk	No	• Effective	Unsure	Unsure	I believe the plan to disproportionately affect small developers. I am unsure of the validity of the housing allocation, especially the windfall sites which I believe the plan overestimates. Windfall numbers are decreasing and flood, climate policy among others are making North Somerset incredibly unattractive to small to medium developers. The attached document includes all of my opinions on the plan. DP9 – Flood Risk Issue: Sequential/Exception Tests required for all sites, even small schemes in defended flood zones. This blocks conversions in town centres where vacant retail frontages could be repurposed.	My proposed modifications are included in the associated representation. DP9 – Flood Risk • Modification: Exempt sites of 9 or fewer dwellings in Weston super Mare, Portishead, Clevedon, and Nailsea from Sequential/Exception Tests. Exempt sites of 4 or fewer dwellings in other settlement boundaries. Require mandatory flood resistant and resilient measures (raised sockets, resilient doors, concrete/tiled floors, CIRIA guidance).		Dan Clarke Hall.pdf

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						Allow conversion of redundant ground floor premises in defended flood zones, subject to resilience measures. Rationale: Flood risk assessments should be based on defended scenarios. Restricting conversions in town centres undermines regeneration, leaving dead frontages and vacant units that weaken vitality and heritage character.		
Policy DP21: Safeguarding employment sites	No	• Effective	Unsure	Unsure	I believe the plan to disproprtionately affect small developers. I am unsure of the validity of the housing allocation, especially the windfall sites which I believe the plan overestimates. Windfall numbers are decreasing and flood, climate policy among others are making North Somerset incredibly unattractive to small to medium developers. The attached document includes all of my opinions on the plan. DP21 – Safeguarding Employment Sites • Issue: Marketing requirements are onerous for small/remote sites with only 2–3 B2/ B8 units. • Modification: Exempt such small sites from marketing requirements.	My proposed modifications are included in the associated representation. DP21 – Safeguarding Employment Sites • Modification: Exempt such small sites from marketing requirements.		Dan Clarke Hall.pdf

Name: Dan Eastwood **I.D:** 62849441

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell already has 800 new houses approved, a 40% increase for the village. These additional numbers would lead to complete overdevelopment. Backwell is allocated a higher number of houses than any other village in North Somerset, and even a higher growth percentage than towns. Backwell is expected to take 7% of the district's housing allocation, compared to Clevedon's 2%.	Backwell already has 800 new houses approved, a 40% increase for the village. These additional numbers would lead to complete overdevelopment. Backwell is allocated a higher number of houses than any other village in North Somerset, and even a higher growth percentage than towns. Backwell is expected to take 7% of the district's housing allocation, compared to Clevedon's 2%.		

Name: Dan Hawkins **I.D:** 62865857

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Pill Green	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	1. Sustainability Appraisal Fails SEA Directive – No Assessment of Brownfield Alternatives to Pill Green (Quote Reg 12 / 2024 Brownfield Register 2,800+ units ignored) 2. No Duty to Cooperate on Bristol's 8,000 Unmet Need (No Statement of Common Ground; unilateral 1,100-home dump in	Policy as follows: "No development on Pill Green until exceptional circumstances are independently verified (NPPF para 147) and sequential testing confirms no viable non-Green Belt alternatives are available, prioritizing brownfield sites in Weston-super-Mare, Portishead and Bristol fringe. Cap total allocation across all sites; require full funding (via s106/CIL agreements) for flood defences to 1-in-1000 year standard + 45% climate change allowance, A369 and M5 J19 capacity upgrades, and additional school and GP places alongside associated additional community infrastructure before granting outline permission. Insert new para 6.7a: 'Allocations must demonstrate no disproportionate impact on village populations, defined as <5% increase in population by 2041.' Allocations in villages with a population under 10,000 must not result in a population increase of		

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					PIEG) 3. Green Belt Exceptional Circumstances Not Evidenced (NPPF 147) (Parcel identified as high-performing agricultural land; no sequential test) 4. 44% Population Bomb on Pill & Easton-in-Gordano – Disproportionate & Unjustified (600 homes = 24% from one site alone.) 5. No Deliverability Plan for A369, M5 J19, Schools, GP Access or Drainage by 2041 (Pill Green undeliverable = ineffective) 6. Brownfield First Policy Ignored – 2,500+ Viable Urban Units Still Available (Weston, Portishead, Bristol fringe) 7. Pill Green Breaches NPPF 159 – No Sequential Test for Non-Green-Belt Sites (Excellent sustainable transport links make urban/brownfield viable) 8. Request Independent Verification of “Exceptional Circumstances” Before Any Pill Green Consent 9. Cap Village Growth at <5% per site. (Reference: 1. 2017 JSP and previous Local Plan allocations, 2. NPPF 11 & 130(f): plans must be “deliverable” and avoid “adverse impacts” on local character and services. 3. Inspector decisions: Local Plan examinations have found allocations causing >10% population increase to be unsound unless supported by exceptional infrastructure evidence, which is absent here.)	more than 5% from any single site unless exceptional circumstances are independently verified and full infrastructure delivery (transport, education, health, drainage) is secured through s106/CIL. Underperformance products across all sites within a settlement must not exceed 20% without a master planned, funded delivery strategy.”		

Name: Dan Sweet **I.D:** 62850721

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land south of Nailsea	No	• Positively prepared • Justified	Unsure	Unsure	I wish to object to the proposed development on the grounds that it is neither sustainable nor in the long-term interests of Backwell or its residents. Local employment opportunities are extremely limited, yet the proposal offers no coherent plan for how new residents would secure work locally or how they would travel to employment without generating substantial additional car journeys. This lack of strategic foresight creates a fundamentally unsustainable pattern of development. Moreover, the proposals do nothing to improve access to genuinely affordable housing for local people. Instead, they serve			

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		• Effective • Consistent with national policy			primarily the financial interests of national housebuilders, who stand to profit from large-scale construction while offering little benefit to those already living in the area. The development represents short-term commercial gain rather than a meaningful or ethical response to local housing needs. The scheme would also result in the permanent loss of Grade 1 agricultural land, currently used for food crops and grazing. Only 7% of this high-quality land remains in North Somerset, making its protection vital for local and national food security. Government policy clearly states the need to safeguard “our best and most versatile land,” yet this proposal would sacrifice it for housing that is neither affordable nor justified. Once lost, this farmland—and the wildlife habitats it supports—can never be recovered. The irreversible destruction of such a valuable resource for the sake of developer profit represents a clear failure to prioritise long-term community resilience or environmental responsibility. Backwell already has 800 new houses approved, equating to a 40% increase in the village’s size. Adding a further 1,000 homes would amount to extreme overdevelopment. There is no evidence that the scale of growth proposed is either needed or deliverable. Crucially, despite the volume of new housing planned, local people are not being provided with housing that meets their financial realities. The development, much like others recently approved, risks further inflating local prices and pushing residents—especially younger families—further out of the area. Meanwhile, Backwell is already experiencing a deficit in school places, and there are no firm commitments to invest in healthcare, leisure facilities, or transport infrastructure. Despite this, the village has been allocated a higher proportion of new housing than any other village in North Somerset, and even more than some towns. No needs assessment or viability analysis has been provided to justify this disproportionate burden. Backwell is not an employment hub, and most residents commute, yet no social cohesion assessment has been completed. The proposals would also severely harm local biodiversity. The fields earmarked for development form part of a key habitat corridor in one of the world’s most nature-depleted countries. They are relied upon by protected species, including the rare Lesser and Greater Horseshoe Bats associated with the Brockley Maternity Roost and the nearby SSSI. The loss of this habitat would be permanent and impossible to mitigate effectively. The proposed new road does not offer a realistic solution to existing traffic congestion in Nailsea or on Station Road, Backwell Common, or Chapel Hill. Constructing it under or over the railway would be extraordinarily expensive and potentially unfeasible, yet the Infrastructure Delivery Plan lacks the necessary analysis, costings, or confirmed funding. This further highlights the speculative nature of the proposals. Flood risk is an additional major concern. Backwell Common and surrounding areas already flood regularly, and the fields adjacent to Backwell Lake (Reservoir) lie directly on a floodplain. Further development would exacerbate these risks significantly. The designation of this area as a strategic growth location raises serious concerns regarding landscape character, the loss of Green Belt and high-quality agricultural land, and the uncertainty of delivering essential infrastructure in time to support such extensive growth. Although government policy requires 50% affordable housing on Green Belt land, this in turn reduces developer contributions towards infrastructure, placing even greater pressure on already overstretched local services. Finally, the railway station—often cited as justification for dense development—remains wholly inadequate as a transport hub. It is inaccessible for those with mobility issues and difficult for families with young children, making it unrealistic to rely on as a primary transport solution for a development of this size. In summary, these proposals place developer profit before the needs, wellbeing, and future resilience of the community. The irreversible loss of valuable farmland and wildlife habitat, combined with a lack of infrastructure, affordability, and long-term planning, renders the development unsustainable and inappropriate. I therefore strongly urge that this application be refused.			
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent	Unsure	Unsure	I wish to object to the proposed development on the grounds that it is neither sustainable nor in the long-term interests of Backwell or its residents. Local employment opportunities are extremely limited, yet the proposal offers no coherent plan for how new residents would secure work locally or how they would travel to employment without generating substantial additional car journeys. This lack of strategic foresight creates a fundamentally unsustainable pattern of development. Moreover, the proposals do nothing to improve access to genuinely affordable housing for local people. Instead, they serve primarily the financial interests of national housebuilders, who stand to profit from large-scale construction while offering little benefit to those already living in the area. The development represents short-term commercial gain rather than a			

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		with national policy			meaningful or ethical response to local housing needs. The scheme would also result in the permanent loss of Grade 1 agricultural land, currently used for food crops and grazing. Only 7% of this high-quality land remains in North Somerset, making its protection vital for local and national food security. Government policy clearly states the need to safeguard “our best and most versatile land,” yet this proposal would sacrifice it for housing that is neither affordable nor justified. Once lost, this farmland—and the wildlife habitats it supports—can never be recovered. The irreversible destruction of such a valuable resource for the sake of developer profit represents a clear failure to prioritise long-term community resilience or environmental responsibility. Backwell already has 800 new houses approved, equating to a 40% increase in the village’s size. Adding a further 1,000 homes would amount to extreme overdevelopment. There is no evidence that the scale of growth proposed is either needed or deliverable. Crucially, despite the volume of new housing planned, local people are not being provided with housing that meets their financial realities. The development, much like others recently approved, risks further inflating local prices and pushing residents—especially younger families—further out of the area. Meanwhile, Backwell is already experiencing a deficit in school places, and there are no firm commitments to invest in healthcare, leisure facilities, or transport infrastructure. Despite this, the village has been allocated a higher proportion of new housing than any other village in North Somerset, and even more than some towns. No needs assessment or viability analysis has been provided to justify this disproportionate burden. Backwell is not an employment hub, and most residents commute, yet no social cohesion assessment has been completed. The proposals would also severely harm local biodiversity. The fields earmarked for development form part of a key habitat corridor in one of the world’s most nature-depleted countries. They are relied upon by protected species, including the rare Lesser and Greater Horseshoe Bats associated with the Brockley Maternity Roost and the nearby SSSI. The loss of this habitat would be permanent and impossible to mitigate effectively. The proposed new road does not offer a realistic solution to existing traffic congestion in Nailsea or on Station Road, Backwell Common, or Chapel Hill. Constructing it under or over the railway would be extraordinarily expensive and potentially unfeasible, yet the Infrastructure Delivery Plan lacks the necessary analysis, costings, or confirmed funding. This further highlights the speculative nature of the proposals. Flood risk is an additional major concern. Backwell Common and surrounding areas already flood regularly, and the fields adjacent to Backwell Lake (Reservoir) lie directly on a floodplain. Further development would exacerbate these risks significantly. The designation of this area as a strategic growth location raises serious concerns regarding landscape character, the loss of Green Belt and high-quality agricultural land, and the uncertainty of delivering essential infrastructure in time to support such extensive growth. Although government policy requires 50% affordable housing on Green Belt land, this in turn reduces developer contributions towards infrastructure, placing even greater pressure on already overstretched local services. Finally, the railway station—often cited as justification for dense development—remains wholly inadequate as a transport hub. It is inaccessible for those with mobility issues and difficult for families with young children, making it unrealistic to rely on as a primary transport solution for a development of this size. In summary, these proposals place developer profit before the needs, wellbeing, and future resilience of the community. The irreversible loss of valuable farmland and wildlife habitat, combined with a lack of infrastructure, affordability, and long-term planning, renders the development unsustainable and inappropriate. I therefore strongly urge that this application be refused.			

Name: Dan Wilmott **I.D:** 62865953

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Grove Farm	No	• Positively prepared • Justified	Unsure	Unsure	Backwell already has 800 new houses approved a 40% increase and more leads to over development.			

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		• Effective • Consistent with national policy						

Name: Danbywiske Limited **I.D:** 62794561

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP23: Monaghan Mushrooms, Stock Lane Langford Broad Location	Yes		Yes	Yes	N/A	Recommended Alterations to Draft Policy LP23 Wording “Land within the Monaghan Mushrooms broad location site boundary as identified on the Policies Map is identified as a potential suitable area to accommodate additional housing growth as a result of redevelopment, some of which is subject to the successful relocation of the existing Mushroom Farm business operations being secured elsewhere within North Somerset.” The suggested change to the draft policy wording above, would allow for this portion of the landholding to come forward for development in advance of the relocation of the existing mushroom farm operation.	Pegasus Group has been instructed on behalf of Danbywiske Limited to make the following representation in relation to Draft Policy LP23 (Monagham Mushrooms, Stock Lane Langford Broad Location) of the North Somerset Local Plan 2041: Pre-submission Plan (Reg 19). Danbywiske Limited are supportive of Draft Policy LP23 (as landowners of this broad site location that comprises Policy LP23 as identified on the Policies Map) and broadly consider it sound when assessed against NPPF Para 36. Outline planning permission (ref. 23/P/0448/OUT) has been secured for 120 dwellinghouses plus non-residential floorspace (including employment uses) on land which is currently surplus to the requirements of the existing operation. This draft non-strategic policy enables the redevelopment of the existing mushroom farm through the outline permission as well as the remaining land holdings in the event that the facility relocates to alternative premises within North Somerset. This is consistent with NPPF Chapter 11 in making efficient use of underutilised and previously developed land. However, in addition to the delivery of the outline planning permission, there is opportunity for some residential development to come forward within the broad location site boundary (as identified on the Policies Map) in advance of the relocation of the existing mushroom farm operations. In particular, there is an existing field within the northeastern portion of the landholding which is not constrained by the ongoing operations of the mushroom farm business (see Figure 1 in the attached document). This land is ‘deliverable’ as defined in NPPF Annex 2 since it is available now and forms part of the wider mushroom farm site allocation identified in Schedule 1 and the Policies Map.	P20-3277 NSC Local Plan Reg 19 Reps.pdf

Name: Daniel Bater **I.D:** 62814817

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell has already seen an additional 800 new houses approved. This is a 40% increase for the village which will lead to complete overdevelopment. The proposed road would not effectively serve Nailsea’s traffic or relieve congestion on Station Road, Backwell Common, or Chapel Hill. Engineering the road under or over the railway would be highly expensive and possibly unfeasible. It would simply serve to destroy habitat and cause light, noise and air pollution to local residents who already live adjacent to the proposed development areas. Despite significantly proposed population increase for backwell, there is a deficit in school places and no investment in health services or leisure facilities. The lack of infrastructure and services cannot support another 1,000 houses.			

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					Backwell is allocated a higher number of houses than any other village in North Somerset, and even a higher growth percentage than towns. Backwell is expected to take 7% of the district's housing allocation, compared To Clevedon's 2%. There is no justification for this, given the poor strategic location of this village. There is no needs or viability analysis for an extra 1,000 houses for Backwell. Backwell is not an employment hub, most residents commute, making this location a poor choice for development which will only serve to worsen traffic congestion into Bristol at rush hour. No social cohesion impact assessment has been provided for this development. This development is located on Grade 1 Agricultural Land currently used for food crops and grazing. There is only 7% of this high quality land left in the whole of North Somerset and this should be preserved instead of being seen as easy land for development. Government policy states that "we must protect our best and most versatile land" to safeguard food security. This development therefore contradicts government policy and undermine food security. Development would destroy valuable wildlife habitats and further harm biodiversity in one of the world's most Nature-depleted countries. This would include species such as bats, voles and amphibians which are abundant in this area. Specifically the proposals threaten the Brockley Maternity Roost and SSSI, with rare Lesser and Greater Horseshoe Bats Relying on the land for food. The Infrastructure Delivery Plan lacks analysis and costings, and there are no funding guarantees for the new road or services.the roadway is unlikely to be feasible and will be too technically complex. It will cross land that is regularly flooded by heavy rainfall. Backwell Common and surrounding areas are prone to surface water flooding, which would be aggravated by more housing. I have concerns regarding the strategic growth location designation which include the impact on the area's character, the loss of Greenbelt and high-quality agricultural land, the risk of flooding, and uncertainty over whether the road can be funded and delivered on time to support the proposed housing. Backwell Lake (Reservoir) and adjacent fields, where the new roads and housing is planned and are on a floodplain, which floods regularly. Government policy requires 50% affordable housing on Greenbelt Land, but this reduces the funds developers contribute towards infrastructure. It is unclear how the developer will contribute sufficiently to support the required infrastructure for the size and scale of the proposal. It's clear that the sheer volume of growth with the required investment infrastructure and services over such a short period Is destabilising, unsustainable and undeliverable. Backwell railway station is not fit for purpose as a transport hub; it remains inaccessible for people with mobility issues and presents serious challenges when travelling with young children. The platform is not sufficiently long to support increased volumes of passengers and walking routes are not suitable for significantly increases volumes of foot traffic.			

Name: Darren Nutting **I.D:** 62832065

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared	Unsure	Unsure	Proposed Housing Development by Mac Mic Strategic Land, East Backwell To: North Somerset Council Planning DepartmentRe: Objection to Proposed Development by Mac Mic Strategic Land (MMSL), East Backwell I am writing to register my strong objection to the proposed housing development by Mac Mic Strategic Land (MMSL) on			

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		• Justified • Effective • Consistent with national policy			land north of Farleigh Road, East Backwell. The scale, location, and underlying assumptions of the proposal make it unsound, unsustainable, and wholly incompatible with Backwell's environment, infrastructure, and community character. 1. The Proposed Link Road is Undeliverable, Unfunded, and Fundamentally Invalidates the Scheme The developer's justification for large-scale housing relies heavily on the assumption that a new link road — historically proposed to alleviate traffic and connect the area to strategic routes — will be delivered. However, this link road has been judged "not deliverable," removed from relevant strategic planning frameworks, and carries no identifiable funding. It is therefore nothing more than an aspiration with no real prospect of materialising. This is not a minor technicality: the viability of the entire development hinges on infrastructure that does not exist and that planning authorities themselves have acknowledged is unlikely ever to exist. To proceed with housing on this basis would be reckless. It would mean building first and hoping for infrastructure later — a pattern that has repeatedly led to long-term congestion, social strain, and costly retrofitting that local taxpayers are left to fund. 2. Severe and Unacceptable Impact on Local Traffic and Transport Backwell already suffers from peak-time congestion around the A370, Station Road, and road links into Nailsea. Without a deliverable link road — and with no realistic alternative transport solution proposed — the development would add hundreds of additional vehicle trips per day to an already overloaded network. The result would be: * Increased congestion and journey times * Spill-over traffic through village lanes not designed for high volumes * Higher air pollution in residential areas and near schools * Greater road safety risks for pedestrians and cyclists Approving a major development under these circumstances would fail even the most basic tests of transport sustainability. 3. Irreversible Loss of Green Belt Character and High-Quality Agricultural Land The development would destroy a large area of open countryside that forms a critical green buffer separating Backwell from Nailsea. These fields are not "spare land": they are Grade-1 agricultural land of national importance, and they play a vital role in preserving the rural setting and character of the village. Once this land is built over, it is gone forever. No amount of landscaping or token "green space" within an estate can compensate for the permanent loss of the village's natural setting and agricultural heritage. 4. Environmental and Biodiversity Harm The site supports a range of wildlife species, hedgerows, and ecological networks that contribute to Backwell's biodiversity. Large-scale housing would cause habitat loss, fragmentation, and disturbance, with impacts that cannot be "offset" meaningfully. At a time when councils and government bodies claim to prioritise climate resilience and nature recovery, approving a development that destroys active farmland, mature hedgerows, and wildlife corridors would be deeply contradictory. 5. Over-strain on Local Services and Infrastructure Backwell's schools, medical facilities, public transport, and utilities are already operating near capacity. Adding hundreds of homes without guaranteed upgrades to these services would create further pressure on: * GP waiting times * School place availability * Public transport reliability * Parking at Backwell & Nailsea Station * Water and drainage systems Without firm, costed, and funded infrastructure commitments — none of which the developer has provided — the proposal cannot be described as sustainable. 6. A Direct Conflict with the Character and Scale of Backwell Backwell is a village, not a strategic urban expansion zone. The proposal would effectively double the size of East Backwell, fundamentally altering its nature, community identity, and landscape. This level of growth far exceeds what local residents, planners, or the Neighbourhood Plan ever considered appropriate or sustainable. 7. No Community Mandate and Clear Local Opposition Backwell residents have consistently and democratically expressed their opposition to large-scale development in this location. The existing Neighbourhood Plan — approved by referendum — envisioned modest, proportionate growth, not speculative mass housebuilding driven by a land promoter rather than community need. To ignore this would be to disregard the clearly expressed wishes of the village and undermine faith in the planning process. Conclusion This proposal is fundamentally flawed. It depends on a link road that is unfunded and no longer considered deliverable, it threatens the environmental and agricultural fabric of Backwell, it overloads already stretched infrastructure, and it would irreversibly damage the character of the village.			

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					I therefore urge North Somerset Council to reject the application in full.			

Name: Dave Carroll **I.D:** 62906945

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm					Formal Objection to North Somerset Council Draft Local Plan Development Proposals for Portishead Down, Weston Big Wood, Tower Farm, and Black Rock EXECUTIVE SUMMARY I am writing to formally object to the proposed development of Portishead Down, Weston Big Wood, Tower Farm, and Black Rock as outlined in North Somerset Council's draft Local Plan [10]. These proposals represent a significant threat to protected green spaces, biodiversity, and community wellbeing. While I note that the Council is now consulting on the soundness and legality of the plan [10], I have serious concerns about whether the consultation is comprehensive, adequate, and properly addresses all the critical issues raised in this objection. This objection addresses: 1. Legal and process failures 2. Environmental protection concerns (SSSI, ancient woodland, biodiversity) 3. Discriminatory targeting of Portishead for green space sacrifice 4. Per-capita impact on existing residents 5. Transparency and accountability issues 6. Infrastructure capacity concerns 7. Climate change and carbon impact 8. All questions requiring Council response PART 1: LEGAL ARGUMENTS AND PROCESS CONCERNS 1.1 Consultation on Soundness and Legality Current Status: The Council is now consulting on the soundness and legality of the plan [10]. While this is welcome, I have serious concerns about whether the consultation is comprehensive and adequately addresses all soundness tests. Legal Requirements: • Under the Planning and Compulsory Purchase Act 2004 [1], Local Plans must be "sound" and comply with legal requirements • The National Planning Policy Framework (NPPF) [2] requires Local Plans to be: o Positively prepared - providing a strategy which meets objectively assessed development needs o Justified - based on proportionate evidence o Effective - deliverable over the plan period o Consistent with national policy - enabling the sustainable use of land Concerns About Consultation:			

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					• Is the consultation comprehensive enough to properly assess soundness? • Are all soundness tests being explicitly addressed? • Is sufficient information provided to enable proper assessment? • Are all stakeholders being adequately engaged? • Is the consultation period sufficient? Questions: • How is the Council ensuring that all four soundness tests are properly assessed? • What evidence is being provided to demonstrate soundness? • How are responses to the soundness consultation being evaluated? • Will the Council publish its assessment of soundness before the plan proceeds to examination? 1.2 Environmental Protection Legislation Statutory Protections: • Wildlife and Countryside Act 1981 [3] - Protection of habitats and species • Countryside and Rights of Way Act 2000 [4] - Protection of Sites of Special Scientific Interest (SSSI) • Environment Act 2021 [5] - Biodiversity net gain requirements (10% minimum) • Climate Change Act 2008 [6] - Carbon reduction obligations 1.3 Green Belt and Protected Landscape Considerations • Green Belt land should only be developed in "very special circumstances" (NPPF paragraph 144) [2] • NPPF paragraph 102 [2] provides strong protection for Local Green Spaces • Development should only be permitted in "very special circumstances" 1.4 Public Sector Equality Duty • Under the Equality Act 2010 [19], public authorities have a Public Sector Equality Duty • This requires consideration of how decisions affect people with protected characteristics • Development decisions must not discriminate or have disproportionate impact PART 2: ENVIRONMENTAL CONCERNS - CRITICAL PROTECTIONS 2.1 Site of Special Scientific Interest (SSSI) and Ancient Woodland Protection Critical Environmental Status: • Weston Big Wood is designated as a Site of Special Scientific Interest (SSSI) [16] - this is the highest level of statutory protection for wildlife sites in England • Ancient or Semi-Natural Woodland - These woodlands are irreplaceable habitats that have existed since at least 1600 AD [17] • Development adjacent to or affecting SSSIs requires exceptional			

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					justification under the Wildlife and Countryside Act 1981 [3] • The Countryside and Rights of Way Act 2000 [4] provides additional protection for SSSIs Expert Concerns: • Local wildlife expert Chris Sperring MBE has highlighted the ecological risks associated with these proposals [18] • Development threatens rare flora and fauna that depend on these protected habitats • Loss of habitat connectivity will fragment wildlife populations Legal Requirements: • Any development affecting SSSIs must demonstrate: o No reasonable alternative exists o Overriding public interest o Appropriate mitigation and compensation • Question: Has Natural England been properly consulted? What is their position? 2.2 Biodiversity Net Gain - Legally Binding Requirement Environment Act 2021 Requirements: • Mandatory 10% biodiversity net gain for all developments [5] • This must be measurable, deliverable, and maintained for at least 30 years • Loss of ancient woodland and SSSI habitat makes achieving net gain extremely difficult, if not impossible Critical Questions: • Can 10% net gain be achieved on-site given the loss of protected woodland? • If off-site compensation is proposed: o Where will this be located? o Is the compensation land of equivalent ecological value? o How will it be secured and maintained for 30 years? o Who will monitor and enforce this? 2.3 Climate Change Impact - Supreme Court Precedents Recent Legal Precedents (2024): • Horse Hill Oil Well Case (June 2024): UK Supreme Court ruled that planning authorities must consider the full environmental impact, including downstream greenhouse gas emissions, when approving projects [14]. This includes: o Emissions from construction o Emissions from use of developed land o Loss of carbon sequestration capacity o Long-term climate impacts • West Cumbria Coal Mine (September 2024): High Court ruled government approval unlawful due to inadequate consideration of environmental consequences [15] Application to This Development: • Loss of Carbon Sinks: Woodland acts as a vital carbon sink. Development would: o Remove existing carbon sequestration capacity o Release stored carbon from soil and vegetation o Eliminate future carbon capture potential			

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					• Embodied Carbon: Construction of new homes generates significant embodied carbon • Transport Emissions: Additional housing will increase car dependency and transport emissions • Urban Heat Island Effect: Loss of woodland increases local temperatures Legal Requirement: • The Council must conduct a comprehensive carbon impact assessment • This must include both direct and indirect emissions • Failure to do so could render the plan unlawful under recent Supreme Court precedents [14], [15] 2.4 Flood Risk - Critical Precedent Lynchmead Farm Case (North Somerset, 2024): • Planning Inspectorate upheld the Council's decision to refuse 75 houses due to flood risks [12] • This demonstrates that flood risk is a valid reason for refusal • Development increases impermeable surfaces, leading to: o Increased surface water runoff o Risk of flash flooding o Overwhelming of drainage systems o Impact on watercourses Question: What flood risk assessments have been conducted, and do they meet the standards that led to Lynchmead Farm refusal? 2.5 Air Quality and Public Health • Trees filter air pollution (particulate matter, nitrogen oxides, ozone) • Loss of woodland reduces natural air filtration • Increased traffic from development will worsen air quality • Poor air quality causes respiratory and cardiovascular disease • Children and elderly are particularly vulnerable PART 3: DISCRIMINATION AND EQUALITY - DISPROPORTIONATE TARGETING 3.1 The Key Discrimination - Double Burden Portishead is being asked to SACRIFICE PROTECTED GREEN SPACES (SSSI [16], ancient woodland [17]) to accommodate this growth [10] Weston-super-Mare is NOT being required to sacrifice equivalent protected green spaces [9] This is double discrimination: 1. Loss of green space amenity [10], [16], [17] - Protected green spaces destroyed 2. Increased competition for remaining amenities [7], [9] - significantly more people competing for same services Additional Critical Factors: • Portishead has higher average house prices than other areas in North Somerset [20] • Developers can achieve higher profit margins in Portishead [20]			

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					• Portishead is being singled out to sacrifice its most valuable protected green spaces [9], [10] • This suggests profit-driven targeting rather than equitable distribution [9], [20] • Portishead's smaller size (26,366 residents [7] vs ~85,000 in Weston-super-Mare [8]) means less capacity to absorb growth without significant impact Impact on Existing Residents: New residents will compete with existing Portishead residents for: • GP appointments (already under pressure) • School places (limited capacity) • Recreational facilities (will be reduced by loss of green spaces) • Road capacity (already congested) • Parking spaces Additional burden: Loss of green spaces means fewer recreational amenities available Infrastructure Capacity Per Capita: • Portishead's smaller size means infrastructure is less able to absorb growth • Smaller towns have less spare capacity in schools, healthcare, roads • Question: Has the Council assessed per-capita impact on existing residents' access to services? 3.2 Neighbourhood Plan Conflict Portishead Neighbourhood Plan: • Approved by referendum in July 2023 [11] • Represents the democratically expressed will of the community • Any development conflicting with the Neighbourhood Plan may be: o Unlawful o Discriminatory (ignoring community's expressed preferences) o Undemocratic Question: Do the proposed developments conflict with the Neighbourhood Plan? 3.3 Brownfield Development Programme Council's Own Strategy: • North Somerset Council has a brownfield development programme [13] • The Council has moved forward with delivering homes on brownfield sites • Question: Why is Portishead being asked to sacrifice green spaces when brownfield alternatives exist? Inequity: • If brownfield development is the Council's strategy [13], why is Portishead being treated differently [10]? • Are other areas being required to sacrifice green spaces, or only Portishead [9], [10]? • This suggests unequal treatment and potential discrimination [9], [10], [19]			

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					PART 4: TRANSPARENCY AND ACCOUNTABILITY 4.1 Unequal Access to Decision-Makers Critical Concern: • There is a lack of transparency regarding councillor meetings with different stakeholder groups • Question: Have councillors met more frequently with property developers than with local residents and environmental groups? • This raises concerns about: o Bias in decision-making - if developers have greater access to councillors o Unequal influence - if community voices are not heard equally o Accountability - if meetings are not properly recorded or declared o Conflicts of interest - if councillors have undeclared relationships with developers Evidence Required: • Records of councillor meetings with property developers • Records of councillor meetings with local residents and community groups • Records of councillor meetings with environmental organisations • Comparison of meeting frequency and access • Register of Interests - any undeclared relationships with developers Legal Implications: • Unequal access may breach principles of: o Fairness - all stakeholders should have equal opportunity to influence decisions o Transparency - public should know who influences decision-makers o Accountability - councillors should be accountable for their engagements o Public Sector Equality Duty [19] - decisions should not discriminate PART 5: INFRASTRUCTURE AND COMMUNITY IMPACT 5.1 Infrastructure Capacity Critical Questions: • Transport: Can local roads handle increased traffic? What about public transport? • Schools: Are there sufficient school places? • Healthcare: Can GP surgeries and hospitals accommodate new residents? • Water and Sewage: Is infrastructure adequate? • Utilities: Can electricity, gas, and broadband networks support development? Cost Implications: • Who pays for infrastructure improvements? • Will Council Tax increase to fund necessary upgrades? • Are developer contributions (CIL/S106) sufficient? 5.2 Loss of Green Space and Recreation Community Impact: • Portishead Down and Weston Big Wood are valuable community assets • Loss of recreational space for walking, cycling, and nature			

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					appreciation • Negative impact on physical and mental health • Reduction in accessible green space per capita (contrary to NPPF guidance [2]) 5.3 Character and Heritage • Development may fundamentally alter the character of Portishead • Loss of rural/woodland setting • Impact on views and landscape • Potential harm to heritage assets PART 6: LEGAL PRECEDENTS SUPPORTING OBJECTION 6.1 North Somerset Precedents Lynchmead Farm Case (2024): • Planning Inspectorate upheld North Somerset Council's decision to refuse 75 houses [12] • Reason: Future flood risks • Key Learning: Environmental concerns, particularly flood risk, are valid grounds for refusal • Application: If Portishead sites have flood risk, this precedent supports refusal Slade Road, Portishead: • Council deprioritized development following community opposition [13] • Key Learning: Organized community resistance can influence planning outcomes • Application: Demonstrates that community opposition in Portishead has previously been effective [13] 6.2 UK Supreme Court Precedents (2024) Horse Hill Oil Well Case (June 2024): • Ruling: Planning authorities must consider full environmental impact, including downstream emissions [14] • Outcome: Planning permissions quashed • Key Principle: Inadequate environmental assessment renders planning decisions unlawful • Application: Council must conduct comprehensive environmental assessment including carbon impact West Cumbria Coal Mine (September 2024): • High Court ruled government approval unlawful [15] • Reason: Inadequate consideration of environmental consequences • Application: Demonstrates that environmental concerns can successfully challenge planning decisions [14], [15] PART 7: ALL QUESTIONS FOR THE COUNCIL Legal and Process Questions: 1. How is the Council ensuring that the consultation on soundness and legality is comprehensive and addresses all four soundness tests (positively prepared, justified, effective, consistent with national policy)? 2. Has the Council complied with the duty to cooperate? 3. What evidence demonstrates that all reasonable alternatives have been considered? 4. How does the plan comply with the NPPF soundness tests [2]?			

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					5. What protected species surveys have been conducted? 6. How will 10% biodiversity net gain [5] be achieved? Infrastructure Questions: 7. What is the capacity of local roads, and what improvements are planned? 8. Are there sufficient school places, and where will new schools be located? 9. Can healthcare services accommodate additional residents? 10. Is water and sewage infrastructure adequate? 11. Who will pay for necessary infrastructure improvements? Environmental Questions: 12. What is the carbon impact of the proposed development? (Required by Supreme Court precedent [14]) 13. What flood risk assessments have been conducted, and do they meet the standards that led to Lynchmead Farm refusal [12]? 14. How will air quality be protected? 15. What measures will protect watercourses from pollution? 16. Is this ancient or semi-natural woodland [17], and if so, why is development proposed? 17. Has Natural England been consulted regarding the SSSI (Weston Big Wood) [16]? 18. Has the Council considered the Supreme Court ruling in Horse Hill (June 2024) [14] requiring full environmental impact assessment? Economic Questions: 19. What is the cost-benefit analysis of the development? 20. What is the value of ecosystem services that will be lost? 21. How will local businesses be affected? 22. What guarantees exist that developers will deliver promised infrastructure? Discrimination and Equality Questions: 23. Why is Portishead being asked to sacrifice protected green spaces when other areas are not required to make equivalent sacrifices [9]? 24. Has the Council assessed the per-capita impact on existing Portishead residents' access to amenities (GP appointments, school places, recreational facilities)? 25. Given Portishead's smaller size (26,366 residents [7]), how can it absorb significant new development without impact on existing residents' quality of life? 26. Why are Portishead residents being asked to bear a double burden: (1) loss of protected green spaces, and (2) increased competition for remaining amenities? 27. Has an Equality Impact Assessment been conducted, including per-capita impact analysis? 28. How does targeting Portishead (higher house prices [20]) comply with the Public Sector Equality Duty [19]? 29. Do the proposals conflict with the Portishead Neighbourhood Plan (approved by referendum [11])? 30. Why is Portishead being treated differently from other areas with brownfield development opportunities [13]? 31. What is the justification for targeting an area with higher property values for development? 32. How does this align with equitable distribution of development			

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					across North Somerset? 33. Given that Portishead is being asked to sacrifice protected green spaces, how is this equitable compared to other areas? Transparency and Accountability Questions: 34. How many meetings have councillors held with property developers in relation to the Local Plan, compared to meetings with local residents and environmental groups? 35. Are councillor appointment diaries publicly available, and if so, where can they be accessed? 36. Have any councillors declared interests in property development companies or land in areas proposed for development? 37. What proportion of Planning Committee meeting time has been allocated to developer presentations versus community group presentations? 38. How does the Council ensure equitable access to decision-makers for all stakeholder groups? PART 8: ALTERNATIVE SOLUTIONS 8.1 Brownfield First • Prioritise brownfield sites for development [13] • Use existing planning powers to bring forward brownfield land • Explore opportunities for urban regeneration 8.2 Density and Infill • Increase density in existing settlements • Focus on infill development • Redevelopment of underused sites • Conversion of existing buildings 8.3 Neighbouring Authorities • Work with neighbouring authorities to meet housing needs • Explore cross-boundary development opportunities • Share infrastructure and services PART 9: CONCLUSION The proposed development of Portishead Down, Weston Big Wood, Tower Farm, and Black Rock [10] represents a significant threat to our community's green spaces, biodiversity, and quality of life. While the Council is now consulting on the soundness and legality of the plan [10], I have serious concerns about whether this consultation is comprehensive enough and whether the plan meets the statutory soundness requirements [1], [2]. Critical Environmental Concerns: • Weston Big Wood is a Site of Special Scientific Interest (SSSI) [16] - the highest level of statutory protection [3], [4] • Development threatens ancient or semi-natural woodland [17] - irreplaceable habitats that have existed since at least 1600 AD • Recent Supreme Court precedents (2024) [14], [15] require comprehensive environmental assessment, including carbon impact • Biodiversity net gain (10%) [5] may be impossible to achieve given loss of protected habitat [16], [17] Evidence of Discriminatory Targeting:			

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					• Portishead is being asked to sacrifice protected green spaces [9], [10] • Other areas (e.g., Weston-super-Mare) [9] are not required to sacrifice equivalent green spaces • Per-capita impact: Portishead residents [7] face significant population increase while losing protected green spaces (SSSI [16], ancient woodland [17]) • Double burden: Portishead residents lose green space amenity [10] AND face increased competition for remaining amenities [7], [9] • Portishead has higher house prices [20], making development more profitable for developers • Smaller town size (26,366 [7] vs ~85,000 [8]) means less capacity to absorb growth without significant impact on existing residents • This suggests profit-driven targeting rather than equitable distribution [9], [20] • May breach Public Sector Equality Duty under Equality Act 2010 [19] Strong Legal Precedents: • Lynchmead Farm (North Somerset): Planning Inspectorate upheld refusal due to flood risk [12] • Horse Hill (Supreme Court 2024): Ruled planning must consider full environmental impact [14] • West Cumbria Coal Mine: Approval ruled unlawful due to inadequate environmental assessment [15] • These precedents support challenging the proposals on environmental grounds [12], [14], [15] I strongly urge North Somerset Council to: 1. Withdraw these proposals from the Local Plan 2. Prioritise brownfield development [13] and explore all alternatives 3. Ensure comprehensive consultation on soundness and legality addresses all concerns raised [1], [2] 4. Protect our green spaces for current and future generations 5. Engage meaningfully with the community on all planning decisions 6. Ensure equitable access to decision-makers for all stakeholder groups 7. Conduct Equality Impact Assessment including per-capita analysis [19] I reserve the right to: • Submit further evidence and representations • Present at the Local Plan examination • Pursue legal remedies if the process is flawed • Escalate concerns to the Planning Inspectorate and other relevant bodies I look forward to the Council's response and hope that these proposals will be reconsidered in light of the serious concerns raised. APPENDIX: REFERENCES [1] Planning and Compulsory Purchase Act 2004. Available at: https://www.legislation.gov.uk/ukpga/2004/5/contents [2] Ministry of Housing, Communities & Local Government. (2021). National Planning Policy Framework. Available at: https://www.gov.uk/government/publications/national-planning-policy-framework--2 [3] Wildlife and Countryside Act 1981. Available at: https://www.legislation.gov.uk/ukpga/1981/69 [4] Countryside and Rights of Way Act 2000. Available at:			

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					https://www.legislation.gov.uk/ukpga/2000/37/contents [5] Environment Act 2021. Available at: https://www.legislation.gov.uk/ukpga/2021/30/contents [6] Climate Change Act 2008. Available at: https://www.legislation.gov.uk/ukpga/2008/27/contents [7] Office for National Statistics. (2021). Census 2021: Population and household estimates for Portishead. Available at: https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland [8] Office for National Statistics. (2021). Census 2021: Population and household estimates for Weston-super-Mare. Available at: https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland [9] North Somerset Council. (2023). Draft Local Plan: Housing Allocation Distribution. Available at: https://n-somerset.gov.uk/my-services/planning-building-control/planning-policy/local-plan [10] Portishead Town Council. (2024). Local Plan Consultation: Development Proposals for Portishead Down, Weston Big Wood, Tower Farm, and Black Rock. Available at: https://www.portishead.gov.uk/local-plan [11] North Somerset Council. (2023). Portishead Neighbourhood Plan - Referendum Result (July 2023). Available at: https://n-somerset.gov.uk/my-services/planning-building-control/planning-policy/neighbourhood-plans/portishead-neighbourhood-plan [12] North Somerset Council. (2024). Planning Inspectorate Upholds Council Decision - Lynchmead Farm. Available at: https://n-somerset.gov.uk/news/planning-inspectorate-upholds-council-decision [13] North Somerset Council. (2024). Council Moves Forward Development Programme to Deliver Homes on Brownfield Sites. Available at: https://n-somerset.gov.uk/news/council-moves-forward-development-programme-deliver-homes-brownfield-sites [14] UK Supreme Court. (2024). R (on the application of Finch) v Surrey County Council [2024] UKSC 20 (Horse Hill Oil Well Case). Available at: https://www.supremecourt.uk/cases/uksc-2022-0069.html [15] High Court of Justice. (2024). R (on the application of Friends of the Earth) v Secretary of State for Levelling Up, Housing and Communities [2024] EWHC 2142 (Admin) (West Cumbria Coal Mine). Available at: https://www.bailii.org/ew/cases/EWHC/Admin/2024/2142.html [16] Natural England. (2024). Sites of Special Scientific Interest: Weston Big Wood. Available at: https://designatedsites.naturalengland.org.uk/ [17] Natural England. (2024). Ancient Woodland Inventory. Available at: https://www.gov.uk/government/collections/ancient-woodland-inventory [18] Portishead Town Council. (2024). Public Meeting: Have Your Say on Portishead's Future Development Plans - Expert Presentation by Chris Sperring MBE. Available at: https://www.portishead.gov.uk/news/2025/11/public-meeting-have-your-say-on-portisheads-future-development-plans [19] Equality Act 2010. Available at: https://www.legislation.gov.uk/ukpga/2010/15/contents [20] House Price Data - Portishead vs Other North Somerset Areas. • Land Registry House Price Index: https://www.gov.uk/government/statistical-data-sets/uk-house-price-index-data-downloads • Rightmove local area statistics			

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Black Rock, north of Clevedon Road					Formal Objection to North Somerset Council Draft Local Plan Development Proposals for Portishead Down, Weston Big Wood, Tower Farm, and Black Rock EXECUTIVE SUMMARY I am writing to formally object to the proposed development of Portishead Down, Weston Big Wood, Tower Farm, and Black Rock as outlined in North Somerset Council's draft Local Plan [10]. These proposals represent a significant threat to protected green spaces, biodiversity, and community wellbeing. While I note that the Council is now consulting on the soundness and legality of the plan [10], I have serious concerns about whether the consultation is comprehensive, adequate, and properly addresses all the critical issues raised in this objection. This objection addresses: 1. Legal and process failures 2. Environmental protection concerns (SSSI, ancient woodland, biodiversity) 3. Discriminatory targeting of Portishead for green space sacrifice 4. Per-capita impact on existing residents 5. Transparency and accountability issues 6. Infrastructure capacity concerns 7. Climate change and carbon impact 8. All questions requiring Council response PART 1: LEGAL ARGUMENTS AND PROCESS CONCERNS 1.1 Consultation on Soundness and Legality Current Status: The Council is now consulting on the soundness and legality of the plan [10]. While this is welcome, I have serious concerns about whether the consultation is comprehensive and adequately addresses all soundness tests. Legal Requirements: • Under the Planning and Compulsory Purchase Act 2004 [1], Local Plans must be "sound" and comply with legal requirements • The National Planning Policy Framework (NPPF) [2] requires Local Plans to be: o Positively prepared - providing a strategy which meets objectively assessed development needs o Justified - based on proportionate evidence o Effective - deliverable over the plan period o Consistent with national policy - enabling the sustainable use of land Concerns About Consultation: • Is the consultation comprehensive enough to properly assess soundness? • Are all soundness tests being explicitly addressed? • Is sufficient information provided to enable proper assessment? • Are all stakeholders being adequately engaged? • Is the consultation period sufficient? Questions:	Formal Objection to North Somerset Council Draft Local Plan Development Proposals for Portishead Down, Weston Big Wood, Tower Farm, and Black Rock EXECUTIVE SUMMARY I am writing to formally object to the proposed development of Portishead Down, Weston Big Wood, Tower Farm, and Black Rock as outlined in North Somerset Council's draft Local Plan [10]. These proposals represent a significant threat to protected green spaces, biodiversity, and community wellbeing. While I note that the Council is now consulting on the soundness and legality of the plan [10], I have serious concerns about whether the consultation is comprehensive, adequate, and properly addresses all the critical issues raised in this objection. This objection addresses: 1. Legal and process failures 2. Environmental protection concerns (SSSI, ancient woodland, biodiversity) 3. Discriminatory targeting of Portishead for green space sacrifice 4. Per-capita impact on existing residents 5. Transparency and accountability issues 6. Infrastructure capacity concerns 7. Climate change and carbon impact 8. All questions requiring Council response PART 1: LEGAL ARGUMENTS AND PROCESS CONCERNS 1.1 Consultation on Soundness and Legality Current Status: The Council is now consulting on the soundness and legality of the plan [10]. While this is welcome, I have serious concerns about whether the consultation is comprehensive and adequately addresses all soundness tests. Legal Requirements: • Under the Planning and Compulsory Purchase Act 2004 [1], Local Plans must be "sound" and comply with legal requirements • The National Planning Policy Framework (NPPF) [2] requires Local Plans to be: o Positively prepared - providing a strategy which meets objectively assessed development needs o Justified - based on proportionate evidence o Effective - deliverable over the plan period o Consistent with national policy - enabling the sustainable use of land Concerns About Consultation: • Is the consultation comprehensive enough to properly assess soundness? • Are all soundness tests being explicitly addressed? • Is sufficient information provided to enable proper assessment? • Are all stakeholders being adequately engaged? • Is the consultation period sufficient? Questions: • How is the Council ensuring that all four soundness tests are properly assessed? • What evidence is being provided to demonstrate soundness? • How are responses to the soundness consultation being evaluated? • Will the Council publish its assessment of soundness before the plan proceeds to examination? 1.2 Environmental Protection Legislation Statutory Protections: • Wildlife and Countryside Act 1981 [3] - Protection of habitats and		

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					• Any development affecting SSSIs must demonstrate: o No reasonable alternative exists o Overriding public interest o Appropriate mitigation and compensation • Question: Has Natural England been properly consulted? What is their position? 2.2 Biodiversity Net Gain - Legally Binding Requirement Environment Act 2021 Requirements: • Mandatory 10% biodiversity net gain for all developments [5] • This must be measurable, deliverable, and maintained for at least 30 years • Loss of ancient woodland and SSSI habitat makes achieving net gain extremely difficult, if not impossible Critical Questions: • Can 10% net gain be achieved on-site given the loss of protected woodland? • If off-site compensation is proposed: o Where will this be located? o Is the compensation land of equivalent ecological value? o How will it be secured and maintained for 30 years? o Who will monitor and enforce this? 2.3 Climate Change Impact - Supreme Court Precedents Recent Legal Precedents (2024): • Horse Hill Oil Well Case (June 2024): UK Supreme Court ruled that planning authorities must consider the full environmental impact, including downstream greenhouse gas emissions, when approving projects [14]. This includes: o Emissions from construction o Emissions from use of developed land o Loss of carbon sequestration capacity o Long-term climate impacts • West Cumbria Coal Mine (September 2024): High Court ruled government approval unlawful due to inadequate consideration of environmental consequences [15] Application to This Development: • Loss of Carbon Sinks: Woodland acts as a vital carbon sink. Development would: o Remove existing carbon sequestration capacity o Release stored carbon from soil and vegetation o Eliminate future carbon capture potential • Embodied Carbon: Construction of new homes generates significant embodied carbon • Transport Emissions: Additional housing will increase car dependency and transport emissions • Urban Heat Island Effect: Loss of woodland increases local temperatures Legal Requirement: • The Council must conduct a comprehensive carbon impact assessment • This must include both direct and indirect emissions • Failure to do so could render the plan unlawful under recent Supreme Court precedents [14], [15]	o Where will this be located? o Is the compensation land of equivalent ecological value? o How will it be secured and maintained for 30 years? o Who will monitor and enforce this? 2.3 Climate Change Impact - Supreme Court Precedents Recent Legal Precedents (2024): • Horse Hill Oil Well Case (June 2024): UK Supreme Court ruled that planning authorities must consider the full environmental impact, including downstream greenhouse gas emissions, when approving projects [14]. This includes: o Emissions from construction o Emissions from use of developed land o Loss of carbon sequestration capacity o Long-term climate impacts • West Cumbria Coal Mine (September 2024): High Court ruled government approval unlawful due to inadequate consideration of environmental consequences [15] Application to This Development: • Loss of Carbon Sinks: Woodland acts as a vital carbon sink. Development would: o Remove existing carbon sequestration capacity o Release stored carbon from soil and vegetation o Eliminate future carbon capture potential • Embodied Carbon: Construction of new homes generates significant embodied carbon • Transport Emissions: Additional housing will increase car dependency and transport emissions • Urban Heat Island Effect: Loss of woodland increases local temperatures Legal Requirement: • The Council must conduct a comprehensive carbon impact assessment • This must include both direct and indirect emissions • Failure to do so could render the plan unlawful under recent Supreme Court precedents [14], [15] 2.4 Flood Risk - Critical Precedent Lynchmead Farm Case (North Somerset, 2024): • Planning Inspectorate upheld the Council's decision to refuse 75 houses due to flood risks [12] • This demonstrates that flood risk is a valid reason for refusal • Development increases impermeable surfaces, leading to: o Increased surface water runoff o Risk of flash flooding o Overwhelming of drainage systems o Impact on watercourses Question: What flood risk assessments have been conducted, and do they meet the standards that led to Lynchmead Farm refusal? 2.5 Air Quality and Public Health • Trees filter air pollution (particulate matter, nitrogen oxides, ozone) • Loss of woodland reduces natural air filtration • Increased traffic from development will worsen air quality • Poor air quality causes respiratory and cardiovascular disease • Children and elderly are particularly vulnerable PART 3: DISCRIMINATION AND EQUALITY - DISPROPORTIONATE TARGETING 3.1 The Key Discrimination - Double Burden Portishead is being asked to SACRIFICE PROTECTED GREEN		

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While the Council is now consulting on the soundness and legality of the plan [10], I have serious concerns about whether this consultation is comprehensive enough and whether the plan meets the statutory soundness requirements [1], [2]. Critical Environmental Concerns: • Weston Big Wood is a Site of Special Scientific Interest (SSSI) [16] - the highest level of statutory protection [3], [4] • Development threatens ancient or semi-natural woodland [17] - irreplaceable habitats that have existed since at least 1600 AD • Recent Supreme Court precedents (2024) [14], [15] require comprehensive environmental assessment, including carbon impact • Biodiversity net gain (10%) [5] may be impossible to achieve given loss of protected habitat [16], [17] Evidence of Discriminatory Targeting: • Portishead is being asked to sacrifice protected green spaces [9], [10] • Other areas (e.g., Weston-super-Mare) [9] are not required to sacrifice equivalent green spaces • Per-capita impact: Portishead residents [7] face significant population increase while losing protected green spaces (SSSI [16], ancient woodland [17]) • Double burden: Portishead residents lose green space amenity [10] AND face increased competition for remaining amenities [7], [9] • Portishead has higher house prices [20], making development more profitable for developers • Smaller town size (26,366 [7] vs ~85,000 [8]) means less capacity to absorb growth without significant impact on existing residents • This suggests profit-driven targeting rather than equitable distribution [9], [20] • May breach Public Sector Equality Duty under Equality Act 2010 [19] Strong Legal Precedents: • Lynchmead Farm (North Somerset): Planning Inspectorate upheld refusal due to flood risk [12] • Horse Hill (Supreme Court 2024): Ruled planning must consider full environmental impact [14] • West Cumbria Coal Mine: Approval ruled unlawful due to inadequate environmental assessment [15] • These precedents support challenging the proposals on		

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Withdraw these proposals from the Local Plan 2. Prioritise brownfield development [13] and explore all alternatives 3. Ensure comprehensive consultation on soundness and legality addresses all concerns raised [1], [2] 4. Protect our green spaces for current and future generations 5. Engage meaningfully with the community on all planning decisions 6. Ensure equitable access to decision-makers for all stakeholder groups 7. Conduct Equality Impact Assessment including per-capita analysis [19] I reserve the right to: • Submit further evidence and representations • Present at the Local Plan examination • Pursue legal remedies if the process is flawed • Escalate concerns to the Planning Inspectorate and other relevant bodies I look forward to the Council's response and hope that these proposals will be reconsidered in light of the serious concerns raised. APPENDIX: REFERENCES [1] Planning and Compulsory Purchase Act 2004. Available at: https://www.legislation.gov.uk/ukpga/2004/5/contents [2] Ministry of Housing, Communities & Local Government. (2021). National Planning Policy Framework. Available at: https://www.gov.uk/government/publications/national-planning-policy-framework--2 [3] Wildlife and Countryside Act 1981. Available at: https://www.legislation.gov.uk/ukpga/1981/69 [4] Countryside and Rights of Way Act 2000. Available at: https://www.legislation.gov.uk/ukpga/2000/37/contents [5] Environment Act 2021. Available at: https://www.legislation.gov.uk/ukpga/2021/30/contents [6] Climate Change Act 2008. Available at: https://www.legislation.gov.uk/ukpga/2008/27/contents [7] Office for National Statistics. (2021). Census 2021: Population and household estimates for Portishead. Available at: https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland [8] Office for National Statistics. (2021). 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Available at: https://n-		

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					• Lynchmead Farm (North Somerset): Planning Inspectorate upheld refusal due to flood risk [12] • Horse Hill (Supreme Court 2024): Ruled planning must consider full environmental impact [14] • West Cumbria Coal Mine: Approval ruled unlawful due to inadequate environmental assessment [15] • These precedents support challenging the proposals on environmental grounds [12], [14], [15] I strongly urge North Somerset Council to: 1. Withdraw these proposals from the Local Plan 2. Prioritise brownfield development [13] and explore all alternatives 3. Ensure comprehensive consultation on soundness and legality addresses all concerns raised [1], [2] 4. Protect our green spaces for current and future generations 5. Engage meaningfully with the community on all planning decisions 6. Ensure equitable access to decision-makers for all stakeholder groups 7. Conduct Equality Impact Assessment including per-capita analysis [19] I reserve the right to: • Submit further evidence and representations • Present at the Local Plan examination • Pursue legal remedies if the process is flawed • Escalate concerns to the Planning Inspectorate and other relevant bodies I look forward to the Council's response and hope that these proposals will be reconsidered in light of the serious concerns raised. APPENDIX: REFERENCES [1] Planning and Compulsory Purchase Act 2004. Available at: https://www.legislation.gov.uk/ukpga/2004/5/contents [2] Ministry of Housing, Communities & Local Government. (2021). National Planning Policy Framework. Available at: https://www.gov.uk/government/publications/national-planning-policy-framework--2 [3] Wildlife and Countryside Act 1981. Available at: https://www.legislation.gov.uk/ukpga/1981/69 [4] Countryside and Rights of Way Act 2000. Available at: https://www.legislation.gov.uk/ukpga/2000/37/contents [5] Environment Act 2021. Available at: https://www.legislation.gov.uk/ukpga/2021/30/contents [6] Climate Change Act 2008. Available at: https://www.legislation.gov.uk/ukpga/2008/27/contents [7] Office for National Statistics. (2021). Census 2021: Population and household estimates for Portishead. Available at: https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland [8] Office for National Statistics. (2021). Census 2021: Population and household estimates for Weston-super-Mare. Available at: https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland [9] North Somerset Council. (2023). Draft Local Plan: Housing Allocation Distribution. Available at: https://n-somerset.gov.uk/my-services/planning-building-control/planning-policy/local-plan [10] Portishead Town Council. (2024). Local Plan Consultation: Development Proposals for Portishead Down, Weston Big Wood, Tower	somerset.gov.uk/news/planning-inspectorate-upholds-council-decision [13] North Somerset Council. (2024). Council Moves Forward Development Programme to Deliver Homes on Brownfield Sites. Available at: https://n-somerset.gov.uk/news/council-moves-forward-development-programme-deliver-homes-brownfield-sites [14] UK Supreme Court. (2024). R (on the application of Finch) v Surrey County Council [2024] UKSC 20 (Horse Hill Oil Well Case). Available at: https://www.supremecourt.uk/cases/uksc-2022-0069.html [15] High Court of Justice. (2024). R (on the application of Friends of the Earth) v Secretary of State for Levelling Up, Housing and Communities [2024] EWHC 2142 (Admin) (West Cumbria Coal Mine). Available at: https://www.bailii.org/ew/cases/EWHC/Admin/2024/2142.html [16] Natural England. (2024). Sites of Special Scientific Interest: Weston Big Wood. Available at: https://designatedsites.naturalengland.org.uk/ [17] Natural England. (2024). Ancient Woodland Inventory. Available at: https://www.gov.uk/government/collections/ancient-woodland-inventory [18] Portishead Town Council. (2024). Public Meeting: Have Your Say on Portishead's Future Development Plans - Expert Presentation by Chris Sperring MBE. Available at: https://www.portishead.gov.uk/news/2025/11/public-meeting-have-your-say-on-portisheads-future-development-plans [19] Equality Act 2010. Available at: https://www.legislation.gov.uk/ukpga/2010/15/contents [20] House Price Data - Portishead vs Other North Somerset Areas. • Land Registry House Price Index: https://www.gov.uk/government/statistical-data-sets/uk-house-price-index-data-downloads • Rightmove local area statistics		

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					Farm, and Black Rock. Available at: https://www.portishead.gov.uk/local-plan [11] North Somerset Council. (2023). Portishead Neighbourhood Plan - Referendum Result (July 2023). Available at: https://n-somerset.gov.uk/my-services/planning-building-control/planning-policy/neighbourhood-plans/portishead-neighbourhood-plan [12] North Somerset Council. (2024). Planning Inspectorate Upholds Council Decision - Lynchmead Farm. Available at: https://n-somerset.gov.uk/news/planning-inspectorate-upholds-council-decision [13] North Somerset Council. (2024). Council Moves Forward Development Programme to Deliver Homes on Brownfield Sites. Available at: https://n-somerset.gov.uk/news/council-moves-forward-development-programme-deliver-homes-brownfield-sites [14] UK Supreme Court. (2024). R (on the application of Finch) v Surrey County Council [2024] UKSC 20 (Horse Hill Oil Well Case). Available at: https://www.supremecourt.uk/cases/uksc-2022-0069.html [15] High Court of Justice. (2024). R (on the application of Friends of the Earth) v Secretary of State for Levelling Up, Housing and Communities [2024] EWHC 2142 (Admin) (West Cumbria Coal Mine). Available at: https://www.bailii.org/ew/cases/EWHC/Admin/2024/2142.html [16] Natural England. (2024). Sites of Special Scientific Interest: Weston Big Wood. Available at: https://designatedsites.naturalengland.org.uk/ [17] Natural England. (2024). Ancient Woodland Inventory. Available at: https://www.gov.uk/government/collections/ancient-woodland-inventory [18] Portishead Town Council. (2024). Public Meeting: Have Your Say on Portishead's Future Development Plans - Expert Presentation by Chris Sperring MBE. Available at: https://www.portishead.gov.uk/news/2025/11/public-meeting-have-your-say-on-portisheads-future-development-plans [19] Equality Act 2010. Available at: https://www.legislation.gov.uk/ukpga/2010/15/contents [20] House Price Data - Portishead vs Other North Somerset Areas. • Land Registry House Price Index: https://www.gov.uk/government/statistical-data-sets/uk-house-price-index-data-downloads • Rightmove local area statistics			

Name: Dave Derrick **I.D:** 62865153

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Justified	Unsure	Unsure	It's unsound. The land should not be used. Backwell doesn't have the infrastructure to support more houses.			

Name: Dave Hayler **I.D:** 14181057

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP6: Villages and rural areas	Yes							

Name: Dave Mazur **I.D:** 62776865

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	My Response to the Local Plan I do not believe the Local Plan is sound in its current form for the following reasons: 1. Inadequate Selection of Sustainable Development Sites The sites chosen are not the most sustainable options available. They come with high environmental, heritage and flood-related impacts and do not effectively address the area's housing requirements. Other, more suitable and sustainable alternatives across North Somerset have not been properly explored. 2. Insufficient Assessment of Flood Risk Flood risk has not been properly evaluated for proposed development in Nailsea and Backwell—particularly at Poplar Farm (west of Nailsea), land east of Backwell, land south of Nailsea, and the associated road infrastructure. As a result, Policy LP3 cannot be considered sound. 3. Failure to Meet Walkable-Neighbourhood and Accessibility Standards All of the proposed housing sites in Nailsea sit well beyond the 800-metre walkable-neighbourhood guideline. They do not prioritise access to local services, facilities or employment, contradicting the Plan's own stated aims. Moreover, the Plan offers no strategy for improving local job opportunities. 4. Overdependence on a Railway Station Already Identified as Inadequate The Plan puts significant weight on the railway station, yet simultaneously acknowledges its shortcomings—no step-free access, insufficient shelter, poor safety, and limited cycle parking. No measures are proposed to address these issues. The station is also outside a reasonable walking or cycling catchment, and cycle access is further hindered by the accident hotspot at Bucklands Batch. 5. Lack of Evidence for Transport Mitigation or Deliverable Infrastructure Nailsea is already constrained by its transport network, yet the Plan provides no evidence that proposed mitigation—such as the so-called "strategic rail link"—is designed, funded or deliverable. Even if it were viable, it would not be completed ahead of development and therefore cannot be relied upon. This undermines the soundness of the proposals. 6. Reliance on Vague Aspirations Instead of Clear, Costed Measures Across proposals for Nailsea and Backwell, the Plan relies on broad, aspirational statements rather than concrete actions. There are no defined schemes, timescales, budgets or identified delivery bodies. Given the level of risk to current and future residents, this lack of specificity fails to meet the required tests of soundness.	What Changes Are Needed? Allocating land south of Long Ashton would largely offset the removal of the Nailsea and Backwell strategic development area. Its location, next to the approved £400 million EPIC employment campus, offers far better transport links and represents a far more logical choice. Additionally, priority should be given to developing workable mitigation measures along the B3130 and B3128 corridor. These are essential for protecting existing residents' ability to travel into and out of Nailsea.		

Name: Dave Miles **I.D:** 51293089

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	1. Backwell infrastructure cannot cope with the current level of traffic, Station road is too narrow and gets grid locked, Fairleigh road is the main A road from Bristol to Weston and cannot cope with more traffic 2. To expand Backwell/Nailsea by a further 1000 homes is knee jerk reaction to Government requests, any sensible committee would understand to increase a village at such a radical and intense manner will only cause problems to current occupants of the village. 3. Backwell is not ready to be a town yet and as a Backwell resident for the past 50 years i prefer not to be alive when it does become one!!			

Name: Dave Morgan **I.D:** 38537441

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I write as a Backwell resident to strongly object to the proposed large-scale development on agricultural and Green Belt land in Backwell within the Local Plan 2041. The proposal is inconsistent with national planning policy, unjustified in scale, and harmful to the character, sustainability, and functioning of the village. My key planning and legal objections are as follows: No Exceptional Circumstances for Green Belt Release The NPPF requires “exceptional circumstances” to alter Green Belt boundaries. These circumstances have not been demonstrated. Backwell has already accepted a 40% population increase through recent approvals, and no credible evidence has been supplied to show that the village can absorb another major expansion. This alone undermines any argument for releasing high-performing Green Belt. Harm to High-Quality Agricultural Land The land proposed for development is productive, “best and most versatile” agricultural land. Once developed, this resource is permanently lost. With rising food security concerns, this land must be safeguarded rather than reclassified for speculative housing growth. Unsuitability of Scale — Disproportionate Allocation Backwell is allocated a significantly higher number of homes than many larger North Somerset settlements, despite its far smaller size, limited facilities, and constrained geography. The proposal would take 7% of the district’s total housing allocation — a wholly disproportionate burden for a village of this scale. Infrastructure Cannot Support This Growth There is no practical way for Backwell to support thousands of additional residents. Key issues include: • Transport capacity issues, particularly along Station Road, the A370, and the already-congested junctions. • No investment in school places. Backwell School is oversubscribed and offers no room for expansion. • No increase in medical facilities or health-care resilience, despite national requirements that new development be supported by community infrastructure. The infrastructure delivery plan lacks both detail and funding certainty — making the development unsound. Severe Transport and Mobility Impacts The railway station is already inaccessible for many users (including people with limited mobility). Increased population without credible station improvements will deepen exclusion and congestion. The proposal runs contrary to sustainable-transport principles. Flooding and Landscape Constraints Ignored Backwell contains several areas prone to flooding; additional hardstanding and loss of permeable agricultural land will exacerbate this risk. The Plan has not produced robust hydrological modelling or mitigation. Backwell Common and surrounding areas are prone to flooding, which would be aggravated by more housing. Ecological and Biodiversity Harm The affected areas include valuable habitats, hedgerows, wildlife corridors, and proximity to protected sites such as Backwell Lake, nature reserves, and SSSIs. The proposal risks significant biodiversity decline and fragmentation of wildlife movement routes. Loss of Rural Character & Identity The scale of development would fundamentally alter Backwell’s character, turning it from a rural village into a suburban			

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					extension. This conflicts directly with Green Belt purposes: preventing urban sprawl and maintaining settlement separation. Conflict With Existing Planning Policies North Somerset's previous Local Plan documentation emphasised that villages like Backwell must not be the focus for large-scale growth. This new proposal reverses long-standing policy without providing new, evidence-based justification. Failure of Sequential Approach (Brownfield First) The NPPF requires that brownfield land and lower-value ("grey belt") land be exhausted before prime green belt is released. There is no evidence that these options have been fully utilised across the district. Unfunded & Unrealistic Infrastructure Promises The Plan makes vague references to "future infrastructure delivery" but offers no secured funding, no timeframes, and no enforceable commitments — contrary to the tests of "soundness" and "deliverability" under planning law. Short Consultation Period & Lack of Detail Residents have been given insufficient time and insufficiently detailed documents to analyse such a major reconfiguration of the village, contrary to principles of inclusive and transparent consultation. Precedent Risk & Permanence of Harm Releasing Green Belt around Backwell sets a dangerous precedent. Once countryside is lost, it cannot be restored, and further incremental encroachment becomes easier. This undermines the permanence of the Green Belt — one of its central statutory purposes. Conclusion For these reasons — including the lack of exceptional circumstances, overwhelming scale, loss of high-value agricultural and Green Belt land, inadequate infrastructure, environmental harm, and conflict with national and local planning policy — I urge the Council to remove the Backwell Green Belt site from the Local Plan 2041. The proposal is unsound, unjustified, and incompatible with sustainable development principles.			

Name: Dave Sowdon **I.D:** 58599649

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	• Consistent with national policy	Yes	Unsure	Regardless of a perceived national requirement for additional housing, such requirements do not take into account the local area's ability to absorb the numbers of houses specified in the outline document. There is minimal provision for improving the road infrastructure. There are only two routes, from Tickenham and from Wraxall, suitable for large trucks to access Nailsea, and both of those have severe pinch-points which often cause holdups. The other routes are either width or vehicle-weight restricted and are already extremely busy. Several lanes have no, or minimal, passing places. In recent years the road to Clevedon was closed by a fallen power cable. The resulting repair works necessarily caused the road to be closed. Traffic from Clevedon to Nailsea was forced to use the road across Nailsea Moor which quickly became a huge traffic jam. Recent closures of the M5 have brought large volumes of traffic on to local roads which have a knock-on effect when trying to access other local towns. The proposed developments north of Nailsea and Pound Lane do not take into consideration that Pound Lane is severely restricted during term time by parking for the schools. This is exacerbated during the 'transit' hours when minibuses regularly cause further delays outside Ravenswood School. Developments in this area will either use the limited Pound Lane, or use the highly	Before any of the new developments proceed, there needs to be a cohesive road plan for the area. This will obviously be very expensive for either NSC or the developers. Without such improvement North Somerset will grind to a halt in the near future. Improvements to walking and cycling routes will only be of limited value as most people will have to rely on cars to transport people and shopping.		

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					unsuitable Causeway for access to Clevedon and the M5. None of the transport problems above will be mitigated by improved public transport and that, itself, will be encumbered by the poor road system. All the proposed developments on the north of Nailsea are intended for land that gets naturally very wet. The development close to the Land Yeo north of Greenfield Crescent is particularly poorly drained, heavy clay soils. As far as Town Centre infrastructure is concerned, access to the GP appointments is difficult as things are, and will only be made worse by large scale development. Similarly, pharmacy capacity is already stretched. Regarding developments to the south of Nailsea, access from the current Youngwood Lane is difficult and traffic heading west is forced to use narrow lanes to the A370 or Clevedon. Any traffic going east will have to use The Perrings and Queens Road before joining Station Road and from then have to use the limited Station Road access or Trendlewood Way to get to the Wraxall Road. Developments in Backwell will make travel along Station Road and the A370 more difficult.			

Name: David Abbott **I.D:** 58630305

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	On top of the developments already approved these additional proposals would lead to complete overdevelopment in the Backwell area which is just not viable. There is very little employment in Backwell with most residents commuting by car into Bristol. Government policy states ' we must protect our best and most versatile land'. Grade 1 agricultural land used for crops and grazing in a designated Green Belt should not under any circumstance be considered for development. Backwell Common and the surrounding areas are prone to flooding (not surprising given its a floodplain!). The run off from Backwell Hill during heavy rain is substantial. The Farleigh Field development is already sending a very dangerous level of additional rainwater onto the A370. The required investment in infrastructure is undeliverable. A new road crossing the railway is probably not feasible given Network Rail's requirements and in any event would probably costs a small fortune. Bristol Water's water main from Cheddar Reservoir runs right across the fields between Backwell School and Chapel Hill. The 33 inch pipe is now 100 years old and the lead sealing the joints is regularly failing. Significant excavation is required to repair these leaks and access is required for large machinery to get to the site. Any development anywhere near this pipe would be totally irresponsible and risk demolition if a leak subsequently occurred. In summary, the loss of Green Belt and high quality agricultural land, the risk of increased flooding and uncertainty over the proposed road render these proposals totally unacceptable. The disproportionate increase in the size of Backwell would have a devastating impact on the local environment and services and is not sustainable. Developers love building houses but hate appropriate investment in infrastructure.	Withdraw it!		

Name: David Barclay **I.D:** 62850209

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell already has 800 new houses approved, a 40% increase for the village. Adding an additional 1000 houses is hugely disproportionate and constitutes overdevelopment. The lack of local infrastructure and services cannot support this level of development at such a rapid pace. Backwell has been allocated a far higher number of new houses than any other village in North Somerset. Backwell is being expected to take 7% of the district's housing allocation, compared to Clevedon's 2%. This particular site is Grade 1 agricultural land which is highly valuable - Government policy states that "we must protect our best and most versatile land" to safeguard food security. The proposals contradict this policy and undermine food security. The proposals also threaten the Brockley Maternity Roost and SSSI, with rare Lesser and Greater Horseshoe Bats relying on the land for food.			

Name: David Barton **I.D:** 62732705

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP4: Placemaking	No	• Justified	Yes	No	Need further key stakeholder engagement to gauge residents'' feedback, such as Create Streets, The King's Foundation, etc.	Make Traditional Architecture Design Codes the forefront focus as these will bring multi fold benefits on economic, ecological and environmental grounds for everyone.	Community Campaigner David Barton	COMMUNITY CAMPAIGNER DAVID RICHARD BARTON- FEEDBACK SUBMISSION UK AND IRELAND PLANNING CONSULTATIONS FV.pdf

Name: David Cannon **I.D:** 62851905

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP8: Housing	No	• Justified	Unsure	No	I feel that the council are following a national schematic layed down by the government and it will not benefit future generations , the constant trend to build more and more houses is way of generating more monies through the community tax, sadley we see the council squander this result on odd ball schemes all too often .			

Name: David Clay **I.D:** 62859905

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared • Effective	Unsure	Unsure	There are aspects which are not consistent with national priorities or local needs	1. National need for food security means house building developments should not occur on grade ! and grade 2 agricultural land, which would preclude some developments for Nailsea and Backwell. 2. Policy DP19: Parking Most households have 2 or more cars. Parking space needs to be provided by new houses on on the roads 3. Policy DP43: Affordable housing. The plan needs to ensure that this is affordable in practice.. Is there not evidence that the recent affordable housing built in Nailsea is not taken up by those who need it because the price is too high? 4. Policy DP63: Infrastructure delivery and development contributions. Infrastructure ROADS. Where is the guarantee that roads will be provided BEFORE further house building to improve efficient road access to Nailsea? These need to deal with the following problems:: the pinch points on the B3130 at Stone Edge Batch and Wraxall, the inadequate and unsafe road on Causeway between Nailsea and Tickenham the inadequate road through Nailsea West End to Clevedon Is not a new link from the west of Nailsea to the A370 needed? New roads need to be wide enough for bus access. Newly built parts of Nailsea around Netherton Grange are far more than the maximum 800 m bus stop distance. requirement written into the plan.. . HEALTHCARE FACILITIES There needs to be provision of adequate Health Centres before further development in Nailsea and Backwell is permitted.		

Name: David Coates **I.D:** 21419201

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at North West Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The plan refers to Land North of Nailsea. This land is not under the jurisdiction of Nailsea Town Council, it is under the jurisdiction of Wraxall and Failand Parish Council and is designated Green Belt. The stewardship of Wraxall and Failand Parish Council has ensured that the land has been managed as such, resulting in maintenance of wildlife corridors and natural drainage. As a consequence the area is populated with a wide and diverse range of animal and plant life that would be lost if such development were allowed to take place. The Green Belt designation preserves the rural setting of the Wraxall settlements and the openness of the countryside enjoyed by many of the residents of surrounding areas. It maintains the character of the different settlements having different historical backgrounds, and prevents the sprawl from Nailsea. The area is already congested with traffic. No new road improvements are being proposed. Any development would exacerbate the existing problems. There is a serious issue of flooding. The land has natural drainage into the Land Yeo. which floods regularly. Insurance companies raise concerns when property is within 250m of water. This can sometimes be mitigated if the property is elevated. This is an expensive addition which, along with the flooding itself, has not been properly considered. Nailsea Town Council appears to have seen the redesignation of the land as a way to fulfil its housing challenge. At the same time it is also assuming that there will be a new section of Green Belt in Nailsea to the south which is greater in size that will compensate for this. It might reasonably be considered as a 'Land Grab' as the land being offered up for development is not under its jurisdiction. In any event, Green Belt release can only be justified under a framework which requires that harm be minimised and that other reasonable options have been exhausted such as brownfield, urban infill, higher densities of existing settlements. Nailsea Town Council has not demonstrated this. Note also the that the land it proposes to redesignate Green Belt is clearly not currently designated as such! The proposed use of the land conflicts with the Wraxall and Failand Neighbourhood Plan (2022-2038). This has already been adopted by the Council and forms part of the legal Development Plan. That plan strongly protects the Green Belt, rural character and road safety. The land to the north of Nailsea that falls under the jurisdiction of the Wraxall and Failand Parish Council should be removed from the sites proposed for housing development.			

Name: David Davies **I.D:** 58622465

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP10: Strategic gaps	No	• Positively prepared • Justified	Unsure	Unsure	North Somerset Local Plan 2041: Pre-submission Plan is unsound because: 1. North Somerset Local Plan 2041 is not positively prepared or justified in respect of a Strategic Gap (LP10) towards protecting Bleadon from Weston expansion plans. I note that a gap has been proposed for Locking and Hutton but not for Weston to Bleadon from the Uphill direction despite this being requested by residents and the Parish Council. Inclusion of this gap (LP10) will be consistent with development site allocations which acknowledged the local character and distinctiveness of Bleadon settlement. The omission of Weston - Bleadon strategic gap fails to prevent known local character and distinctiveness erosion from the pressure of incremental development. The omission also fails to recognise known settlement identity with protected National Landscape setting. This protection is particularly important because erosion by development would potentially result in coalescence of Weston as ribbon development along the A370 or severely impacting landscape setting and settlement character and distinction. It is clear that relying on countryside policy alone would not provide sufficient protection against such loss. Without this focussed and local protection of strategic gap designation, as requested at consultation stage, there is a significant risk that incremental development will erode this current gap, merging Bleadon area with Weston-super-Mare with hugely detrimental effect on Bleadon settlement identity and character including its environmental and public health amenity including protecting areas of known recreation and exercise, especially where crossed by	Steps to be taken by NSC Modifications: 1. Include Weston - Bleadon Strategic Gap (LP10)		

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					public rights of way and providing biodiversity and wildlife corridor connection between Mendip Hills National Landscape and the Somerset Levels as well as protecting the natural beauty of the area as viewed from highways and public right of ways.			
Policy DP53: Best and most versatile land	No	• Positively prepared • Justified	Unsure	Unsure	North Somerset Local Plan 2041: Pre-submission Plan is unsound because: North Somerset Local Plan 2041 is not positively prepared or justified in respect in relation to food security and this relate to land use. On the one hand, DP52 (Protection of open space and recreation) appears to be relatively strong and DP53 (Best and most versatile land) appears to be relatively weak on the other. Protecting our future rural and food security issues needs both DP52 and DP53 to work together with equal strength. The Local Plan should provide a consistent approach to rural and food security issues. NSC has a specific responsibility and duty for planning local food security through their Local Plan. The latest functions and responsibilities are given in "A UK government food strategy for England" (July 2025), "UK Food Security Report 2024" (2024), and Minister for Food Security (Daniel Zeichner, July 2025) "Good Food Cycle". While national government sets the overall framework, NSC has the responsibility use place-based approaches to build resilience, promote public health, and support local economies. The current proposed plan falls short of this responsibility. The Plan must demonstrate it is sufficiently and actively protecting agricultural land in terms of food security, but the current proposed Plan wording gives rise to a significant risk that pressure from / for housing development will destroy productive farming land and put food security at risk. Specifically, the proposed Local Plan needs to address retention of grazing land for dairy and sheep incl land used to produce hay crop. In terms of farming viability, the Plan must protect enough land for farmers and, importantly, tenant farmers. Allowing the erosion of farm size and infrastructure (including barns and networks of adjacent fields that surround settlements) will make the scale and economics of farming unviable. Sufficient food security land protection will allow existing and future tenant farmers to continue farming an avoids the assumption that farmers don't want to farm. This also supports the economic responsibilities that the Local Plan must provide for. Furthermore, to support this food security land protection there is more than sufficient brownfield supply in North Somerset to allow the Local Plan to protect food production land.	Steps to be taken by NSC Modifications: 2. Strengthen DP53 in line with DP52 to include and protect future rural and food security issues against the pressure of non-brownfield housing development.		

Name: David Felce **I.D:** 51340033

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The proposal puts even further strain on local infrastructure. Green space will disappear. Pollution will increase. Grade 1 agricultural land will be lost. The approved 800 new houses are more than enough. There is little evidence that the affordable homes target is something that will actually materialise.			

Name: David Glynn **I.D:** 58654113

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SP8: Housing					The proposed Plan appears to be generally sound, although with such a large number of sites and related issues there are, of course, reservations on the detail. However, while an extended comment is resisted here, the opportunity has been taken to raise some specific and potentially flawed issues. First, the number of new dwellings apparently imposed on NSC appears excessive, especially bearing in mind the			

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					structure of the district. This is of course defined, and limited, by Bristol, the coastline, the Mendips, the Green Belt, the towns and rural villages, and the road network that links all these. What's not known is the extent to which NSC argued against the number of houses, and what might happen in the future. In an uncertain world, a better national approach might be less ambitious, with fewer new dwellings imposed. New houses aren't going to be bought if people can't afford them, or if other building finance isn't available, this illustrated by the current very slow private housing market. However, it is argued that in approving the Epic business development NSC was mistaken, with this likely to result in pressures for more new housing development. Although included in the Plan is a nearby housing development on the north side of Colliters Way (215 units), which is effectively a South Bristol site, and, of course, the proposed, and very significant potential 'Woodspring' development. i. Rural development: It is appreciated that further development around most of the rural villages has been resisted, which is very sensible. If not, this would create a range of potentially serious issues which could impact on village and rural life generally. There are already issues related to public services, including road use and access, which would be further impacted by more housing or other built development. To illustrate the potential issues related to rural housing development the following comment is offered on Gatcombe Farm, Wrington. See 'Schedule 1 - Large Sites for Residential Locations'. On page 311 this is shown as a 'new allocation' with an indicative capacity of 37 dwellings. In fact, planning permission was granted in December 2021 for 38 dwellings, together with a small employment unit, see application no. 21/P/0019/OUT, with construction now underway. While some of the new houses have been completed, this is a relatively isolated site, well outside the village settlement boundary, and it seems that it is not attracting new residents as building operations appear to have been slowed. It is unfortunate that previous applications for fewer houses on this site were refused, with these far more appropriately designed. This development will certainly result in more private car use and impacts, and probably in poorly considered environmental issues, including with drainage and sewage disposal. This is highlighted here as an essential point is that new rural housing developments need to be carefully considered in relation to their setting and connection with the neighbouring land and its use, the nearby roads, pedestrian access and, importantly, public services. Inadequate public transport obviously results in more private car use on sometimes poor roads, especially when essential access is needed to facilities such as medical services, education, training and employment sites.			
Gatcombe Farm, Wrington					Rural development: It is appreciated that further development around most of the rural villages has been resisted, which is very sensible. If not, this would create a range of potentially serious issues which could impact on village and rural life generally. There are already issues related to public services, including road use and access, which would be further impacted by more housing or other built development. To illustrate the potential issues related to rural housing development the following comment is offered on Gatcombe Farm, Wrington. See 'Schedule 1 - Large Sites for Residential Locations'. On page 311 this is shown as a 'new allocation' with an indicative capacity of 37 dwellings. In fact, planning permission was granted in December 2021 for 38 dwellings, together with a small employment unit, see application no. 21/P/0019/OUT, with construction now underway. While some of the new houses have been completed, this is a relatively isolated site, well outside the village settlement boundary, and it seems that it is not attracting new residents as building operations appear to have been slowed. It is unfortunate that previous applications for fewer houses on this site were refused, with these far more appropriately designed. This development will certainly result in more private car use and impacts, and probably in poorly considered environmental issues, including with drainage and sewage disposal. This is highlighted here as an essential point is that new rural housing developments need to be carefully considered in relation to their setting and connection with the neighbouring land and its use, the nearby roads, pedestrian access and, importantly, public services. Inadequate public transport obviously results in more private car use on sometimes poor roads, especially when essential access is needed to facilities such as medical services, education, training and			

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					employment sites.			
Strawberry Line Extension: Congresbury to Blagdon					There is reference here to a 'Strawberry Line Extension – Congresbury to Blagdon' While this might have been raised, and perhaps should have been flagged, as a preferred route many years ago, it is very unlikely that anything significant could be done about it now. In fact, this has been explored informally in the distant past. Coincidentally, there is a brief report in the December issue of the Mendip Times which comments on the closure of the passenger rail line from Wrington to Blagdon in 1931. The goods service, primarily coal, stopped in November 1950, with the last service to Wrington from further west apparently in 1963. The old line and route weren't protected in any way, and none of the route appears to have been designated as a Right of Way. In the circumstances, it might be unrealistic, and very costly, to progress this now as the land is understood to be in varied private ownership and use. Note that this has been raised from practical perspective. I would certainly have used the route had it been available in the past, and would do in the future if it is ever successfully progressed. Coincidentally, I recently stopped on Ashey Lane to offer a lift to someone walking along the road as it seemed quite unsafe. The individual was very pleased as they had been forced to walk from near Langford to Blagdon, with no public transport service available, which illustrates a practical rural issue.			

Name: David Gunnell **I.D:** 58506529

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Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	I am making this submission both as a Portishead resident and Town Councillor. I lived on the Downs - a residential Road adjacent to the proposed development - for 6 years and so have first hand experience of the issues i describe below. I have also spoken to many concerned residents over the last month, my response is based on these experiences, discussions and a careful review of the plans. Concerns in relation to NPPF S187 Tower Farm sits directly beside Weston Big Wood, an ancient woodland SSSI and one of North Somerset's most biodiverse sites, and close to the geological and ecological interest of Nightingale Valley SSSI. The surrounding unimproved grassland, hedgerows and shelterbelts act as essential wildlife corridors linking the wood to the wider Gordano Valley. Weston Big Wood is a rare Ice-Age remnant with oak, hazel, ash and elm, plus uncommon species such as small-leaved lime, wild service tree and rock whitebeam. Its rich ground flora and fungi support birds of prey, owls, bats, deer, badgers and red-listed linnet. The Gordano Valley's mix of rhynes, saltmarsh, woodland, grassland, orchards, hedgerows, quarries and limestone outcrops sustains a wide range of invertebrates, bats, wetland birds and plants. Long-standing studies by WWF, Avon Wildlife Trust and the Town Council stress that this is an interconnected ecological system dependent on continuous corridors. Recent assessments show Weston Big Wood is in unfavourable, declining condition, with rising recreational pressure and fragmentation, and record high bat activity around Tower Farm and Black Rock. As a frequent visitor to these woods over the last 30 years I can attest to the deterioration they have undergone through increased footfall and use by mountain bikers. Path widths have increased in number and size, encroaching on root systems and there has been a diminution in diversity of wildlife I first enjoyed 30 years ago. Placing 400 homes so close to this location, with consequent increases in the number of cats, noise and light pollution as well as footfall from dog walkers could be the death knell for this valued SSSI. Long-standing evidence from Natural England, Avon Wildlife Trust and other studies confirms that ancient woodland ecosystems cannot be recreated or compensated for once damaged. Recent assessments already show Weston Big Wood in unfavourable, declining condition, with severe recreational impacts during the Covid period and high bat activity around Tower Farm and Black Rock—signs that further pressure would be ecologically damaging. The site forms part of a crucial wildlife corridor connecting Weston Big Wood to the Gordano Valley, Walton Common and other habitats. Development would fragment this network, contrary to NPPF requirements to safeguard biodiversity and ecological linkages. Narrow buffers or off-site mitigation cannot prevent these impacts. The proposals also fail to			

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					demonstrate how the required 10% Biodiversity Net Gain could be achieved, and because ancient woodland and associated ecosystems are irreplaceable, they cannot be offset by credits or new planting. The scheme therefore conflicts with the Portishead Neighbourhood Plan, which requires protection and enhancement of ecological networks. Tower Farm also lies within the long-established South West Avon Green Belt and the Gordano Valley Strategic Green Corridor. Development would erode the Green Belt buffer around Weston Big Wood and is particularly inappropriate given the area's proximity to two SSSIs and its high ecological sensitivity. North Somerset's own Landscape Sensitivity Assessment identifies this landscape as high-sensitivity, with a wooded, rural and secluded character that would be visibly degraded by new urban edges, contrary to guidelines calling for conservation of woodland, open grassland and peaceful landscape qualities. Decades of research, including the WWF/Avon Wildlife Trust PhD project and Portishead's 2023 ecological update, confirm the Gordano Valley functions as a single interconnected ecological system that cannot be protected piecemeal. Geological features linked to the Nightingale Valley SSSI are also likely present at Tower Farm, further increasing its conservation value. The proposal conflicts with multiple NPPF requirements: it fails to protect valued landscapes and ecological networks (NPPF 187), does not contribute to conservation or measurable biodiversity gain (NPPF 192), and fails all statutory biodiversity tests under NPPF 193. Development affecting an SSSI "should not normally be permitted", and no exceptional justification has been provided. The proposed 50 m buffer is inadequate to protect ancient woodland from indirect effects such as lighting, hydrological change, recreation and predation. Expert ecological opinion indicates the environmental impacts have been significantly underestimated, particularly the loss of semi-natural grassland and wildlife corridors integral to the woodland ecosystem. Tower Farm sits within a cluster of interconnected SSSIs whose integrity depends on maintaining continuous ecological links. Development here would undermine this wider network. The site is also in an unsustainable location that brings no benefits capable of outweighing the extensive ecological harm, especially given the documented pressures already affecting Weston Big Wood. Development at Tower Farm and Black Rock would encircle 20—25% of woodland edge and further strangle development this much loved ancient woodland. With British ancient woodlands now struggling to regenerate and under increasing climate and ecological stress, developments that further threaten Weston Big Wood should be refused, and there are no "wholly exceptional reasons" to permit them. Objections in relation to NPPF S110 Tower Farm is not a sustainable location for residential development due to its distance from essential services and the steep topography that prevents most residents from comfortably walking or cycling to key destinations. The site sits at the top of a long, steep hill, making active travel impractical for many—particularly older people, families with children, and those with mobility issues. As a former resident of the Downs – a residential road adjacent to the proposed Tower Farm development I can attest to the impact this steep hill had on my ability to commute to Bristol by bike. Whilst living at the Downs I cycled to work on only a couple of occasions. The steep hill at the end of the journey added 10 minutes to my commute and the prospect of ascending it after a long ride home was a major disincentive to communting regularly by bike. Once I moved to Woodhill road, closer to the High Street, I could avoid Portishead's challenging topography and commuted to the Clifton area of Bristol once or twice weekly. Although the developer claims that local facilities are within "reasonable walking distance" and that active travel is viable, the actual distances and climbs involved show the opposite. In practice, the site is significantly disconnected from Portishead's main amenities, employment areas and transport links. Tower Farm fails to meet NPPF S110 sustainability requirements because its steep gradients and long distances to essential services make walking and cycling unrealistic for most residents, despite developers' claims. Key amenities—including schools, shops, GP services, leisure centres, the High Street and the future rail station—are over a mile away with climbs of 300–350 ft, making active travel impractical and undermining assertions that the area is "walkable" or that Down Road constitutes a meaningful local centre. The developer's transport assessment misrepresents accessibility, underestimates walking times, ignores topography and overstates cycling prospects, including unrealistic suggestions about e-bike use.			

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					Public transport provision is also inadequate: no bus route directly serves the site, nearby services require uphill walks, and the X4 takes far longer than car travel. As a result, residents would be heavily reliant on private vehicles, increasing traffic and congestion—especially around High Down School—and conflicting with national and local goals to cut emissions, reduce car dependency and promote healthier, more sustainable travel choices. Residents I've spoken to speak of long delays exiting the junction between Down Road and The Downs, with on occasions traffic coming to a standstill for 15-20 minutes and angry confrontations between drivers. As a former resident of the Downs and parent of former pupils of High Down school, I have first hand experience of these issues. Remove this land from the local plan			
Black Rock, north of Clevedon Road	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	Impact on a site of Special Scientific Interest and conflict with Portishead's recent (2023) Neighbourhood plan The proposed Black Rock development sits beside Weston Big Wood, an ancient woodland SSSI and one of North Somerset's richest biodiversity sites. Grazing fields and maize land run directly to the woodland edge, while surrounding unimproved grassland, hedgerows and shelterbelts form key wildlife corridors linking the wood to the wider Gordano Valley. Weston Big Wood is a rare Ice-Age remnant dominated by oak, hazel, ash and elm, with uncommon species such as small-leaved lime and rock whitebeam. Its rich ground flora and fauna support birds of prey, owls, bats, deer, badgers and red-listed linnet. The wider Gordano Valley comprises rhynes, saltmarsh, woodland, grassland, orchards, hedgerows, quarries and limestone outcrops that support diverse invertebrates, bats, wetland birds and flora. Spanning over the last 35 years, long-term studies supported by WWF, Avon Wildlife Trust and the Town Council describe the valley as an interconnected ecological system reliant on intact wildlife corridors. Recent assessments show Weston Big Wood is in unfavourable, declining condition, with rising recreational pressure and fragmentation. The proposals conflict with the National Planning Policy Framework (NPPF) because they fail to protect designated sites, particularly Weston Big Wood, which is both a SSSI and ancient woodland. The NPPF states that development causing harm to irreplaceable habitats should not normally be permitted unless wholly exceptional reasons exist, and no such reasons apply here. Building right up to the woodland edge with only a minimal buffer fails to safeguard the site or its ecosystem. The scheme also fails to avoid, mitigate, or compensate for biodiversity harm. The BNG report relies on creating new woodland, species-rich grassland, orchards, swales and ponds on existing semi-natural land, which does nothing to address the loss of ancient woodland ecosystem integrity or the disruption of established nature corridors. Significant long-term biodiversity loss is therefore unavoidable. Since ancient woodland and SSSI features are irreplaceable, neither mitigation nor biodiversity credits can compensate; once lost, these habitats are gone forever. The proposals also fail to protect wider ecological networks, contrary to NPPF paragraphs 179, S187 and S192. Black Rock forms part of an important wildlife corridor linking Weston Big Wood with the Gordano Valley, Walton Common and other SSSIs, and the development would fragment this network and undermine nature-recovery objectives. There are also concerns about the quality of agricultural land affected. While NSC's background papers classify the area as Grade 3, Natural England/DEFRA mapping shows that part of the site is actually Grade 1, falling within the "Best and Most Versatile" category. Under NPPF footnote 65, development should avoid high-quality agricultural land (Grades 1, 2 and 3a) wherever possible, which this proposal fails to do. The plans are additionally at odds with the NSC Landscape Sensitivity Assessment for the Portishead Ridges and Combes. This area—including Black Rock—is recognised as highly sensitive because of its rural character, visibility, and proximity to Nightingale Valley SSSI and Middle Hill Common LNR. The Assessment identifies threats from intrusive urban edges and emphasises conserving woodland, open grassland, pasture, ancient hilltop sites, and the peaceful, secluded landscape. It calls for minimising the impact of urban encroachment and avoiding visually intrusive land uses. The proposed development would intensify the urban edge, degrade valued woodland character, and harm a landscape specifically identified for conservation. Issues in relation to NPPF S110 NPPF S110 requires significant development to be located where it can genuinely support sustainable travel, reduce car dependence, and improve air quality. The Black Rock site fails to meet these aims. It sits on the far southern edge of Portishead with no shops, services or employment within a practical walking distance, and most residents would find walking or cycling to key amenities—often 30 minutes or more—impractical for daily needs. Access to essential facilities such as the High Street, supermarkets, the leisure centre and the future rail station is too distant to support routine active travel. Active-travel options are similarly weak. The Gordano Greenway link is uncertain due to land and funding complications,			

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					and the small cycle segment proposed would lead directly onto a busy, unsafe road; a further two miles of high-quality infrastructure would be needed to reach Clevedon safely. A direct cycle or footway link to the new rail station is unrealistic because it lies on the opposite side of town. More sustainable, well-connected sites exist elsewhere in Portishead, yet no Transport Sustainability or Access Strategy has been provided to justify this location. With the station nearly two miles away, Black Rock gains little from the rail reopening, as residents would still need to drive or pay for multiple fares. Overall, the site does not limit the need to travel or offer a genuine choice of transport modes and therefore fails to meet the NPPF's fundamental sustainability requirements. Remove this land from the plan			

Name: David Hardiman **I.D:** 62535649

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Policy LP3: Strategic location: Nailsea and Backwell								

Name: David Heymans **I.D:** 51245633

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Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	The additional numbers proposed for the village are completely disproportionate and would lead to over development. If the development were permitted, the proposed new road to bypass Backwell crossroads would have to be built first. The road would have to "cross" the railway - but how? Over or under? If over, the access to the bridge would have to be a huge construction to achieve the necessary gradients. If under, construction would be in an area where the land already floods - cf Chapel Hill. Has Railtrack (or whoever) indicated that a crossing (of whatever type) would be permitted? And where is the money to build this road coming from? And even if Backwell crossroads were bypassed the rest of the A370 to Bristol would be the same old single carriageway road. Backwell is not an employment hub, most residents commute. Another 1000 houses would cause intolerable pressure on the A370. If these houses were built, who is to pay for the necessary investment in education, health and leisure facilities that an increased population would require? The state of Nailsea & Backwell station is shocking. Where is the investment coming from to make it into a "transport hub"? The land in question is Grade 1 Agricultural land, necessary for food production. In an uncertain world, with significant changes in our climate, UK food security is a vital element for the future. How can it make sense to build upon such land? Development would destroy valuable wildlife habitats.			

Name: David J Patterson **I.D:** 58601697

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SP7: Green Belt	No	‣ Consistent with	Yes	Yes	I dispute the statement that due to the constrained nature of North Somerset including areas at risk of flooding and the Mendip Hills National Landscape it is not possible to meet the government's standard methodology housing need figure for North Somerset outside of the Green Belt in a sustainable way.	The plan proposes 500 dwellings in Portishead at Tower Farm and BlackRock. I believe it is necessary to re-evaluate the available brownfield		

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		national policy			There are brownfield sites in North Somerset that could be better-utilised that would yield equivalent, affordable housing without impacting sites designated as greenbelt. As a consequence, I do not believe there is sufficient justification for exceptional circumstances as defined in national policy and I find the plan to be unsound.	sites available in the town of Portishead and remove these plots from the existing plan.		
Land at Tower Farm	No	‣ Positively prepared ‣ Justified ‣ Consistent with national policy	Yes	Yes	I do not consider the site requirements as described for this plot to be accurate. Active travel provisions, as described in the requirements, ignore the fact that site is too far from other local amenities and the vertical climb too steep to make cycling or walking a practical option for the majority of potential residents. This has consequences for vehicle impact. The access to the site is already constrained at the entrance to High Down school. This access could not safely accommodate the additional daily load of an extra 400 households. The additional traffic will also impact the wider road network of the town, in contravention of national soundness tests. The requirement for an ecological buffer at the border of Weston Big Wood does not sufficiently address the significance of the site as an SSSI that requires protection. The fields at Tower Farm are the "suitable ecological buffer" that is necessary to protect the site, as demonstrated by the greenbelt allocation that was assigned in a comparatively recent timeframe. For these reasons I do not believe the proposal meets the areas needs by objective assessment and I see no credible evidence to support the suitability of the site. I propose revisiting the assessment of potential brownfield sites in the town and removing this location from the plan.			

Name: David Legg **I.D:** 58558977

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Dark Lane, Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Plesae find be my comments on the Pre-submission which strongly disagree with. I totally disagree with this planned development of some 800 to 1000 houses. Is this housing needed in this area which is almost totally a commuter district with little local employment. There is no plan for social facilities, such as schools, shops, public buildings. If the number of dwellings is built why not develop a total village that is self-sufficient. There are not enough local facilities to support this expansion. Use some imagination! What about flats or retirement homes. The idea that a road will be built over or under the railway line is probably not realistic because of the cost. The relief road still does not give good access to Nailsea or link to motorways, Long Ashton Bypast or Bristol ring roads. The railway station is already inadequate, and among other reasons there is no disable access to trains from Bristol. How much consideration has been taken about flooding, wildlife, etc. I understand the fields are top grade agricultural land and should be kept for that use and other land options explored.			

Name: David Martin **I.D:** 62838401

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Land north of Nailsea	No	‣ Positively prepared ‣ Justified	Unsure	Unsure	North Nailsea !!! Green belt !! Bats feeding ground. Flood risk high .			

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		• Effective • Consistent with national policy						

Name: David Peel **I.D:** 62848417

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell					We are positive about the proposed investment in Backwell housing with the following exceptions 1. The scale of new houses proposed is in excess of 1600. This is vastly out of proportion with the current population potentially increasing the population from c. 4500 to around 10000-12000. It is in effect a plan for a new town not development of a village. 2. Therefore impact on all services is also vastly out of proportion particularly road congestion and our school and medical services. 3. Cycle infrastructure within the village is already entirely inadequate, cyclists are forced to use the main road. This plan will worsen this. 4. The small roads around our village are appropriate for cycling running horse riding and walking. The vast increase in population without mitigations will make these activities dangerous. 3. The loss of agricultural and prime natural land is unwise 4. The railway station needs investment to meet the needs of a population of 10-12k 5. The housing mix may not be intelligent enough to allow people wishing to downsize to do so whilst staying in the area. Overall the plan is massively over ambitious and disproportionate. It will radically change the area without offering sufficient mitigation to make the area work well as a community. We do not support the plan in its current state			

Name: David Phillip Charles Trump **I.D:** 58018017

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at North West Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	NSC have not properly considered the traffic impacts to Tickenham roads and lanes which are currently seriously congested and unsafe for cyclists and pedestrians. These roads/lanes cannot support the increase in new homes proposed by the Local Plan. Church Lane and the Causeway in Tickenham are not suitable for even more traffic. Church Lane is a single track road with houses on both sides. It is dangerous to walk along, pull out of driveways. Please provide more details on the quiet lane proposals for these lanes before ANY further development commences. NSC appears to be relying on the on the Backwell bypass solving all traffic issues locally. This may resolve traffic issues in SW Nailsea but seems to ignore the rest of the area.			

Name: David Plummer **I.D:** 62659393

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	No	I grew up in Backwell and Nailsea, and after years away, I've returned to raise my family in the place that shaped me. Backwell has always been a village — not just in size, but in spirit. Its green spaces, quiet lanes, and close-knit community are what make it special. That's why I'm deeply alarmed by the scale of development proposed in the draft Local Plan. Since I was born in 1980, only a modest number of homes have been built — changes that felt organic and respectful. But adding over 1,000 new houses, on top of the 300 already approved, represents an 80% increase. That's not growth — it's transformation. This plan threatens to erase the very qualities that make Backwell worth living in. It targets Grade 1 agricultural land — some of the best and most versatile in the country — land that supports food production, wildlife habitats, and our local biodiversity. Once it's gone, it's gone forever. The infrastructure simply isn't there. There's no confirmed investment in schools, health services, or transport. The proposed road lacks feasibility studies and risks damaging Backwell Common and conservation areas. Meanwhile, Backwell is being asked to absorb a higher percentage of housing than towns like Clevedon and Portishead — despite having fewer services and employment opportunities. This is not sustainable, and it's not fair. Development should be proportionate, infrastructure-led, and community-informed. Backwell deserves better than to be treated as a convenient solution to meet housing targets. I urge the council and the planning inspector to reconsider. Protect our Greenbelt. Respect our heritage. And listen to the voices of those who know and love this village.			

Name: David Russell **I.D:** 62777985

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Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	NSC has not properly considered: Alternative brownfield or greenfield sites with far lower ecological impact, both in Portishead and across North Somerset. Opportunities to increase housing density on proposed brownfield sites, which could remove the need to develop Tower Farm and Black Rock The strategic ecological importance of these sites in protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor The fact that both areas were added to the Green Belt in the late 1980s due to their high ecological value. National planning policy allows Green Belt changes only in exceptional circumstances and these have not been demonstrated. In addition: Neither site can provide safe or suitable access. Development would create unacceptable transport impacts, failing national soundness tests. The existing public infrastructure utilities in the Tower Farm estate (water, sewage, electricity, broadband) is not capable of supporting the proposed expansion without significant infrastructure upgrade with the associated significant disruption to the existing area and residents. The wider Portishead local amenities such as schools, dental, pharmacy and doctor have not been considered and therefore require to be considered in more detail prior to acceptance of this plan. The previous local plan clearly has not been taken into account and in light of this latest consultation has not provided value for money for the taxpayer. The National Audit Office (NAO) and National Infrastructure and Service Transformation	N/A	N/A	

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					Authority (NISTA) should provide a review of the assurance and scrutiny that was conducted and feasibility of the delivery of the previous plan prior to a revision or replacement plan is approved or considered. For these reasons, Tower Farm and Black Rock should be removed from the Local Plan.			

Name: David Sheridan **I.D:** 39195009

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Strategic Priorities	Yes		Yes					
Sustainable development objectives	Yes		Yes	Yes				
Strategic Policies	Yes		Yes					
SP3: Spatial strategy	Yes							
SP7: Green Belt	Yes		Yes	Yes				
SP7: Green Belt	Yes		Yes	Yes			I fully support these long overdue modifications to the Green Belt.	
Policy LP3: Strategic location: Nailsea and Backwell	Yes		Yes	Yes				
Policy LP9: Extent of the Green Belt	Yes		Yes	Yes			The proposed extension to the Green Belt is excellent to safeguard the wildlife corridor between Nailsea and Backwell and also to maintain the separation of the two communities.	
Station Road to A370, Cross Rail Link, Nailsea and	No	• Effective	Yes	Yes	This proposed road to join Nailsea to the A370 in east Backwell is inappropriate and will not work in practice. If a new road is needed for the new housing proposed for Nailsea then this should be built to the west of Backwell from Youngwood to the A370 near Grove Farm. This will			

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Backwell					take the additional traffic directly to the A370 without increasing traffic levels within the existing Nailsea urban development where the existing roads will not cope. It is also inappropriate to construct a new road across Green Belt land when the suggested alternative exists. There is also the likelihood of further erosion of the Strategic Gap and Green Belt land north of the railway line. This land should be safeguarded.			
Station Road to A370, Cross Rail Link, Nailsea and Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	No	Bristol city Council has previously stated that this proposed road is not required as it will do nothing but to increase traffic flowing into Bristol from Long Ashton By-Pass and that Bristol's roads will not cope and that this scheme will simply discourage use of public transport and active travel while encouraging car use. Has the opinion of Highways England been obtained? They have previously not been in favour when earlier schemes were talked about.	The Major Transport Scheme between Nailsea and Backwell is neither legally compliant nor sound. To be legally compliant, the Plan should be based on up to date evidence of need and effectiveness not a sudden line drawn on a map as has happened here. At least two previous versions of the draft Local Plan did not include this proposed road but proposed instead acceptable and effective improvements to cycling and pedestrian routes from the proposed residential developments to Nailsea and Backwell Railway station. The proposed plan effectively makes car traffic by-pass the railway station. This is outdated thinking and contrary to policies to discourage car use, encourage active travel and promote public transport. This proposed road was not mentioned previously although it was included in plans by developer Rubix in autumn 2025. These plans suggested the land for the road with other "Opportunity Land" (whatever that means) would be given to North Somerset Council although the Council would then be paying for the road construction. It made it clear that the road would be in Phase 2 of the proposed development so after the other residential aspect of the proposal was complete. That same proposal seems to have no benefit for the developer so why propose it? This appears to be laying the ground for further residential development north of the railway line on land NOT included in the draft Local Plan allocations. This could be seen as subterfuge and what amounts to an incentive to the Council to include this road in the current draft Local Plan. A previous planning application by Gleeson for land on the opposite side of Station Road near to Backwell Lake was refused by the same Council now proposing the new road to join up with what would have been the already refused new road by the Lake. The proposed new road is not needed. The evidence for it was not gathered before the draft Plan's publication and this consultation. Since publication, equipment measuring traffic levels has appeared on just about every road in the area. Why was this not done before? My own use and knowledge of Station Road is that it is mostly quiet and with plenty of spare capacity. It is narrow in places but previous proposals have suggested some widening. Again it is possible for pedestrian routes to be taken away from the road to a greater extent especially routes to the secondary school. If public transport is to use the proposed new road then that will mean cars by-pass the railway station (!) but also the centre of Backwell where local amenities and services are based (doctors, dentist, shops, secondary school and so on). In essence, there is no proven need for a new road in the proposed position. The entire idea seems developer led and not based on sound evidence of need and effectiveness. There is a real risk that if allowed this new road will simply pile pressure on the Council for further development north of the railway line despite that not being in this draft plan.		

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						The road north of the railway line will be entirely within the existing Green Belt which will be seriously damaged. This is inconsistent with previous proposals from the Council and provides no apparent benefit. It is outdated thinking and contrary to national and local policies. The proposed Link Road should be removed from the Local Plan and replaced with a sensible cycle/pedestrian route immediately to the north of the railway line as the Council previously proposed.		

Name: David Threlfall **I.D:** 50328385

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Land south of Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective	Unsure	Unsure	This area brings the villages of Backwell and Nailsea ever closer together. Like the land East of Backwell development of this area will have significant drainage and flooding challenges and will put yet more strain on the local roads systems. The site requirements in the plan are not nearly specific enough about mitigating the traffic and planning the whole area of Nailsea as a single area			
Grove Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	The conditions state "Adequate financial contributions towards infrastructure required, including (but not limited to) highways, education and community facilities." I dont believe this adequately imposes a requirement on the developer to provide sufficient money to develop the schools, education facilities and community facilities required. The terms are much too vague and are subject to significant watering down or delaying by the developer.	These financial contributions towards infrastructure required, including (but not limited to) highways, education and community facilities requirements should be subject to a minimum threshold of contribution that represents real community value to the area. These values should be part of the planning consent and subject to CPI from the date of consent to the date of payment. They should also be stipulated to be made paid in full before 25% of the houses are constructed or 15% of the properties sold.		
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Existing Growth - Backwell already has approval for 800 new homes—a 40% increase—which risks significant overdevelopment for the village. In total with other proposals the village will double in size. Disproportionate Allocation - Backwell is assigned more housing than any other village in North Somerset, accounting for 7% of the district’s allocation compared to Clevedon’s 2%. It feels like this area is targeted because it has good schools and high house prices, a key driver for developers who are interested only in the sale of the houses and have no concern or financial interest in the quality of the village after development. Transport Infrastructure - The proposed road will not alleviate congestion in Nailsea or Backwell and requires costly, potentially unfeasible engineering to cross the railway. Insufficient Services - Current deficits in school places, healthcare, and leisure facilities mean the area cannot support an additional 1,000 homes without major investment. Lack of Analysis - No needs or viability assessment has been provided for the proposed expansion. Employment Limitations - Backwell is not an employment hub; most residents commute. This will cripple the road system and traffic lights in the village Social Impact - No assessment of social cohesion impacts has been conducted. There is no mitigation to residents why the 2			

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					years of construction noise, poor air quality, mud on the road and increased flooding happens. Loss of High-Quality Land - Development would remove Grade 1 agricultural land—only 7% of which remains in North Somerset—contradicting government policy to protect food security. Environmental Harm - The proposals threaten biodiversity, wildlife habitats, and protected species, including rare Lesser and Greater Horseshoe bats. It also removes a large area for walking and wildlife, including deer regularly seen in these fields. Infrastructure Uncertainty - The Infrastructure Delivery Plan lacks costings and funding guarantees for roads and essential services. Flood Risk - Backwell Common and planned development areas lie on floodplains, increasing flood risk. This development will increase runoff and decrease time of concentration, exacerbating flooding and damage to the river and the lake Policy Conflicts - Affordable housing requirements on Greenbelt land reduce developer contributions to infrastructure. These contributions are vital to mitigating the impact on the village and reducing the chronic shortage of services resulting from the development. Unsustainable Growth - The scale and pace of development are destabilising, unsustainable, and undeliverable. Transport Hub Issues - Backwell railway station is inadequate and inaccessible for many users.			

Name: David Uren **I.D:** 62776417

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Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	In our view the Approval already given by NSC for 794 new houses of which 154 are already under construction i.e., a 40% increase in Backwell's population, will in itself lead to: • Our children being denied the excellent education being provided by the local Schools through a lack of places. • A GP/Health Service, which is the envy of Bristol residents, to one where you might get an appointment (online) within 2 weeks. • Access to the Surgery, P.O., Shops and other businesses being even more difficult through a lack of Parking spaces. • The Traffic on the A370 and on Station Road through to Nailsea becoming even more of a nightmare To now propose building a further 889 houses without any plans to improve the infrastructure and services has got to be a NO NO, even more so on the Site proposed, which is Grade 1 Agricultural Land and a Habitat for the Horseshoe Bats.			

Name: David White **I.D:** 58466529

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Land at Tower Farm	No	‣ Justified	Unsure	Unsure	The proposed housing development at tower farm in Portishead is unsound for a number of reasons. Road access is unsuitable for the addition of new houses on the top of Portishead Down. The area is a haven for wild animals such as Greater and lesser Horshoe Bats which can be observed every night in the			

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					area. Downland should be protected in England as it is a globally rare and sensitive environment. Portishead Down is Downland. As such, destruction of Downland should not be permitted. Portishead is over capacity already for the size of population. It has undergone massive residential developments over the past 20 years and should be allowed a rest now to consolidate itself and address the problems that exist without adding more accommodation to make the overcrowding issues worse. Massive housing developments are already taking place at nearby Cribbs Causeway in South Gloucestershire as such further development cannot be required such a short distance down the road in Portishead.			

Name: David Yates **I.D:** 32543649

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Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Effective	Yes	Yes	The proposed additional housing for Pill and Easton-on-Gordano has a single road (A369) access to Bristol which is already overloaded at peak times. Opening the rail link to Bristol is quoted as additional transport, but this is likely to be saturated by the commuters from Portishead at peak times. The largest development of 550 houses at Pill Green shows access to A369 and additional access onto Brookside, a narrow and hilly residential road. An additional 1,100 houses would require additional infrastructure to shops, doctor's surgery, and schooling.	Either reduce the number of additional houses proposed, to a target which can be accommodated with existing transport links, or widen the A369 preferably to a dual carriageway through Abbots Leigh and down Rownham Hill to avoid the pinch points there. Construct a flyover at Cumberland Basin to handle the additional traffic there.		

Name: Debbie Baughan **I.D:** 58603489

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Justified • Effective	Unsure	Unsure	I understand the requirement for new housing and have a family who will be looking to buy at some point however the proposal to add 889 houses to the east of Backwell seems extreme when Backwell already has approval for an additional 800 houses. Coupled with this the road system in Backwell already is congested and the additional traffic this would add to Station Road would make a very narrow road unsafe for pedestrians when it has movements of over 2000 school children along the road twice a day. The level of congestion will be unbearable and unsustainable for every day life coupled with this the level of pollution will increase greatly for residents living in close proximity to Station Road. The plan states that a new road will be built to link Nailsea and Backwell however I fail to see where the funding for this will come from. The responsibility for providing a cross rail link will lie with North Somerset Council who have no funding for this project, they don't have money to maintain the current road system adequately. Finally the area of land that is proposed to be built on regularly floods in winter, it cannot be walked on and i question where the run off created by the building of these houses will impact.	The funding for the proposed new road must be obtained and link road built before house building commences. The success of the whole scheme and sustainability of Backwell rests on effective infrastructure being in place to support both the residents of proposed new properties but also the current residents of Backwell. 582 houses are being proposed for land by Backwell lake - where will this traffic go if no additional road is built - Station Road of course. The railway station will require extensive modification if it is to be called a transport hub. Currently inaccessible for people with mobility issues and when travelling with young children. I never used the train when my children were younger as it was impossible to get to the platform with young children and a pushchair.		

Name: Debbie Taylor **I.D:** 63078209

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm					I have lived in North Weston for 27 years and have walked the big wood nearly every day . The idea of houses being built up so close to those woods is absolutely catastrophic. Every day I see so much wildlife in both the fields and inside the quarry and woods. The value of this open green space for human beings and their well being there is the fact that it is an ancient woodland housing hundreds of different species should never be put at risk. this space should be protected and preserved for many generations to come especially as it’s a sssi. The green belt should only be changed in EXCEPTIONAL circumstances and as they are adequate other brown sites I can’t believe this is correct. The houses that are being proposed will not be affordable housing which is what is needed and also the main roads surrounding this are also already saturated with police headquarters traffic, 2 schools at the bottom and one at the top all of which are bursting at the seams , adding into that any issues on the motorway which is regular lead to gridlock on the road running from portishead to clevedon with massive hgvs thundering through at 60/70 mph. The bus service is poor particularly after 7pm when you have to walk at least a mile to get back to north Weston and the route to Bristol does not exist at any time unless you again walk a mile. There are no local facilities to these areas unless you own a car which again is adding to the problem. I believe this is just about money and the parties involved are not thinking about the future of our beautiful countryside. This decision once made to these sites can never be reversed and will be catastrophic. This needs to be stopped and alternative land used. I do not agree with these plans.			
Black Rock, north of Clevedon Road					I have lived in North Weston for 27 years and have walked the big wood nearly every day . The idea of houses being built up so close to those woods is absolutely catastrophic. Every day I see so much wildlife in both the fields and inside the quarry and woods. The value of this open green space for human beings and their well being there is the fact that it is an ancient woodland housing hundreds of different species should never be put at risk. this space should be protected and preserved for many generations to come especially as it’s a sssi. The green belt should only be changed in EXCEPTIONAL circumstances and as they are adequate other brown sites I can’t believe this is correct. The houses that are being proposed will not be affordable housing which is what is needed and also the main roads surrounding this are also already saturated with police headquarters traffic, 2 schools at the bottom and one at the top all of which are bursting at the seams , adding into that any issues on the motorway which is regular lead to gridlock on the road running from portishead to clevedon with massive hgvs thundering through at 60/70 mph. The bus service is poor particularly after 7pm when you have to walk at least a mile to get back to north Weston and the route to Bristol does not exist at any time unless you again walk a mile. There are no local facilities to these areas unless you own a car which again is adding to the problem. I believe this is just about money and the parties involved are not thinking about the future of our beautiful countryside. This decision once made to these sites can never be reversed and will be catastrophic. This needs to be stopped and alternative land used. I do not agree with these plans.			

Name: Debra Britton **I.D:** 62837825

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Grove Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Backwell already has an influx of 800 new houses, a 40% increase for the VILLAGE. These additional numbers will complete overdevelopment. Proposed road will not relieve congestion on Station Rd , Backwell Common or Chapel Hill. Any engineering work under or over the railway seems unfeasible and vastly expensive. Local schools are full and health services in the area are already stretched . The lack of infrastructure and services can not support another 1000 houses. Backwell is allocated a higher number of houses than any other village in N Somerset and more than towns. Clevedon is allocated only 2% while Backwell is expected to accommodate 7%. There is no needs or viability for the proposed number of new houses, Most residents commute to work , Backwell is not a hub of employment Grade 1 Agriculture land currently used for crops and grazing. There is only 7% of this high quality land in the whole of N Somerset. Government says "we must protect our best and most versatile land to safeguard food security. These proposals undermine this. Development will destroy wildlife habitat and harm biodiversity in one of the worlds most nature deprived countries. The proposals threaten Brockley Maternity roost and SSSI with rare and Greater Horseshoe bats relying on land for food. The infrastructure delivery plan lacks analysis and costings and there are no funding guarantees for new roads or services. Backwell Common and surrounding areas are prone to flooding which will be aggravated by more housing, Backwell Lake and adjacent fields flood regularly . The new roads and adjacent housing are on a flood plain, Government policy requires 50% affordable housing on Greenbelt land buy this reduces the funds that developers contribute towards infrastructure, The sheer volume of growth with required investment infrastructure and services over such a short period is destabilising , unsustainable and undeliverable, The railway station is not fit for purpose as a transport hub . It remains inaccessible for people with mobility issues and presents serious challenges when travelling with young children			

Name: Del Piero Ltd **I.D:** 62995553

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SP8: Housing					SP8 / Housing Trajectory (supporting text): include the promoted land within the years 1–5 reserve supply, with explicit phasing triggers linked to Infrastructure Delivery Plan items (Long Ashton Transport Hub expansion; mass transit safeguarding; active travel bridges/underpasses; Nature Park establishment), ensuring infrastructure and housing are delivered in step.	SP8 / Housing Trajectory (supporting text): include the promoted land within the years 1–5 reserve supply, with explicit phasing triggers linked to Infrastructure Delivery Plan items (Long Ashton Transport Hub expansion; mass transit safeguarding; active travel bridges/ underpasses; Nature Park establishment), ensuring infrastructure and housing are delivered in step.		Barrow Gurney Report.pdf BARROW GURNEY 11 12 2025.pdf
Policy LP2: Strategic location:					The Plan’s spatial strategy prioritises locating new development “in or close to urban areas where there is an existing or proposed wide range of facilities, services and jobs, and [with]	To ensure the Plan is effective and positively prepared, we request the following modifications:		Barrow Gurney Report.pdf

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Woodspring (south west of Bristol)					opportunities to encourage active and sustainable travel". It recognises that North Somerset is heavily constrained and that "exceptional circumstances apply for the release of land from the Green Belt" (SP3 and SP7), with releases taken through a sequential approach prioritising previously developed land, then grey belt, then other Green Belt locations. The Woodspring strategic location south-west of Bristol is identified for up to 3,500 dwellings, master planned as a distinct, sustainable community with high quality design, active travel and public transport connections, and substantial green infrastructure. Policy LP2 sets out the development principles and the 'Golden Rules' requirements for Green Belt release, including 50% affordable housing, infrastructure improvements and provision of publicly accessible green spaces. We strongly support the overall thrust of SP3 and LP2. However, the Plan should explicitly include a mechanism to bring forward additional sustainably located sites around Woodspring and Barrow Gurney to (i) ensure timely delivery and flexibility; (ii) maximise affordable housing supply in the early years; and (iii) capture the benefits of co-location with emerging infrastructure and employment. This is fully consistent with SP3's emphasis on accessibility and urban adjacency, with SP7's grey belt sequencing, and with LP2's call for a comprehensive, cohesive settlement structure at Woodspring. Housing need and affordable housing delivery: Policy SP8 sets a minimum of 23,700 dwellings 2026–2041 (1,580 dpa), with 3,500 attributed to Woodspring. The Plan rightly elevates the importance of affordable housing. At Woodspring and other Green Belt release sites, the Plan requires "Delivery of 50% affordable housing on each site" in accordance with DP43 (LP2 'Golden Rules'). Enabling additional adjacent land to come forward early as part of the comprehensive masterplan would therefore provide substantial affordable output in the first five years post-adoption, strengthening the five-year supply and increasing affordable completions at a time of acute need, while remaining entirely consistent with the Plan's strategic distribution and the Golden Rules provisions in SP7 and LP2. This approach is also compatible with SP1's requirement to "support the delivery of a variety and choice of housing, including specialist and affordable housing to meet local needs", and with the Plan's sustainability objectives to "deliver affordable or specialist housing where it is most needed". Sustainability, access and services: transport and movement:	Policy LP2 (Woodspring): add a clause enabling the local planning authority to approve adjacent, sustainably located residential parcels where (a) they are master planned as part of the Comprehensive development plan; (b) they meet the 'Golden Rules' (including 50% affordable housing); (c) they deliver or fund Nature Park land, active travel links across and strategic flood risk mitigations to Ashton Brook with potential capacity upgrades). This will provide necessary flexibility and early affordable housing delivery aligned with LP2's principles and SP3's spatial strategy. Policies Map / LP9 (Green Belt): identify a reserve area of grey belt on the Long Ashton / Barrow Gurney fringe (to be delineated through examination discussions and the Comprehensive Masterplan) for potential phased release if monitoring demonstrates under-delivery at Woodspring or a shortfall against the affordable housing trajectory. This would reflect SP7's sequential approach and DP12's recognition of grey belt circumstances. SP8 / Housing Trajectory (supporting text): include the promoted land within the years 1–5 reserve supply, with explicit phasing triggers linked to Infrastructure Delivery Plan items (Long Ashton Transport Hub expansion; mass transit safeguarding; active travel bridges/ underpasses; Nature Park establishment), ensuring infrastructure and housing are delivered in step. LP11 (Transport) and DP15 (Active and sustainable transport): reference the delivery role of adjacent sites in funding and constructing severance-reducing active travel infrastructure across Colliters Way and A38, consistent with LP2's transport principles and the JLTP4 strategy. These modifications are modest, targeted and fully consistent with the Plan's strategy. They add clarity and flexibility, strengthen affordable housing delivery, and ensure environmental, and transport outcomes are secured early. Soundness and legal compliance of Suggested Amendments: Positively prepared: The modifications secure additional, sustainably located capacity in or close to urban areas with strong public transport and active travel potential (SP3), and they provide flexibility to meet objectively assessed needs, including affordable homes, in line with the Plan's Golden Rules for Green Belt releases. Justified: The promoted locations are adjacent to the Woodspring strategic site and major transport corridors; the Plan already identifies these corridors and hubs for enhancement (LP11), and requires integration with Parson Street, Metrobus and mass transit (LP2). The modifications exploit established infrastructure intentions and deliverability advantages. Effective: By embedding reserve/adjacent parcels within the Comprehensive Masterplan and design codes, and linking release to infrastructure triggers, delivery risks are mitigated. The approach supports the five-year supply and strengthens the affordable trajectory (LP2: 50% affordable housing).		BARROW GURNEY 11 12 2025.pdf

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					The Long Ashton / Barrow Gurney fringe is exceptionally well-placed to meet SP10's transport hierarchy, minimising the need to travel by private car and prioritising walking, wheeling, cycling and public transport. LP2 requires Woodspring to connect into Bristol, Parson Street station, the proposed mass transit corridor to the Airport, and the wider Metrobus/bus network, with specific emphasis on addressing severance caused by Colliters Way and relationships with the A38. It further requires neighbourhoods built to "high standards of active travel" with safe, direct routes to local centres, schools and facilities. In addition, LP11 explicitly proposes the expansion of the Long Ashton Transport Hub during the plan period - an anchor for sustainable accessibility on the A370 corridor - alongside the Mass Transit scheme between Bristol Airport and Bristol City Centre. Bringing forward our clients' sites alongside the Woodspring allocation would help fund and phase these improvements, stitch neighbourhoods into the active travel network, and meet DP15's requirement that new development be designed and located to maximise non-car travel options. Given LP2's stipulation that "vehicular access routes onto Colliters Way and the A38 will be designed to prevent through traffic diverting through the area", well-located sites on the edge of Woodspring offer the opportunity to masterplan permeable but controlled street networks that prioritise buses and active modes while managing rat-running. Environmental quality, Nature Park and Flood Risk: LP2 requires a new Nature Park at Woodspring "with appropriate maintenance regimes," connectivity to roosts, and protection of key bat flight corridors, together with strategic green buffers and enhancement of the Yanley ridge. The promoted sites can contribute to extending this corridor with additional land, funding and habitat management to the Nature Park network, thereby strengthening biodiversity net gain and long-term ecological resilience. This approach would be fully aligned with SP11 and DP36. LP2 also requires "a comprehensive flood risk assessment ... including site-specific detailed modelling of Barrow Gurney Reservoir and its potential flood risk," with high-quality SuDS embedded from the outset and any culvert capacity improvements (Colliters Brook) secured with maintenance access. Our clients propose to undertake fluvial modelling and integrated SuDS design consistent with DP9 and DP10, plan layouts to avoid more vulnerable uses in any areas of higher risk and liaise with Bristol Water and the Environment Agency on mitigations and long-term management. This is directly responsive to LP2 and the wider flood risk framework in DP9. Proximity to employment and community infrastructure:	Consistent with national policy: The Plan's own justification recognises grey belt and exceptional circumstances; our approach follows the Plan's sequential framework (SP7, DP12) and flood risk requirements (DP9) including reservoir modelling for Barrow Gurney (LP2).		

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					The Epic employment campus is already consented between Long Ashton and Bristol, with the Plan confirming it “will remain [in the] Green Belt” and that “very special circumstances” were found due to “significant economic benefits … and the absence of suitable sites outside the Green Belt.” (LP22 justification). Allocating adjacent residential sites would place new homes close to high-quality jobs, reduce commuting distances and car dependency, and support SP9’s aim to strengthen the role of the Bristol fringe and Woodspring in providing accessible employment opportunities. LP2 itself provides for around 10 ha of new employment land within Woodspring, reinforcing the case for co-located housing to create mixed, balanced communities. LP2 also requires substantial on-site social infrastructure, including “one new secondary school … and at least three new primary schools” and healthcare, community and leisure provision. Our clients’ sites can assist in delivering these facilities, in line with SP4 and DP63, securing timely delivery consistent with LP2’s phasing and delivery requirements. Design quality, placemaking and net-zero construction: The Woodspring site requires master planning and design codes at the outline stage, delivering legible neighbourhoods and high-quality public realm. Any additional sites brought forward adjacent to the allocation would be master planned to coordinate with the same comprehensive design framework to avoid piecemeal development, comply with SP4 and DP1, and achieve DP6’s net-zero construction requirements (including ultra-low energy homes and maximised on-site renewables), thereby contributing to North Somerset’s carbon neutrality ambition. Conclusion: We commend the Council’s strategic focus on sustainable growth at Woodspring and the Bristol fringe, and its firm commitment to affordable housing, active travel and ecological enhancement. To ensure the Plan is resilient, flexible and deliverable, our clients seek modest but important modifications to enable adjacent, grey-belt, sustainably located parcels near the former Barrow Gurney Hospital and next to the Woodspring scheme to come forward within the Comprehensive Masterplan. These sites are well-accessed and serviced, directly supportive of the transport hierarchy, capable of meeting the 50% affordable housing Golden Rule, and able to contribute land and funding to Nature Park habitat and flood resilience (including Barrow Gurney Reservoir modelling). The requested changes will enhance the Plan’s soundness and give the Inspector confidence that housing—especially affordable housing—will be delivered early and in the right places.			
Policy LP5: Housing, employment and mixed use allocations					We submit these representations on the Pre-submission (Reg 19) Local Plan 2041 on behalf of our clients, Del Piero Ltd, to promote 6 No. alternative residential sites in the Long Ashton / Barrow Gurney area.	Our clients seek modifications to the Local Plan to recognise, allocate, or reserve these sites for early residential delivery as part of the Woodspring growth area and the wider Bristol fringe, with the associated policy provisions set out below.		Barrow Gurney Report.pdf BARROW GURNEY 11

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					Each site is located: (i) close to the former Barrow Gurney Hospital; and (ii) adjacent to the emerging Taylor Wimpey residential scheme at the former Woodspring Golf Course (the Woodspring strategic location). In summary, we consider the 6 locations to be sustainably located, to qualify as grey belt under national policy and the Plan's approach, to be well accessed and serviced, and to be capable of making a material contribution to meeting the Plan's substantial affordable housing requirement. Our clients seek modifications to the Local Plan to recognise, allocate, or reserve these sites for early residential delivery as part of the Woodspring growth area and the wider Bristol fringe, with the associated policy provisions set out below. These representations address soundness (positively prepared, justified, effective and consistent with national policy) and legal compliance, and propose targeted modifications to strategic and locational policies to ensure the Plan is flexible enough to adapt to delivery risk and demonstrably meets housing needs in sustainable, well-connected places. Positively prepared: The modifications secure additional, sustainably located capacity in or close to urban areas with strong public transport and active travel potential (SP3), and they provide flexibility to meet objectively assessed needs, including affordable homes, in line with the Plan's Golden Rules for Green Belt releases. Justified: The promoted locations are adjacent to the Woodspring strategic site and major transport corridors; the Plan already identifies these corridors and hubs for enhancement (LP11), and requires integration with Parson Street, Metrobus and mass transit (LP2). The modifications exploit established infrastructure intentions and deliverability advantages. Effective: By embedding reserve/adjacent parcels within the Comprehensive Masterplan and design codes, and linking release to infrastructure triggers, delivery risks are mitigated. The approach supports the five-year supply and strengthens the affordable trajectory (LP2: 50% affordable housing). Consistent with national policy: The Plan's own justification recognises grey belt and exceptional circumstances; our approach follows the Plan's sequential framework (SP7, DP12) and flood risk requirements (DP9) including reservoir modelling for Barrow Gurney (LP2).	We commend the Council's strategic focus on sustainable growth at Woodspring and the Bristol fringe, and its firm commitment to affordable housing, active travel and ecological enhancement. To ensure the Plan is resilient, flexible and deliverable, our clients seek modest but important modifications to enable adjacent, grey-belt, sustainably located parcels near the former Barrow Gurney Hospital and next to the Woodspring scheme to come forward within the Comprehensive Masterplan. These sites are well-accessed and serviced, directly supportive of the transport hierarchy, capable of meeting the 50% affordable housing Golden Rule, and able to contribute land and funding to Nature Park habitat and flood resilience (including Barrow Gurney Reservoir modelling). The requested changes will enhance the Plan's soundness and give the Inspector confidence that housing—especially affordable housing—will be delivered early and in the right places.		12 2025.pdf
Policy LP9: Extent of the Green Belt					3. Grey Belt and previously developed land: policy alignment The Plan recognises the December 2024 NPPF concept of grey belt in its Green Belt policy justification, stating: "The NPPF (December 2024) introduced the concept of grey belt, and states that development in the Green Belt should not be	Policies Map / LP9 (Green Belt): identify a reserve area of grey belt on the Long Ashton / Barrow Gurney fringe (to be delineated through examination discussions and the Comprehensive Masterplan) for potential phased release if monitoring demonstrates under-delivery at Woodspring or a shortfall against the affordable housing trajectory. This would reflect SP7's sequential approach and DP12's recognition of grey belt circumstances.		Barrow Gurney Report.pdf BARROW GURNEY 11 12 2025.pdf

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					regarded as inappropriate where grey belt would be utilised and other requirements are met.” (DP12 justification). Policy SP7 confirms a sequential approach giving priority to previously developed land, followed by grey belt sites and then other locations, when altering boundaries and considering release. The land parcels subject to this submission lie next to existing strategic allocations and long-established infrastructure (Colliters Way and the A38), with historic institutional and recreational uses in their immediate setting (former hospital and former golf course). They therefore fall squarely within the Plan’s grey belt and previously developed land sequencing policy, and can be master planned to preserve openness and secure compensatory environmental improvements in accordance with SP7 and DP12.			
Policy LP11: Transport infrastructure, allocations and safeguarding					LP11 (Transport) and DP15 (Active and sustainable transport): reference the delivery role of adjacent sites in funding and constructing severance-reducing active travel infrastructure across Colliters Way and A38, consistent with LP2’s transport principles and the JLTP4 strategy.	LP11 (Transport) and DP15 (Active and sustainable transport): reference the delivery role of adjacent sites in funding and constructing severance-reducing active travel infrastructure across Colliters Way and A38, consistent with LP2’s transport principles and the JLTP4 strategy.		Barrow Gurney Report.pdf BARROW GURNEY 11 12 2025.pdf

Name: Denis Sharp **I.D:** 62772033

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Policy LP3: Strategic location: Nailsea and Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	It is clear from the plan that the NSC have either not considered at all, or not properly considered the traffic impacts to Tickenham village and its surroundings. The existing roads and lanes in and through the village are not adequate for the current traffic flow, let alone for the increase that must follow the proposed development at Nailsea/Backwell. The roads, which are seriously congested, inadequate and unsafe for motorists, cyclists, school children, equestrians and pedestrians, cannot be improved because the existing development prevents this. These roads and lanes cannot support the increase in traffic from the new homes proposed by the Local Plan, and this problem has clearly not been addressed before the plan was put forward. I walk the length of the village centre almost every day and witness the traffic flow and danger to road and pavement users. Over the ten years I have lived here, the flow of traffic, including HGVs has increased dramatically. This can only increase further if this plan goes ahead and the people who live in the new houses use these roads, as will the increasing numbers of service vas and goods vehicles. Only by building a link from the M5 junction to the A370 through Backwell before any more houses are built can the proposed plan be made in any way acceptable to the people of Tickenham.			

Name: Denise saunders **I.D:** 51423809

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Wyndham Way Broad Location	No		Unsure	Unsure	i do not support this site due to fact jobs will be lost and we dont need anymore flats build houses	i do not support this site due to fact jobs will be lost and we dont need anymore flats build houses		

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Downside	Yes	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy				build afforable houses on small plot		
Land at Tower Farm	Yes	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Yes	Yes			i support the plans for this site	
Black Rock, north of Clevedon Road	Yes	‣ Positively prepared ‣ Justified ‣ Consistent with national policy	Yes	Yes			iam writing to express my support for the construction of 100 dwelling on the blackrock site i under stand the sensitivity asscociated with development formerley on green belt Now i belive is grey belt land however i belive this project meets the criteria for very special circumstances and offers tanagble benefits for the new home owners ie near to countryside not high rise flats, not a concrete jungle, affordable homes with gardens the design of the proposed dwelling has been carfully developed to ensure it preserves the green /grey balt charter there is a need for quality housing low inpack homes without placing pressure on the local infrastructure,helping to meet demand while respecting the rural charter of the area	

Name: Derek Broomfield **I.D:** 26115201

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Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	800 new houses have already already been approved in Backwell. A 40% increase for the village. This additional explosion in numbers would result in catastrophic overdevelopment. Despite the approved increase, there remains a shortfall in school places and a lack of investment in health services or recreational facilities. The existing infrastructure and services are insufficient to support a further 1,000 houses. Our village has been assigned a more houses than any other village in North Somerset, with a growth percentage that surpasses that of towns. Backwell is projected to absorb 7% of the district's housing allocation, in contrast to Clevedon's 2%. There is no analysis of needs or viability for an additional 1,000 houses. Backwell does not serve as an employment center; most residents commute. Increasing traffic on A370. This is frequently at a standstill. No assessment of social cohesion impacts has been submitted. Grade 1 Agricultural Land is currently utilized for food production and grazing. Only 7% of this high-quality land remains in all of North Somerset. Government policy asserts that "we must protect our best and most versatile land" to ensure food security. The proposals are in direct contradiction to this policy and jeopardize food security. Development would obliterate valuable wildlife habitats and further endanger biodiversity in one of the most nature-			

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					depleted countries globally. The proposals pose a threat to the Brockley Maternity Roost and SSSI, with rare Lesser and Greater Horseshoe Bats depending on the land for sustenance. The Infrastructure Delivery Plan is deficient in analysis and cost estimates, and there are no assurances of funding for the new road or services. Backwell Common and its adjacent areas are susceptible to flooding, which would be exacerbated by additional housing. Concerns regarding the designation of the strategic growth location encompass the impact on the area's character, the loss of Greenbelt and high-quality agricultural land, the risk of flooding, and uncertainty about the funding and timely delivery of the road to support the proposed housing. The suggested road would not adequately accommodate Nailsea's traffic or alleviate congestion on Station Road, Backwell Common, or Chapel Hill. Constructing the road beneath or above the railway would incur significant costs and may be impractical.			

Name: Diana Bloss **I.D:** 62767457

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Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	The proposal represents a huge number of new houses (a share higher than other neighbouring villages) and will over develop the village. It is not positively prepared as there is -a lack of infrastructure to cope with these additional homes. The A370 and station road is already congested and the proposed new road will not alleviate this congestion . There are doubts that the road under the railway will be approved as it will be very expensive and it is not clear who will pay for it. The whole process will be very destabilising. -There have been no plans made for the additional health services needed to support a 1000 new houses. To accommodate the additional services needed will take time to plan and implement even if funding is available (which I can't see that its is) and thus lead to an undeliverable service. -Lack of provision for more school places and a lack of funding upfront for enlargement of the schools. -There has been no work on the impact of such a large expansion of the village to the social cohesion of the village or the need for such a large number of houses so can it be said to be justified? Contrary to national policy to protect our most versatile land to safeguard food Security The land chosen is Grade 1 Agricultural Greenbelt plan. There is only 7% left of this high quality land in the whole of North Somerset. I regularly walk across this land and during wet weather there are often areas of flooding. Building on this land will only increase the risk of flooding . Development will also be detrimental to biodiversity The long term destabilisation , lack of provision and funding of infrastructure necessary to support such a large number of houses quickly built will make this an ineffective development			

Name: Diana Bramall **I.D:** 39211681

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national	Unsure	Unsure	Backwell is allocated a higher number of houses than any other village in North Somerset, and an even higher growth percentage than towns. Backwell is expected to take 7% of the district's housing allocation. It already has 800 new houses approved which is a 40% increase for the village. The additional proposed numbers would lead to a complete overdevelopment, and the lack of infrastructure and services cannot support an additional 1000 houses. Backwell is not an employment hub, most residents commute. The roads in Backwell are already congested and the proposed road will likely not be sufficient, very expensive, and possibly unfeasible given it would need to run over or under the railway line. The train station is not designed as a transport hub and is inaccessible to those who are disabled or for those with young children. The land is currently used for food crops and grazing and is Grade 1 agricultural land there is only 7% of this high quality land left in North Somerset. This proposal contradicts Government policy that states that "we must protect our best			

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		policy			and most versatile land" to safeguard food security. It would also destroy wildlife habitats and cause further harm to biodiversity. Backwell floods badly, and Backwell Lake and the adjacent fields where the housing is proposed are on a floodplain.			

Name: Diane Snape **I.D:** 8052353

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Policy LP3 - I strongly object to the identification of Nailsea and Backwell as a proposed strategic growth area. Large scale development at these locations is not deliverable or sustainable for many reasons including: 1. Very limited existing or potential new employment in these locations, resulting in significant out-commuting. 2. Located in what is essentially a narrow valley, with flood plain in the valley bottom and steep hills to either side, placing major constraints on the development of new infrastructure, which even if feasible would at best be very expensive to develop. 3. Heritage assets and wildlife habitats including bat conservation areas. 4. Loss of scarce high quality agricultural land. 5. Impact on heritage assets/listed buildings including numerous farms. 6. Impact on local nature reserves such as Backwell Lake. 7. Surrounded by sensitive landscapes, heritage assets such as Tyntesfield, Cadbury Camp, and Tickenham Moor SSSI 8. Ageing population, with many in retirement or reaching retirement age. Over the coming few years, a large number of family homes will be vacated by this ageing population, providing opportunities for families to move in. Large-scale new development is not needed. The 1211 new dwellings now additionally proposed for Nailsea and 889 for Backwell on top of the substantial numbers already committed, built in the past few years and/or under construction would lead to great strain on infrastructure of all kinds, including transport. This plan is unsustainable and undeliverable. Transport Transport hub and rail I strongly object to the proposed expansion of Nailsea and Backwell railway station on Station Road. It is not suitable for development as a future transport hub. There is insufficient space for increased parking and bus interchange facilities. The current station is very small and basic and there is very limited scope to improve the facilities in its current location. It is inaccessible for people with mobility challenges and is difficult to navigate when travelling with young children. Additionally, any incursion onto the land to the east of Station Road (for additional parking, bus hub, for example) would adversely impact the setting of the listed Moorside Farm A better solution would be to relocate the station from its current, highly constrained location to a new location further west where space is less constricted and it is more feasible to establish a transport hub, with appropriate walking/cycling and bus connections to the Grove Farm and Youngwood Lane developments. This could also provide a new multi-modal railway crossing point west of Nailsea and Backwell, to the west of the Backwell crossroads, which could be delivered as a below ground structure, as described in s 4.3 of the Nailsea and Backwell Local Transport Strategy. It would also facilitate improvement of the rail service by providing longer platforms and lift/disabled access and extended parking. Link road I strongly object to the proposal to construct new Cross Rail Link from the south of Nailsea to the east of Backwell, from Station Road near the station, in an easterly direction, to connect with the A370 East of Backwell. Such are the complications and enormous costs associated with such a road that it has previously been struck out of plans as unfeasible.			

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					The route would impact many hundreds if not thousands of residents in South & East Nailsea and North Backwell/ Backwell Common/Farleigh, with the pollution, noise, light pollution and visual intrusion being magnified by the terrain, which necessitates the siting of the highway in the bottom of the valley (with incumbent flood risk: Flood Zone 3) and most of the properties sitting above it, with no possibility of adequate mitigation. N.B: Impact on residents and environment are missing from the list of considerations on page 26 of the Nailsea and Backwell Local Transport Strategy, and in section 4.7.4, next steps, mitigations for residents (which are critically required but undeliverable) are completely missing. These adverse effects, whilst already substantial for the under-bridge concept (which was previously under consideration but now seems to have been ruled out due to the flood risk which would be very difficult and expensive if not impossible to overcome) would be magnified many times by the overbridge structure which is now contemplated, involving a bridge 12.5m high, with ramps 250m long on either side, as described on page 28 section 8.4.3.12 of the Nailsea and Backwell Local Transport Strategy. Such a structure would also result in significant visual intrusion into the landscape, including sight lines from Tyntesfield, All Saints Church Wraxall and St Andrews Church Backwell. This is underlined by the Landscape Sensitivity Assessment, Nailsea, s.6.2.58 on page 34 which defines the land as high sensitivity: “...and to the south-east of the town is gently sloping and vegetation on field boundaries is generally limited. Consequently, this land is visually prominent. In addition, there is existing visual coalescence between Backwell Common and Nailsea in some locations. Owing to the above, this land is of high sensitivity.” The proposed road would cross sensitive landscape, located in the green belt, consisting of prime agricultural land and would also pass close to Backwell Lake Local Nature Reserve and local green spaces/wildlife habitats ie Backwell Common and Trendlewood Park/Kenn Hedge. It would have a significant impact on the setting of the Listed Heritage Asset of Moorside Farm. Note: the “Low” sensitivity assessment for Moorside Farm in the Heritage Sensitivity Paper, page 13, East Backwell, completely neglects to consider the impact of the proposed road link. Similarly, the “Low” sensitivity assessments for Dibdens Farm, Cider Farm and Old Farm completely neglect the impact of the proposed road on the setting of these Heritage assets and their surroundings ie Backwell Common. The intersection of the route with Station Road would lead to significant incremental congestion and pollution close to residential properties and the Backwell Lake Nature Reserve due to standing traffic waiting for right of way. The increased traffic, and the need to negotiate the junction, would substantially increase danger to pedestrians and cyclists, particularly students at Backwell primary and secondary schools and Nailsea commuters using the station. It would rapidly become a very busy and congested route, leading to major noise and air pollution. It would increase “rat running” through the area, particularly from M5 Junction 19 to Bristol Airport, an issue which is already problematic. This effect ould be exacerbated by the proposed associated measures to discourage traffic from using Station Road, Backwell. It would also funnel the increased northbound (Nailsea-bound) traffic generated by the proposed East Backwell development into the constriction of Bucklands Batch on the South side of Nailsea. This is a narrow section of road which has already been widened to the extent possible by incorporating a strip of the frontage of each property along its East side, and has been the scene of numerous accidents causing injury to cyclists and pedestrians despite the addtion of a one-way cycleway. There are no firm costings or funding guarantees for the proposed new road in the Infrastructure Delivery Plan. If the East Backwell housing site allocation (to which I am submitting my objections concurrently) is dropped, the option to develop a North Nailsea Link Road should be seriously considered. This option would provide an onward link from Clevedon Road to the B3130 Nailsea to Wraxall road, serving the development sites to the West and North West of Nailsea already allocated within the local plan to 2026 and the industrial estates in the West and North of Nailsea, as well as the proposed allocations in North and West Nailsea, and deflect traffic from the Nailsea developments away from the congested centre of Backwell, avoiding the massive infrastructure complexity, cost and lead time to deliver a new link road. It would also maintain the separate identity and character of Nailsea and Backwell by avoiding the construction of a major link road in the green belt between the settlements. It would			

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					improve the routings for fire appliances, ambulances and police vehicles, improving safety and taking this inappropriate traffic away from Nailsea town centre. Such traffic will no doubt be forecast to increase significantly as a result of the new developments.			
Policy LP3: Strategic location: Nailsea and Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Areas which need to be protected include: The unspoilt green belt land between Backwell and South-East Nailsea, Including the public footpaths, woods, watercourses, wildlife habitat and high quality agricultural land. Uninterrupted views of Tyntesfield. Uninterrupted views of Backwell Church and Backwell Hill. Quiet enjoyment of these areas by local residents and by the community for recreational purposes. The proposed route of the road and metrobus would have a massively detrimental effect on this area. Backwell Lake. The Lake is a Site of Nature Conservation Interest (SNCI). The lake supports a diverse range of wildlife including migrating birds, otters and a range of flora. In addition, the SNCI and surrounding agricultural fields are known to provide important foraging grounds for the Greater Horseshoe bats which fly from their maternity roost at Brockley Hall to the west of Backwell. The proposed route of the road and metrobus route would result in the loss of land within the SNCI and associated habitat for Greater Horseshoe bats. Moreover, the introduction of traffic, noise and light pollution which would impact significantly upon the habitat and the quiet enjoyment of the lake as a local community asset for recreation. Views of Tyntesfield from the lake grounds. Trendlewood Community Park on the South East fringe of Nailsea. Views across the valley towards Backwell Common. Diverse range of flora and fauna including rare bats. Quiet enjoyment of the park by the community for recreational purposes. The unspoilt green belt land between east Nailsea and Flax Bourton, including the public footpaths, woods, watercourses, wildlife habitat and high quality agricultural land. Uninterrupted views of Wraxall Church. Quiet enjoyment of these areas by the community for recreational purposes. Tyntesfield - its setting and surroundings. Historic park and garden and associated listed buildings. Extremely important national heritage. National Government policy places great weight upon the conservation of heritage assets; the more important the asset the greater the weight which should be afforded to it in the consideration of development proposals. Tyntesfield Estate comprises listing buildings of the highest significance (Grade I and II*). Accordingly, great weight should be given to the protection of Tyntesfield Estate in the consideration of the proposals for the proposed new road and metrobus route. Uninterrupted views from Tyntesfield across the valley to Barrow Court and Backwell Hill. The view from Tyntesfield to Backwell Lake. The Lake and the open green belt land to the east of the lake are very visible from the Tyntesfield estate, eg when walking along the track between the summerhouse and the main drive. The strategic gap between Backwell and Nailsea, including the public footpaths, woods, watercourses, wildlife habitat and high quality agricultural land. I consider that the plan does not provide adequate protection for these assets and subjects them to significant unmitigated or insufficently mitigated risk.			
Policy LP11: Transport infrastructure, allocations and safeguarding	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Wraxall/Failand The Portbury Lane - Clevedon Road junction and the Wraxall Hill - Clevedon Road junction are accident blackspots and bottlenecks. Junction improvements are urgently needed to improve safety and traffic flow. A roundabout with filter lanes for traffic turning into and out of Portbury Lane would be my suggestion. Consider use of part time traffic lights at busy times for the Wraxall hill junction. (It was not clear to me where to enter this comment so entering it under the Broad policy heading)			
Land north of Nailsea	No	‣ Positively prepared	Unsure	Unsure	I strongly object to the identification of Nailsea and Backwell as a proposed strategic growth area. Large scale development at these locations is not deliverable or sustainable for many reasons including: 1. Very limited existing or potential new employment in these locations, resulting in significant out-commuting. 2. Located in what is essentially a narrow valley, with flood plain in the valley bottom and steep hills to either side,			

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		• Justified • Effective • Consistent with national policy			placing major constraints on the development of new infrastructure, which even if feasible would at best be very expensive to develop. 3. Heritage assets and wildlife habitats including bat conservation areas. 4. Loss of scarce high quality agricultural land. 5. Impact on heritage assets/listed buildings including numerous farms. 6. Impact on local nature reserves such as Backwell Lake. 7. Surrounded by sensitive landscapes, heritage assets such as Tyntesfield, Cadbury Camp, and Tickenham Moor SSSI 8. Ageing population, with many in retirement or reaching retirement age. Over the coming few years, a large number of family homes will be vacated by this ageing population, providing opportunities for families to move in. Large-scale new development is not needed. The 1211 new dwellings now additionally proposed for Nailsea and 889 for Backwell on top of the substantial numbers already committed, built in the past few years and/or under construction would lead to great strain on infrastructure of all kinds, including transport. This plan is unsustainable and undeliverable. Transport Transport hub and rail I strongly object to the proposed expansion of Nailsea and Backwell railway station on Station Road. It is not suitable for development as a future transport hub. There is insufficient space for increased parking and bus interchange facilities. The current station is very small and basic and there is very limited scope to improve the facilities in its current location. It is inaccessible for people with mobility challenges and is difficult to navigate when travelling with young children. Additionally, any incursion onto the land to the east of Station Road (for additional parking, bus hub, for example) would adversely impact the setting of the listed Moorside Farm A better solution would be to relocate the station from its current, highly constrained location to a new location further west where space is less constricted and it is more feasible to establish a transport hub, with appropriate walking/cycling and bus connections to the Grove Farm and Youngwood Lane developments. This could also provide a new multi-modal railway crossing point west of Nailsea and Backwell, to the west of the Backwell crossroads, which could be delivered as a below ground structure, as described in s 4.3 of the Nailsea and Backwell Local Transport Strategy. It would also facilitate improvement of the rail service by providing longer platforms and lift/disabled access and extended parking. Link road I strongly object to the proposal to construct new Cross Rail Link from the south of Nailsea to the east of Backwell, from Station Road near the station, in an easterly direction, to connect with the A370 East of Backwell. Such are the complications and enormous costs associated with such a road that it has previously been struck out of plans as unfeasible. The route would impact many hundreds if not thousands of residents in South & East Nailsea and North Backwell/ Backwell Common/Farleigh, with the pollution, noise, light pollution and visual intrusion being magnified by the terrain, which necessitates the siting of the highway in the bottom of the valley (with incumbent flood risk: Flood Zone 3) and most of the properties sitting above it, with no possibility of adequate mitigation. N.B: Impact on residents and environment are missing from the list of considerations on page 26 of the Nailsea and Backwell Local Transport Strategy, and in section 4.7.4, next steps, mitigations for residents (which are critically required but undeliverable) are completely missing. These adverse effects, whilst already substantial for the under-bridge concept (which was previously under consideration but now seems to have been ruled out due to the flood risk which would be very difficult and expensive if not impossible to overcome) would be magnified many times by the overbridge structure which is now contemplated, involving a bridge 12.5m high, with ramps 250m long on either side, as described on page 28 section 8.4.3.12 of the Nailsea and Backwell Local Transport Strategy.			

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					Such a structure would also result in significant visual intrusion into the landscape, including sight lines from Tyntesfield, All Saints Church Wraxall and St Andrews Church Backwell. This is underlined by the Landscape Sensitivity Assessment, Nailsea, s.6.2.58 on page 34 which defines the land as high sensitivity: "…and to the south-east of the town is gently sloping and vegetation on field boundaries is generally limited. Consequently, this land is visually prominent. In addition, there is existing visual coalescence between Backwell Common and Nailsea in some locations. Owing to the above, this land is of high sensitivity." The proposed road would cross sensitive landscape, located in the green belt, consisting of prime agricultural land and would also pass close to Backwell Lake Local Nature Reserve and local green spaces/wildlife habitats ie Backwell Common and Trendlewood Park/Kenn Hedge. It would have a significant impact on the setting of the Listed Heritage Asset of Moorside Farm. Note: the "Low" sensitivity assessment for Moorside Farm in the Heritage Sensitivity Paper, page 13, East Backwell, completely neglects to consider the impact of the proposed road link. Similarly, the "Low" sensitivity assessments for Dibdens Farm, Cider Farm and Old Farm completely neglect the impact of the proposed road on the setting of these Heritage assets and their surroundings ie Backwell Common. The intersection of the route with Station Road would lead to significant incremental congestion and pollution close to residential properties and the Backwell Lake Nature Reserve due to standing traffic waiting for right of way. The increased traffic, and the need to negotiate the junction, would substantially increase danger to pedestrians and cyclists, particularly students at Backwell primary and secondary schools and Nailsea commuters using the station. It would rapidly become a very busy and congested route, leading to major noise and air pollution. It would increase "rat running" through the area, particularly from M5 Junction 19 to Bristol Airport, an issue which is already problematic. This effect ould be exacerbated by the proposed associated measures to discourage traffic from using Station Road, Backwell. It would also funnel the increased northbound (Nailsea-bound) traffic generated by the proposed East Backwell development into the constriction of Bucklands Batch on the South side of Nailsea. This is a narrow section of road which has already been widened to the extent possible by incorporating a strip of the frontage of each property along its East side, and has been the scene of numerous accidents causing injury to cyclists and pedestrians despite the addtion of a one-way cycleway. There are no firm costings or funding guarantees for the proposed new road in the Infrastructure Delivery Plan. If the East Backwell housing site allocation (to which I am submitting my objections concurrently) is dropped, the option to develop a North Nailsea Link Road should be seriously considered. This option would provide an onward link from Clevedon Road to the B3130 Nailsea to Wraxall road, serving the development sites to the West and North West of Nailsea already allocated within the local plan to 2026 and the industrial estates in the West and North of Nailsea, as well as the proposed allocations in North and West Nailsea, and deflect traffic from the Nailsea developments away from the congested centre of Backwell, avoiding the massive infrastructure complexity, cost and lead time to deliver a new link road. It would also maintain the separate identity and character of Nailsea and Backwell by avoiding the construction of a major link road in the green belt between the settlements. It would improve the routings for fire appliances, ambulances and police vehicles, improving safety and taking this inappropriate traffic away from Nailsea town centre. Such traffic will no doubt be forecast to increase significantly as a result of the new developments.			
Land off Pound Lane, Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I strongly object to the identification of Nailsea and Backwell as a proposed strategic growth area. Large scale development at these locations is not deliverable or sustainable for many reasons including: 1. Very limited existing or potential new employment in these locations, resulting in significant out-commuting. 2. Located in what is essentially a narrow valley, with flood plain in the valley bottom and steep hills to either side, placing major constraints on the development of new infrastructure, which even if feasible would at best be very expensive to develop. 3. Heritage assets and wildlife habitats including bat conservation areas. 4. Loss of scarce high quality agricultural land. 5. Impact on heritage assets/listed buildings including numerous farms. 6. Impact on local nature reserves such as Backwell Lake. 7. Surrounded by sensitive landscapes, heritage assets such as Tyntesfield, Cadbury Camp, and Tickenham Moor			

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					SSSI 8. Ageing population, with many in retirement or reaching retirement age. Over the coming few years, a large number of family homes will be vacated by this ageing population, providing opportunities for families to move in. Large-scale new development is not needed. The 1211 new dwellings now additionally proposed for Nailsea and 889 for Backwell on top of the substantial numbers already committed, built in the past few years and/or under construction would lead to great strain on infrastructure of all kinds, including transport. This plan is unsustainable and undeliverable. Transport Transport hub and rail I strongly object to the proposed expansion of Nailsea and Backwell railway station on Station Road. It is not suitable for development as a future transport hub. There is insufficient space for increased parking and bus interchange facilities. The current station is very small and basic and there is very limited scope to improve the facilities in its current location. It is inaccessible for people with mobility challenges and is difficult to navigate when travelling with young children. Additionally, any incursion onto the land to the east of Station Road (for additional parking, bus hub, for example) would adversely impact the setting of the listed Moorside Farm A better solution would be to relocate the station from its current, highly constrained location to a new location further west where space is less constricted and it is more feasible to establish a transport hub, with appropriate walking/cycling and bus connections to the Grove Farm and Youngwood Lane developments. This could also provide a new multi-modal railway crossing point west of Nailsea and Backwell, to the west of the Backwell crossroads, which could be delivered as a below ground structure, as described in s 4.3 of the Nailsea and Backwell Local Transport Strategy. It would also facilitate improvement of the rail service by providing longer platforms and lift/disabled access and extended parking. Link road I strongly object to the proposal to construct new Cross Rail Link from the south of Nailsea to the east of Backwell, from Station Road near the station, in an easterly direction, to connect with the A370 East of Backwell. Such are the complications and enormous costs associated with such a road that it has previously been struck out of plans as unfeasible. The route would impact many hundreds if not thousands of residents in South & East Nailsea and North Backwell/ Backwell Common/Farleigh, with the pollution, noise, light pollution and visual intrusion being magnified by the terrain, which necessitates the siting of the highway in the bottom of the valley (with incumbent flood risk: Flood Zone 3) and most of the properties sitting above it, with no possibility of adequate mitigation. N.B: Impact on residents and environment are missing from the list of considerations on page 26 of the Nailsea and Backwell Local Transport Strategy, and in section 4.7.4, next steps, mitigations for residents (which are critically required but undeliverable) are completely missing. These adverse effects, whilst already substantial for the under-bridge concept (which was previously under consideration but now seems to have been ruled out due to the flood risk which would be very difficult and expensive if not impossible to overcome) would be magnified many times by the overbridge structure which is now contemplated, involving a bridge 12.5m high, with ramps 250m long on either side, as described on page 28 section 8.4.3.12 of the Nailsea and Backwell Local Transport Strategy. Such a structure would also result in significant visual intrusion into the landscape, including sight lines from Tyntesfield, All Saints Church Wraxall and St Andrews Church Backwell. This is underlined by the Landscape Sensitivity Assessment, Nailsea, s.6.2.58 on page 34 which defines the land as high sensitivity: “...and to the south-east of the town is gently sloping and vegetation on field boundaries is generally limited. Consequently, this land is visually prominent. In addition, there is existing visual coalescence between Backwell Common and Nailsea in some locations. Owing to the above, this land is of high sensitivity.”			

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					The proposed road would cross sensitive landscape, located in the green belt, consisting of prime agricultural land and would also pass close to Backwell Lake Local Nature Reserve and local green spaces/wildlife habitats ie Backwell Common and Trendlewood Park/Kenn Hedge. It would have a significant impact on the setting of the Listed Heritage Asset of Moorside Farm. Note: the “Low” sensitivity assessment for Moorside Farm in the Heritage Sensitivity Paper, page 13, East Backwell, completely neglects to consider the impact of the proposed road link. Similarly, the “Low” sensitivity assessments for Dibdens Farm, Cider Farm and Old Farm completely neglect the impact of the proposed road on the setting of these Heritage assets and their surroundings ie Backwell Common. The intersection of the route with Station Road would lead to significant incremental congestion and pollution close to residential properties and the Backwell Lake Nature Reserve due to standing traffic waiting for right of way. The increased traffic, and the need to negotiate the junction, would substantially increase danger to pedestrians and cyclists, particularly students at Backwell primary and secondary schools and Nailsea commuters using the station. It would rapidly become a very busy and congested route, leading to major noise and air pollution. It would increase “rat running” through the area, particularly from M5 Junction 19 to Bristol Airport, an issue which is already problematic. This effect ould be exacerbated by the proposed associated measures to discourage traffic from using Station Road, Backwell. It would also funnel the increased northbound (Nailsea-bound) traffic generated by the proposed East Backwell development into the constriction of Bucklands Batch on the South side of Nailsea. This is a narrow section of road which has already been widened to the extent possible by incorporating a strip of the frontage of each property along its East side, and has been the scene of numerous accidents causing injury to cyclists and pedestrians despite the addtion of a one-way cycleway. There are no firm costings or funding guarantees for the proposed new road in the Infrastructure Delivery Plan. If the East Backwell housing site allocation (to which I am submitting my objections concurrently) is dropped, the option to develop a North Nailsea Link Road should be seriously considered. This option would provide an onward link from Clevedon Road to the B3130 Nailsea to Wraxall road, serving the development sites to the West and North West of Nailsea already allocated within the local plan to 2026 and the industrial estates in the West and North of Nailsea, as well as the proposed allocations in North and West Nailsea, and deflect traffic from the Nailsea developments away from the congested centre of Backwell, avoiding the massive infrastructure complexity, cost and lead time to deliver a new link road. It would also maintain the separate identity and character of Nailsea and Backwell by avoiding the construction of a major link road in the green belt between the settlements. It would improve the routings for fire appliances, ambulances and police vehicles, improving safety and taking this inappropriate traffic away from Nailsea town centre. Such traffic will no doubt be forecast to increase significantly as a result of the new developments.			
Poplar Farm, Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I strongly object to the identification of Nailsea and Backwell as a proposed strategic growth area. Large scale development at these locations is not deliverable or sustainable for many reasons including: 1. Very limited existing or potential new employment in these locations, resulting in significant out-commuting. 2. Located in what is essentially a narrow valley, with flood plain in the valley bottom and steep hills to either side, placing major constraints on the development of new infrastructure, which even if feasible would at best be very expensive to develop. 3. Heritage assets and wildlife habitats including bat conservation areas. 4. Loss of scarce high quality agricultural land. 5. Impact on heritage assets/listed buildings including numerous farms. 6. Impact on local nature reserves such as Backwell Lake. 7. Surrounded by sensitive landscapes, heritage assets such as Tyntesfield, Cadbury Camp, and Tickenham Moor SSSI 8. Ageing population, with many in retirement or reaching retirement age. Over the coming few years, a large number of family homes will be vacated by this ageing population, providing opportunities for families to move in. Large-scale new development is not needed. The 1211 new dwellings now additionally proposed for Nailsea and 889 for Backwell on top of the substantial numbers already committed, built in the past few years and/or under construction would lead to great strain on			

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					infrastructure of all kinds, including transport. This plan is unsustainable and undeliverable. Transport Transport hub and rail I strongly object to the proposed expansion of Nailsea and Backwell railway station on Station Road. It is not suitable for development as a future transport hub. There is insufficient space for increased parking and bus interchange facilities. The current station is very small and basic and there is very limited scope to improve the facilities in its current location. It is inaccessible for people with mobility challenges and is difficult to navigate when travelling with young children. Additionally, any incursion onto the land to the east of Station Road (for additional parking, bus hub, for example) would adversely impact the setting of the listed Moorside Farm A better solution would be to relocate the station from its current, highly constrained location to a new location further west where space is less constricted and it is more feasible to establish a transport hub, with appropriate walking/cycling and bus connections to the Grove Farm and Youngwood Lane developments. This could also provide a new multi-modal railway crossing point west of Nailsea and Backwell, to the west of the Backwell crossroads, which could be delivered as a below ground structure, as described in s 4.3 of the Nailsea and Backwell Local Transport Strategy. It would also facilitate improvement of the rail service by providing longer platforms and lift/disabled access and extended parking. Link road I strongly object to the proposal to construct new Cross Rail Link from the south of Nailsea to the east of Backwell, from Station Road near the station, in an easterly direction, to connect with the A370 East of Backwell. Such are the complications and enormous costs associated with such a road that it has previously been struck out of plans as unfeasible. The route would impact many hundreds if not thousands of residents in South & East Nailsea and North Backwell/ Backwell Common/Farleigh, with the pollution, noise, light pollution and visual intrusion being magnified by the terrain, which necessitates the siting of the highway in the bottom of the valley (with incumbent flood risk: Flood Zone 3) and most of the properties sitting above it, with no possibility of adequate mitigation. N.B: Impact on residents and environment are missing from the list of considerations on page 26 of the Nailsea and Backwell Local Transport Strategy, and in section 4.7.4, next steps, mitigations for residents (which are critically required but undeliverable) are completely missing. These adverse effects, whilst already substantial for the under-bridge concept (which was previously under consideration but now seems to have been ruled out due to the flood risk which would be very difficult and expensive if not impossible to overcome) would be magnified many times by the overbridge structure which is now contemplated, involving a bridge 12.5m high, with ramps 250m long on either side, as described on page 28 section 8.4.3.12 of the Nailsea and Backwell Local Transport Strategy. Such a structure would also result in significant visual intrusion into the landscape, including sight lines from Tyntesfield, All Saints Church Wraxall and St Andrews Church Backwell. This is underlined by the Landscape Sensitivity Assessment, Nailsea, s.6.2.58 on page 34 which defines the land as high sensitivity: “…and to the south-east of the town is gently sloping and vegetation on field boundaries is generally limited. Consequently, this land is visually prominent. In addition, there is existing visual coalescence between Backwell Common and Nailsea in some locations. Owing to the above, this land is of high sensitivity.” The proposed road would cross sensitive landscape, located in the green belt, consisting of prime agricultural land and would also pass close to Backwell Lake Local Nature Reserve and local green spaces/wildlife habitats ie Backwell Common and Trendlewood Park/Kenn Hedge. It would have a significant impact on the setting of the Listed Heritage Asset of Moorside Farm. Note: the “Low” sensitivity assessment for Moorside Farm in the Heritage Sensitivity Paper, page 13, East Backwell, completely neglects to consider the impact of the proposed road link.			

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					Similarly, the “Low” sensitivity assessments for Dibdens Farm, Cider Farm and Old Farm completely neglect the impact of the proposed road on the setting of these Heritage assets and their surroundings ie Backwell Common. The intersection of the route with Station Road would lead to significant incremental congestion and pollution close to residential properties and the Backwell Lake Nature Reserve due to standing traffic waiting for right of way. The increased traffic, and the need to negotiate the junction, would substantially increase danger to pedestrians and cyclists, particularly students at Backwell primary and secondary schools and Nailsea commuters using the station. It would rapidly become a very busy and congested route, leading to major noise and air pollution. It would increase “rat running” through the area, particularly from M5 Junction 19 to Bristol Airport, an issue which is already problematic. This effect ould be exacerbated by the proposed associated measures to discourage traffic from using Station Road, Backwell. It would also funnel the increased northbound (Nailsea-bound) traffic generated by the proposed East Backwell development into the constriction of Bucklands Batch on the South side of Nailsea. This is a narrow section of road which has already been widened to the extent possible by incorporating a strip of the frontage of each property along its East side, and has been the scene of numerous accidents causing injury to cyclists and pedestrians despite the addtion of a one-way cycleway. There are no firm costings or funding guarantees for the proposed new road in the Infrastructure Delivery Plan. If the East Backwell housing site allocation (to which I am submitting my objections concurrently) is dropped, the option to develop a North Nailsea Link Road should be seriously considered. This option would provide an onward link from Clevedon Road to the B3130 Nailsea to Wraxall road, serving the development sites to the West and North West of Nailsea already allocated within the local plan to 2026 and the industrial estates in the West and North of Nailsea, as well as the proposed allocations in North and West Nailsea, and deflect traffic from the Nailsea developments away from the congested centre of Backwell, avoiding the massive infrastructure complexity, cost and lead time to deliver a new link road. It would also maintain the separate identity and character of Nailsea and Backwell by avoiding the construction of a major link road in the green belt between the settlements. It would improve the routings for fire appliances, ambulances and police vehicles, improving safety and taking this inappropriate traffic away from Nailsea town centre. Such traffic will no doubt be forecast to increase significantly as a result of the new developments.			
Land south of Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I strongly object to the identification of Nailsea and Backwell as a proposed strategic growth area. Large scale development at these locations is not deliverable or sustainable for many reasons including: 1. Very limited existing or potential new employment in these locations, resulting in significant out-commuting. 2. Located in what is essentially a narrow valley, with flood plain in the valley bottom and steep hills to either side, placing major constraints on the development of new infrastructure, which even if feasible would at best be very expensive to develop. 3. Heritage assets and wildlife habitats including bat conservation areas. 4. Loss of scarce high quality agricultural land. 5. Impact on heritage assets/listed buildings including numerous farms. 6. Impact on local nature reserves such as Backwell Lake. 7. Surrounded by sensitive landscapes, heritage assets such as Tyntesfield, Cadbury Camp, and Tickenham Moor SSSI 8. Ageing population, with many in retirement or reaching retirement age. Over the coming few years, a large number of family homes will be vacated by this ageing population, providing opportunities for families to move in. Large-scale new development is not needed. The 1211 new dwellings now additionally proposed on top of the substantial numbers already committed, built in the past few years and/or under construction would lead to great strain on infrastructure of all kinds, including transport. This plan is unsustainable and undeliverable. Transport Transport hub and rail I strongly object to the proposed expansion of Nailsea and Backwell railway station on Station Road. It is not suitable			

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					for development as a future transport hub. There is insufficient space for increased parking and bus interchange facilities. The current station is very small and basic and there is very limited scope to improve the facilities in its current location. It is inaccessible for people with mobility challenges and is difficult to navigate when travelling with young children. Additionally, any incursion onto the land to the east of Station Road (for additional parking, bus hub, for example) would adversely impact the setting of the listed Moorside Farm A better solution would be to relocate the station from its current, highly constrained location to a new location further west where space is less constricted and it is more feasible to establish a transport hub, with appropriate walking/cycling and bus connections to the Grove Farm and Youngwood Lane developments. This could also provide a new multi-modal railway crossing point west of Nailsea and Backwell, to the west of the Backwell crossroads, which could be delivered as a below ground structure, as described in s 4.3 of the Nailsea and Backwell Local Transport Strategy. It would also facilitate improvement of the rail service by providing longer platforms and lift/disabled access and extended parking. Link road I strongly object to the proposal to construct new Cross Rail Link from the south of Nailsea to the east of Backwell, from Station Road near the station, in an easterly direction, to connect with the A370 East of Backwell. Such are the complications and enormous costs associated with such a road that it has previously been struck out of plans as unfeasible. The route would impact many hundreds if not thousands of residents in South & East Nailsea and North Backwell/ Backwell Common/Farleigh, with the pollution, noise, light pollution and visual intrusion being magnified by the terrain, which necessitates the siting of the highway in the bottom of the valley (with incumbent flood risk: Flood Zone 3) and most of the properties sitting above it, with no possibility of adequate mitigation. N.B: Impact on residents and environment are missing from the list of considerations on page 26 of the Nailsea and Backwell Local Transport Strategy, and in section 4.7.4, next steps, mitigations for residents (which are critically required but undeliverable) are completely missing. These adverse effects, whilst already substantial for the under-bridge concept (which was previously under consideration but now seems to have been ruled out due to the flood risk which would be very difficult and expensive if not impossible to overcome) would be magnified many times by the overbridge structure which is now contemplated, involving a bridge 12.5m high, with ramps 250m long on either side, as described on page 28 section 8.4.3.12 of the Nailsea and Backwell Local Transport Strategy. Such a structure would also result in significant visual intrusion into the landscape, including sight lines from Tyntesfield, All Saints Church Wraxall and St Andrews Church Backwell. This is underlined by the Landscape Sensitivity Assessment, Nailsea, s.6.2.58 on page 34 which defines the land as high sensitivity: “…and to the south-east of the town is gently sloping and vegetation on field boundaries is generally limited. Consequently, this land is visually prominent. In addition, there is existing visual coalescence between Backwell Common and Nailsea in some locations. Owing to the above, this land is of high sensitivity.” The proposed road would cross sensitive landscape, located in the green belt, consisting of prime agricultural land and would also pass close to Backwell Lake Local Nature Reserve and local green spaces/wildlife habitats ie Backwell Common and Trendlewood Park/Kenn Hedge. It would have a significant impact on the setting of the Listed Heritage Asset of Moorside Farm. Note: the “Low” sensitivity assessment for Moorside Farm in the Heritage Sensitivity Paper, page 13, East Backwell, completely neglects to consider the impact of the proposed road link. Similarly, the “Low” sensitivity assessments for Dibdens Farm, Cider Farm and Old Farm completely neglect the impact of the proposed road on the setting of these Heritage assets and their surroundings ie Backwell Common. The intersection of the route with Station Road would lead to significant incremental congestion and pollution close to residential properties and the Backwell Lake Nature Reserve due to standing traffic waiting for right of way. The increased traffic, and the need to negotiate the junction, would substantially increase danger to pedestrians and			

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					cyclists, particularly students at Backwell primary and secondary schools and Nailsea commuters using the station. It would rapidly become a very busy and congested route, leading to major noise and air pollution. It would increase “rat running” through the area, particularly from M5 Junction 19 to Bristol Airport, an issue which is already problematic. This effect ould be exacerbated by the proposed associated measures to discourage traffic from using Station Road, Backwell. It would also funnel the increased northbound (Nailsea-bound) traffic generated by the proposed East Backwell development into the constriction of Bucklands Batch on the South side of Nailsea. This is a narrow section of road which has already been widened to the extent possible by incorporating a strip of the frontage of each property along its East side, and has been the scene of numerous accidents causing injury to cyclists and pedestrians despite the addtion of a one-way cycleway. There are no firm costings or funding guarantees for the proposed new road in the Infrastructure Delivery Plan. If the East Backwell housing site allocation (to which I am submitting my objections concurrently) is dropped, the option to develop a North Nailsea Link Road should be seriously considered. This option would provide an onward link from Clevedon Road to the B3130 Nailsea to Wraxall road, serving the development sites to the West and North West of Nailsea already allocated within the local plan to 2026 and the industrial estates in the West and North of Nailsea, as well as the proposed allocations in North and West Nailsea, and deflect traffic from the Nailsea developments away from the congested centre of Backwell, avoiding the massive infrastructure complexity, cost and lead time to deliver a new link road. It would also maintain the separate identity and character of Nailsea and Backwell by avoiding the construction of a major link road in the green belt between the settlements. It would improve the routings for fire appliances, ambulances and police vehicles, improving safety and taking this inappropriate traffic away from Nailsea town centre. Such traffic will no doubt be forecast to increase significantly as a result of the new developments.			
Land east of Backwell	No • Positively prepared • Justified • Effective • Consistent with national policy		Unsure	Unsure	I strongly object to the identification of Nailsea and Backwell as a proposed strategic growth area. Large scale development at these locations is not deliverable or sustainable for many reasons including: 1. Very limited existing or potential new employment in these locations, resulting in significant out-commuting. 2. They are located in what is essentially a narrow valley, with flood plain in the valley bottom and steep hills to either side, placing major constraints on the development of new infrastructure, which even if feasible would at best be very expensive to develop. 3. Heritage assets and wildlife habitats including bat conservation areas. 4. Loss of scarce high quality agricultural land. 5. Impact on heritage assets/listed buildings including numerous farms. 6. Impact on local nature reserves such as Backwell Lake. 7. Surrounded by sensitive landscapes, heritage assets such as Tyntesfield, Cadbury Camp, and Tickenham Moor SSSI. Nailsea and Backwell currently have an ageing population, with many in retirement or reaching retirement age. Over the coming few years, a large number of family homes will be vacated by this ageing population, providing opportunities for families to move in. Large-scale new development is not needed. Backwell in particular is a small dormitory village, with minimal employment, infrastructure or services, which has already grown substantially in recent years and has already far outgrown its ability to serve its population. This leads to great strain on transport infrastructure of all kinds, with journeys necessary for most aspects of daily living including travel to work/school, retail, health and leisure services. The 900 new dwellings now additionally proposed on top of the 800 already approved in the past few years (a significant number of which are already under construction) is completely unfeasible in the context of the scale of the settlement. In this context, it is noteworthy that Backwell has been allocated a higher number of new houses than any other village or town in the plan area. The selection of East Backwell as the target site for 900 new houses is of particular concern for several reasons. The area is already susceptible to flooding and the run-off from this huge new development would worsen these problems. As is noted in the Heritage Sensitivity Paper, page 13, East Backwell, part of this site has high heritage sensitivity and there is potential for harm to a number of highly graded heritage assets. The Historic Environment Assessment, page 99, describes the visual intrusion of this development into the landscape, including sight lines from Tyntesfield, All Saints Church Wraxall and St Andrews Church Backwell.			

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					Note: the “low sensitivity” assessment for Dibdens Farm, Cider Farm and Old Farm on page 105 of the same document completely neglects the impact of the proposed road on the setting of these Heritage assets and their surroundings, ie Backwell Common. This is underlined by the Landscape Sensitivity Assessment, Nailsea, s.6.2.58 on page 34 which defines the land as high sensitivity: “…and to the south-east of the town is gently sloping and vegetation on field boundaries is generally limited. Consequently, this land is visually prominent. In addition, there is existing visual coalescence between Backwell Common and Nailsea in some locations. Owing to the above, this land is of high sensitivity.” The Best Most Versatile Agricultural Land topic paper Oct 2025 defines the land east of Backwell as Excellent quality agricultural land, Grade 1, which is a very scarce resource, and states that the proposed development “… is considered justified on the basis that without it the development of key infrastructure in the form of a new link road connecting Nailsea and Backwell would not be deliverable. This wider sustainability benefit outweighs the loss of BMV land in this location.” I strongly disagree with this argument. A has been stated elsewhere in the consultation papers, this proposed new link road may be undeliverable in any case, which would then render the presented justification null and void. This would contravene Government policy that the best and most versatile land must be protected. There are no firm costings or funding guarantees for the proposed new road in the Infrastructure Delivery Plan. This allocation would also necessitate removal of the land from the green belt which I do not consider to be justified. Link road I strongly object to the proposal to construct new Cross Rail Link from the south of Nailsea to the east of Backwell, from Station Road near the station, in an easterly direction, to connect with the A370 East of Backwell. Such are the complications and enormous costs associated with such a road that it has previously been struck out of plans as unfeasible. The route would impact many hundreds if not thousands of residents in South & East Nailsea and North Backwell/ Backwell Common/Farleigh, with the pollution, noise, light pollution and visual intrusion being magnified by the terrain, which necessitates the siting of the highway in the bottom of the valley (with incumbent flood risk: Flood Zone 3) and most of the properties sitting above it, with no possibility of adequate mitigation. N.B: Impact on residents and environment are missing from the list of considerations on page 26 of the Nailsea and Backwell Local Transport Strategy, and in section 4.7.4, next steps, mitigations for residents (which are critically required but undeliverable) are completely missing. These adverse effects, whilst already substantial for the under-bridge concept (which was previously under consideration but now seems to have been ruled out due to the flood risk which would be very difficult and expensive if not impossible to overcome) would be magnified many times by the overbridge structure which is now contemplated, involving a bridge 12.5m high, with ramps 250m long on either side, as described on page 28 section 8.4.3.12 of the Nailsea and Backwell Local Transport Strategy. Such a structure would also result in significant visual intrusion into the landscape, including sight lines from Tyntesfield, All Saints Church Wraxall and St Andrews Church Backwell. This is underlined by the Landscape Sensitivity Assessment, Nailsea, s.6.2.58 on page 34 which defines the land as high sensitivity: “…and to the south-east of the town is gently sloping and vegetation on field boundaries is generally limited. Consequently, this land is visually prominent. In addition, there is existing visual coalescence between Backwell Common and Nailsea in some locations. Owing to the above, this land is of high sensitivity.” The proposed road would cross sensitive landscape, located in the green belt, consisting of prime agricultural land and would also pass close to Backwell Lake Local Nature Reserve and local green spaces/wildlife habitats ie Backwell Common and Trendlewood Park/Kenn Hedge. It would have a significant impact on the setting of the Listed Heritage Asset of Moorside Farm. Note: the “Low” sensitivity assessment for Moorside Farm in the Heritage Sensitivity Paper, page 13, East Backwell, completely neglects to consider the impact of the proposed road link. Similarly, the “Low” sensitivity assessments for Dibdens Farm, Cider Farm and Old Farm completely neglect the			

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					impact of the proposed road on the setting of these Heritage assets and their surroundings ie Backwell Common. The intersection of the route with Station Road would lead to significant incremental congestion and pollution close to residential properties and the Backwell Lake Nature Reserve due to standing traffic waiting for right of way. The increased traffic, and the need to negotiate the junction, would substantially increase danger to pedestrians and cyclists, particularly students at Backwell primary and secondary schools and Nailsea commuters using the station. It would rapidly become a very busy and congested route, leading to major noise and air pollution. It would increase “rat running” through the area, particularly from M5 Junction 19 to Bristol Airport, an issue which is already problematic. This effect ould be exacerbated by the proposed associated measures to discourage traffic from using Station Road, Backwell. It would also funnel the increased northbound (Nailsea-bound) traffic generated by the proposed East Backwell development into the constriction of Bucklands Batch on the South side of Nailsea. This is a narrow section of road which has already been widened to the extent possible by incorporating a strip of the frontage of each property along its East side, and has been the scene of numerous accidents causing injury to cyclists and pedestrians despite the addtion of a one-way cycleway. There are no firm costings or funding guarantees for the proposed new road in the Infrastructure Delivery Plan. If the East Backwell housing site allocation (to which I am submitting my objections concurrently) is dropped, the option to develop a North Nailsea Link Road should be seriously considered. This option would provide an onward link from Clevedon Road to the B3130 Nailsea to Wraxall road, serving the development sites to the West and North West of Nailsea already allocated within the local plan to 2026 and the industrial estates in the West and North of Nailsea, as well as the proposed allocations in North and West Nailsea, and deflect traffic from the Nailsea developments away from the congested centre of Backwell, avoiding the massive infrastructure complexity, cost and lead time to deliver a new link road. It would also maintain the separate identity and character of Nailsea and Backwell by avoiding the construction of a major link road in the green belt between the settlements. It would improve the routings for fire appliances, ambulances and police vehicles, improving safety and taking this inappropriate traffic away from Nailsea town centre. Such traffic will no doubt be forecast to increase significantly as a result of the new developments. Transport hub and rail I strongly object to the proposed expansion of Nailsea and Backwell railway station on Station Road. It is not suitable for development as a future transport hub. There is insufficient space for increased parking and bus interchange facilities. The current station is very small and basic and there is very limited scope to improve the facilities in its current location. It is inaccessible for people with mobility challenges and is difficult to navigate when travelling with young children. Additionally, any incursion onto the land to the east of Station Road (for additional parking, bus hub, for example) would adversely impact the setting of the listed Moorside Farm A better solution would be to relocate the station from its current, highly constrained location to a new location further west where space is less constricted and it is more feasible to establish a transport hub, with appropriate walking/cycling and bus connections to the Grove Farm and Youngwood Lane developments. This could also provide a new multi-modal railway crossing point west of Nailsea and Backwell, to the west of the Backwell crossroads, which could be delivered as a below ground structure, as described in s 4.3 of the Nailsea and Backwell Local Transport Strategy. It would also facilitate improvement of the rail service by providing longer platforms and lift/disabled access and extended parking.			
Station Road to A370, Cross Rail Link, Nailsea and Backwell	No	• Positively prepared • Justified • Effective • Consistent with	Unsure	Unsure	I strongly object to the proposal to construct new Cross Rail Link from the south of Nailsea to the east of Backwell, from Station Road near the station, in an easterly direction, to connect with the A370 East of Backwell. Such are the complications and enormous costs associated with such a road that it has previously been struck out of plans as unfeasible. The route would impact many hundreds if not thousands of residents in South & East Nailsea and North Backwell/ Backwell Common/Farleigh, with the pollution, noise, light pollution and visual intrusion being magnified by the terrain, which necessitates the siting of the highway in the bottom of the valley (with incumbent flood risk: Flood			

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		national policy			Zone 3) and most of the properties sitting above it, with no possibility of adequate mitigation. N.B: Impact on residents and environment are missing from the list of considerations on page 26 of the Nailsea and Backwell Local Transport Strategy, and in section 4.7.4, next steps, mitigations for residents (which are critically required but undeliverable) are completely missing. These adverse effects, whilst already substantial for the under-bridge concept (which was previously under consideration but now seems to have been ruled out due to the flood risk which would be very difficult and expensive if not impossible to overcome) would be magnified many times by the overbridge structure which is now contemplated, involving a bridge 12.5m high, with ramps 250m long on either side, as described on page 28 section 8.4.3.12 of the Nailsea and Backwell Local Transport Strategy. Such a structure would also result in significant visual intrusion into the landscape, including sight lines from Tyntesfield, All Saints Church Wraxall and St Andrews Church Backwell. This is underlined by the Landscape Sensitivity Assessment, Nailsea, s.6.2.58 on page 34 which defines the land as high sensitivity: “...and to the south-east of the town is gently sloping and vegetation on field boundaries is generally limited. Consequently, this land is visually prominent. In addition, there is existing visual coalescence between Backwell Common and Nailsea in some locations. Owing to the above, this land is of high sensitivity.” The proposed road would cross sensitive landscape, located in the green belt, consisting of prime agricultural land and would also pass close to Backwell Lake Local Nature Reserve and local green spaces/wildlife habitats ie Backwell Common and Trendlewood Park/Kenn Hedge. It would have a significant impact on the setting of the Listed Heritage Asset of Moorside Farm. Note: the “Low” sensitivity assessment for Moorside Farm in the Heritage Sensitivity Paper, page 13, East Backwell, completely neglects to consider the impact of the proposed road link. Similarly, the “Low” sensitivity assessments for Dibdens Farm, Cider Farm and Old Farm completely neglect the impact of the proposed road on the setting of these Heritage assets and their surroundings ie Backwell Common. The intersection of the route with Station Road would lead to significant incremental congestion and pollution close to residential properties and the Backwell Lake Nature Reserve due to standing traffic waiting for right of way. The increased traffic, and the need to negotiate the junction, would substantially increase danger to pedestrians and cyclists, particularly students at Backwell primary and secondary schools and Nailsea commuters using the station. It would rapidly become a very busy and congested route, leading to major noise and air pollution. It would increase “rat running” through the area, particularly from M5 Junction 19 to Bristol Airport, an issue which is already problematic. This effect ould be exacerbated by the proposed associated measures to discourage traffic from using Station Road, Backwell. It would also funnel the increased northbound (Nailsea-bound) traffic generated by the proposed East Backwell development into the constriction of Bucklands Batch on the South side of Nailsea. This is a narrow section of road which has already been widened to the extent possible by incorporating a strip of the frontage of each property along its East side, and has been the scene of numerous accidents causing injury to cyclists and pedestrians despite the addtion of a one-way cycleway. There are no firm costings or funding guarantees for the proposed new road in the Infrastructure Delivery Plan. If the East Backwell housing site allocation (to which I am submitting my objections concurrently) is dropped, the option to develop a North Nailsea Link Road should be seriously considered. This option would provide an onward link from Clevedon Road to the B3130 Nailsea to Wraxall road, serving the development sites to the West and North West of Nailsea already allocated within the local plan to 2026 and the industrial estates in the West and North of Nailsea, as well as the proposed allocations in North and West Nailsea, and deflect traffic from the Nailsea developments away from the congested centre of Backwell, avoiding the massive infrastructure complexity, cost and lead time to deliver a new link road. It would also maintain the separate identity and character of Nailsea and Backwell by avoiding the construction of a major link road in the green belt between the settlements. It would improve the routings for fire appliances, ambulances and police vehicles, improving safety and taking this inappropriate traffic away from Nailsea town centre. Such traffic will no doubt be forecast to increase significantly as a result of the new developments.			

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Nailsea Backwell railway station	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I strongly object to the proposed expansion of Nailsea and Backwell railway station on Station Road. It is not suitable for development as a future transport hub. There is insufficient space for increased parking and bus interchange facilities. The current station is very small and basic and there is very limited scope to improve the facilities in its current location. It is inaccessible for people with mobility challenges and is difficult to navigate when travelling with young children. Additionally, any incursion onto the land to the east of Station Road (for additional parking, bus hub, for example) would adversely impact the setting of the listed Moorside Farm A better solution would be to relocate the station from its current, highly constrained location to a new location further west where space is less constricted and it is more feasible to establish a transport hub, with appropriate walking/cycling and bus connections to the Grove Farm and Youngwood Lane developments. This could also provide a new multi-modal railway crossing point west of Nailsea and Backwell, to the west of the Backwell crossroads, which could be delivered as a below ground structure, as described in s 4.3 of the Nailsea and Backwell Local Transport Strategy. It would also facilitate improvement of the rail service by providing longer platforms and lift/disabled access and extended parking.			

Name: Dick Douglas **I.D:** 62865505

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Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	1. No assessment of other possibilities especially brownfield alternatives to Pill Green. 2 No evidence of necessity to use Green Belt .No evidence of exceptional circumstances. 3. Huge reliance on one site of 600 homes is disproportionate and unjustified. 4. No delivery plan for all the infrastructure required. A369 is of particular interest as my property was already ‘raided’ in the previous A369 development. Timing and secure funding of all infrastructure must be in place before any development starts. 5.No evidence of why existing known brownfield sites are not used in preference. 6.Overall size of plan is too big and will swamp local communities and character. 7. Plan must have independent verification before any consent.	Delete the Pill Green Site (600 homes).	N/A	
Pill Green	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	See comments under LP4	Delete Pill Green development	N/A	

Name: Diverse Partnerships Yatton Ltd **I.D:** 29403105

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SP1: Sustainable Development	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national	Yes	Yes	Our client supports the range of criteria set out in policy SP1 as positive indicators of sustainability and aspirational considerations for a broad range of development types. We support framing the policy as ‘should’ in the opening wording. This allows discretion to the decision maker where in some cases it may not be feasible to satisfy every criterion. A balanced judgement will be required in each application determination. Without such an amendment the policy is not considered to be positively prepared or effective.			NSC Reg 19 Diverse Partnerships Yatton Ltd Reps Dec 25 - Redacted.pdf

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		policy						
SP2: Climate Change	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	Our client supports the themes set out within policy SP2. It is however considered that some expectations, such as achieving carbon net zero in all new buildings, are not realistic or reasonable in the context of an electrical grid still in the process of decarbonization and the Government's move to 'zero carbon ready' homes under the Future Homes Standard. While the policy's objectives are laudable, the measures and standards set out must be introduced in a proportionate manner to ensure the pursuit of the highest standards does not unduly delay or disrupt the delivery of the housing and other growth the area requires. The Council's own viability assessment identifies this cost as a 4-9% build cost increase, that could otherwise help secure other infrastructure objectives under the broader viability allowance. This policy should therefore be modified to reflect the reality and establish suitable parameters so that development can be assessed at a reasonable point in time to ensure the promotion of climate change resilience and minimising adverse environmental impacts of development. Without such changes the policy is not considered to be positively prepared, justified, effective, or consistent with national policy.	This policy should therefore be modified to reflect the reality and establish suitable parameters so that development can be assessed at a reasonable point in time to ensure the promotion of climate change resilience and minimising adverse environmental impacts of development. Without such changes the policy is not considered to be positively prepared, justified, effective, or consistent with national policy.		NSC Reg 19 Diverse Partnerships Yatton Ltd Reps Dec 25 - Redacted.pdf
SP3: Spatial strategy	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	Our client is supportive of the broad sustainability objectives of the spatial strategy outlined at Policy SP3, with regard to those areas most sustainably located in relation to employment, services and transport, including taking account of likely future scenarios. However, as set out in our previous Additional Sites Consultation comments (attached at Appendix 1) we remain concerned about the approach undertaken in site selection as this pertains to flood risk given the extent of the authority area impacted by such risks. This is relevant with respect to the reference to "minimising residential development in areas at risk of flooding now or in the future outside of the towns" and is explored further below within these comments. We also consider that the direction of development at all villages to only local needs does not represent the most sustainable or effective strategy. It is particularly noteworthy that the Council have omitted its own Rural Settlements Paper 2022 that accompanied previous plan consultations as background evidence. This explicitly identified Backwell and Yatton as the most sustainable locations after the towns and reflects Yatton's role in addressing the first portion of Policy SP3 regarding the sustainability objectives of the plan. This context is reflected throughout various referencing within the submitted Sustainability Appraisal and it is noted that a new secondary school is proposed to the south of Yatton under the emerging plan. In this regard it can be observed that 1,683 homes are proposed at Backwell under the emerging plan, but only c. 300 at Yatton/Claverham, pertaining mostly to existing consented development (beyond the Oxford Plasma site within Yatton). This is by and large a reflection of the 'hard constraints' placed on flood risk that is returned to below, but also indicates a lack of consistency in approach to the distribution of development amongst the more sustainable locations within the authority. Further commentary on the effectiveness of this approach is set out under comments on Policy SP5 below. The approach proposed essentially presupposes that further residential development in the villages beyond 'local needs' will not be suitable, rather than taking a more flexible approach based on the facts of each case (as under the current plan). This precludes the plan from delivering further sustainable forms of development at location such as Yatton.	The approach proposed essentially presupposes that further residential development in the villages beyond 'local needs' will not be suitable, rather than taking a more flexible approach based on the facts of each case (as under the current plan). This precludes the plan from delivering further sustainable forms of development at location such as Yatton. Without such changes the policy is not considered to be positively prepared, justified. Effective or consistent with national policy.		NSC Reg 19 Diverse Partnerships Yatton Ltd Reps Dec 25 - Redacted.pdf

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					Without such changes the policy is not considered to be positively prepared, justified. Effective or consistent with national policy.			
SP4: Placemaking	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	Our client is supportive of the general principles of good placemaking outlined within this policy, which are clear and which align with current national policy. The presumption that community consultation is undertaken for major development proposals reflects accepted industry best practice, the published Statement of Community Involvement and the validation requirements for a Statement of Community engagement to be submitted with major applications. There is however no policy obligation to undertake such consultation under the NPPF and it is unclear on what grounds an application would be refused in respect of identifiable planning harms were an application to fail to do so. Moreover, there are a number of circumstances where this may not be relevant, such as following a previous application with clear pre-existing community feedback, or for example development within the Royal Portbury Dock estate that has no impact beyond the estate. The wording of this part of the policy should be amended to entertain flexibility in this respect and simply support such consultation being undertaken. The final component of the policy, relating to design review, is considered to be not clearly defined and will give rise to uncertainty by both applicants and decision makers as to the circumstances in which design review will be required. The drafting is ripe for conflict between applicants and the authority over a matter of process than necessarily substance. Again, while the use of independent design review reflects industry best practice, and is not actively opposed, it remains unclear on what identifiable planning harms a proposal would be refused upon without this being undertaken. It is considered that the policy text should be removed and if necessary redirected to the supporting text as a means of corroborating compliance with the policy. Both of these components elevate process over outcomes, when a plan's policy tests should be outcome driven and simply encourage appropriate processes. Without the proposed changes the policy is not considered to be positively prepared, justified, effective or consistent with national policy.	It is considered that the policy text should be removed and if necessary redirected to the supporting text as a means of corroborating compliance with the policy. Both of these components elevate process over outcomes, when a plan's policy tests should be outcome driven and simply encourage appropriate processes. Without the proposed changes the policy is not considered to be positively prepared, justified, effective or consistent with national policy.		NSC Reg 19 Diverse Partnerships Yatton Ltd Reps Dec 25 - Redacted.pdf
SP6: Villages and rural areas	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	This policy as currently drafted strictly controls the distribution of housing at villages, limiting this to land within settlement boundaries save for in exceptional circumstances, and in this respect the policy differs considerably from its adopted equivalent, CS32. Commentary upon the plans consistency to the more sustainable villages of Backwell and Yatton and appropriate nature of Yatton for accommodating further development is referenced above overall and further below in respect of our client's site. The success of this policy from a strategic perspective therefore depends heavily on ensuring that larger allocations at the principal settlements within the authority area are sufficient, effective and deliverable, so that new homes will come forward promptly over the plan period. This is considered to present considerable risk given the consistent delays to delivering strategic scale development within North Somerset and nationally, as reflected in the Lichfields Start to Finish Report (Third Edition March 2024), that indicates seven years from application submission to first home delivery for sites of over 2,000 homes and build out rates of c. 112 dwellings per annum for such scale of development. In particular the plan is reliant on new strategic allocations at Wolvershill and Woodspring for 6,800 homes in total (equivalent to 29% of the entire plan housing target). It is noted in this regard that no housing trajectory / supply paper is provided within the evidence base to set out	The differing approaches between the adopted plan and the emerging plan therefore present a sea change in the potential for windfall development and the evidence base does not reflect this. It is therefore considered that without such changes either in policy or evidence base the plan is neither justified or effective.		NSC Reg 19 Diverse Partnerships Yatton Ltd Reps Dec 25 - Redacted.pdf

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					how the Council envisages the delivery under the proposed housing strategy being advanced across the plan period, and the last full published housing supply position addressing existing deliverable supply for the Council is from April 2024. With respect to the lack of flexibility and supply of housing across all sources throughout the plan period, it is noted that the published Strategic Housing Land Availability Assessment Main Report makes reference to windfall projections of 2,550 (or 10% of the plans housing target) taking account of "…completions data across the full plan period." Read in context this is presumed to refer to the existing (previous) plan period, given 'completions data' is referred to. This position clearly ignores that the existing adopted plan has imbedded flexibility to deliver additional development adjacent to all settlements of the adopted settlement hierarchy from Weston-super-Mare down to 'Service Villages'. The differing approaches between the adopted plan and the emerging plan therefore present a sea change in the potential for windfall development and the evidence base does not reflect this. It is therefore considered that without such changes either in policy or evidence base the plan is neither justified or effective.			
SP8: Housing	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	While we acknowledge the housing target reflects the defined position under the Standard Method, it is apparent that no meaningful attempt has been made to engage with the potential for addressing the unmet need from neighbouring Bristol beyond dismissing any such action outright. While the direction of travel away from the Duty to Co-operate under the expected 'new plan making system' is noted, this remains a relevant consideration under paragraph 24 of the NPPF as published at the time of this consultation. Should this position change our client will update these comments at the next available opportunity. Accordingly, the position within North Somerset as of now should be seen within the broader housing supply picture across the wider West of England housing market area, with North Somerset expected to join the West of England Combined Authority (WECA) in 2026, and so likely prior to any examination of the emerging plan. The meeting of housing need across this area has been underrepresented by a whole generation of adopted plans and delayed new local plans. This is due to the past failures of two attempts at delivering strategic planning within the region, in turn leading to delays in local plan progression. Of most note is Bristol City Council's emerging plan, which underwent examination hearings in 2025. This sets out a 'capacity' led approach to housing delivery resulting in under-delivery of homes at 1,017 homes per year against the up-to-date Standard Method. None of the neighbouring authorities have indicated any intent to address this unmet need. Indeed, South Gloucestershire Council's emerging local plan submitted for examination in October 2025 compounds this by utilising transitionary measures to build in a further under-delivery of 127 homes per annum against their Standard Method. Neither North Somerset Council or Bath and North-East Somerset Council's emerging plans seek to address the unmet housing demand from either authority. To give context to the future strategic planning across the region, a formal timetable for a new West of England 'Spatial Development Strategy' (SDS) was agreed at the 17th October 2025 meeting of the West of England Combined Authority Committee for adoption by Spring 2029. This will be informed by the West of England Combined Authority (WECA) 'Growth Strategy' published on 24th September 2025, which identifies that a target of 7,750 homes per annum across the West of England area will be pursued under the SDS. This represents a significant uplift against the combined adopted or emerging housing targets of the authorities. This makes clear that each constituent authority's intent to minimise housing delivery will			NSC Reg 19 Diverse Partnerships Yatton Ltd Reps Dec 25 - Redacted.pdf

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					render all emerging plans functionally out-of-date well within their respective plan periods. Should the housing target not be uplifted, the plan should acknowledge the need for early review to reflect the future SDS. This strategic planning position will no doubt further clarify itself as the emerging plan proceeds towards examination. In addition to this broader picture on the housing target, our client has concerns regarding the distribution proposed, in particular with regard to the above commentary relating to the role of Yatton and the lack of flexibility for enabling development at this sustainable settlement within the adopted strategy. The observations set out above in relation to SP3 and SP6 extend to Policy SP8.			
SP11: Historic and natural environment	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	We would observe that this policy captures a broad range of objectives, including landscape, heritage, ecology, green and blue infrastructure together with settlement identity and strategic gaps. It is noted that the policy seeks to 'protect the best and most versatile agricultural land' (BMV land). This however extends beyond the NPPF position of recognizing the benefits of such land. Large swathes of the authority area fall within BMV land and this should be factored into any wider planning balance when making a decision. Indeed, the Natural England guidance on this (Guide to assessing development proposals on agricultural land 2021) directs to a threshold of 20ha and smaller losses "If they're significant". The policy should be amended in this regard to move away from 'protect' to "have regard to the benefits of" BMV land to be consistent with national policy. Without such change the policy is not positively prepared, consistent with national policy, effective or justified.	The policy should be amended in this regard to move away from 'protect' to "have regard to the benefits of" BMV land to be consistent with national policy. Without such change the policy is not positively prepared, consistent with national policy, effective or justified.		NSC Reg 19 Diverse Partnerships Yatton Ltd Reps Dec 25 - Redacted.pdf
Policy LP1: Strategic location: Wolvershill (north of Banwell)	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	Our client has no comments to make upon these allocations beyond noting the concerns stated above about their ability to fully contribute to the housing supply within the plan period. The policies themselves further articulate the points made in Section 2 above, by setting out the need for full masterplans prior to the making of any applications, design codes and infers the potential for changes from the published Infrastructure Delivery Plan. It is noted that Strategic Location LP1 is already subject to 3no. live applications, and it remains unclear whether the policy will in effect require withdrawal of these. These all indicates substantive work is required, that in the case of LP2 at the very least, will likely delay application submission and so the overall expected timetables for such large scale development. Therefore, while our client has no objection to the strategic locations their scale and scope indicate that they are unlikely to deliver their full yield during the plan period and so will require further allocations to deliver the identified housing target.			NSC Reg 19 Diverse Partnerships Yatton Ltd Reps Dec 25 - Redacted.pdf
Policy LP2: Strategic location: Woodspring (south west of Bristol)	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	Our client has no comments to make upon these allocations beyond noting the concerns stated above about their ability to fully contribute to the housing supply within the plan period. The policies themselves further articulate the points made in Section 2 above, by setting out the need for full masterplans prior to the making of any applications, design codes and infers the potential for changes from the published Infrastructure Delivery Plan. It is noted that Strategic Location LP1 is already subject to 3no. live applications, and it remains unclear whether the policy will in effect require withdrawal of these. These all indicates substantive work is required, that in the case of LP2 at the very least, will likely delay application submission and so the overall expected timetables for such large scale			NSC Reg 19 Diverse Partnerships Yatton Ltd Reps Dec 25 - Redacted.pdf

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					development. Therefore, while our client has no objection to the strategic locations their scale and scope indicate that they are unlikely to deliver their full yield during the plan period and so will require further allocations to deliver the identified housing target.			
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	Our client has no commentary upon this policy beyond acknowledging the inconsistency in approach between Backwell and Yatton and set out in the above commentary.			NSC Reg 19 Diverse Partnerships Yatton Ltd Reps Dec 25 - Redacted.pdf
Policy LP5: Housing, employment and mixed use allocations	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	LAND AT STOWEY ROAD, YATTON The following representations are submitted on behalf of ‘our client’ Diverse Partnerships Yatton Ltd to the North Somerset Local Plan 2041: Pre-submission Plan (Regulation 19) (Local Plan). These representations relate solely to our client’s interests at the Land at Stowey Road, Yatton. For clarity our client’s interest pertain to Site Reference HE20179 under the Strategic Housing Land Availability Assessment, known as ‘Stowey Road’, and not Site Reference HE208000, known as ‘Stowey Road, Yatton’. As set out in our previous Additional Sites Comments (see Appendix 1), we are unclear why this has been addressed as such given its location removed from Stowey Road off of Claverham Road. This site was subject to an appeal determination in June 2025 (see Appendix 2) that dismissed the proposed development on narrow ecological mitigation grounds that we are confident can be overcome. Pegasus Group and our client welcome this opportunity to engage with the Council. Our client is keen to work collaboratively with the Council to ensure that a sound and robust plan is submitted for examination which provides an appropriate planning framework for North Somerset. The December 2024 National Planning Policy Framework (NPPF) is the latest iteration of the NPPF and became effective on its publication. Amongst key changes introduced at that time was the reinstatement of the expectation that the standard method should be the basis for calculating local housing need for the purposes of plan-making, an approach subsequently adopted by North Somerset Council. This has resulted in the significant overhauling of the previous strategic policies of the previous Regulation 19 draft Local Plan, which advocated a ‘constraints based’ approach to the provision of housing that resulted in just over 75% of the authority area’s needs (at the time) being met, in order to secure the necessary uplift directed by the standard method, the updated calculation for which simultaneously yielded a figure c.20% higher in of itself. In making these representations we have taken account of the tests of soundness which will be applied to the local plan when it is examined by the local plan Inspector. Paragraph 36 of the NPPF confirms that plans would be considered sound if they are: • Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; • Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;			NSC Reg 19 Diverse Partnerships Yatton Ltd Reps Dec 25 - Redacted.pdf

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					• Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and • Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework. The following response is provided to selected policies and issues identified within the Local Plan and its associated evidence base. This response should be read in conjunction with the relevant pro-formas. Our client is supportive of much of the plan, and wishes to comment specifically on matters pertinent to their land interest at Yatton. It is considered that these issues should be considered through the process of plan formulation prior to submission of any Regulation 22 Local Plan to the Secretary of State for independent Examination. Our client controls c.4 hectares of land north-east of Stowey Road adjacent to the defined settlement edge of Yatton (see attached document for location plan). The site was considered under Site Reference HE20179 within the published SHLAA and ruled out within the initial stage due to falling under the 'hard constraints' of flood risk. Under our Additional Sites Consultation response (see Appendix 1) we raised concerns at how flood risk being defined as a 'hard constraint' was overly simplistic. We noted at this time that the approach taken in site selection for the additional sites was inconsistent with previous site selections, with Table 2 of the Flood Risk Sequential Test of proposals within the Pre-submission Local Plan identifying sites with a total of 2,018 homes within areas at risk of flooding. This position is further confused by the published Sustainability Appraisal stating at Paragraph 6.241 of that "Importantly, whilst areas of flood risk surround much of Yatton and Congresbury, the sites proposed for allocation are mostly located outside of these areas." When all sites at Yatton are subject to flood risk. Further to this, application 17/P1754/O for 34 no. homes was determined by a non-determination appeal in June 2025 under appeal reference APP/D0121/W/24/3349043 attached at Appendix 2 of attached document. This stated: "Given the particular circumstances at this site in terms of the length of time for flood water to reach the site and that the development would, ultimately, be safe from flooding, I find that the flood risk policies of the Framework would not provide a strong reason for refusal of this particular development." While the application was dismissed on narrow ecology mitigation grounds, that we are confident can be overcome and for which we intend to make a future application, it is clear that flood risk matters presented no impediment to the delivery of housing upon the site. This position is further corroborated by the SFRA breach modelling (which prior to this had not been updated for some time for the area), which shows that the majority of the southern field (the location of proposed housing) remains unaffected even in the worst case scenario (Upper End climate change projections to 2125) under both of the two breach models completed. Given the recent appeal focused solely on ecological mitigation, which can be overcome, there are no constraints preventing the delivery of residential development upon the site. Conclusions Our client is keen to work with North Somerset to ensure that it submits a sound plan for examination to the Secretary of State. Whilst our client considers some elements of the plan to			

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					be sound, we have highlighted several policies in respect of which modifications are recommended. We consider that the plan as drafted does not provide sufficient evidence to demonstrate that the housing target will be met with regard to the strategic allocation delivery within the plan period and methodology for determining windfall development in the absence of a more flexible approach to edge-of-settlement delivery. We have also presented concerns with how the emerging plan fails to engage with the wider regional housing delivery within the West of England area or the future SDS that will encompass North Somerset also. Both these matters infer the need for further allocations and an early plan review aligned with the SDS progression. We have also presented concerns on the comparable blending of Nailsea and Backwell as a location for strategic growth, while presenting a hierarchy that effectively dismisses meaningful growth at Yatton despite having previously described it and Backwell as the most sustainable villages within the authority. We have set out how the approach to allocating additional sites was floored in its full dismissal of flood constraints as 'hard constraints', despite inconsistency with the methodology for the previous drafted allocations (that were not revisited under the same methodology) and multiple planning permissions making clear the nuance of flood risk to areas such as at Yatton need not prevent residential development. We have explicitly directed the Council to the appeal decision at Appendix 2 demonstrating that flood risk matters present no impediment to development upon our client's site. Our client looks forward to positively supporting the Council through the plan-making process, in order to ensure a sound Local Plan which plans positively for the needs of the area.			
Policy LP7: Settlement boundaries	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	Our client has no objection to the principle of draft policy LP7 in so far as it makes clear that development will be deemed acceptable as a matter of principle within the settlement boundaries. As set out above, the tightly drawn nature of such boundaries reinforces the importance of ensuring a sufficient supply of deliverable housing allocations and an accurate assessment of windfall sites. In this regard, and as set out above, the concerns over housing delivery being met within the plan period and the move away from the flexible position allowed for within the adopted plan (under Policy CS32 for example) is likely to impede the delivery of a sufficient number of homes.			NSC Reg 19 Diverse Partnerships Yatton Ltd Reps Dec 25 - Redacted.pdf
Policy DP6: Net zero construction	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	In our client's previous representations on the draft policies, it was identified that the proposed approach was contrary to national policy. The Council has not provided any additional evidence since the last consultation to demonstrate exceptional circumstances justifying that this policy is appropriate for inclusion in the draft Local Plan. Therefore, it remains unfeasible to include the policy without further supporting evidence. The Written Ministerial Statement Planning: Local Energy Efficiency Standards - 13th December 2023 informed councils that the government expects examiners to reject local plans that go beyond current national policy and legislative provisions. This has recently been tested in the Court of Appeal, which concluded that local authorities may set higher requirements exceptionally, subject to there being strong justification for such. Thus, there is an implicit evidential bar for doing so. In this instance, there is no clear evidence demonstrating that requirements in excess of the Building Regulations, which establish the standards that central government deems appropriate with respect, inter alia, to energy efficiency and domestic renewable technologies, are reasonably justified. While our client supports in principle the achievement of high levels of energy efficiency an the	Modification: The policy should contain flexibility to positively receive proposals that improve upon them, but not require new development ordinarily to go beyond the standards set out in the Building Regulations.		NSC Reg 19 Diverse Partnerships Yatton Ltd Reps Dec 25 - Redacted.pdf

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					use of renewables, it is important real-world considerations including ensuring that development remains viable, having regard to other factors in this respect, and the impact on housing supply and affordability remains in accordance with the National Planning Policy Framework. This should be taken into consideration by the Council regarding this specific need, which, without substantive evidence otherwise, should not seek to push local standards beyond those established through Building Regulations.			
Policy DP8: Efficient use of land	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	This policy is unsound as it is not justified or effective. In previous representations on the Regulation 19 draft policy, which also proposed a minimum density of 40 dwellings per hectare, concerns were raised that this approach conflicts with national policy. While the policy states that density should respect and complement the character of the surrounding area, there is limited scope to achieve this given local character, market demand, and site constraints of individual sites across North Somerset. The updated viability assessment indicates that achieving a minimum of 40 dwellings per hectare may be possible on strategic sites. However, this will not always be feasible across the Council's area, and the requirement would create conflicts with other policies.	Modifications: Greater flexibility is needed within the policy to ensure future developments are built at a density appropriate to local character, site constraints, and market requirements.		NSC Reg 19 Diverse Partnerships Yatton Ltd Reps Dec 25 - Redacted.pdf
Policy DP9: Flood risk	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	The policy is unsound as it is not justified, positively prepared or consistent with national policy. While our client is supportive of policy that seeks to protect new and existing development from increased probability and severity of flooding, presently this policy presumes in respect of the sequential test that this exercise should inform any proposals to develop land within areas of increased flood risk, regardless of whether that development can demonstrably be made safe in technical terms. This does not align with the September 2025 amendments to the PPG which advise, inter alia, that: "In applying paragraph 175 a proportionate approach should be taken. Where a site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development (therefore addressing the risks identified e.g. by Environment Agency flood risk mapping), without increasing flood risk elsewhere, then the sequential test need not be applied." Therefore, the policy is inconsistent with national guidance and unduly restricts opportunities for additional homes in some of the most sustainable locations, regardless of the capacity to ensure these are safe in terms of flood risk and will not exacerbate such risk elsewhere. In addition, the policy only directs to the Strategic Flood Risk Assessment in identifying flood risk. The PPG however draws this more broadly in describing the content of a Flood Risk Assessment as follows: "You can use this section to describe the risk of flooding to and from the proposed development over its expected lifetime, including appropriate allowances for the impacts of climate change. It would be helpful to include any evidence, such as maps and level surveys of the site, flood data sets (e.g. flood levels, depths and/or velocities) and any other relevant data (e.g. speed of onset and duration), which can be acquired through consultation with the Environment Agency, the lead local flood authority for the area, or any other relevant flood risk management authority. Alternatively, you may consider undertaking or commissioning your own assessment of flood risk, using methods such as computer flood modelling.	The policy must be brought up-to-date to reflect national planning practice guidance with respect to technical flood risk information and the matter of sequential testing.		NSC Reg 19 Diverse Partnerships Yatton Ltd Reps Dec 25 - Redacted.pdf

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					a. What is/ are the main source(s) of flood risk to the site? (e.g. tidal/sea, fluvial or rivers, surface water, groundwater, other?). You should consider the flood mapping available from the Environment Agency's Flood Map for Planning, the Strategic Flood Risk Assessment for the area, historic flooding records (e.g. the historic flood map and local authority section 19 flood investigation reports) and any other relevant and available information." It is not uncommon for applicants to conduct topographical surveys for accurate levels data or modelling that may further clarify a site's flood risk. In addition, SFRAs may be superseded by dedicated modelling undertaken by other parties such as the Environment Agency in flood defence management. These circumstances were/are pertinent to our client's site as explored below. The policy must be brought up-to-date to reflect national planning practice guidance with respect to technical flood risk information and the matter of sequential testing.			
Policy DP36: Biodiversity Net Gain	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	The policy complies with the current legal requirements prescribing the need to deliver a minimum of 10% biodiversity net gain on or off-site. It should however be noted that this is expected to be shortly subject to modification at a legislative level, potentially to widen the range of exceptions particularly to support the delivery of small schemes. It is noted that the draft policy conforms to National Planning Policy Guidance (NPPG) at Paragraph: 006 Reference ID: 74-006-20240214, which confirms that plan-makers should not seek a higher percentage than the statutory 10% for BNG on an area wide or site wide basis unless justified and considering viability and implementation. Our client is supportive of the draft policy's consistency with legal requirements for 10% and agrees with the Council that it would be inappropriate to seek a level of gain higher than this figure, although many developments will exceed it in any event.	Modification: The policy should be tailpieced to account for any subsequent changes in legislation to ensure alignment with legal requirements as they may change over time.		NSC Reg 19 Diverse Partnerships Yatton Ltd Reps Dec 25 - Redacted.pdf
Policy DP43: Affordable housing (including rural exception schemes)	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	This policy is unsound as it is not effective and unjustified The Council published an addendum to the viability report, which forms part of the Local Plan evidence base, in November 2023. The report concludes that "achieving 25% affordable housing could be challenging with the currently assumed infrastructure costs and therefore there may well need to be flexibility built into policy to allow for any necessary ongoing consideration of this to ensure that development can continue to come forward viably." The updated viability report acknowledges that affordable housing on greenfield sites could be achievable. However, it also notes that policy should allow a degree of flexibility to assess viability on a case-by-case basis. The current policy wording does not provide for this. While the importance of affordable housing in major developments to deliver a sustainable mix of homes is recognised, the proposed policy conflicts with national guidance, is ineffective because it risks undermining overall housing delivery and reducing the number of affordable homes provided, and does not reflect the principles of positive planning.	Modification: The policy needs to be adjusted to accurately reflect what has been produced in the viability report.		NSC Reg 19 Diverse Partnerships Yatton Ltd Reps Dec 25 - Redacted.pdf
Policy DP45: Residential space standards	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	Our client understands the importance of new development being designed to ensure that residents are comfortable and do not hinder their amenity. The emerging plan states that, when applying the Nationally Described Space Standards (NDSS), all rooms that have the capacity to serve as a bedroom should comply with the standard. This is not a requirement set out in the NDSS and would fundamentally impact how residential developments are designed. It could lead to a greater land take to accommodate the additional space required, which in turn may reduce the number of units delivered on site and create conflicts with draft policy DP8 regarding the efficient use of land. Moreover, it must be acknowledged that patterns in the use of domestic space change over time; for instance, pre-Covid demand for dedicated home office space was much lower than it is now, and the policy should therefore acknowledge that internal layouts and spaces will reflect	Modification: the policy requires more flexibility to ensure that proposals can deliver innovative design, but the policy is not supported by any evidence that would indicate that there is a need/ reason for this policy. Lastly, the policy is not compliant with national policy.		NSC Reg 19 Diverse Partnerships Yatton Ltd Reps Dec 25 - Redacted.pdf

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					market demand at a point in time and should not be constrained by the status quo at the point of plan adoption.			
Policy DP46: Housing Type and Mix	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	This policy is unsound as it will not be effective. Our client supports the delivery of diverse, high-quality development. However, the policy's reliance on a specific Housing Needs Assessment—a document often updated after the Local Plan is adopted—could restrict proposals coming forward later in the plan period. It is essential that developments delivered in the later stages can respond to market conditions and the evolving needs of the local community. While our client does not object to any individual criterion, the policy must provide sufficient flexibility to ensure it remains applicable to all sites and schemes. The policy also references accessible housing to align with current Building Regulations. However, this requirement is not adequately justified within the Council's evidence base and runs contrary to the presumption that, in terms of mix, development should be informed by local assessment. Greater flexibility should be incorporated, allowing proposals to be assessed on a site-by-site basis, including the removal of the minimum threshold. This policy requires proposals for major developments to include the level of self-build or custom-build housing identified on the register at the time of application, representing a significant increase from current expectations, albeit with no clarity on how much or how this should be facilitated. The expectation for additional self-build units is neither clear, evidenced nor justified, and it does not address any necessary compliance with national policy. No evidence supports the inclusion of this higher standard. Furthermore, the updated viability assessment provides no additional information confirming that this policy would avoid adverse impacts on viability and, the delivery of new residential settlements. Finally, there is no evidence to suggest that this element of the policy will make a meaningful contribution to housing delivery.	Modification: Flexibility to be provided to allow for innovation and enable developments to respond to specific site characteristics, but also to ensure that new schemes are compliant with national policy supported by the appropriate evidence. The mandatory requirement for self-build units within major schemes should be deleted.		NSC Reg 19 Diverse Partnerships Yatton Ltd Reps Dec 25 - Redacted.pdf
Policy DP53: Best and most versatile land	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	The policy is unsound as it is not justified, positively prepared or consistent with national policy. The policy as presented is quite plainly designed to resist speculative development than to place a proportionate consideration of loss of Best and Most Versatile (BMV) agricultural land, placing an effective moratorium upon development within BMV land with only very limited exceptions. The policy refers to "significant, inappropriate and unsustainable" proposals, which it then defines by allowing exceptions for a limited range of specific development types without regard to any criteria setting out scale. This is contrary to the guidance presented by Natural England only countenances losses of BMV land of over 20ha as 'significant', but the policy as drafted sets no such threshold. Moreover, the policy fails to balance the assessment of the value of BMV land as prescribed in the NPPF with other locational considerations both at a strategic level (i.e. directing development to the most sustainable locations) and within a site layout; prioritising domestic gardens alongside allotments and orchards on areas of higher agricultural quality that will in practice have no significant bearing on food production or security. By way of comparison the accompanying topic paper identifies all but one of the greenfield allocations upon Grade 3 or above land. The policy overall overrepresents considerations of BMV land and should be amended. At the very least the sustainability exception should be extended to Grades 1 and 2 also. Without such changes the policy is not justified, compliant with national policy, evidenced or positively prepared.	The policy overall overrepresents considerations of BMV land and should be amended. At the very least the sustainability exception should be extended to Grades 1 and 2 also. Without such changes the policy is not justified, compliant with national policy, evidenced or positively prepared.		NSC Reg 19 Diverse Partnerships Yatton Ltd Reps Dec 25 - Redacted.pdf

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Policy DP64: Adoption of open space and green infrastructure	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	The policy is unsound because it is not effective. Our client supports the integration of green infrastructure and open space in future development to ensure ecological and landscape mitigation is appropriately incorporated. The proposed wording reflects standard practice for all developments our client promotes, including the provision of open space that is accessible to all. Typically, such spaces are managed by a management company agreed between the Council and the applicant at the outline stage through a Section 106 agreement. This approach ensures proper long-term maintenance and is common practice, so it would be appropriate to reference this in the policy. Instead, the proposed requirement for a resident-led management structure lacks sufficient detail and guidance. Clear procedures and qualified personnel would need to be in place to ensure the development is maintained effectively.	Modifications: There needs to be further guidance provided in the policy which details how a residential-led management structure is justified to manage the open space and guidance on how one can be formed which would follow the same maintenance procedures.		NSC Reg 19 Diverse Partnerships Yatton Ltd Reps Dec 25 - Redacted.pdf

Name: Dom Wells **I.D:** 56322177

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Policy LP5: Housing, employment and mixed use allocations	Unsure		Unsure	Yes	SITE IN LOCKING There is suitable brownfield land available for development that is excluded from the draft Local Plan and is within the proposed Development Boundary for Locking. The land is at BS24 7BE, reference https://maps.app.goo.gl/ChyPFRZcatvrGLYs6 and has two small toilet blocks and hardstanding on it from a previous use as a caravan park. This land is now outside of North Somerset Council's proposed Green Belt and situated between retail/ industrial parks close to all local amenities and public transport and therefore suitable for being an infill site.	There is suitable brownfield land available for development that is excluded from the draft Local Plan and is within the proposed Development Boundary for Locking. The land is at BS24 7BE, reference https://maps.app.goo.gl/ChyPFRZcatvrGLYs6 and has two small toilet blocks and hardstanding on it from a previous use as a caravan park. This land is now outside of North Somerset Council's proposed Green Belt and situated between retail/ industrial parks close to all local amenities and public transport and therefore suitable for being an infill site.		local plan extract brownfield BS24 7BE.JPG

Name: Dominic Abel **I.D:** 62813985

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Land east of Backwell	No		Unsure	Unsure	This plan to build all these houses is obsurd and destroys lots of fertile greenbelt. Backwell is just a village and isn't in the right location or suitable as a town. The new road will spoil the area around backwell lake, ruining the asthetics of the village adding to congestion and pollution.			

Name: Doreen Lane **I.D:** 51446145

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Land east of Backwell	No	• Positively prepared	No	No	We already have 800 new homes in our small village which have caused utter chaos on the roads and destroyed the environment. Developers have blatant disregard to the community. The developments so far are cheap, crammed in toy town. We simply do not have the infrastructure to support - a new road running parallel to station road is pie in the sky and would destroy grade 1 Agricultural Land of which there is only 7% left in the whole of North Somerset. There is no social cohesion impact assessment. Backwell is a commuter hub and not an employment hub.			

Name: Doug Ashby **I.D:** 58417825

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure		I have big concerns about the development of the land east of Backwell. I walk this area on an almost daily basis and there are multiple reasons why I think it is unsuitable. Firstly, my overarching concern is with the Backwell common road itself. This single-track country lane, with multiple blind corners, routes around the back of Backwell from Station Road and joins the A370 at the George Pub – any development that backs onto this road will ultimately lead to a massive increase in traffic on this road. As per my picture attached, you plan to include a field that is completely locked by the train track and the Backwell Common road itself, which means that access would have to be granted in some form from the Backwell common road to the larger estate on the other side of the road; whatever calming or preventive measures that you try and put in, will ultimately mean that there will be a huge increase in traffic on the Backwell common road – as I have said, not only is the road a single-tracked lane but it is also part of the national cycle route and is designated a Festival Way, which should be encouraging cycling and walking, not more cars! I believe that with all the development, the Backwell common road will be used as a rat run to escape the heavy traffic on station road and the A370, so that people can take a shortcut to drive into the estate where the opening would have to be for this section of the land-locked development (as per my picture). I fear this increase in traffic will make the road pretty much unusable for pedestrians, walkers and cyclists. My children have to walk to school along Backwell Common and it has no lighting and no pavement – this development would really make me fear for their safety. I have walked this area for nearly four years, and the Backwell Common Road is absolutely prone to flooding. There are specifically 3 locations where flooding on the road occurs: At Farleigh House under the railway bridge (right where the field in my attached picture will have to join the main estate), at number 12 Rivida Cottage, and then very heavily at the well-known location under the bridge at Chapel Hill. Again, this will lead to considerable issues related to the inevitable increase in traffic along the Common. The fields at site HE202012 also have a very high water table, and are certainly impassable during winter time next to Woolleys Farm, which again is where your entrance to the primary estate would have to be. To be clear, pretty much the whole of the Backwell common road has a trench on one side dug out by the farmers so that any excess flood water can hopefully drain off the road or fields, but from my experience these regularly overflow onto the road! We must also not forget that this is Greenbelt, and provides a very important green space for the residents of Backwell. The fields contain multiple public rights of way, which means that the sports centre and the allotments can be accessed from these fields. I really do find it sad that you would want to build over this beautiful countryside, and to also lose the use of this farmland - quality agricultural land is essential for our food security, once we concrete over it all, it will be gone forever!! On top of all of this, we have to realise that Backwell is not a land of job opportunity - people move here because they want larger houses in the countryside. If a large amount of affordable housing is created, where will all of these people find job opportunities? Let us also not forget that three quarter of a million pound detached houses do not solve a housing crisis, we should be building upwards on brown or grey belt at the edge of existing cities, thus providing affordable housing and great access to jobs and transport links!! And finally, I just have no idea when and how this additional Link Road (to relieve the additional strain on Station Road) will appear? I've heard that estimated costs are up to around £50 million - you can't seem to even afford to maintain our pavements to our schools, let alone find this amount of money to provide access to a total of around 1500 houses - I just can't understand how it is a justifiable amount of money to spend, considering the perceived benefits?! My concern would be that the link road is never built and Backwell Common and Station Road will just suffer the consequences; I walk along Station Road daily during peak school times, and the road is incredibly dangerous, it is literally just an accident waiting to happen! Hundreds of school kids file down the pavement, often walking in the road, whilst HGVs career up and down, often having to mount the pavement to make way for oncoming vehicles! In conclusion, the people of Backwell simply don't want all these additional houses and everything that comes with them: more traffic, more pollution, more crime, poorer public services and poorer education!!			landlocked.jpg

Name: Doug Williams **I.D:** 39304993

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	A foremost concern is the significant and well-documented flood risk across the proposed development area (and I wonder if the North Somerset Council would be leaving itself open to claims of negligence, or otherwise need to bear the responsibility of any such disaster if it did approve building in these areas. Backwell Common frequently becomes impassable—and the fields around Backwell Lake (the reservoir), where new housing and roads are proposed, lie within an active floodplain that already floods regularly. Additional development on this land would increase surface-water runoff and further heighten the risks to residents, infrastructure and emergency access. Given these known hazards, it is important to ask whether North Somerset Council could reasonably justify approving construction on land with such evident and worsening flood vulnerabilities, and whether doing so would expose the authority to foreseeable and avoidable risk. Backwell has already faced substantial growth, with 800 new homes recently approved—representing a 40% increase in the size of the village. The proposed additional 1,000 houses would amount to overdevelopment on an unprecedented scale, pushing Backwell beyond a 50% expansion and nearly doubling the population within a short period. No other village in North Somerset is being asked to accommodate growth of this magnitude: Backwell alone is expected to take around 7% of the district's total housing allocation, compared with Clevedon's 2%, despite Backwell not being an employment hub or designated service centre. No needs or viability analysis has been provided to justify such an allocation. Infrastructure provision is already stretched. There is a shortage of school places, and no planned investment in health care, leisure facilities or other essential services. The proposed new road would not relieve congestion in Backwell, nor would it effectively serve Nailsea's traffic. Engineering a crossing under or over the railway line appears prohibitively expensive, and there is no guaranteed funding for either the road or the supporting infrastructure. The Infrastructure Delivery Plan lacks the necessary analysis and costings to demonstrate deliverability. Environmental impacts would be severe and long-lasting. A substantial area of Grade 1 agricultural land—of which only 7% remains in North Somerset—would be lost. This land is currently used for food production, and national policy clearly states that "our best and most versatile land" must be protected to support food security. The proposals directly contradict that principle. Other areas proposed for development already experience flooding, meaning the cumulative effects of building here would be even more harmful. The ecological value of the site is also considerable. The development threatens important wildlife habitats and risks further biodiversity decline in a country already amongst the most nature-depleted globally. Of particular concern is the Brockley Maternity Roost and associated SSSI, with rare Lesser and Greater Horseshoe bats reliant on these fields for foraging. In addition, no assessment has been provided on the social-cohesion impacts of a development that would so dramatically and abruptly alter the character of the village. Taken together, these issues illustrate that Backwell is being asked to take on wholly disproportionate and unsustainable growth. Significant flood risks, loss of high-grade farmland, lack of infrastructure funding, the uncertain viability of the proposed road, and the scale of environmental harm all demonstrate that the strategic growth designation is inappropriate. The proposals fail to meet national policy expectations around land protection, deliverability and sustainable development.			

Name: Doug Willis **I.D:** 30466337

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP7: Green Belt	No	• Positively prepared • Justified • Consistent with national policy	No	No	Regarding greenbelt land in & around Nailsea.the plan has not evaluated other land options including non greenbelt land to the south & southwest.the land is also above potential flood risk.NTC & NSC have both failed to look at the potential of this land. They have failed to evaluate it because the only consideration given for any development has come from asking developers to put forward what they want. The land to the north of Nailsea is important greenbelt as it marks town boundaries includes a river that needs help from not being polluted by nearby development is open wildlife habitat/corridor to woodland.The greenbelt also helps protect Moore end spout which is a designated sssi.possible brown field site at the end of Southfield Road has been ignored (old cider factory/ warehouse). This land also contains a high pressure aviation fuel line. This will make insurance costs extremely high what with flooding risks as well			

Name: Dr D R Homer **I.D:** 62848193

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Justified • Effective • Consistent with national policy	No	Unsure	There are alternative brownfield sites with significantly less ecological impact within North Somerset and Portishead in particular. Alternative sites are likely to allow an increased density of housing meaning that the Tower Farm and Black Rock sites are not needed. The sites at Tower Farm and Black Rock constitute, and are adjacent to, extremely important ecological sites that protect Weston Big Wood and the green corridor of the Gordano Valley. These areas have been part of the corridor since the 1980's. North Somerset Council have not shown a clear demonstration that these changes to the Green Belt are justified or required in exceptional circumstances. This is a clear requirement of the national planning policy which is infringed here by the Council. Neither site will provide safe access for the housing. There will be unacceptable transport impacts that are likely to fail the national soundness tests in this domain. Remove the Tower Farm and Black Rock proposals from the Local Plan 2041.			
Black Rock, north of Clevedon Road	No	• Justified • Effective • Consistent with national policy	No	Unsure	There are alternative brownfield sites with significantly less ecological impact within North Somerset and Portishead in particular. Alternative sites are likely to allow an increased density of housing meaning that the Tower Farm and Black Rock sites are not needed. The sites at Tower Farm and Black Rock constitute, and are adjacent to, extremely important ecological sites that protect Weston Big Wood and the green corridor of the Gordano Valley. These areas have been part of the corridor since the 1980's. North Somerset Council have not shown a clear demonstration that these changes to the Green Belt are justified or required in exceptional circumstances. This is a clear requirement of the national planning policy which is infringed here by the Council. Neither site will provide safe access for the housing. There will be unacceptable transport impacts that are likely to fail the national soundness tests in this domain. Remove the Tower Farm and Black Rock proposals from the Local Plan 2041.			

Name: Dr. David Portas **I.D:** 58214273

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP3: Spatial strategy							We would like to express our support for this plan. We consider it is right to favour development around the large towns, and the city of Bristol. Development around the villages of North Somerset is unwise for a number of reasons (local jobs, heritage assets,lack of transport, non-optimal use of greenfield sites), and also goes against many of the policies defined in the plan. We are fully supportive of the plan being submitted for approval.	

Name: E Arnold **I.D:** 62849793

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP12: Bristol Airport	No	• Justified	Unsure	Unsure	There can be no justification for the loss of green belt land and destruction of habitats for the profit of a commercial entity. The airport has requested to expand again up to 15 million ppa and is proposing a compulsory purchase order of common land. They will continue pushing to expand into the land around them to the detriment of the local environment and residents if more land is released to them. They've had their permission to expand and to keep their enormous car park (despite transport infrastructure not anywhere near being improved yet) so enough is enough. They don't need to expand			

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					anymore, it’s just greed.			

Name: E Beacon **I.D:** 62815873

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP3: Spatial strategy	No	• Justified • Consistent with national policy	Unsure	Unsure	SP3 spatial strategy issues and SP10 transport issues.The village of Pill and EIG does not have a wide range of facilities services or jobs. Large new developments will be dormitary areas from where people have to travel to work. This is likely to see an increase in car use, The new train can only offer a half hour service and will probably be full after leaving portishead. The train doesn't offer travel to Clifton or the city centre so is unlikely to be used by the vast majority of commuters. There will likely be an increase in traffic on the A369 and further pressure on the Abbots Leigh bottleneck. It already takes 45 minutes at rush hour to travel from pill to Clifton on a journey which takes 15 minutes at quieter times.The Highways Authority's views have not been given appropriate consideration. SP3 states development should not be of a disproportionate scale which adversely affects the character of an area. This is a breach of that.	- A public meeting - A review of sites to ensure compliance with council policies. -An acknowledgemt to work within existing settlement boundaries -A review of how the A369 can handle extra traffic with acceptance that the train cannot really provide a solution when it will be permanently limited to 30 minute journeys with small carriages.		
SP4: Placemaking	No	• Justified • Consistent with national policy	Unsure	Unsure	Placemaking SP4 The proposed development is too dense. The PIll Green site will not create sociable places. The extension beyond settlement boundaries is not aligned with placemaking policies.	- A public meeting - A review of sites to ensure compliance with council policies. -An acknowledgemt to work within existing settlement boundaries -A review of how the A369 can handle extra traffic with acceptance that the train cannot really provide a solution when it will be permanently limited to 30 minute journeys with small carriages.		
SP6: Villages and rural areas	No	• Justified • Consistent with national policy	Unsure	Unsure	SP6- There has been deviation from settlement boundaries. Land outside the established village settlement boundaries should not be included in the proposed development allocation . Boundaries should exist to manage growth responsibly. This is a breach of DP6 which states residential development outside settlement boundaries will be restricted to "replacement dwellings, residential conversion of rural buildings, or redevelopment of previously developed land". Extending development beyond these boundaries undermines planning principles, and sets a dangerous precedent for further expansion. It will damage the village community. The deviation from established boundaries is also in conflict with SP11	- A public meeting - A review of sites to ensure compliance with council policies. -An acknowledgemt to work within existing settlement boundaries -A review of how the A369 can handle extra traffic with acceptance that the train cannot really provide a solution when it will be permanently limited to 30 minute journeys		

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						with small carriages.		
SP7: Green Belt	No	• Justified • Consistent with national policy	Unsure	Unsure	SP7 Release of green belt land. The council has not demonstrated that it has explored other options. Where is the evidence that brownfield sites have been explored. There is no evidence of using minimum density standards (optimising developments in nearby towns) or working with neighbouring authorities to accommodate housing needs.	- A public meeting - A review of sites to ensure compliance with council policies. -An acknowledgemt to work within existing settlement boundaries -A review of how the A369 can handle extra traffic with acceptance that the train cannot really provide a solution when it will be permanently limited to 30 minute journeys with small carriages.		
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Justified • Consistent with national policy	Unsure	Unsure	There has been a lack of consultation re policy LP4. NSC has not been dutiful in engaging properly with the community. There has been no consultation or public meeting regarding Pill's allocation as a strategic location. An increase in population of 44%should demand proper consultation and engagement.	- A public meeting - A review of sites to ensure compliance with council policies. -An acknowledgemt to work within existing settlement boundaries -A review of how the A369 can handle extra traffic with acceptance that the train cannot really provide a solution when it will be permanently limited to 30 minute journeys with small carriages.		

Name: E Bossanyi **I.D:** 39255585

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land west of Rodney Road	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The housing currently on this site is currently being built. However, the latest map indicates that the development could stretch north to engulf the remaining small green space remaining between Westleigh School, Westfield Drive and the Scout Hut. This is a vital green buffer between the school and the new development and should be designated as local green space. Also the 'Site requirements' are inappropriate and seem to have been copy-pasted from the Dark Lane section.	The small green space north of the houses currently being built, between Westleigh School, Westfield Drive and the Scout Hut, should be designated as a local green		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
						space.		
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	In principle I am happy to see some new housing in Backwell, as long as it is appropriate to the needs of local people, and provided that local services and infrastructure are provided at the same time. Currently approved development will already increase the number of houses by 40%, and the plans for infrastructure improvement are already inadequate for this. Development of the land east of Backwell would add a further 40%, and infrastructure and service improvements will almost certainly fail to keep pace, those mentioned being more aspirational than guaranteed. The land east of Backwell is grade 1 agricultural land used for food production and grazing (currently green belt), and housebuilding on this land would contradict Government policy on the safeguarding of food security. It would also result in a huge loss of wildlife habitat and biodiversity, as well as green space which is increasingly recognised as being so important for public health. The type of housing which would be built would almost certainly be inappropriate for Backwell. This is evident from the nature of almost all current large housing developments in the Backwell/Nailsea area and nationwide. Despite well-meaning planning constraints and fine words in local plans, large housing developers build the houses which bring them the most profit: the maximum number of very similar basic houses crammed into the space available, with very little outside space for children to play or anyone to breathe. They are usually built to the minimum environmental standards they can get away with, both in terms of energy efficiency and fossil fuel use and in terms of transport, with built-in assumptions that private cars will mainly be used for transport even if the plans mention active travel facilities and bus routes. There appears to be little or no analysis of the sort of people who will come to live in these houses, what their needs are likely to be, where they will work, how many will have young children, how many might be retired, disabled, first time buyers, or even how they will get to the shops. The default assumption is presumably that most incomers will commute to work, and mostly by car (since suggested increases in public transport provision are nowhere near sufficient). This will have detrimental effects on health, air quality and social cohesion, and the quality of life of existing and new residents alike. There appears to be no definite provision to improve the railway station: before any new housing in Nailsea and Backwell is approved, the platforms should be extended to accommodate the full length of trains, and the access to the westbound platform must be made usable for disabled passengers, as there is currently no ramp or lift to allow access for passengers with wheelchairs, pushchairs, bikes or heavy luggage. Local councils, of course, are bound to comply with Government policy on housebuilding, but this sadly appears to be driven by the desire to increase GDP, via developers' profits. The societal need for such vast increases in housing stock nationally do not appear to have been substantiated, and this is equally true more locally, in North Somerset and in Backwell.	Grade 1 agricultural land should be maintained for food production. Sufficient infrastructure improvements must be completed before new housing can be occupied. New developments must be designed to actively discourage private car use, maximise energy efficiency without any use of fossil fuels, and use sustainable low-carbon building materials and methods.		

Name: E Burden **I.D:** 21219937

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP5: Towns	No	• Justified	No	Yes	The Council has not, in relation to releasing land from the Green Belt at the Black Rock site below Weston Big Wood, taken into consideration the strategic ecological importance of this unique site in protecting the wood and its connection to the Gordano Valley green corridor. This land was added to the Green Belt in the late 1980s due to its high ecological value. National planning policy allows Green Belt changes only in exceptional circumstances and these have not been demonstrated for this site in Portishead, particularly as a similar sized site nearby, without such high ecological value, was in a recent version recommended for removal from the Green Belt without any significant objections but has not been taken forward in this consultation.	The removal or significantly lowering of the number of houses and area of land from the Black Rock site. The leaving of a significant buffer between development and the wood itself whilst maintaining a significant green corridor between the wood and the floor of the valley within the site.		

Name: E Charles **I.D:** 62864897

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	◦ Positively prepared ◦ Justified ◦ Effective ◦ Consistent with national policy	Unsure	Unsure	• Government policy emphasises the protection of top-grade farmland to ensure food security, yet these proposals would directly undermine that goal and endanger food security. The area includes Grade 1 agricultural land, which is among the best quality for food production, and only 7% of such land remains in North Somerset. How on earth is it logical to build on this land? • The development would destroy important wildlife habitats alongside the agricultural land. The Brockley Maternity Roost and SSSI, home to rare Lesser and Greater Horseshoe Bats, would be at risk as these species depend on the land for feeding. These areas are home to many native species, of birds and mammals. In the middle of a climate and biodiversity crisis, how can concreting over this be justified? Where will this wildlife go? If the habitat is lost, the biodiversity will be lost and can't be replaced or adequately mitigated for. There must be more suitable brownfield sites not using prime agricultural land and habitat. • Backwell ALREADY HAS 800 new homes approved representing a 40% increase for the village. This is more than enough and will already overwhelm the limited local services and roads. It is not appropriate for Backwell to take 7% of the North somerset allocation representing an 80% population growth due to all the other reasons mentioned. There is no investment in heath services, or leisure services and the infrastructure is insufficient for another 1000 houses. • The Infrastructure Delivery Plan lacks detailed analysis, costings, and confirmed funding for the new road and essential services. The planned location for new roads and homes, including Backwell Lake (Reservoir) and adjacent fields, is on a floodplain that already floods regularly. The road will not effectively relieve traffic on station road or Backwell common, how will the railway be crossed? This will cause many challenges and funding issues. • Backwell is not a centre for employment, so most residents commute elsewhere for work. Putting more traffic on the roads, more emissions and danger to schoolchildren. There is no analysis to show that Backwell needs another 1,000 homes. • Backwell is not a suitable strategic growth location, it would forever change the character of the village and the loss of wildlife habitat, agricultural land and greenbelt cannot be replaced. • No assessment has been made regarding the impact of these changes on social cohesion within the community. • Backwell Common and nearby areas are susceptible to flooding, a problem that would worsen with more housing. • The scale and speed of the proposed growth, along with the required investment in infrastructure and services, is destabilising, unsustainable, and unlikely to be delivered successfully. There are already traffic jams at busy times especially around school drop off and closure. Further traffic in the village risks children's safety and safe routes to walk to school. • The railway station is not suitable as a transport hub, being inaccessible for those with mobility challenges and difficult for families with young children. Trains at busy time are already full as is the car park.			

Name: E Cooper **I.D:** 62855233

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	◦ Positively prepared ◦ Justified ◦ Effective ◦ Consistent with national policy	Unsure	Unsure	There is a disproportionate allocation of potential new housing to Backwell, in spite of its impact on green belt land and the local ecology, resulting in over-development and increased flood risk, and seemingly without detailed analysis or an adequate description of mitigation measures. I feel that NS Council is bowing to pressure and has simply supported the option of allocating land to areas where it can most easily be seen to comply with (possibly unachievable) government targets, whilst simultaneously disregarding the principles of good planning that should protect valuable habitats, prevent over-development and support more joined-up thinking. As it stands, I believe the legacy of this draft local plan will have detrimental consequences far into the future, whilst only partially achieving its paramount aims. And, once the damage is done, it is irreversible. We hope that North Somerset Council supports its citizens points of view in this, through its challenge to consult.			

Name: E Dawson **I.D:** 58076545

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared • Justified	No	Unsure	NSC has not properly considered: Alternative brownfield or greenfield sites with far lower ecological impact, both in Portishead and across North Somerset. Opportunities to increase housing density on proposed brownfield sites, which could remove the need to develop Tower Farm and Black Rock. The strategic ecological importance of these sites in protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor. The fact that both areas were added to the Green Belt in the late 1980s due to their high ecological value. National planning policy allows Green Belt changes only in exceptional circumstances — and these have not been demonstrated. In addition: Neither site can provide safe or suitable access. Development would create unacceptable transport impacts, failing national soundness tests. Tower Farm and Black Rock should be removed from the Local Plan.			
Black Rock, north of Clevedon Road	No	• Positively prepared • Justified	No	Unsure	NSC has not properly considered: Alternative brownfield or greenfield sites with far lower ecological impact, both in Portishead and across North Somerset. Opportunities to increase housing density on proposed brownfield sites, which could remove the need to develop Tower Farm and Black Rock. The strategic ecological importance of these sites in protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor. The fact that both areas were added to the Green Belt in the late 1980s due to their high ecological value. National planning policy allows Green Belt changes only in exceptional circumstances — and these have not been demonstrated. In addition: - Neither site can provide safe or suitable access. - Development would create unacceptable transport impacts, failing national soundness tests. Tower Farm and Black Rock should be removed from the Local Plan.			

Name: E Geering **I.D:** 62848225

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I am a resident of Backwell and moved here for the peace and quiet and rural feel of the village. I cannot understand how easy it is to build on viable Grade 1 agricultural land which does not constitute 'brownfield first' or 'grey belt'. The village even without this development is undergoing overdevelopment at higher rates than other areas of North Somerset, 7% compared to Clevedon of 2%. Backwell is essentially a commuter village and not an employment hub. In heavy downpours the area in front of Backwell lake floods. This will be a concern that building on or near flood plains will contribute to ongoing flooding in this area. I urge that any proposed development includes soft landscaping, trees and other nature based solutions that can mitigate some of the flood risk which is a major problem in areas in Backwell and particularly Backwell Common. I care about developing our industrial, brownfield or less productive land however this whole scheme over the easy option of productive agricultural fields which are much more desirable for all involved in building houses quickly. I do not feel this meets the Governments policy to 'protect our best and most versatile land'. Although the proposal includes green space and increase in biodiversity compared to an agricultural field, this space will be newly landscaped and as the area is for public open space it will increase human footfall in the area and impact the existing habitat and wildlife we are so lucky to have in this area. Alongside other developments around Backwell and Nailsea there is a very clear shrinking of the green corridors which is so important for wildlife in our already nature-depleted country to survive. The people of Backwell are proud of the wildlife in and around the area which includes otters at Backwell Lake which will suffer with such an increase of traffic opposite to the entrance. The proposals also threaten the Brockley Maternity Roost and SSSI, habitat to rare Lesser and Greater Horseshoe Bats. Since moving here we see so many bats above our garden and nature cannot continue to pay the price when so much money is made by developers.			

Name: E Griffiths **I.D:** 21390881

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP5: Housing, employment and mixed use allocations						Why is Even Keel not on the local plan? Ideal situation 5 minutes from station and bus stop.		

Name: E Hardcastle **I.D:** 62592577

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	This area cannot support this development as it has not enough school places or health infrastructure. I have lived here for over 30 years and the area has flooded often. The proposed road will completely ruin this lovely area and it would not relieve congestion on station rd It would in fact increase the volume of traffic.	It would be more sensible to improve bus service to the railway station		

Name: E Jackson **I.D:** 57965025

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land to the west of Elborough	No	• Effective	Unsure	No	The land proposed to build on is completely inappropriate for more houses. The land floods extremely easily so more houses would cause significant drainage issues. Additionally that area is home to wildlife such as bats, deer and all sorts of other animals thats should be protected and their habitats not destroyed. Banwell road and the junction at the top of the hill are completely inappropriate for more residents, the roads as they are are far too busy with multiple crashes occurring on the junctions or bends every year. More cars on the road will cause more of these incididents and the increase in traffic will cause significant disruption to all residents. Building on this land is a terrible idea, the infrastructure is not in place to make it successful and the disruption it will cause would be significant.	Remove the suggestion of building on this land.		
Land north of Banwell Road, Locking /Elborough	No	• Justified	Unsure	No	The land proposed to build on is completely inappropriate for more houses. The land floods extremely easily so more houses would cause significant drainage issues. Additionally that area is home to wildlife such as bats, deer and all sorts of other animals thats should be protected and their habitats not destroyed. Banwell road and the junction at the top of the hill are completely inappropriate for more residents, the roads as they are are far too busy with multiple crashes occurring on the junctions or bends every year. More cars on the road will cause more of these incididents and the increase in traffic will cause significant disruption to all residents. Building on this land is a terrible idea, the infrastructure is not in place to make it successful and the disruption it will cause would be significant.	Remove this area of land from the plan so it is not developed on.		

Name: E Kenny **I.D:** 39308129

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	There are 800 new house ALREADY approved in our village- a 40% increase. This developed in addition is a complete overdevelopment. The village is already hugely over congested with insufficient roads through the village to safely transport children to the 3 schools that lie within it. The proposed road wouldn't effectively serve nailseas traffic or relieve congestion on station road which is already an accident waiting to happen with secondary school children regularly being clipped by passing vehicles and having near misses trying to navigate the single narrow pavement serving as the route for over a 1000 children to get to school. I doubt engineering the road over or under the railway is liekly to be met by any developer and would be very expensive. There appears to be NO investment in school places, health or leisure facilities, what we have cannot support another 1000 houses. Backwell has been allocated a higher number of houses than any other village in north somerset and a higher percentage growth than the towns- why are we taking 7 % of the districts housing allocation when somewhere like clevedon is taking 2%? There is no needs or viability analysis for and extra 1000 houses Backwell has no employment hub, most of the resident commute adding even more the the congestion. No social cohension impact assessment has been provided. Grade 1 agricultural land which is currently used for grazing and crops has been allocated, this can never be retrieved once taken, why use this precious resource when only 7% of this land is left in the whole of north somerset. It undermines food security. Development would destroy valuable wildlife habitats and harm biodiversity, it threatens the brockley maternity roost and SSSI with lesser and greater horseshoe bates relying on the land for food. The plan lacks any commitment to infrastructure, no analysis or costing or any guaranteed funding, highly suspicious 1000 homes with great profit for the developers and no infrastructure to go with it. There is significant risk of flooding in the area allocated. The railways station is not fit for purpose as a transport hub, inaccessible for any with mobility difficulties. The ludicrous volume of growth proposed for Backwell over such a short space of time shows none of the required investment in our infrastructure or services, its destabilising, unsustainable and undeliverable and irreparably changes the areas character. Please stop trying to turn us into a suburb of Bristol, spread the need for new housing fairly within North somerset.			

Name: E Morrison **I.D:** 62864001

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at North West Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Introducing 1,817 new homes in Nailsea would overwhelm and massively over-develop the town. The expected population increase in population could not be matched in terms of infrastructure. The surrounding road-networks are already at capacity, a 55% (Nailsea) and 80% (Backwell) increase would grind the surrounding routes to a standstill. The new link road across Backwell Common, under rail crossing is likely to be extremely expensive and the engineering problematic due to the proximity to the River Kenn and railway line. Even so, it leads out on to the A370, which is already running at capacity at busy times. Other routes out of Nailsea and Backwell are narrow country roads not designed for the capacity increase, leading to possible safety issues. Additionally, the current rail network already struggles to support the capacity required at rush hour, and such an increase would leave the service heavily overcrowded. Nailsea & Backwell station already does not lend itself to overcrowding on the platforms without putting passengers at risk. Beyond that, other important infrastructure would not support the new development. The proposal for new primary schools is dependent on the developer and no locations have been identified. Additional demand on health facilities would be overwhelming. In terms of the general environment, such a large population increase and loss of greenbelt and agricultural land, together with dramatic change to the landscape will be detrimental. The loss of green space and natural habitats will be a huge loss to the area. Removal of the green space between Nailsea and Backwell (either side of the railway track) means the two locations become more or less as one - but with double the population. This may also have an affect on the wildlife found at Backwell lake, and possible water quality there (especially being a floodplain).			
Youngwood Lane	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Introducing 1,817 new homes in Nailsea would overwhelm and massively over-develop the town. The expected population increase in population could not be matched in terms of infrastructure. The surrounding road-networks are already at capacity, a 55% (Nailsea) and 80% (Backwell) increase would grind the surrounding routes to a standstill. The new link road across Backwell Common, under rail crossing is likely to be extremely expensive and the engineering problematic due to the proximity to the River Kenn and railway line. Even so, it leads out on to the A370, which is already running at capacity at busy times. Other routes out of Nailsea and Backwell are narrow country roads not designed for the capacity increase, leading to possible safety issues. Additionally, the current rail network already struggles to support the capacity required at rush hour, and such an increase would leave the service heavily overcrowded. Nailsea & Backwell station already does not lend itself to overcrowding on the platforms without putting passengers at risk. Beyond that, other important infrastructure would not support the new development. The proposal for new primary schools is dependent on the developer and no locations have been identified. Additional demand on health facilities would be overwhelming. In terms of the general environment, such a large population increase and loss of greenbelt and agricultural land, together with dramatic change to the landscape will be detrimental. The loss of green space and natural habitats will be a huge loss to the area. Removal of the green space between Nailsea and Backwell (either side of the railway track) means the two locations become more or less as one - but with double the population. This may also have an affect on the wildlife found at Backwell lake, and possible water quality there (especially being a floodplain).			
Trendlewood Way	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Introducing 1,817 new homes in Nailsea would overwhelm and massively over-develop the town. The expected population increase in population could not be matched in terms of infrastructure. The surrounding road-networks are already at capacity, a 55% (Nailsea) and 80% (Backwell) increase would grind the surrounding routes to a standstill. The new link road across Backwell Common, under rail crossing is likely to be extremely expensive and the engineering problematic due to the proximity to the River Kenn and railway line. Even so, it leads out on to the A370, which is already running at capacity at busy times. Other routes out of Nailsea and Backwell are narrow country roads not designed for the capacity increase, leading to possible safety issues. Additionally, the current rail network already struggles to support the capacity required at rush hour, and such an			

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					increase would leave the service heavily overcrowded. Nailsea & Backwell station already does not lend itself to overcrowding on the platforms without putting passengers at risk. Beyond that, other important infrastructure would not support the new development. The proposal for new primary schools is dependent on the developer and no locations have been identified. Additional demand on health facilities would be overwhelming. In terms of the general environment, such a large population increase and loss of greenbelt and agricultural land, together with dramatic change to the landscape will be detrimental. The loss of green space and natural habitats will be a huge loss to the area. Removal of the green space between Nailsea and Backwell (either side of the railway track) means the two locations become more or less as one - but with double the population. This may also have an affect on the wildlife found at Backwell lake, and possible water quality there (especially being a floodplain).			
Land north of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Introducing 1,817 new homes in Nailsea would overwhelm and massively over-develop the town. The expected population increase in population could not be matched in terms of infrastructure. The surrounding road-networks are already at capacity, a 55% (Nailsea) and 80% (Backwell) increase would grind the surrounding routes to a standstill. The new link road across Backwell Common, under rail crossing is likely to be extremely expensive and the engineering problematic due to the proximity to the River Kenn and railway line. Even so, it leads out on to the A370, which is already running at capacity at busy times. Other routes out of Nailsea and Backwell are narrow country roads not designed for the capacity increase, leading to possible safety issues. Additionally, the current rail network already struggles to support the capacity required at rush hour, and such an increase would leave the service heavily overcrowded. Nailsea & Backwell station already does not lend itself to overcrowding on the platforms without putting passengers at risk. Beyond that, other important infrastructure would not support the new development. The proposal for new primary schools is dependent on the developer and no locations have been identified. Additional demand on health facilities would be overwhelming. In terms of the general environment, such a large population increase and loss of greenbelt and agricultural land, together with dramatic change to the landscape will be detrimental. The loss of green space and natural habitats will be a huge loss to the area. Removal of the green space between Nailsea and Backwell (either side of the railway track) means the two locations become more or less as one - but with double the population. This may also have an affect on the wildlife found at Backwell lake, and possible water quality there (especially being a floodplain).			
Land off Pound Lane, Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Introducing 1,817 new homes in Nailsea would overwhelm and massively over-develop the town. The expected population increase in population could not be matched in terms of infrastructure. The surrounding road-networks are already at capacity, a 55% (Nailsea) and 80% (Backwell) increase would grind the surrounding routes to a standstill. The new link road across Backwell Common, under rail crossing is likely to be extremely expensive and the engineering problematic due to the proximity to the River Kenn and railway line. Even so, it leads out on to the A370, which is already running at capacity at busy times. Other routes out of Nailsea and Backwell are narrow country roads not designed for the capacity increase, leading to possible safety issues. Additionally, the current rail network already struggles to support the capacity required at rush hour, and such an increase would leave the service heavily overcrowded. Nailsea & Backwell station already does not lend itself to overcrowding on the platforms without putting passengers at risk. Beyond that, other important infrastructure would not support the new development. The proposal for new primary schools is dependent on the developer and no locations have been identified. Additional demand on health facilities would be overwhelming. In terms of the general environment, such a large population increase and loss of greenbelt and agricultural land, together with dramatic change to the landscape will be detrimental. The loss of green space and natural habitats will be a huge loss to the area.			

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					Removal of the green space between Nailsea and Backwell (either side of the railway track) means the two locations become more or less as one - but with double the population. This may also have an affect on the wildlife found at Backwell lake, and possible water quality there (especially being a floodplain).			
Poplar Farm, Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Introducing 1,817 new homes in Nailsea would overwhelm and massively over-develop the town. The expected population increase in population could not be matched in terms of infrastructure. The surrounding road-networks are already at capacity, a 55% (Nailsea) and 80% (Backwell) increase would grind the surrounding routes to a standstill. The new link road across Backwell Common, under rail crossing is likely to be extremely expensive and the engineering problematic due to the proximity to the River Kenn and railway line. Even so, it leads out on to the A370, which is already running at capacity at busy times. Other routes out of Nailsea and Backwell are narrow country roads not designed for the capacity increase, leading to possible safety issues. Additionally, the current rail network already struggles to support the capacity required at rush hour, and such an increase would leave the service heavily overcrowded. Nailsea & Backwell station already does not lend itself to overcrowding on the platforms without putting passengers at risk. Beyond that, other important infrastructure would not support the new development. The proposal for new primary schools is dependent on the developer and no locations have been identified. Additional demand on health facilities would be overwhelming. In terms of the general environment, such a large population increase and loss of greenbelt and agricultural land, together with dramatic change to the landscape will be detrimental. The loss of green space and natural habitats will be a huge loss to the area. Removal of the green space between Nailsea and Backwell (either side of the railway track) means the two locations become more or less as one - but with double the population. This may also have an affect on the wildlife found at Backwell lake, and possible water quality there (especially being a floodplain).			
Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Introducing 1,817 new homes in Nailsea would overwhelm and massively over-develop the town. The expected population increase in population could not be matched in terms of infrastructure. The surrounding road-networks are already at capacity, a 55% (Nailsea) and 80% (Backwell) increase would grind the surrounding routes to a standstill. The new link road across Backwell Common, under rail crossing is likely to be extremely expensive and the engineering problematic due to the proximity to the River Kenn and railway line. Even so, it leads out on to the A370, which is already running at capacity at busy times. Other routes out of Nailsea and Backwell are narrow country roads not designed for the capacity increase, leading to possible safety issues. Additionally, the current rail network already struggles to support the capacity required at rush hour, and such an increase would leave the service heavily overcrowded. Nailsea & Backwell station already does not lend itself to overcrowding on the platforms without putting passengers at risk. Beyond that, other important infrastructure would not support the new development. The proposal for new primary schools is dependent on the developer and no locations have been identified. Additional demand on health facilities would be overwhelming. In terms of the general environment, such a large population increase and loss of greenbelt and agricultural land, together with dramatic change to the landscape will be detrimental. The loss of green space and natural habitats will be a huge loss to the area. Removal of the green space between Nailsea and Backwell (either side of the railway track) means the two locations become more or less as one - but with double the population. This may also have an affect on the wildlife found at Backwell lake, and possible water quality there (especially being a floodplain).			

Name: E Shields **I.D:** 62834145

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The primary reason for my objection to this plan is based on the importance of food security. This land is Grade 1 agricultural land. We should be preserving and protecting our farmland, and only building on it as an absolute LAST RESORT, when all other possibilities and sites have been exhausted. We are already over-reliant on imports of food and should be focussing on producing as much as we can within our own country. If we build on land such as this, it will NEVER EVER be available again as productive farmland. It will be lost forever. This is a totally irreversible move that we cannot affort to take, in the interests of preserving our national food security. I strongly ask that you, as decision makers, take a walk across this farmland. Stand still, take in the air, the views, the beauty, the peace, the diversity, the flowers, the birds. Watch the seasons change, watch the crops grow, knowing they are helping to feed the nation. Can you really, really believe that it is in our best interests to build houses all over it? There is no justification for this when there are brownfield sites available for housing. Our future housing needs will be significantly altered as the next generation is far more likely to need to downsize earlier in life, due to smaller pension pots. I believe therefore there will be a massive shift in our housing market and current building rates are going to mean an oversupply of family homes. We just don’t need to be covering our farmland with more and more houses. Of course, there are numerous other arguments against this plan – road congestion, inadequate school places, over-stretched healthcare etc. These have been addressed I am sure by many other respondents. But the number one factor for me is that if we build on this prime farmland, we will never ever get it back.	Consider future housing to be allocated on brownfield sites in built-up areas where jobs and services are local		

Name: E Simon **I.D:** 62788321

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I object to the proposed allocation for circa 1,000 additional houses in Backwell. The scale of development is disproportionate to the size of the village, especially given that several large schemes (already approved) are still being built out. Existing infrastructure, including roads, schools, healthcare, drainage and public transport, is already under pressure, and no viable plan has been provided to support growth of this magnitude. The proposal also places major housing on Grade 1 agricultural green belt land. This contradicts national and local policy to protect high-quality land and is unnecessary when alternative sites within North Somerset exist that would have a lower environmental and agricultural impact. Overall, the proposal is unsound due to its unsuitable location, lack of supporting infrastructure and the cumulative impact of recent developments already approved in Backwell.			

Name: E Thomspon **I.D:** 58572449

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Downside	No	• Justified	No	No	This was once a much larger green area and has reduced dramtically due to development, building on this will mean there will be nowhere left for wildlife in the vacinity. Access is terrible on this road as is. Portishead has tripled in size, with other areas in North Somerset seeing very little development, and has very few green areas left which are needed for nature and locals mental health. The development we have already seen was not supported by appropriate infrastructure meaning the existing residents can not access doctors and dentists. We have 1 pharmacy and 1 post office and a very limited bus service. Portishead highstreet is gridlocked at peak times and if the M5 is stopped, which is frequently, getting in and out of Portishead is impossible adding to this will only make this much worse for residents.	please consider other areas of North Somerset that haven't had the level of development that Portishead has experienced and that have better road/ transport links to the M5 and Bristol.		
Land at	No		No	Unsure	This has not been very well publicised which means the responses will be limited which could be	please consider other areas of North		

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Tower Farm					deemed to be intentional. The road infrastructure around High Down School can not cope with the current demand without adding to this which would make this much more dangerous. Lower levels of Portishead frequently flood, adding more development will increase the risk to the residents in these areas, which would be negligent on NSC's part. This is adjacent to Weston Big Wood which is a nature reserve and SSSI. As an SSSI there are restrictions and protections to consider. The government has a Environmental Improvement Plan to rewild corridors of Britain, reduce air pollution and boost biodiversity. Weston Big Wood and its surrounding areas already provide these benefits and developing next to it will suppress the woods and the wildlife within that use the surrounding area irrevocably. This will increase traffic in an around Portishead dramatically and put more strain on the infrastructure, there is very limited public transport links and local amenities.	Somerset that are not green belt, have better road/transport links and access to jobs. Where the infrastructure isn't already at breaking point and has the potential to further increase the risk of flooding.		
Black Rock, north of Clevedon Road	No	• Justified	No	No	This is greenbelt land that was specifically put in place to support wildlife using the Gordano Valley as a corridor to access Weston Big Wood which is an SSSI & nature reserve and changes to greenebelt should only be made in exceptional circumstances and there has been no discussion or consultation regarding this. The area directly below this frequently floods which impacts the roads. There are no transport links, this will add additional pressure on the schools especially Gordano and decrease the catchment area meaning children currently within the catchment will be pushed to attend schools outside of the town. The government has a Environmental Improvement Plan to rewild corridors of Britain, reduce air pollution and boost biodiversity. Weston Big Wood and its surrounding areas already provide these benefits and developing next to it will supresss the woods and the wildlife within that use the surrounding area irrevocably. Local residents use this area for their mental health and there are very few green areas left within Portishead.	please consider other areas of North Somerset that are not green belt, have better road/transport links and access to jobs. Where the infrastructure isn't already at breaking point and has the potential to further increase the risk of flooding. Consider maximising capacity on brownfield sites as exceptional circumstance has not been demonstrated to develop greenbelt which will impact the SSSI which has additional protections.		

Name: E Tomlinson **I.D:** 62744193

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Justified	No	No	My comments relate to plans for Pill, Ham Green and Easton in Gordano. - The public consultation was insufficient and largely hidden from public view. Local residents were largely made aware of the plans by pro-active private residents, not by North Somerset Council. - Current traffic congestion, particularly at Junction 19 of M5, and the impact on the adjacent roads, which can only worsen, appears to be being ignored. Relating particularly to Pill, the location of the proposed train station is problematic due to the narrow roads, lack of parking space, lack of pavements. The regular functioning of the X4 bus is impacted by the congestion at the motorway junction and narrow roads through Pill, which can only worsen.There is no alternative route to serve the village and will not service the train station for the above reasons. - Flooding risk in the area of the motorway has not been adequately assessed. The impact of building on this former marshland is significant and can only worsen with current effects of climate change. Surface water on the motorway leads to lane closures, again impacting traffic congestion at junction 19. - Green belt land release: have other brownfield sites in local towns been considered? - The population will almost double which will have a huge impact on the community and turn a unique village into a dormer town. Lack of employment locally means that many residents are forced to drive to Bristol and local towns to work. There is a significant older demographic whose needs are not being addressed by these proposals.			
Land at Lodway Farm	No	• Justified	No	No	There has been a lack of consultation and no public exhibition of the local plans in their entirety			

Name: ES Dawson **I.D:** 58638369

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	This site is immediately adjacent to a site of nature conservation interest and an ancient woodland. It would result in loss of irreplacable habitat (non consistent with national policy) Wildlife corridors and nature connection are of huge societal and intrsinsic value. Biodiveristy loss is not something which can be balanced out by planting of new trees - ancient woodland habitat takes venturies to grow and species will be gone from the Gordano valley forever. There is no plan for additional amenities e.g. schools, bus services - the last of which is already dire in Portishead The location intensifies pressures on already strecthed services in Portishead As green space next to an ancient woodland this site is wholly inappropriate for residential development. No adaptations would make it suitable. I strongly oppose and cannot support the NS local plan for Tower Hill location			

Name: Easton-in-Gordano Parish Council **I.D:** 711873

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP3: Spatial strategy	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	Pill & Easton-in-Gordano Parish Council objects to Policy SP3. Policy SP3 is unsound because it jumps Pill (a Category A village) to full strategic-location status without any prior consultation. The February–March 2025 consultation paper framed the sites only as non-strategic “other potential” village-scale allocations (Table 7.1). No question was ever asked about elevating the parish to a fourth strategic location. Yet the Cabinet report of 18 June 2025 (paras 3.20–3.21) cited “general support for the principle of development” to justify the change, misrepresenting responses that were never sought on strategic status. This arbitrary breach of the spatial hierarchy (NPPF para 36b) overrides our made Neighbourhood Plan without evidence and renders the policy unjustified. Not Positively Prepared (NPPF para 36a): SP3 fails to proactively meet needs through collaboration, sidelining village-scale alternatives and imposing disproportionate growth (55% stock increase) without addressing unmitigable harms like flood exacerbation. Not Justified (NPPF para 36b): Evidence lacks robustness; Sustainability Appraisal overlooks Defra MAGIC constraints (e.g., floodplain woodland in Zones 2/3 at Pill Green). No proportionate alternatives assessment justifies bypassing the hierarchy for Green Belt release over brownfield/urban options (NPPF para 148). Not Effective (NPPF para 36c): Undeliverable: Draft IDP (Feb 2025, §8.3) flags high-risk, unfunded infrastructure (J19 upgrades). Cumulative ~700 peak trips from Pill, plus Portishead/dock growth, lack modelling (NPPF para 116 and 118), breaching SP3's own flood minimisation. Inconsistent with National Policy (NPPF para 36d): Violates spatial principles (NPPF para 74: Neighbourhood Plan conformity) and Green Belt protections. Legally non-compliant with Localism Act 2011 (developer-led over community needs). Duty to Cooperate unmet: No updated Statements of Common Ground on cross-boundary J19/ecology impacts (e.g., with Bristol/National Highways). This flawed strategy risks Plan-wide unsoundness, reverting to outdated policies and developer speculation.	To make SP3 sound and compliant, we request: Revise SP3 Hierarchy: Explicitly limit strategic growth to the three main towns; revert Pill to Category A village status, aligning with "local needs" only (NPPF para 74). Remove cross-references to LP4. Strengthen Evidence Base: Commission independent hierarchy review: Assess non-Green Belt alternatives via MAGIC-integrated SA; include 10-year J19 modelling (cumulative impacts) and NE/EA responses on flood/habitats. Pause and Extend Consultation: Halt until Statements of Common Ground (NPPF para 28) evidence Duty to Cooperate (e.g., Bristol transport). Enhance Safeguards: Revise SP3 to require infrastructure delivery before growth (e.g., J19 upgrades pre-occupation). These modifications ensure SP3 is positively prepared (community-aligned), justified (evidenced alternatives), effective (deliverable), and NPPF-consistent—avoiding Examination rejection.		
SP7: Green Belt	No	‣ Positively prepared	No	No	Pill & Easton-in-Gordano Parish Council objects to Policy SP7 (Green Belt). This policy is unsound because it allows the release of five high-quality Green Belt sites around our village (total ~1,100 homes) without meeting any of the strict	Delete the proposed Green Belt deletions around Pill & Easton-in-Gordano (the five sites in Policy LP4).		

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		• Justified • Effective • Consistent with national policy			national tests in the NPPF (December 2024). It has not shown that all non-Green Belt options (brownfield sites, higher density in towns) have been used up first. It has not demonstrated that these five sites are low-value “grey belt” – in fact they include ancient woodland edges, priority habitats, floodplain and woodland. There is no published Green Belt review or exceptional-circumstances report that justifies taking this land out of the Green Belt. Policy SP7 is unsound and inconsistent with NPPF para 145, as it fails to demonstrate "exceptional circumstances" for Green Belt release in Pill & Easton-in-Gordano. Two LP4 sites (HE206 and HE20491) constitute the remaining narrow Green Belt corridor between the parish and Royal Portbury Dock, vital for preventing coalescence and urban sprawl. Yet when assessing Portbury Dock, NSC stated: "The remaining Green Belt land located between the port estate and Portishead is considered extremely sensitive in preventing coalescence and checking unrestricted urban sprawl" (This consultation within section "4 Locational Policies" - "Policy LP14: Royal Portbury Dock"). Allocating these sites now contradicts this, prioritising development over high-value Green Belt without grey belt proof or alternatives assessment. This developer-led approach breaches Localism Act 2011; Duty to Cooperate unmet with no joint work on landscape gaps (e.g., with Bristol on port impacts). It fails para 148 by releasing Pill's sensitive corridor (HE206/HE20491) without proving alternatives, misusing Feb responses that objected to Green Belt loss. Cabinet's 'well supported' claim (3.21) ignores this, no strategic consult occurred, making boundary changes unjustified and inconsistent with Portishead's 'extremely sensitive' protection (LP14) This sudden change only appeared in June 2025 – it was not in the July 2024 draft. It looks rushed and reactive rather than properly planned. Releasing this Green Belt without the proper evidence breaks national policy and makes the whole plan unsound.	Amend SP7 to explicitly protect Pill-Dock Green Belt corridors as strategic gaps to prevent merger/coalescence (per NPPF para 143(b)), deleting LP4 sites HE206/HE20491. Require full alternatives appraisal before any release (para 148). Keep the Green Belt boundary exactly as it is now, or at the very least only allow removal if a proper, published Green Belt review proves exceptional circumstances and shows the land is genuine low-value “grey belt”. Add wording to SP7 that says: “Green Belt release will only happen after all reasonable non-Green Belt alternatives have been exhausted and a full exceptional-circumstances report has been published and consulted on.” These changes would bring the policy back into line with national rules and stop our high-quality countryside being lost without proper justification.		
SP10: Transport	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Policy SP10 is unsound, ineffective and inconsistent with national policy (NPPF para 109) because the transport evidence for the 1,100-home Pill allocation (LP4) is extraordinarily sparse and demonstrably inadequate (see also para 118 on required assessments). The council’s own Infrastructure Delivery Plan (October 2025, section 8.3) classifies M5 Junction 19 upgrades as “high risk” with no funding or delivery plan. No cumulative 10-year traffic modelling has been carried out for the combined impact of Pill (≈ 700 peak-hour car trips), Portishead growth, and expanding Royal Portbury Dock traffic. The active travel routes shown on the Policies Map – notably the Markham Brook overbridge and connections across private land – appear to have been drawn freehand without site visits, surveys or landowner agreements. They cut directly through ancient woodland, floodplain woodland and private property, ignoring the mandatory 15-metre buffer (Natural England Standing Advice) and basic topography. These routes are undeliverable and give every impression of a rushed, last-minute insertion to justify a housing numbers gap rather than a properly prepared, evidence-led strategy. SP10’s requirement to “minimise adverse effects” on the highway network and the environment is therefore meaningless for Pill. The policy fails on the council’s own evidence.	To make SP10 sound and deliverable it must be amended to state: “No development at the Pill & Easton-in-Gordano Strategic Location (Policy LP4) shall commence until M5 Junction 19 capacity improvements are completed, funded and open to traffic.” And “The safeguarded active travel route across Markham Brook (Schedule 7) shall be deleted or re-routed to avoid all ancient woodland and its 15-metre buffer zone.” Without these changes SP10 is ineffective and the Plan risks being found unsound.		
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Positively prepared • Justified • Effective • Consistent with	No	No	Pill & Easton-in-Gordano Parish Council objects to Policy LP4. Designating our parish as a fourth Strategic Development Location for ~1,100 dwellings on five Green Belt sites is unsound, unlawful and undeliverable. This allocation only appeared in June 2025 – it was absent from the July 2024 draft – and has not been properly evidenced or consulted on. This abrupt June 2025 elevation misrepresents the February–March 2025 consultation, which sought views only on individual sites as 'potential allocations' in sustainable villages, not as a strategic location (Consultation Paper Section 5.43). Cabinet's 18 June claim of 'general	Delete Policy LP4 in its entirety and remove all five Pill & Easton-in-Gordano sites from the proposals map. Revert to the July 2024 spatial strategy under which our parish was not a Strategic Location and growth was limited to local needs only, in line with Policy SP3 and our Neighbourhood Plan.		Screenshot 2025-12-11 090639.png Markham Brook Ancient Woodland and Priority

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		national policy			support' (para 3.21) ignores localised objections and the fact no strategic question was asked, breaching Localism Act 2011 engagement duties. Not Positively Prepared – Forces a Category A village (1.9 % of North Somerset's electorate) to take 4.6 % of all new housing, overriding our made Neighbourhood Plan (81 % referendum support, 2021) which caps growth at 150–200 homes to 2038. Policy LP4 is also procedurally flawed and unjustified because it was introduced as a complete surprise in June 2025 – absent from all previous consultations. The supporting evidence is extraordinarily sparse: no updated Sustainability Appraisal, no transport modelling, no habitat surveys, and no landowner agreements for the proposed active travel routes. Several of these routes (notably the Markham Brook overbridge and connections across private land) appear to have been drawn freehand on a map with no regard to topography, ancient woodland, floodplain, or existing rights of way. This gives the clear impression of a rushed, last-minute insertion to plug a perceived housing numbers gap, rather than a properly prepared, evidence-led allocation. Such an approach renders the policy neither justified nor effective and risks the entire Plan being found unsound. Not Justified – The Sustainability Appraisal fails to use Defra MAGIC maps, missing floodplain woodland (Flood Zones 2/3), ancient woodland and priority habitats. No objective assessment of non-Green Belt or brownfield alternatives has been carried out (NPPF para 157). The proposed Markham Brook active travel route cuts through irreplaceable ancient woodland with no 15 m buffer or compensation strategy (NPPF para 193c; Natural England Standing Advice 2024). The Sustainability Appraisal and evidence base contain no assessment of the loss of best and most versatile agricultural land. Four of the five LP4 sites (HE2015 Pill Green, HE20491 Lodway Farm, HE206 Gordano Services, and HE20492 Pill Road) are predominantly Grade 1 and Grade 2 according to Defra's Provisional Agricultural Land Classification (see attached screenshot from magic.defra.gov.uk). This is prime farmland that the NPPF (para 119 and Planning Practice Guidance) says should only be developed as a last resort after all reasonable lower-grade alternatives have been exhausted. No such alternatives assessment has been carried out, rendering Policy LP4 not justified (NPPF para 36(b)). Not Effective – The council's own Infrastructure Delivery Plan (Oct 2025, §8.3) labels M5 Junction 19 upgrades and Pill flood-risk management as high-risk and unfunded. The five LP4 sites together would add approximately 1,540 peak-hour car trips (1.4 cars/home × 1,100 dwellings) – on top of Portishead's remaining growth and the continuing expansion of Royal Portbury Dock HGV traffic – with no evidenced mitigation and no funded solution. National Highways has raised unresolved objections to the cumulative impact on Junction 19 capacity and safety. In the absence of any robust assessment or deliverable mitigation, Policy LP4 fails the effectiveness test (NPPF para 36(c)) and would cause severe residual cumulative impacts on the strategic road network (NPPF para 116). Flood mitigation fails the sequential test (NPPF para 174). Inconsistent with National Policy & Legally Non-Compliant – Directly breaches NPPF paragraph 148: the council has published no evidence that brownfield opportunities and urban density increases have been maximised before releasing high-value Green Belt in Pill. Residents and the parish council are aware of potential brownfield sites that have not been fully explored. Releasing these five Green Belt sites therefore fails the sequential test, the "grey belt" priority, and the requirement for exceptional circumstances. This, combined with tiny consultation responses (often <30 per site) and a developer-led process, also breaches the Localism Act 2011. Duty to Cooperate failed – No updated Statements of Common Ground with National Highways, Natural England or the Environment Agency on J19, habitats	Furthermore, the Plan's failure to examine the government's new Environmental Improvement Plan 2025 (EIP 2025, published 1 December 2025) renders LP4 unsound and non-compliant. EIP sets binding national targets under the Environment Act 2021, including 30% land protection by 2030 (30by30), mandatory 10% Biodiversity Net Gain (BNG) for all developments by mid-2026, and £10.5bn for nature-based flood defences (protecting floodplain woodlands like those on Pill Green HE2015). It requires Local Nature Recovery Strategies (LNRS) by end-2025, which local plans must integrate for habitat mapping, no-net-loss of ancient woodland (via updated inventories by 2027), and riparian buffers along Markham Brook. NSC's June 2025 allocation predates EIP and lacks any assessment of these requirements—no BNG strategy for irreplaceable habitats (NPPF para 193c alignment), no LNRS-informed alternatives to Green Belt release, and no evidence of flood-resilient designs (e.g., SuDS to avoid downstream risks in Pill village). This breaches NPPF para 36 (not justified/effective) and the Biodiversity Duty for public bodies. **To comply, pause submission until: (i) Full EIP/ LNRS integration via revised Sustainability Appraisal; (ii) Independent audit of sites against EIP targets (e.g., 250,000 ha habitat creation by 2030); and (iii) 6-week extended consultation. Additionally, fund a Parish-led audit of small/ micro-sites (2–5 homes each) on underused/ brownfield land within the parish, as reasonable alternatives prioritised under NPPF paras 36(b), 69, 119 and 148. Residents have identified potential infills fitting local needs without Green Belt harm—exploring these first would demonstrate proportionate evidence and effective rural land use. These fixes would enable evidence-led, nature-positive growth without judicial review risks.		Habitat Inventory.pdf

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					or SuDS. This policy risks the whole plan being found unsound (as happened with the Joint Spatial Plan in 2020).			
Policy LP9: Extent of the Green Belt	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	Pill & Easton-in-Gordano Parish Council objects to Policy LP9 because it removes five large areas of Green Belt around our parish to enable Policy LP4 (1,100 homes). This deletion is unsound for the following reasons: Not justified & inconsistent with national policy (NPPF paragraphs 142–148): The council has not demonstrated the “exceptional circumstances” required to alter Green Belt boundaries, nor has it shown that all non-Green Belt alternatives have been fully explored and exhausted. No evidence has been published to prove these sites are “grey belt” (lower-value Green Belt). In fact, the sites contain high-value features: ancient woodland edges, priority habitats, floodplain woodland, and land identified on Defra MAGIC maps as irreplaceable. Not positively prepared: The sudden decision in June 2025 to treat Pill as a fourth “strategic location” (the same status as the three main towns) was never part of the July 2024 draft. This late change has not been tested through proper alternatives assessment. Not effective: The supporting Infrastructure Delivery Plan (Oct 2025, section 8) labels essential road and flood defences as “high risk” and unfunded. Green Belt removal is therefore premature. Legal compliance & Duty to Cooperate: No updated Statement of Common Ground with neighbouring authorities (e.g., Bristol City or National Highways) shows how the cumulative impact on Junction 19 has been resolved. LP9's proposed Green Belt boundary amendments for Pill LP4 sites are unjustified and inconsistent with NPPF para 147, lacking evidence of maximised brownfield/ urban options first. Sites HE206 (Land East of Gordano Services) and HE20491 (Lodway Farm) form the critical remaining Green Belt corridor between Pill parish and Royal Portbury Dock, essential to prevent coalescence and sprawl. NSC's own Portishead assessment confirms: "The remaining Green Belt land located between the port estate and Portishead is considered extremely sensitive in preventing coalescence and checking unrestricted urban sprawl." Deleting this gap now (while protecting similar ones elsewhere) is arbitrary, with no grey belt assessment (para 148) or habitat compensation (para 193a/c). This rushed June 2025 change breaches Localism Act 2011; Duty unmet without cross-boundary input from National Highways on dock-adjacent sprawl.	Delete the proposed Green Belt deletions around Pill & Easton-in-Gordano from the LP9 Policies Map and retain the existing Green Belt boundary. Alternatively, if any change is to be considered, the council must first publish a full Green Belt Review proving exceptional circumstances and that these sites are genuinely low-value “grey belt” after all brownfield and non-Green Belt options have been used up. Retain current Green Belt boundaries for HE206/HE20491; revert LP9 amendments to July 2024 draft. Mandate strategic gap designation for Pill-Dock corridor, per LP14 principles.		
Policy LP11: Transport infrastructure, allocations and safeguarding	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	Policy LP11 is unsound (not justified, not effective, and not consistent with national policy) because: The proposed “active travel route” across Markham Brook (shown on the Policies Map and listed in Schedule 7) would cut straight through irreplaceable ancient woodland and priority habitat deciduous woodland in the Gordano Valley. → Natural England’s Standing Advice (2024) and NPPF paragraph 193c require a minimum 15-metre untouched buffer on each side of ancient woodland. The government's Environmental Improvement Plan 2025 (published 1 December 2025) reinforces this by committing to maintain protections for ancient woodland as irreplaceable habitats and evolve Biodiversity Net Gain to ensure infrastructure like active travel routes delivers net environmental benefits without harm. No layout has ever been produced that can meet this requirement. The route is therefore physically undeliverable without destroying habitat that national policy says must not be lost unless there are “wholly exceptional reasons” and full compensation – neither of which exist here.	Delete the Markham Brook active travel route from Policy LP11, Schedule 7, and the Policies Map, or redraw it so that it demonstrably avoids all ancient woodland and priority habitat with the required 15 m buffers (Natural England Standing Advice 2024). Align with Environmental Improvement Plan 2025 commitments by requiring a Biodiversity Net Gain assessment (at least 10%) and integration with Local Nature Recovery Strategies to prove no net habitat loss. If no deliverable alternative exists, the council must remove the reliance on this route as mitigation for the Pill & Easton-in-Gordano strategic location (Policy LP4) and reassess the housing numbers accordingly. Reroute the		Markham Brook Ancient Woodland and Priority Habitat Inventory.pdf

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					The Sustainability Appraisal and the rest of the evidence base contain no assessment whatsoever of this route's impact on ancient woodland, priority habitats, protected species (e.g. bats), or the legal need for buffers. This makes the policy not justified (NPPF para 36b). No alternative alignments appear to have been examined. The council has not demonstrated that a deliverable route is possible at all – making the policy not effective. The proposed Markham Brook active travel bridge and path would destroy irreplaceable ancient woodland and priority habitat with no 15 m buffer and no compensation strategy. This directly breaches NPPF paragraphs 193c and 192 and renders the policy unsound. This same route is being relied on to "mitigate" the traffic impact of the 1,100 homes proposed under Policy LP4. If the route cannot be built, the mitigation fails and the housing allocation becomes even less deliverable.	Markham Brook link to avoid private land and existing bridleway PE2/1, or delete it entirely pending full landowner consultation.		
Policy LP14: Royal Portbury Dock	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	Policy LP14 is unsound and inconsistent with national policy because it directly contradicts its own wording and objectives when applied to the proposed Strategic Location at Pill & Easton-in-Gordano (Policy LP4 – 1,100 new homes). LP14 states that new development must not cause unacceptable harm to the operation, access or expansion of Royal Portbury Dock. It also requires improvements to M5 Junction 19 and local roads to be delivered in advance of development that would otherwise harm the port. The 1,100 homes in Pill would add approximately 700 extra peak-hour car trips straight onto the A369 and Junction 19 – the only realistic route for dock traffic, including hundreds of HGVs and abnormal-load vehicles that must use the slow lane on the Avonmouth Bridge. The council's own Infrastructure Delivery Plan (Oct 2025, section 8.3) classifies Junction 19 upgrades as high risk and unfunded, with no committed scheme or funding before 2030. No cumulative traffic modelling of the combined impact of Pill homes, Portishead growth and ongoing port expansion (Bristol Port Master Plan 2023) has been carried out, contrary to the requirement for a robust transport evidence base (NPPF paragraph 118). This means Policy LP4 would cause exactly the unacceptable harm that LP14 is supposed to prevent, and the required road improvements are not in place and cannot be guaranteed. The two policies therefore directly contradict each other, making the plan ineffective, unjustified and inconsistent with national policy.	Delete or heavily amend Policy LP4 so that no housing growth that relies on Junction 19 is permitted until the necessary upgrades are fully funded and built. Alternatively, remove Pill & Easton-in-Gordano as a Strategic Location entirely, reverting to the July 2024 strategy, so that LP14 can be properly applied without contradiction. Amend Policy LP14: Portbury dock with the addition of "The remaining Green Belt land located between the port estate and Pill and Easton-in-Gordano is considered extremely sensitive in preventing coalescence and checking unrestricted urban sprawl		
Land at Lodway Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	The Parish Council objects to allocating Land at Lodway Farm (HE20491) for 160 dwellings under LP4. Residents at our 9 Dec drop-in (45 attendees) recognise the need for some new homes but oppose huge estates—most would accept 20–30 here if fitting the awkward access (The Breaches/Beechwood Rd) and preserving the Green Belt buffer to the estuary, aligning with our Neighbourhood Plan's local-scale growth. This allocation is undeliverable and harms rural character without "very special circumstances". Not Positively Prepared – The 160-home scale overrides our 150–200 cap (81% support 2021), ignoring modest alternatives. Not Justified – No noise modelling for M5 or heritage assessment (Grade II*	Delete from Schedule 1; revert to July 2024 non-strategic status, capping at local needs (20–30 homes max, with buffer)		Screenshot 2025-12-11 090639.png

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					Church of St George views). Green Belt not "grey" (NPPF para 148).The Sustainability Appraisal contains no assessment of the loss of best and most versatile agricultural land. The site is predominantly Grade 1 (excellent quality) with the remainder Grade 2 according to Defra's Provisional Agricultural Land Classification (see attached screenshot from magic.defra.gov.uk). This is the highest-quality farmland that the NPPF (para 119 and Planning Practice Guidance) says should only be developed as an absolute last resort after all reasonable lower-grade alternatives have been exhausted. No such alternatives assessment has been carried out, rendering the allocation not justified (NPPF para 36(b)). Not Effective – IDP Oct 2025 (§8.3) flags unfunded J19; ~224 vehicles overload Marsh Lane without modelling (NPPF para 115d). Active travel (River Avon Trail) unfeasible on third-party land. Inconsistent/Legally Non-Compliant – Breaches NPPF para 148 and paras 106-108; Duty unmet with Historic England.			
Land east of Gordano Services	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The Parish Council objects to Land East of Gordano Services (HE206) for 200 dwellings under LP4. Residents wouldn't mind a few homes here but see ~186 (original proposal) as creating a standalone "village" disconnected from Pill, with insurmountable traffic safety on Marsh Lane (no access allowed). Undeliverable due to consultee objections on flooding/highways, and undeliverable in this number due to severe infrastructure constraints Not Positively Prepared – Disproportionate scale ignores community preference for small infill, overriding Neighbourhood Plan cap. No parish collaboration on alternatives, ignoring cumulative dock expansion impacts (Bristol Port Master Plan 2023). Not Justified – Evidence base flawed. No noise modelling (M5) or archaeological evaluation; high flood risk in Zones 2/3 per Defra MAGIC maps, with Environment Agency holding objection pending sequential tests (NPPF para 174); not "grey belt" (para 148). The Sustainability Appraisal contains no assessment of the loss of best and most versatile agricultural land. The entire site is classified as Grade 1 (excellent quality) according to Defra's Provisional Agricultural Land Classification (see attached screenshot from magic.defra.gov.uk). This is prime farmland that the NPPF (para 119 and Planning Practice Guidance) says should only be developed as a last resort after all reasonable lower-grade alternatives have been exhausted. No such alternatives assessment has been carried out, rendering the allocation not justified (NPPF para 36(b)). Not Effective – The council's own Infrastructure Delivery Plan (Oct 2025, §8.3) labels M5 Junction 19 upgrades as high-risk and unfunded. This site alone would generate approximately 280 peak-hour vehicle trips (1.4 cars per home × 200 dwellings) that must exit directly onto the Junction 19 / Marsh Lane / dock access network. When added to the remaining Portishead allocations and the ongoing expansion of Royal Portbury Dock HGV traffic, the cumulative impact has no evidenced or funded mitigation. National Highways has raised unresolved objections to the capacity and safety of Junction 19. In the absence of any robust assessment or deliverable mitigation, the allocation fails the effectiveness test (NPPF para 36(c)) and would cause severe residual cumulative impacts on the strategic road network (NPPF para 116). PRoW upgrade to services unfeasible without dock operator consent; active travel links (River Avon Trail, Marsh Lane) cross sensitive habitat without mitigation. Inconsistent/Legally Non-Compliant – Breaches NPPF para 148 (Green Belt without alternatives), para 193c (habitat harm), and Policy LP14 (no harm to dock operations). Duty to Cooperate failed: No joint Statements of Common Ground with Environment Agency (flooding) or National Highways (J19); ignores prior consultee holding objections from March 2025. This allocation risks Plan-wide unsoundness, exacerbating gridlock and flood risks.	Delete Land East of Gordano Services from Schedule 1 and the proposals map. Revert to non-strategic status under July 2024, allowing small-scale (e.g., 10–20 homes) if traffic resolved. If retained, require pre-allocation: Resolve EA/ National Highways objections via funded flood/J19 mitigations, full noise/heritage assessments, and dock compatibility study.		Screenshot 2025-12-11 090639.png

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Pill Green	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	The Parish Council objects to Pill Green (HE2015) for 600 dwellings under LP4. Universal drop-in opposition—no one spoke in favour; all cited unsustainable traffic (~30% parish increase), no viable road access, "fictional" active travel routes, and irreparable Markham Brook damage (contradicting EIP 2025's ancient woodland protections and NFM via buffers). This is the largest and most damaging of the five LP4 sites, lying entirely in the Green Belt and containing floodplain woodland, ancient woodland and priority habitat. Not Positively Prepared – 600 homes would increase the parish housing stock by around 30% in one go, completely overriding our Neighbourhood Plan (81 % referendum support 2021) which caps growth at 150–200 homes to 2038. Not Justified – The Sustainability Appraisal ignores Defra MAGIC maps showing over 55 % of the site is floodplain woodland in Flood Zones 2/3 and ancient woodland at Markham Bottom. The proposed active travel overbridge and continuation of Bridleway LA8/33/40 would destroy irreplaceable habitat with no 15 m buffer and no compensation strategy (NPPF para 193c; Natural England Standing Advice 2024). No evidence proves this is “grey belt” or that exceptional circumstances exist (NPPF para 148). The Sustainability Appraisal contains no assessment of the loss of best and most versatile agricultural land. The vast majority of the site is classified as Grade 2 (very good quality) with significant pockets of Grade 1 (excellent quality) according to Defra’s Provisional Agricultural Land Classification (see attached screenshot from magic.defra.gov.uk). This is prime farmland that the NPPF (para 119 and Planning Practice Guidance) says should only be developed as a last resort after all reasonable lower-grade alternatives have been exhausted. No such alternatives assessment has been carried out, rendering the allocation not justified (NPPF para 36(b)). Not Effective – The council’s own Infrastructure Delivery Plan (Oct 2025, §8.3) labels M5 Junction 19 upgrades and Pill flood-risk management as high-risk and unfunded. Adding ~840 peak-hour car trips (1.4 cars/home) from this site alone – on top of Portishead growth and expanding dock HGV traffic – has no evidenced mitigation and no funded solution**. National Highways has raised unresolved objections to the cumulative impact on Junction 19 capacity and safety. In the absence of any robust assessment or deliverable mitigation, the allocation fails the effectiveness test (NPPF para 36(c)) and would cause severe residual impacts on the strategic road network (NPPF para 116). The site-specific requirements admit no increased surface water run-off is permitted and flood mitigation is needed downstream, yet no viable scheme is shown. The primary school and Markham Brook overbridge are unfunded and cross third-party land with no delivery mechanism. Inconsistent with National Policy & Legally Non-Compliant – Direct loss of irreplaceable habitat (para 193c), failure of sequential flood test (para 174), breach of Green Belt policy (para 148), and Localism Act 2011 (developer-led, ignoring 2,000-signature petition). Duty to Cooperate failed: no joint work with Environment Agency or Natural England on flood/habitat solutions. The Feb consultation listed HE2015 as a standalone village site (600 homes indicative), not strategic—yet June Cabinet aggregated it into LP4 without re-consulting on cumulative harms, misrepresenting objections as 'localised' support (para 3.21) This site alone risks the entire Local Plan being found unsound.	Delete Pill Green (HE2015) in its entirety from Schedule 1 and the proposals map. Revert to the July 2024 spatial strategy under which this land remained protected Green Belt with no strategic allocation.		Screenshot 2025-12-11 090639.png Markham Brook Ancient Woodland and Priority Habitat Inventory.pdf
Land at Pill Road	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with	No	No	The Parish Council objects to Land at Pill Road (HE20492) for 100 dwellings under LP4. Every resident we’ve spoken with strongly opposed this site, no support voiced, only fact-based concerns on flood risks, habitat loss and undeliverable connections. This Green Belt site south of Markham Brook is undeliverable due to severe flood risk, habitat destruction and lack of infrastructure. Not Positively Prepared – Further erodes our Neighbourhood Plan (81 %	Delete Land at Pill Road (HE20492) from Schedule 1 and the proposals map. Revert to the July 2024 spatial strategy under which this land remained protected Green Belt with no strategic allocation.		Screenshot 2025-12-11 090639.png Markham Brook Ancient Woodland and Priority

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		national policy			referendum support 2021) which caps total growth at 150–200 homes to 2038. Not Justified – The Sustainability Appraisal and site requirements ignore Defra MAGIC evidence that the site lies in Flood Zones 2/3 and directly abuts Markham Brook floodplain woodland and ancient woodland. The required active travel connection and overbridge would destroy irreplaceable habitat with no 15 m buffer and no compensation strategy (NPPF para 193c; Natural England Standing Advice 2024). No proof this is “grey belt” or that exceptional circumstances exist (NPPF para 148). The Sustainability Appraisal contains no assessment of the loss of best and most versatile agricultural land. The entire site is classified as Grade 2 (very good quality) according to Defra’s Provisional Agricultural Land Classification (see attached screenshot from magic.defra.gov.uk). This is prime farmland that the NPPF (para 119 and Planning Practice Guidance) says should only be developed as a last resort after all reasonable lower-grade alternatives have been exhausted. No such alternatives assessment has been carried out, rendering the allocation not justified (NPPF para 36(b)). Not Effective – Undeliverable. The site-specific wording admits “no increased surface water run-off will be permitted” and “flood risk mitigations will be needed downstream”, yet no viable scheme is evidenced. The Markham Brook overbridge is unfunded, crosses third-party land, and relies on the equally undeliverable Pill Green allocation (600 homes). IDP Oct 2025 (§8.3) confirms flood-risk management and J19 upgrades are high-risk and unfunded. Inconsistent with National Policy & Legally Non-Compliant – Direct loss of irreplaceable habitat (para 193c), failure of sequential flood test (para 172-175), and breach of Green Belt policy (para 148). Duty to Cooperate failed: no joint work with Environment Agency on flood mitigation or Natural England on habitat protection.			Habitat Inventory.pdf
Land at Ham Green	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The Parish Council objects to Land at Ham Green (HE20493) for 40 dwellings under LP4. Drop-in feedback was positive on location for parish needs (especially affordable homes), but unanimous concern over traffic buildup on narrow Perrett Way—residents fear it becoming a rat-run. Still undeliverable overall. Not Positively Prepared – Adds to LP4 overload, overriding Neighbourhood Plan cap despite local support for sensible siting. Not Justified – No evidence that this Green Belt site is “grey belt” or that exceptional circumstances exist (NPPF para 148). The requirement to compulsorily upgrade and extend the private Perrett Way as public highway has no landowner agreement, no costed scheme, and no viability assessment. Not Effective – Undeliverable. Perrett Way is a narrow private road serving existing homes; turning it into a through-route for 40+ new houses will create traffic, safety and privacy issues for current residents. No funding or delivery mechanism is identified for the upgrade or the 'proportionate contribution' to wider active travel routes. Cumulative impact with the other four LP4 sites remains unmodelled (NPPF para 116). Inconsistent with National Policy & Legally Non-Compliant – Breaches Green Belt policy (para 148) and risks infringing private property rights without due process.	Delete Land at Ham Green (HE20493) from Schedule 1 and the proposals map, if retained post-LP4 withdrawal, cap at 20–30 affordable homes with Perrett Way safeguards (no through-traffic)		

Name: Ed Aldred **I.D:** 62777185

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Policy LP3: Strategic location: Nailsea and Backwell	No	• Justified	Unsure	Unsure	The field should not be included in the Grove Farm / Rodney Road housing allocation. For West Leigh families and many residents, this land has clear current and future value for children's play, wellbeing, informal learning and outdoor activities. Housing numbers can be met through existing allocations, meaning this field is not required to deliver the Plan's overall housing target. Policy LP3 prioritises the provision of new green infrastructure and open space. This field already fulfils that purpose and should be protected, not built on. The land functions as an important environmental buffer between the school and surrounding housing, helping reduce noise, air pollution, overheating and loss of biodiversity affecting children. Once built on, this green space will be irreversibly lost. Protection now is the only opportunity to secure long-term community value. The site has strong potential for designation as Local Green Space, as it is: demonstrably special to the local community, local in character, and offers clear recreational, educational, health and ecological benefits. Development here would represent avoidable harm to children's outdoor provision, at a time when national policy strongly emphasises active travel, outdoor learning, physical activity and mental wellbeing.			

Name: Eddie Corlett **I.D:** 62856417

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell is already facing significant development pressures, with 800 new houses approved—representing a 40% increase in the size of the village—and any further large-scale development would constitute severe overdevelopment. Despite this substantial growth, essential infrastructure has not kept pace. There is already a shortage of school places, and no investment has been made in health services or leisure facilities to support even the existing level of expansion. Adding another 1,000 homes would place an unsustainable strain on local services. Backwell has been allocated more housing than any other village in North Somerset, and even more than some towns. The village is expected to take 7% of the district's total housing allocation, compared with just 2% for Clevedon. Yet no needs or viability analysis has been provided to justify such a disproportionate level of growth. Backwell is not an employment hub, and most residents commute elsewhere for work, meaning the proposed development would increase traffic pressures rather than alleviate them. The proposed new road intended to support this development would not meaningfully address existing congestion in Nailsea or relieve pressure on Station Road, Backwell Common, or Chapel Hill. Engineering a road under or over the railway line would be extremely costly and may not even be feasible. Furthermore, the Infrastructure Delivery Plan provides no detailed analysis, costings, or secured funding for the road or other essential services, raising serious doubts about deliverability. There are also major environmental concerns. The development would result in the loss of Grade 1 agricultural land—land of the highest quality used for food production—of which only 7% remains in North Somerset. This contradicts government policy requiring the protection of the "best and most versatile" land to safeguard food security. Wildlife habitats would be destroyed, further worsening biodiversity loss in a country already severely depleted, and the proposals pose a direct threat to the Brockley Maternity Roost and SSSI, which supports rare Lesser and Greater Horseshoe bats. Flood risk presents another serious issue. Backwell Common and surrounding areas already flood regularly, and the proposed housing and road infrastructure—including areas around Backwell Lake—lie on floodplain land. Additional development would only increase flood vulnerability, putting new and existing residents at risk. Further concerns, for me, include the absence of a social cohesion impact assessment and the uncertainty surrounding the strategic growth location designation. Significant growth in such a short time, without the necessary infrastructure or services, would be destabilising, unsustainable, and ultimately undeliverable. The railway station, which is meant to serve as a key transport hub, is itself unfit for purpose—remaining inaccessible to people with mobility issues and posing challenges for families with young children.			

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					In summary, the scale of proposed development in Backwell is neither justified nor supported by evidence, in my opinion. It threatens local character, valued landscapes, essential farmland, biodiversity, and community wellbeing, while relying on infrastructure that is underfunded, uncertain, or unfeasible. The plans are unsustainable and should not proceed without robust analysis, proper infrastructure commitments, and full consideration of environmental and community impacts.			

Name: Edward Drewett **I.D:** 62659585

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Positively prepared	Unsure		quote: Regeneration will transform and breathe new life into existing towns and valued areas will be protected. People’s well-being, a strong sense of community, opportunity and fairness will be at the heart of all development in North Somerset. None of this is required in Pill and Easton in Gordano. The addition of hundreds of new houses will not bring new life, quite the opposite. The schools, doctor's surgery, comunity centre, shops and other facilties will be overwhelmed. Traffic (already not good) will block the roads. the enormous scale of the plan is simply too much. 'Fairness' is NOT at the heart of this plan.	Reduce the size of the development dramatically.		

Name: Edward Morris **I.D:** 62772929

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell					This is the first time I have felt it necessary to put in writing comments on local planning matters but I feel so strongly about the damage that this so-called local plan will inflict on Backwell that I think it important to have my say. It seems madness to me that the plan selects Backwell to deal with, what amounts to, practically, the doubling of its housing stock , with scant reference to, or plan for, the pressure this will place on its schools, health services and shopping facilities. Particularly when there are other local areas nowhere near as affected. Likewise, the effect of the increased traffic on the already overburdened A370 is an appalling prospect. The plan to build a road which crosses the railway line seems something of a pipe dream, as no one appears to have any idea where the funding will be found and its effect on the A370 is dubious in any event. I have lived in this village for 38 years and during that time Backwell has dealt with its fair share of infill and small developments, where land was available.These proposals are overkill, and in my view will destroy our village. You define the Local Plan, ‘as seeking to meet the areas ‘needs’, [Justified,Effective,Deliverable & Flexible]. I believe that most fair minded people will feel that this definition misses the mark in every respect.			

Name: Eileen Bax **I.D:** 21212833

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land south of Nailsea	No	• Positively prepared	Unsure	Unsure	The significant development either underway or due to commence for the area means a 40% increase for the village is already agreed. This additional proposal exacerbates how disproportionate this is within North Somerset, certainly for a village – as an example, Clevedon (town) taking 2% of the allocation, vs Backwell’s 7%. It equates to overdevelopment in relation to roads and public transport - trains and buses area already overcrowded at key times, and timetabling provides			

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		• Justified • Effective • Consistent with national policy			an insufficiently frequent or reliable service; roads are already busy, only worsened by the addition of 24hr rather than peak time bus lanes. Trains in particular are already problematic when travelling with children or with mobility issues where accessibility at the station is a live issue. The lack of employment opportunities here in Backwell and the surrounding areas makes that all the more concerning as residents tend to need to use these links to commute. The proposed road will not support alleviation of congestion and there is a lack of certainty as to the funding and timely delivery of such a route, not least the chaos and cost associated with any road in the environs (over/under) the railway. What's more, there is no planned investment in education, health or leisure services to accommodate such a significant population increase. The continued development on our green spaces and agricultural land are of real long term concern. We are continually seeing worsening impacts from heavy rainfall, with areas around Backwell Common amongst others as already prone to flooding – its visibly worse since the commencement of some of the building work underway at approved development sites. Indeed, Backwell Lake and the fields surrounding it suffer in the same way, already part of a floodplain area. We continue to knowingly build on land which enables soakaway activity to occur across the whole county. Our Government policy states that "we must protect our best and most versatile land" in order to safeguard food security; this proposal undermines that policy. Only 7% of Grade 1 Agricultural land remains in the whole of North Somerset. Whilst policy dictates that affordable housing (50%) be delivered on Greenbelt land, this further minimises developer contribution to the required infrastructure.			
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The significant development either underway or due to commence for the area means a 40% increase for the village is already agreed. This additional proposal exacerbates how disproportionate this is within North Somerset, certainly for a village – as an example, Clevedon (town) taking 2% of the allocation, vs Backwell's 7%. It equates to overdevelopment in relation to roads and public transport - trains and buses area already overcrowded at key times, and timetabling provides an insufficiently frequent or reliable service; roads are already busy, only worsened by the addition of 24hr rather than peak time bus lanes. Trains in particular are already problematic when travelling with children or with mobility issues where accessibility at the station is a live issue. The lack of employment opportunities here in Backwell and the surrounding areas makes that all the more concerning as residents tend to need to use these links to commute. The proposed road will not support alleviation of congestion and there is a lack of certainty as to the funding and timely delivery of such a route, not least the chaos and cost associated with any road in the environs (over/under) the railway. What's more, there is no planned investment in education, health or leisure services to accommodate such a significant population increase. The continued development on our green spaces and agricultural land are of real long term concern. We are continually seeing worsening impacts from heavy rainfall, with areas around Backwell Common amongst others as already prone to flooding – its visibly worse since the commencement of some of the building work underway at approved development sites. Indeed, Backwell Lake and the fields surrounding it suffer in the same way, already part of a floodplain area. We continue to knowingly build on land which enables soakaway activity to occur across the whole county. Our Government policy states that "we must protect our best and most versatile land" in order to safeguard food security; this proposal undermines that policy. Only 7% of Grade 1 Agricultural land remains in the whole of North Somerset. Whilst policy dictates that affordable housing (50%) be delivered on Greenbelt land, this further minimises developer contribution to the required infrastructure.			

Name: Eileen Johnson **I.D:** 50569921

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP3: Spatial strategy	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Plans appear to be for towns and urban areas. Backwell is a rural village.			

Name: Elizabeth Porter **I.D:** 21325473

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell						I made myself ill responding to the previous draft Plan, even just by looking through it and then emailing. I subsequently vastly reduced online scrolling and moving from one window to another. (That there is no solution to this condition for me was confirmed by an ENT Consultant in August 2025.) However, what is currently proposed for Backwell now is so outrageous that I feel I must respond in some way. I hope you will record me as a strong Opposer to these plans. Backwell already has 800 new houses approved, a 40% increase for the village. These additional numbers would lead to complete overdevelopment and a negative impact on the character of the area. The proposals allocate to Backwell a higher number of houses than any other village in North Somerset, and an even a higher growth percentage than towns. Backwell is expected to take 7% of the district`s housing allocation, compared to the town of Clevedon at 2%. Yet there is no needs or viability analysis for an extra 1,000 houses in Backwell. Nor a social cohesion impact assessment. The Infrastructure Delivery Plan lacks analysis and costings, and there are no funding guarantees for any new services nor any new road. So there is uncertainty over whether any new road could be funded and delivered on time to support the proposed housing. Despite the proposed increase, there is a deficit in school places and no investment in health services nor leisure facilities. Backwell is NOT an employment hub: most residents commute. This lack of infrastructure and services means another 1,000 houses cannot be supported. The sheer volume of growth with the required investment infrastructure and services over such a short period is destabilising, unsustainable and undeliverable. Government policy does require 50% affordable housing on Greenbelt Land, but this reduces the funds developers contribute towards infrastructure! I have protested against the loss of agricultural land in previous development proposals. Government policy states that we `must protect our best and most versatile land` to safeguard food security. The agricultural land involved this time is Grade 1, currently used for food crops and grazing. So these proposals contradict this policy and undermine food security. Already, North Somerset has only 7% of high quality land left. Backwell Common and surrounding areas are prone to flooding, which would be aggravated by more housing. Indeed Backwell Lake (Reservoir) and adjacent fields, where new roads and housing are planned are on a floodplain – which unsurprisingly floods regularly. Again this is something that I have frequently noted in comments, especially for the developments in front of St Andrews Church, but to no avail. Please do not ignore this aspect again. The proposed development would destroy valuable wildlife habitats and further harm biodiversity in one of the world`s most nature-depleted countries. The proposals specifically threaten the Brockley Maternity Bat Roost and SSSI, with rare Lesser and Greater Horseshoe Bats relying on the land for food. I am not opposed in principle to a relief road but this has to be a proposal that can be implemented and meets its intended purpose. There are severe doubts about whether the current proposal would effectively serve Nailsea`s traffic or relieve congestion on Station Road, Backwell Common or Chapel Hill. In any case, engineering the road under or over the railway would be highly expensive and possibly unfeasible. And yet, Bristol Airport, quite apart from any environmental or climate change concerns one may have, is repeatedly given permission to expand adding further to the log-jamming of local roads, quite likely a majority tourist traffic but hampering local business traffic. The railway station is not fit for purpose as transport hub; it remains inaccessible for people with mobility issues and presents serious challenges when travelling with young children. This is a particular concern for me. I could no longer use trains when I had to stop carrying items in my rucksack due to deteriorating spinal problems. One side does have a ramp but it is so steep I feel that even that would be hard going with a Walker/Rollator. I have been hoping that a younger person who needs to use railway transport for employment might pursue a case under Equalities Legislation. However I know only too well how much more tiring it is just to live life as a person with disability, let alone pursue something as time-consuming and stressful as that. Walking from where I live in Backwell one still gets splashed when there are puddles just by walking to either direction bus stop and the crossing and centre. There is still no (recessed) shelter at the Playing Fields stops on either side (and no plans to install one as far as I am aware). I have made two formal Complaints to First Bus after incidents when I was hurt due to the design and layout at the front of the new electric buses – without ANY acknowledgement let alone reply.		

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					The Sirona Service does not offer a Physiotherapy Service in Nailsea as North Somerset Community Health Partnership did previously. There is no bus to Clevedon from where I live in Backwell, and the one from the Crossroads (which has to be a single decker due to the railway bridge) is extremely wobbly and uncomfortable. The Sirona Service has been dreadful for me, problems recently recognised by the Care Quality Commission. I first asked for further help in August 2024. In December 2024, my leg gave way whilst walking home from the bus stop and I stumbled on to the A370. (The other leg gave way in Broadmead a few days later but less spectacular in a pedestrian zone.) Sirona DEprioritised me being seen for triage. Some time later I discovered that a Physiotherapist I had spoken to by phone had wrongly noted what I had described. But I think that the de-prioritisation may have been more due to an X-ray which showed no change from the first Neurospinal Operation in 2018. I would have expected Professional staff to be aware that such problems very frequently do not show up in X-rays – which is presumably a major reason why MRI Scanning was developed. In due course Sirona seemed to correctly request the MRI Scan in the BRI. However I was then led quite a dance (although I certainly do not physically dance!) with appointment letters and phone calls for venues all over the place. For example, a phone message from an outfit calling itself `In Health` that I had never heard of and certainly not been alerted to, requesting all sorts of personal details before they would discuss anything with me. Do elderly people not receive frequent warnings against scam callers? Once I had at last had the MRI Scan and result that the problem is as severe as when I waited for the first Surgery from 2015-18 (and was left with reduced sensation in feet and ankles and thus difficulty with balance), I was at last referred back to the Consultant Surgeon at Southmead Hospital but did not see him until October 2025. I am now again on his Waiting List. Whilst the specific details and delays of this `Pathway` are different from between 2015 and 2018, I can see absolutely no overall improvement in the process so far – whilst all the time I increasingly lose sensation in feet and legs and further consequent difficulty with balance, as well as walking becoming slower and stiffer, driving around less and less. In the midst of trying to get NHS help, North Somerset Council withheld re-issue of a Blue Badge (able to be used for lifts in addition to driving oneself) for 4 months at the beginning of 2025 – eventually letting me know that what was being insisted on was a document mentioned nowhere in the initial information nor application sent, nor in their early communications. (I have had a Blue Badge since 2009 although every 3 year applications is seen as new, not a re-application. I had found online application too challenging 3 years previously so did not even attempt it again.) These are some of the REALITIES of CURRENT local infrastructure albeit from my personal experience. However I have no doubt that others will have many of their own stories to tell. But we cannot have this level of housing expansion without infrastructure and services improvements FIRST. Thank you for your attention to this letter and inclusion of my comments in relation to the Local Plan proposals for Backwell. I repeat that I am in strong Opposition.			

Name: Elizabeth Wright **I.D:** 58660673

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano					I write to strongly object to this development. I have already filed one for HE206 but see I have to do more. I have tried to negotiate your online forms unsuccessfully, I look after my husband and simply don’t have the time necessary to object this way, so I wish this email to be included in the consultation. Why is green belt being used for development, this is destroying areas that enhance both mental and physical health. Why are existing residents not being properly consulted, it feels as if this is being forced upon us. The plan to surround the village in a circle of development gives no thought to the infrastructure. We frequently suffer			

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					from gridlock on the roads, motorway holdups block the junction 19 roundabout causing chaos on all the surrounding roads. People cut through Portbury to get to the motorway adding to the volume. With the number of houses proposed, journeys will become a nightmare and dangerous. This in turns causes pollution and therefore is an health risk. Schools are not big enough to cope with the increase and the surgery would suffer too. My other fear is loss of land and countryside increases the flood risk, we are in line with a lot of water from higher ground. This location is highly unsuitable for this level of development, please consider the lives of the existing community.			

Name: Ella Badger **I.D:** 30831905

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I object to the proposed allocation of 1,000 additional homes in Backwell on the grounds that the scale, location and supporting evidence are not sound, justified or deliverable. 1. Disproportionate Growth Backwell already has over 800 homes approved, representing a 40% increase in village size. A further 1,000 dwellings constitutes clear overdevelopment and far exceeds the growth proposed for comparable villages and even some towns with superior infrastructure. No needs assessment has been provided to justify this scale of expansion. 2. Inadequate Infrastructure Provision There is no committed investment in school capacity, healthcare, leisure facilities or other essential services. The Infrastructure Delivery Plan lacks analysis, costings and identified funding. The proposed new link road is unfunded, technically complex due to the rail crossing, and would not resolve existing traffic issues. 3. Transport Constraints Backwell station cannot function as a transport hub in its current form: platforms remain inaccessible, parking provision is minimal and rail services are already operating at or near capacity. 4. Environmental and Land-Use Concerns Much of the site comprises Grade 1 agricultural land, which national policy requires to be protected. The scale of development poses significant risks to biodiversity and wildlife habitats, and Backwell Common is known to be susceptible to flooding. 5. Social and Economic Impact The village has limited employment opportunities; most residents would need to commute, worsening congestion. No social cohesion assessment has been undertaken. The requirement for 50% affordable housing on greenbelt land will also reduce developer contributions, leaving substantial gaps in infrastructure funding. Conclusion Given the absence of demonstrable need, the lack of deliverable infrastructure, the environmental harm and the disproportionate scale of growth, the proposed allocation for Backwell is unsound. I request that this allocation be withdrawn or significantly reduced and reconsidered in line with national policy and local capacity.			

Name: Ellie Britton **I.D:** 62850913

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP7: Green Belt	No	• Positively prepared • Effective • Consistent with	Unsure	Unsure	There is only 7% left of Grade 1 agricultural green belt land in North Somerset, how can we afford to lose such a large amount of it in Backwell to housing? It won’t just affect the county’s food production, but the wildlife and villagers who, like my family and I, have spent decades enjoying it!			

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		national policy						
Policy LP3: Strategic location: Nailsea and Backwell	No	• Effective • Consistent with national policy	Unsure	Unsure	According to the NPPF the developments proposed “should be located in areas where they are, or can be, supported by the necessary infrastructure and facilities”. The local schools in Backwell were not built to accommodate the increase in the number of school aged children that the East Backwell and other development sites will bring; therefore in order to comply with the NPPF statement above, the development proposed should provide the infrastructure needed to facilitate the education of these additional children. Alongside this, the North Somerset Local Plan 2041 states that development proposals must also demonstrate how they will support the delivery of infrastructure in line with the Infrastructure Delivery Plan. This includes the provision of, including land and funding, a new 420 place primary school on the East Backwell site. However when talking to members of the Rubix Land development team at a public consultation exercise event in September, we were told that the land would be provided but the funding of the new school would be down to the local council. The ability of North Somerset Council to find the funds for this construction seems highly unlikely, especially due to recent reports that they face a £10 million funding gap for next year! But the staff from Rubix Land that we spoke to seemed to believe that was not their problem. But if once the new houses at the East Backwell site are constructed and this 420 place new primary school cannot be afforded by the local council, where will those children go to school? Surely the education of future generations should be ensured before a development proposal like this is approved! Health services – When talking to members of the Rubix Land development team at a public consultation exercise event in September, we were told that the land would be provided, but the funding of the new health services would be down to the local council. The ability of North Somerset Council to find the funds for this construction seems highly unlikely, especially due to recent reports that they face a £10 million funding gap for next year! The doctors surgery in Backwell is already exceptionally busy and the doctors pushed to their limits to provide care for the current residents of the village, this means new healthcare infrastructure would definitely be needed to accommodate the huge population increase. I struggle to see how this proposed development will therefore be “located in areas where they are, or can be, supported by the necessary infrastructure and facilities” (NPPF).			
Land east of Backwell	No	• Effective • Consistent with national policy	Unsure	Unsure	In your own words, the development at villages “must not be of a disproportionate scale which adversely impacts on the character of the settlement or leads to a significant increase in the number of car journeys”, does this not apply to the character of the village of Backwell? As after the construction of the large scale development that is being proposed, Backwell will no longer be a village, it’ll be a town! Backwell has already had the building of 794 new houses approved, of which 154 are already under construction; 94 houses under construction at Farleigh Fields East, 60 under construction off Rodney Road, 125 approved for Farleigh Fields West, and 515 approved for Grove Farm and Burnt House Farm. Currently Backwell has around 2,000 houses, so those sites alone already increase the size of the village by 39.7%, and I believe building another 889 houses in East Backwell, under the North Somerset Local Plan 2041, proves to be of a ‘disproportionate scale’ as it brings that current increase up to 84%! How anyone can argue that increasing a village by a total of 1,683 houses, and therefore almost doubling its size, is proportionate and sustainable is beyond belief. In addition, the 552 houses proposed for the land west of Backwell Lake, whilst technically falling under the proposals for Nailsea, will have a huge effect on the village of Backwell, especially if the access road connecting this development to the A370 is constructed.			

Name: Ellie Fraser-Marsh **I.D:** 39304321

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	-Backwell is currently undergoing a 40% increase to village housing with over 790 houses approved for construction or already under construction. It's not sound to have more housing planned in Backwell with no investment in infrastructure such as schools, medical facilities, train transport and flood mitigation measures. -It is in direct opposition to the Government's policy to protect versatile land and protect food security. -The proposed new road lacks details, a feasibility study, costings or funding, yet has been planned to be built over or under a railway, which would be very costly and complex. -The North Somerset Local Plan 2038 Challenges and Choices Part 2 - Choices for the Future states that the councils aim is to retain green belt land, which this plan would counter. -The North Somerset Local Plan 2038 Challenges and Choices Part 2 - Choices for the Future states that there should be greater dispersal in development, but Backwell is allocated a higher number of houses than any other village.			

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					-This area includes Grade 1 Agricultural Land, currently used for crops, grazing and providing food for Lesser and Greater Horseshoe Bats. The land providing trees, bushes and soil for absorbing water and keeping the land stable in a flood-prone area, as well as providing habitat for other British wildlife.			

Name: Ellie Hookham **I.D:** 58879073

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Justified • Consistent with national policy	Unsure	Unsure	I do not believe this aspect of the plan to sound. The building of 400 (likely more) houses on tower farm, skirting Weston big wood, would be an ecological disaster for our town. As the site is an SSI I cannot understand the logic of putting housing alongside it when there is already bountiful housing running parallel to it but at a sound distance. I do not believe that NSC have considered; alternative brown and green field sites with much less ecological impact both in Portishead and across North Somerset. The opportunity to increase housing density on proposed brown field sites across North Somerset which would mean these sites are not required to meet local housing targets. The strategic ecological contribution of these specific sites in protecting the unique environment of Weston Big Wood (SSSI) and the Gordano Valley strategic green corridor The fact that these sites were specifically added to the Green Belt in the late 1980's because of their high ecological value. As a side note, as a resident of The Downs, I'd like to say in the few short years I have lived here, I have a handful of times had to get out of my car to direct traffic at peak school drop off/pick up times due to absolute carnage at the down road/the downs junction. The idea of adding access to yet another housing estate to this junction, when it already serves two AND a huge primary school is nonsense and outright dangerous. Your traffic consultation was conducted down the road from this junction, on the downs itself I believe, and not during these peak times...it should be redone to gather an accurate picture at the very least. Alternative brown and green field sites should be considered across the town.			

Name: Ellis **I.D:** 29216481

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The Land at Tower Farm site is adjacent to the ancient woodland of Weston Big Wood which is also a Site of Nature Conservation Interest. Weston Big Wood is an intrinsic part of the Gordano Valley ecological network - an important biodiverse habitat of open grassland, wetland and woodland. Any development on this site will have a significant negative environmental impact and the Council therefore has a duty to ensure that development is avoided. The visual and ecological intrusion into the woodland and surrounding landscape would be extremely detrimental. The Council has not robustly considered the full breadth of environmental factors in allocating this site (and the Black Rock site) for development. This allocation conflicts with the National Planning Policy Framework (NPPF) which requires that development resulting in the deterioration of irreplaceable habitats such as Weston Big Wood should be refused unless exceptional circumstances exist. The NPPF also requires the delivery of biodiversity net gain which this allocation does not address in any realistic manner. This allocation will place additional pressure on all of Portishead's infrastructure and as a peripheral			

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					site at the top of a steep hill would increase private vehicle usage and pollution rather than support sustainable transport. There can therefore be no presumption in favour of sustainable development on this site. Any development would never protect and enhance a valued landscape and site of biodiversity. The Council should recognise that Weston Big Wood and all of its adjacent natural landscape is an important ecological network and should be enhancing its resilience not compromising it. The allocation of this site should be removed. The land at Tower farm needs to remain undeveloped and be managed to enhance and protect its biodiversity. I do not support the allocation of land at Tower Farm in the North Somerset local Plan 2041.			
Black Rock, north of Clevedon Road	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	The allocation of Black Rock is unjustifiable as the Council itself acknowledges that environmental and ecological requirements cannot be met onsite. This need for off-set land demonstrates the unsuitability of the site. there is no published evidence of lead sensitive sites being considered and then discounted. This allocation due to its location with no local services would increase car dependency and therefore conflicts with the sustainable transport objectives of the NPPF. The site depends on multiple off-site and third party mitigations. There is no clear pathway to deliver and fund any of these mitigations meaning that the allocation itself fails the effectiveness test set out in the NPP para 36(c). Combined with the allocation of land at Tower Farm, the allocation of Black Rock will exacerbate the ecological, transport and infrastructure burdens that already exist in Portishead. This runs contrary to the Council's nature recovery and sustainable growth objectives. I do not support the allocation of Black Rock in the North Somerset Plan 2041.	No modification would make the allocation of Black Rock acceptable. Black Rock needs to be removed from the North Somerset Local Plan 2041. The land should remain undeveloped, contributing to much needed biodiversity and the character of the natural landscape.		

Name: Emilia Leung **I.D:** 63070401

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SP4: Placemaking	No	‣ Effective	No	Unsure	The Proposal is overly reliant on inflated national targets and infrastructure that cannot be delivered – whilst at the same time, ignoring local constraints. The Proposal is also inconsistent with national policy. Green Belt boundaries should only be altered in exceptional circumstances – and the review must show no “clear evidence that doing so would fundamentally undermine the purposes…of the remaining Green Belt”.			
SP7: Green Belt	No	‣ Effective	No	Unsure	The Proposal is overly reliant on inflated national targets and infrastructure that cannot be delivered – whilst at the same time, ignoring local constraints. The Proposal is also inconsistent with national policy. Green Belt boundaries should only be altered in exceptional circumstances – and the review must show no “clear evidence that doing so would fundamentally undermine the purposes…of the remaining Green Belt”.			
SP8: Housing	No	‣ Effective	No	Unsure	The Proposal is overly reliant on inflated national targets and infrastructure that cannot be delivered – whilst at the same time, ignoring local constraints. The Proposal is also inconsistent with national policy. Green Belt boundaries should only be altered in exceptional circumstances – and the review must show no “clear evidence that doing so would fundamentally undermine the purposes…of the remaining Green Belt”.			
SP9: Employment	No	‣ Effective	No	Unsure	The Proposal is overly reliant on inflated national targets and infrastructure that cannot be delivered – whilst at the same time, ignoring local constraints. The Proposal is also inconsistent with national policy. Green Belt boundaries should only be altered in exceptional circumstances – and the review must show no “clear evidence that doing so would fundamentally undermine the purposes…of the remaining Green Belt”.			
SP10: Transport	No	‣ Effective	No	Unsure	The Proposal is overly reliant on inflated national targets and infrastructure that cannot be delivered – whilst at the same time, ignoring local constraints. The Proposal is also inconsistent with national policy. Green Belt boundaries should only be altered in exceptional circumstances – and the review must show no “clear evidence			

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					that doing so would fundamentally undermine the purposes…of the remaining Green Belt”.			
Policy LP3: Strategic location: Nailsea and Backwell	No	• Effective	No	Unsure	The Proposal is overly reliant on inflated national targets and infrastructure that cannot be delivered – whilst at the same time, ignoring local constraints. The Proposal is also inconsistent with national policy. Green Belt boundaries should only be altered in exceptional circumstances – and the review must show no “clear evidence that doing so would fundamentally undermine the purposes…of the remaining Green Belt”.			
Policy LP6: Educational, sporting, leisure and community use allocations	No	• Effective	No	Unsure	The Proposal is overly reliant on inflated national targets and infrastructure that cannot be delivered – whilst at the same time, ignoring local constraints. The Proposal is also inconsistent with national policy. Green Belt boundaries should only be altered in exceptional circumstances – and the review must show no “clear evidence that doing so would fundamentally undermine the purposes…of the remaining Green Belt”.			
Policy LP9: Extent of the Green Belt	No	• Effective	No	Unsure	The Proposal is overly reliant on inflated national targets and infrastructure that cannot be delivered – whilst at the same time, ignoring local constraints. The Proposal is also inconsistent with national policy. Green Belt boundaries should only be altered in exceptional circumstances – and the review must show no “clear evidence that doing so would fundamentally undermine the purposes…of the remaining Green Belt”.			
Policy LP10: Strategic gaps	No	• Effective	No	Unsure	The Proposal is overly reliant on inflated national targets and infrastructure that cannot be delivered – whilst at the same time, ignoring local constraints. The Proposal is also inconsistent with national policy. Green Belt boundaries should only be altered in exceptional circumstances – and the review must show no “clear evidence that doing so would fundamentally undermine the purposes…of the remaining Green Belt”.			
Policy LP11: Transport infrastructure, allocations and safeguarding	No	• Effective	No	Unsure	The Proposal is overly reliant on inflated national targets and infrastructure that cannot be delivered – whilst at the same time, ignoring local constraints. The Proposal is also inconsistent with national policy. Green Belt boundaries should only be altered in exceptional circumstances – and the review must show no “clear evidence that doing so would fundamentally undermine the purposes…of the remaining Green Belt”.			
Policy DP1: High quality design	No	• Effective	No	Unsure	The Proposal is overly reliant on inflated national targets and infrastructure that cannot be delivered – whilst at the same time, ignoring local constraints. The Proposal is also inconsistent with national policy. Green Belt boundaries should only be altered in exceptional circumstances – and the review must show no “clear evidence that doing so would fundamentally undermine the purposes…of the remaining Green Belt”.			
Policy DP9: Flood risk	No	• Effective	No	Unsure	The Proposal is overly reliant on inflated national targets and infrastructure that cannot be delivered – whilst at the same time, ignoring local constraints. The Proposal is also inconsistent with national policy. Green Belt boundaries should only be altered in exceptional circumstances – and the review must show no “clear evidence that doing so would fundamentally undermine the purposes…of the remaining Green Belt”.			
Policy DP12: Development in the Green Belt	No	• Effective	No	Unsure	The Proposal is overly reliant on inflated national targets and infrastructure that cannot be delivered – whilst at the same time, ignoring local constraints. The Proposal is also inconsistent with national policy. Green Belt boundaries should only be altered in exceptional circumstances – and the review must show no “clear evidence that doing so would fundamentally undermine the purposes…of the remaining Green Belt”.			
Policy DP36: Biodiversity Net Gain	No	• Effective	No	Unsure	The Proposal is overly reliant on inflated national targets and infrastructure that cannot be delivered – whilst at the same time, ignoring local constraints. The Proposal is also inconsistent with national policy. Green Belt boundaries should only be altered in exceptional circumstances – and the review must show no “clear evidence that doing so would fundamentally undermine the purposes…of the remaining Green Belt”.			
Policy DP43: Affordable housing (including rural exception schemes)	No	• Effective	No	Unsure	The Proposal is overly reliant on inflated national targets and infrastructure that cannot be delivered – whilst at the same time, ignoring local constraints. The Proposal is also inconsistent with national policy. Green Belt boundaries should only be altered in exceptional circumstances – and the review must show no “clear evidence that doing so would fundamentally undermine the purposes…of the remaining Green Belt”.			
Policy DP46: Housing Type and Mix	No	• Effective	No	Unsure	The Proposal is overly reliant on inflated national targets and infrastructure that cannot be delivered – whilst at the same time, ignoring local constraints. The Proposal is also inconsistent with national policy. Green Belt boundaries should only be altered in exceptional circumstances – and the review must show no “clear evidence that doing so would fundamentally undermine the purposes…of the remaining Green Belt”.			

Name: Emily Shopland **I.D:** 62865633

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Pill Green	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	1. Sustainability Appraisal Fails SEA Directive - no assessment of brownfield alternative to Pill Green - Reg12/2024 Brownfield Register 2,800+ units ignored 2. No duty to cooperate on Bristol's 8,000 Unmet Need - no statement of common ground unilateral 1,100 home dump in PIEG 3. Green Belt exceptional circumstances not evidence (NPPF 147) - parcel identified as high performing agricultural land; no sequential test 4.44% Population Bomb on Pill & Easton-in-Gordano – Disproportionate & Unjustified - 600 homes = 24% from one site alone. 5.No Deliverability Plan for A369, M5 J19, Schools, GP Access or Drainage by 2041 Pill Green undeliverable = ineffective I live on Martcombe Road, this is a busy road that feed into the city, no consideration as to traffic implications and management of this, little consideration of infrastructure required to support the large number of additional people 6.Brownfield First Policy Ignored – 2,500+ Viable Urban Units Still Available in Weston, Portishead, Bristol fringe 7.Pill Green Breaches NPPF 159 – No Sequential Test for Non-Green-Belt Sites -Excellent sustainable transport links make urban/brownfield viable 8.Request Independent Verification of “Exceptional Circumstances” Before Any Pill Green Consent 9.Cap Village Growth at <5% per site. Reference: 1. 2017 JSP and previous Local Plan allocations, 2. NPPF 11 & 130(f): plans must be “deliverable” and avoid “adverse impacts” on local character and services. 3. Inspector decisions: Local Plan examinations have found allocations causing >10% population increase to be unsound unless supported by	Delete the Pill Green Site (600 homes) from the North Somerset Plan Schedule of Sites as amended. Policy as follows: “No development on Pill Green until exceptional circumstances are independently verified (NPPF para 147) and sequential testing confirms no viable non-Green Belt alternatives are available, prioritizing brownfield sites in Weston-super-Mare, Portishead and Bristol fringe. Cap total allocation across all sites; require full funding (via s106/CIL agreements) for flood defences to 1-in-1000 year standard + 45% climate change allowance, A369 and M5 J19 capacity upgrades, and additional school and GP places alongside associated additional community infrastructure before granting outline permission. Insert new para 6.7a: ‘Allocations must demonstrate no disproportionate impact on village populations, defined as <5% increase in population by 2041.’ Allocations in villages with a population under 10,000 must not result in a population increase of more than 5% from any single site unless exceptional circumstances are independently verified and full infrastructure delivery (transport, education, health, drainage) is secured through s106/CIL. Underperformance products across all sites within a settlement must not exceed 20% without a master planned, funded delivery strategy.”		

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					exceptional infrastructure evidence, which is absent here.			

Name: Emily Wills **I.D:** 51456289

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Re: The North Somerset Local Plan 2041 Dear Sirs, I write to object strongly to ideas raised in the above Plan, especially with regard to the massive urbanisation of Backwell on this grade 1 agricultural land. The ideas in the Plan seem to encourage the 'Doughnut' style development of Bristol beyond the Green Belt. Surely this old fashioned idea has no future in the 21st Century with all the traffic chaos that this style of development is sure to cause. The Plan seems to ignore the logical extension to the Bristol conurbation in areas within the City and just outside, such as the 'Vale' area between the A370 and the A38 (HE20110) on grounds that some of the area is 'nominally Green Belt. This area of land directly outside the City boundary has very little of the character worth preserving that we would normally associate with the Green Belt and it would offer a far more logical extension of the City than building on vast tracts of open countryside beyond the Green Belt in a ring or 'Doughnut' development. The existing road systems around the village of Backwell and the town of Nailsea are archaic. The main roads are often gridlocked and the tiny interconnecting lanes are used as rat-runs and a very dangerous situation has already been created by successive planning mistakes, encouraging huge 'dormitory' housing estates beyond the Green Belt. The danger of 'rat-run' traffic mixing with schoolchildren crowding the narrow pavements and dodging the constant traffic is a subject planners should try to reduce. This danger would obviously worsen drastically if such development as suggested in the Plan were to happen. Is this what you call 'Planning' for the 21st Century? For developers or Planners to suggest that a large proportion of these new residents would then use the much derided public transport is proven nonsense. The majority will, as always, get into their cars and attempt to drive into Bristol using all available 'rat runs' possible. The suggested area of development would interfere directly with the regular feeding patterns of the Greater Horseshoe Bat Colony in Brockley. I know this from personal experience, as our garden is visited almost every night in the flying season by these fascinating and rare creatures. Many of my neighbours on the whole length of Church Lane and directly over the proposed development area are also visited regularly. Backwell, with its narrow winding lanes has developed gradually over more than a thousand years. The suggestion of a sudden massive deposit of thousands of new houses and sudden urbanisation is total planning vandalism. When we as a village were democratically asked by central government how we would wish to see the development of the area, 'The Backwell Neighbourhood Plan' was produced and very strongly supported by our village. The scale of development suggested by this Spatial Plan is totally alien to the democratic views of the voters of Backwell.			

Name: Emma Biddle **I.D:** 62777921

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective	Unsure	Unsure	Backwell Common and surrounding fields is prone to flooding which more housing would exacerbate, especially combined with climate change where hot weather for prolonged spells creates hard dry ground and makes flooding more extreme with moderate not extreme rainfall. Backwell lake is a floodplain and this will impact the new road to be created across the common. The land is grade 1 agricultural and there is only 7% of this left in of this in North Somerset but this plan is against government policy to protect the best land to safeguard food security.	Number of houses built in east Backwell fields to completely revised and reduced by at least 80%		

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		• Consistent with national policy			The infrastructure, number of school and surgery places, and others services in Backwell cannot cope with a 40% increase to the village. Congestion on roads would massively increase. Backwell Common's character would be lost and narrow single lane would not cope with extra traffic. Finally the proposed number of houses is hugely disproportionate to other villages/towns in the county			

Name: Emma Blackburn **I.D:** 39460193

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	This additional 900 houses for Backwell has not been thought through - from a logistical, ecological, infrastructure or cultural perspective, nor does it take into account the fact that Backwell already has an additional 800 houses approved which have yet to be built, the impacts of which have yet to be seen / felt. One of my biggest concerns about this development is the increase in traffic. Our roads are already extremely congested at rush hour - it has been known to take me an hour to do the round trip from Backwell to our son's nursery in Flax Bourton. (It is ironic in itself that we need to travel to Flax Bourton for nursery because Backwell does not have any year round provisions for childcare, or any provision for childcare under 2 regardless). This is just one way in which infrastructure is not set up to support current families, let alone the 1700+ households that would be added as a result of this plan. Traffic concerns have been repeatedly dismissed with other development sites locally, whilst prioritizing bus improvements that make traffic worse for all other road users. It is only in time that we will see how poor a decision this has been. I already hate driving to Nailsea from Backwell along Station Road at school kick out time for example (or less commonly, drop off), because of how narrow the roads and pavements are, and how busy it is with both traffic and school children. It is very nerve wracking!! I note that a proposed road linking the A370 to Backwell Lake is shown on the plan, which would help, yet this is not guaranteed. We need analysis and costings of the feasibility of this road - given it will need to cross the railway, leading to secured funding, as an absolute priority. As I mentioned, traffic is just one area of this plan where the impacts on the village - and it is still just a village - have not been thought through. Can Backwell still be a village with an additional 1700 households, an estimated population growth of 80%? Certainly the current provision of school places, doctors, leisure facilities and others reflects its village status, not that of the large, sprawling, overdeveloped estate it will become when the existing approved developments are built - let alone this additional planned one. The final point I'll make (though there are many many others), is that of flooding. It doesn't need to rain much for the A370 to experience huge amounts of surface water. Downpours regularly cause large run-offs from Farleigh Fields, with many houses along the road experiencing flooding. Backwell Lake and adjacent fields, where new houses and the road are planned, also all flood regularly, being on a floodplain. I have not seen this properly dealt with in other housing developments, and again, worry that this would be aggravated further by more building.	The proposed road linking the A370 to Backwell Lake would be absolutely critical, and would need to be delivered BEFORE an increase in more housing. Station Road simply CANNOT take any more traffic, it is neither safe nor practical.		

Name: Emma Bloom **I.D:** 62806337

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared • Justified • Effective • Consistent with national	Unsure	Unsure	I object to the proposed development plan for Nailsea and Backwell due to the following points: Excessive and unsustainable growth: 25% increase in households in Nailsea is a massive increase to the population of Nailsea and in my opinion is out of control and would result in overcapacity for the amenities and infrastructure. Severe traffic and road issues: The current road network in Nailsea is already congested (B3130 and Station Road), or too narrow (e.g. Netherton Wood Lane, West End Lane and Causeway) to handle the significant increase in traffic. The plan's assumption is that the traffic is heading in towards Bristol so no plan is outlined to improve travel southbound, or towards the Motorway.			

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		policy			Destruction of Green Spaces: Building on the green fields around Nailsea and Backwell will destroy the town's character, valuable footpaths and habitats, directly contradicting the stated goal of protecting green spaces and enhancing well-being.			

Name: Emma Eyles **I.D:** 62791937

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Churchill Avenue	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	The planning application detailed under docID=14776372 is fundamentally flawed and should be refused because it represents unsustainable, premature, and demonstrably harmful development that conflicts with multiple core planning policies set out in the North Somerset Local Plan and the National Planning Policy Framework (NPPF). Since the specific details of the proposal are unavailable, the following is a detailed, robust objection synthesized from the most critical and common grounds for refusal in UK planning law: Concise and Detailed Reason for Refusal The application is absolutely the wrong thing to be building because its potential benefits are significantly and demonstrably outweighed by the severe cumulative harm it will inflict upon the environment, local infrastructure, and the character and amenities of the area. This harm is compounded by the proposal's likely conflict with key policies governing settlement boundaries and protecting valuable open space. 1. Conflict with Core Planning Policy and Strategy The proposal is unacceptable as it fails the primary test of sustainable development, as defined by the NPPF, by conflicting directly with the statutory development plan for North Somerset (e.g., the Core Strategy and Site Allocations Plan). Unallocated Land/Green Belt Intrusion: The development is highly likely located on a site outside the defined settlement boundary, potentially in a Strategic Gap or Green Belt area. Such a location constitutes unacceptable encroachment into the countryside, which is contrary to policies intended to direct development to suitable, sequentially preferable brownfield or allocated sites. Premature Development: The application is likely premature, pre-empting the delivery strategy of the emerging North Somerset Local Plan 2039. Approving this unallocated site would undermine the Plan-led system, weaken the Council's ability to ensure holistic infrastructure delivery, and set a harmful precedent for speculative development. 2. Severe Environmental and Ecological Harm The scale and nature of the proposed development would cause irreversible damage to the natural and built environment. Ecological Loss: The site likely supports priority habitat or protected species (e.g., bats, great crested newts). The application fails to demonstrate a net biodiversity gain, and the proposed mitigation measures are insufficient, resulting in the irreplaceable loss of habitat and a breach of ecological planning duties. Landscape and Visual Amenity: The development would result in a major adverse visual impact on the existing landscape character, particularly if visible from an Area of Outstanding Natural Beauty (AONB) or if it destroys a valued local green space. The intrusion of urban structures (massing, density, hardstanding, lighting) would fundamentally erode the rural character of the locality. 3. Unacceptable Strain on Essential Infrastructure and Safety The proposal fails to demonstrate that the local infrastructure network has the capacity to absorb the resulting pressure, leading to detriment to existing residents. Highway Safety and Capacity: The new development will generate a significant	None. Penny Field must be protected at all costs and be made a Local Green Space in its entirety. Under the local planning policy, Penny Field is the perfect candidate for Local Green Space designation because it would be in the top 24% of sites based on policy alignment. Clevedon town council and 2 petitions from 2022 and 2025 with over 600 signatures and consultation with the Clevedon Placemakinh strategy all call to protect Penny Field. Penny field is a prime candidate for Local Nature Recovery as unidentified by WECA, due to the presence of three priority species. Penny Fielx is also located on a green infradtucorridor under NSCs own policy. Under the equalities impact assessment the reduction of green space would adversely affect lower income households.		

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					increase in vehicular movements, resulting in unacceptable congestion at key junctions and a detrimental impact on highway safety, particularly on local lanes or nearby major road networks which are already at capacity. The proposed transport assessment (if submitted) fails to accurately mitigate this increase. Strain on Community Services: The development will place an unmanageable burden on existing community services, including local primary healthcare (GP surgeries) and schools, which are already oversubscribed. There is no clear, funded, and deliverable strategy for necessary expansion or provision of new services commensurate with the number of new residents. 4. Detrimental Impact on Local Amenity and Character The design, scale, and density are inappropriate for the setting, diminishing the quality of life for both existing and future occupants. Poor Design and Scale: The scheme demonstrates a monotonous or overly dense design that fails to respect the scale, built form, and architectural distinctiveness of the surrounding neighbourhood, contravening design policies that require high-quality, locally appropriate architecture. Loss of Residential Amenity: The proximity of the development would result in a loss of privacy, daylight, and outlook for neighboring properties due to overlooking and overbearing massing, directly impacting the living conditions of existing residents.			

Name: Emma Lawrence **I.D:** 51320545

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell has 800 new houses approved already, we don't have room for a anymore as this would lead to complete overdevelopment. The proposed road would not effectively serve Nailsea's traffic or relieve congestion on Station Road, Backwell Common, or Chapel Hill. I'm very worried about the impact on safety of pedestrian on Backwell common. Not sure why this has come back on the table after it was deemed to be unfeasible and undeliverable. T There is a lack of infrastructure and services like drs which cannot support another 1,000 houses. Backwell already has the highest number of houses allocated for a village in north Somerset, and even a higher growth percentage than towns. This doesn't make sense as it is not an employment hub, people mostly commute out to work. The train station is not accessible and the trains are already jam packed at rush hour times. The land that is being proposed to be built on is Grade 1 Agricultural Land which is currently being used for crops and grazing. We only have 7% of this high quality land left in the whole of North Somerset. We need to keep this for food security			

Name: Emma Stephens **I.D:** 58638113

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	> Backwell is a small village with limited infrastructure and services. It is already busy (traffic is a considerable issue as most people commute to Bristol/Weston and further afield). > The plans would massively increase the population od Backwell and overwhelm the available infrastructure, facilities and roads. Backwell is already expanding by 40% and these additional houses would be complete overdevelopment. No needs or viability analysis has been undertaken for a further 1000 homes. > The proposed new road would not effectively serve Nailsea traffic and would be complex to construct under or over the railway line (and likely very expensive). >Very significant environmental impact- losing vital greenbelt land, impact on the character of the area, destroy wildlife and habitats and specific threats to Brockley Maternity Roost and SSSI due to impact on greater horseshoe bats feeding in the area. > We know the area around the lake and adjacent fields (where the road is suggested) regularly flood.			

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					> Backwell railway station is nearby but has significant issues that require major investment which has not been forthcoming- e.g. it remains inaccessible for people with mobility issue and impossible for parents with buggies/prams. > The allocation of housing to Backwell is disproportionate and unfair- taking 7% of the districts housing for a tiny village, whereas Clevedon, a large town with much greater amenities and services is only taking 2%.			

Name: Emma Warren **I.D:** 51434721

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Way too many houses approved (800+) when already 800 have been approved for a large village, this is without any additional amenities which are either at capacity or closing down (school, health, leisure, public transport etc). Particularly as this is fertile land, which we do not have enough of, which also serves as a form of flood relief as this area often floods. It is ridiculous to build on a flood plain and building more houses there will just exacerbate the problem with nowhere for the water to runoff to. Backwell is a commuter village, we risk becoming more of a bristol/nailsea/WSM suburb, traffic will increase which is already a major issue. The fertile land is also home to at least one SSSI and local wildlife needing it too. Public transport is already bad in Backwell. While the buses do run it is only on the main road and station road, the train station in inaccessible to anybody with mobility issues despite money given to change that back in 2012! More links to Nailsea would be good but the proposed road will just increase congestion on the main road and station road. It has been stated there will be public transport which is good but there is no secured funding and likely the first thing that will be cut in the probable outcome of this plan going over budget (not that we have a proper budget given lack of cost analysis) The houses will almost certainly be single family homes rather than an actual mixed density and no additional retail spaces making Backwell less walkable, less productive and overall cost the council more while leading to the eventual decline of the village. It will be incredibly expensive to build in and around the train tracks as well as noisy, while reducing fertile and grazing land.	Cost analysis as well as environmental impact assessment from someone actually qualified and not invested in this development. The road modified by a licensed city planner to ease traffic and better public transportation. Mixed density homes- ie duplexes and triplexes as well as terrace and semi detached homes not just single family dwellings Less homes overall as to not overwhelm local services. Cost guarantee for new public services. A new flood response plan for the entire village and houses adapted to be flood proof if the plan is to go ahead with building on a floodplain, while also being accessible. A viability analysis, again by someone not invested in this development. An increase in public transport and making Nailsea and Backwell train station properly accessible on both sides of the track.	The percentage of affordable housing.	

Name: Environment Agency **I.D:** 62471329

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SP1: Sustainable Development	Yes						Agree with policy	
SP2: Climate Change	Yes							EA Response - NSC Reg 19.pdf
SP2: Climate Change						We welcome the Local Authority's commitment in Policy SP2 that "in order to reduce the overall environmental impact of development, proposals will be		

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						expected to demonstrate how they: Maximise water re-use and the protection of water resources” We request that during the adoption of the Local Plan, the LPA must ensure that water efficiency, rainwater harvesting, and greywater reuse are key priorities. There are opportunities for Green and Blue Infrastructure (GBI), and the implementation of Nature-based Solutions should be encouraged and maximised to help enhance the water environment, reduce (NbS) pressures on water supply, and help mitigate risks of pollution from wastewater. The LPA should encourage GBI and NbS to be integrated into policies and design principles for new development, where relevant and appropriate. We also welcome the commitment in Policy DP5 to “Consider water and wastewater management, incorporating measures to improve water efficiency such as installing water butts, rain gardens and other water reuse features” and that “the adoption of measures within the RIBA 2030 Climate challenge will be supported. This applies to a range of standards, including those relating to water efficiency addressing the likelihood of water shortages associated with a changing climate”. In terms of meeting supply and demand during the adoption of the Local Plan, the LPA needs to assess if existing water supply infrastructure is able to meet future demand, particularly in areas of known water stress. The LPA should consult with Bristol Water to ensure that the development is reflected in their Water Resources Management Plans (WRMPs) available here Water Resources. If necessary, the LPA should consider phasing development so that any new water infrastructure is in place prior to the occupation of development. The LPA must also target development to areas of water surplus, where possible and in areas of water stress, and adopt the tighter building regulation water efficiency standard of 110 litres l/p/p/p/d in the relevant local plan policy to help manage water demand locally. Catchment Coordination: The LPA should undertake integrated planning with water companies and catchment partnerships to ensure sustainable water resource management. It is strongly recommended to develop Water Cycle Studies (WCS) to assess how strategic plans and development proposals will affect the environment. LPAs should be encouraged to consider catchment scale and cross-boundary planning to deliver robust strategies for climate change adaptation and resource planning (note: many water companies cover multiple LPA administrative boundaries).		
SP3: Spatial strategy	Yes						Agree with policy, however DP9 should be linked. throughout the document.	
SP4: Placemaking	Yes							
SP5: Towns	Yes						Agree with policy, but there is no mention or link to DP9 or SP2.	
SP6: Villages and rural areas	Yes						Agree with policy, but there is no mention or link to DP9 or SP2.	
SP7: Green Belt	Yes						Agree with this policy	EA Response - NSC Reg 19.pdf
SP8: Housing	Yes						Agree with policy and we will provide site specific comments later in the document.	
SP9: Employment	Yes						Agree with policy, but there is no mention or link to DP9 or SP2.	

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SP11: Historic and natural environment	Yes						Agree with policy no mention or link to DP9 or SP2.	
SP12: Minerals							Agree with policy no mention or link to DP9 or SP2.	
SP13: Waste							Agree with policy no mention or link to DP9 or SP2.	
Policy LP1: Strategic location: Wolvershill (north of Banwell)	Yes						Agree with policy and the reference to delivery of gypsy and traveller accommodation. These sites must be sequentially located outside of areas of flood risk. No mention or link to DP9: Flood Risk and SP2: Climate Change policies within the main policy text.	
Policy LP2: Strategic location: Woodspring (south west of Bristol)							The Main River Colliter’s Brook runs along the edge of the site within Hanging Hill Wood which also contains a small area of Flood Zone 3. There are a number of ordinary watercourses across the site, some are culverted. Development should sequentially be located away from the area of Flood Zone 3 and the watercourse around Yanley Lane. The flood zone extent is also increasing along the Colliter’s Brook along the northern edge of the site allocation (near Hanging Hill Wood). Increased run off from the development would go down the Colliter’s brook to the Longmoor Brook then down the Longmoor culvert. Capacity of the brooks and tunnel would need to be considered. There is a non EA culvert on the Colliter’s Brook from Yanley Lane going to Hanging Hill Wood at the edge of site that is in a poor condition. Capacity of this would need to be considered. Whilst an internal CCTV inspection on the culvert has previously been undertaken by the Environment Agency, access is difficult. Culvert access improvements in this location are beneficial. Development proposals must include details of ongoing	

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							maintenance for the watercourse. Vehicle access strips should be retained for future emergency access. Site allocation close to Barrow Gurney Reservoir. All sources of flood risk will need to be assessed. As a new strategic site, consideration will need to be made for Long Ashton Flood Storage Area (which is just under the size required for reservoir designation). Future development may need to contribute to both the future maintenance of this dam and further flood risk mitigation measures. With climate change, space will need to be made available to safeguard land to ensure the future provision of flood risk infrastructure required within the area surrounding Long Ashton. This strategic solution (i.e. a pond) is a long-term requirement, with the site location currently unknown. Policy wording comments: •We support the development of a comprehensive masterplan and support new Nature Park and Green Infrastructure corridors. •We support the site specific modelling of Barrow Gurney reservoir for site wide master planning and use of sustainable drainage systems (SuDs) and the sequential approach to different vulnerability uses. •We support the Sequential Test being required. •We support the culvert upgrades and future maintenance access and improvements required.	
Policy LP3: Strategic location: Nailsea and Backwell							No comments on this policy - see Nailsea and Backwell site allocations and Schedule 7: Transport Infrastructure for detailed comments on specific	EA Response - NSC Reg 19.pdf

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							allocations.	
Policy LP4: Strategic location: Pill and Easton-in-Gordano							See Pill and Easton-in-Gordano site allocations for further information and Schedule 7: Transport Infrastructure.	
Policy LP5: Housing, employment and mixed use allocations							See schedule 1 and Schedule 2 for site comments.	
Policy LP5: Housing, employment and mixed use allocations						We wish to highlight that for sites which boarder the Land Yeo watercourse, a suitable buffer must be provided to ensure that access to the watercourse is not restricted for maintenance or emergency access.		
Policy LP6: Educational, sporting, leisure and community use allocations							No comments on the policy - see comments against the individual sites listed in Schedule 4. Primary and Secondary school facilities to be designed with current flood risk, future risk of flooding and surface water drainage in mind. Sequential approach to be followed Proposed new primary schools within Weston-super-Mare part of existing allocations and therefore site-specific comments will apply.	EA Response - NSC Reg 19.pdf
Policy LP7: Settlement boundaries							See Schedule 5 for site specific comments.	
Policy LP8: Town centre hierarchy							See Schedule 6 for site specific comments, a sequential approach should be followed as in Policy DP9 and DP28.	
Policy LP10: Strategic gaps							Haywood Reservoir (formerly Superpond flood storage area) is within Flood Zone 3.	
Policy LP12: Bristol Airport	Yes							
Policy LP14: Royal Portbury Dock						Given the dock's location, we expect the inclusion of flood risk with climate change or water compatible uses with the policy.		EA Response - NSC Reg 19.pdf
Policy LP16: Preferred Area for mineral working – land at Hyatts Wood Farm, south of Stancombe	Yes							EA Response - NSC Reg 19.pdf

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Quarry								
Policy LP17: Preferred Area of search for minerals working – land at Downside Farm, south of Freemans Quarry	Yes							
Policy LP20: Wyndham Way							See site allocations for site specific comments.	
Policy LP21: Coastal Change Management Areas	Yes						Agree with policy.	
Policy LP22: Epic employment campus							Flood risk and climate change not mentioned in policy wording (but considered within the existing permission).	
Policy DP2: Residential development within settlement boundaries						There is no mention or link to DP9 or SP2.		
Policy DP3: Residential extensions						There is no mention or link to DP9 or SP2.		
Policy DP4: Houses in Multiple Occupation and residential subdivision							It is noted that there is no mention or link to DP9 or SP2.	EA Response - NSC Reg 19.pdf
Policy DP5: Climate change adaptation and resilience	Yes						We support this policy and welcome links to other requirements, policies and that a Supplementary Planning Document (SPD) will be prepared.	
Policy DP6: Net zero construction	Yes							EA Response - NSC Reg 19.pdf
Policy DP7: Large scale renewable and low carbon renewable energy						There is no mention or link to DP9 or SP2.		
Policy DP8: Efficient use of land						There is no mention or link to DP9 or SP2.		

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Policy DP9: Flood risk	Yes							
Policy DP10: Sustainable drainage	Yes						We support this policy, particularly inclusion of “essential flood prevention works including drainage to be completed prior to first occupation”.	
Policy DP10: Sustainable drainage						Water Quality We welcome the fact that protecting water quality is a factor across multiple policies within the North Somerset Local Plan. To achieve this, it is important the Local Planning Authority understand how proposed developments can impact wastewater treatment capacity and the quality of the receiving water environment. During adoption of this Local Plan, it should be demonstrated that the sewage and drainage infrastructure is able to meet the demands of development. Wessex Water should be consulted on all proposed development locations to identify any sites that would be connected to sewage treatment works already close to capacity. The LPA is encouraged to consult the latest 25-year statutory WXW Drainage and Wastewater Management Plan (DWMP) to identify infrastructure vulnerabilities, such as sewer collapse risks or ageing assets, so that development proposals can be aligned with current and future capacity. WXW’s DWMP is available at: Drainage and Wastewater Management Plan. As addressed in policies D10 and DP13, the use of SuDS will help manage runoff and prevent nutrients entering the watercourse. The Local Planning Authority should prioritise the connection of new housing developments to the public sewerage system, rather than the use of private wastewater treatment works, to further support the prevention of nutrients entering the watercourse. The Local Planning Authority is also recommended to identify whether the proposed site options are in areas vulnerable to storm overflow spills from Combined Sewer Overflows (CSOs). The LPA can consult WXW’s business plan to identify sewage infrastructure investment schemes supporting growth. The current WXW business plan is available at: Business plans – Ofwat. Understanding the current sewerage infrastructure and proposed improvements that will support growth, through communications with Wessex Water during the adoption of the North Somerset Local Plan, will help the LPA protect water quality in North Somerset which is a part of the Local Plan policies.		
DP11: Rivers, watercourses and springs	No					We support this policy subject to changes: The policy wording currently states “Active operations also include regular vegetation management by the Environment Agency and Internal Drainage Board to retain open water habitat and volume of water storage that supports the aquatic wildlife in times of drought and reduces risk to properties in times of excess water.” The wording should be changed to include: that riparian owners also responsible for regular vegetation management (Environment Agency powers are permissive). The Flood Risk Activity Permit wording current states “The Environment Agency requires environmental permits for flood risk activities such as erecting structures like culverts in or over main rivers, or building or altering		

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						any permanent or temporary structure designed to contain or divert flood waters from a main river." The wording should be changed to include: a permit is required for works within 8m of a fluvial watercourse and 16m from tidally influenced watercourses.		
Policy DP12: Development in the Green Belt							It is noted that there is no mention or link to DP9 or SP2.	EA Response - NSC Reg 19.pdf
Policy DP14: Highway safety, traffic and provision of infrastructure associated with development						There is no mention or link to DP9 or SP2.		EA Response - NSC Reg 19.pdf
Policy DP15: Active and sustainable transport	Yes							EA Response - NSC Reg 19.pdf
Policy DP16: Active travel routes						If active travel routes near to watercourses, we require appropriate buffer distances away from these watercourses, to ensure that access is retained to watercourses for maintenance vehicles and emergencies.		
Policy DP21: Safeguarding employment sites	Yes						We agree with this policy. The changes from Use Class E to C3 residential as permitted development is concerning in high flood risk areas. We support this policy by removing permitted development rights.	
Policy DP22: Visitor attractions	Yes						We agree with this policy	EA Response - NSC Reg 19.pdf
Policy DP23: Visitor accommodation	Yes						We agree with this policy.	
Policy DP24: Town Centres						Ground floor flats and sleeping accommodation should be avoided in line with the development management guidance of the Level 1 SFRA (appendix B).		
Policy DP34: Green infrastructure	Yes						We support this policy.	EA Response - NSC Reg 19.pdf
Policy DP35: Nature conservation	Yes					We welcome North Somerset Council Local Plan Nature Conservation Ambitions and that their commitment in Policy DP35 that "Development which would have an adverse impact on identified sites of international importance (which include Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites) will not be permitted". To support this, it is strongly recommended that the LPA should consult Natural England (NE) where there may be impacts to designated sites. Also, although the specific information is currently limited, the Local Authority needs to ensure that the adoption of its Local Plan is linked with the Environmental Delivery Plan (EDP) under the Planning and Infrastructure Bill. For information EDP's will be led by Natural England. We also welcome the commitment in Policy SP1 to "avoid adverse		

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						environmental impacts which, on their own or cumulatively, would result in air, water or other pollution or harm to living conditions, health or safety". It must be ensured that during the adoption of the Local Plan the Local Authority priorities the objectives and requirements of the current River Basin Management Plan (RBMP) Cycle 3 , found at River basin management plans: updated 2022 - GOV.UK so that there is no deterioration in the condition of water bodies from any new development and that Water Framework Directive (WFD) obligations are addressed through spatial planning. To support this, the LPA can refer to the Catchment Data Explorer to access data on the status classification of water bodies in proximity to the proposed housing development, evaluate any potential detrimental impact on water body quality, and develop policies to mitigate these impacts. The Catchment Data Explorer is available at: England | Catchment Data Explorer. Note until CDE is updated with the latest classification in mid-2026 (current update March 2025), it is advised that the LPA should also discuss with the Environment Agency the updated classification, so they are working with the most up to date information. The Environment Agency is taking a more detailed, stakeholder-informed approach within the updated RBMP Cycle 4 to developing body-specific water programmes of measures, aiming to meet legal requirements. These programmes will guide key water management activities and investment decisions. The Draft RBMP Cycle 4 Consultation Launch is in 2026, and the Final RBMP Cycle 4 publication is late 2027. The work is expected to deliver better national environmental outcomes by targeting investment where it's most needed. Regarding climate resilience, we would advise North Somerset Council to obtain a copy of our External Environment Agency Strategic Climate Change Planning Advice Summary Note, developed by the Environment Agency's National Climate Change team which provides a summary of the Environment Agency's strategic planning advice through a climate adaptation focus. This is available internally at Summary Note of the Environment Agency's Strategic Climate Change Planning Advice. The West of England Combined Authority (WECA) was one of the Local Authorities who participated in the Pilot Programme in 2024.		
Policy DP36: Biodiversity Net Gain	Yes							EA Response - NSC Reg 19.pdf
Policy DP37: Trees, Woodlands and Hedges						Tree planting should be set away from watercourses, to ensure that access is retained to watercourses for maintenance vehicles and emergencies.		
Policy DP43: Affordable housing (including rural exception schemes)						There is no reference to sequential approach and/or location of this type of housing.		EA Response - NSC Reg 19.pdf
Policy DP44: Gypsies, Travellers and Travelling Showpeople.						Sequential approach to be followed when allocating new sites. Extensions to existing sites within Flood Zone 3 need to be mindful of suitability of increasing flood risk with climate change. NPPF policy objection remains.		

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Policy DP47: Older Persons Accommodation						Development must take a sequential approach to flood zones when allocating different housing types, particularly if this includes ground floor sleeping accommodation and single storey dwellings. Development must consider flood risk with climate change.		
Policy DP48: Residential annexes						There is no mention of flood risk or climate change.		
Policy DP53: Best and most versatile land						Residential proposals must be sequentially located to the lowest areas of flood risk.		
Policy DP54: Rural workers housing						Proposals must be sequentially located to the lowest areas of flood risk, and should include temporary use of caravans.		
Policy DP55: Agriculture and land based rural businesses							New buildings must be sequentially located to the lowest areas of flood risk. Stockpiles must also be located away from flood zones and watercourses.	
Policy DP56: Equestrian development	Yes						We support this policy.	EA Response - NSC Reg 19.pdf
Policy DP57: Replacement dwellings in the countryside						Dwellings must be designed to reduce the risk of flooding, be two-storey within flood risk areas and incorporate flood resilience measures where possible.		EA Response - NSC Reg 19.pdf
Policy DP58: Conversion or re-use of rural buildings						Flood resilience measures to be incorporated where possible. Access, egress and location of sleeping accommodation to be considered (particularly as this type of building is often single storey).		
Policy DP59: Previously developed land in the countryside						Flood resilience measures to be incorporated where possible.		
Policy DP60: Employment on green field land in the countryside					New buildings must be sequentially located to the lowest areas of flood risk on the vulnerability of their use. Buildings to be designed to reduce the risk of flooding both today and with climate change. Flood resilience measures to be incorporated where possible.			
Policy DP61: Existing businesses in the countryside						New buildings must be sequentially located to the lowest areas of flood risk on the vulnerability of their use. Buildings to be designed to reduce the risk of flooding both today and with climate change. Flood resilience measures to be incorporated where possible.		
Policy DP62: Visitor accommodation in the						New buildings must be sequentially located to the lowest areas of flood risk on the vulnerability of their use. New and existing development must be designed to reduce the risk of flooding both today and with climate change. Flood resilience measures to be incorporated where possible.		

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countryside including camping and caravanning								
Policy DP63: Infrastructure delivery and development contributions	No	• Effective				We agree with this policy. However, we recommend expanding this policy to include contributions towards maintenance and upgrades to flood defences from any Risk Management Authority (RMA)	We agree with this policy. However, we recommend expanding this policy to include contributions towards maintenance and upgrades to flood defences from any Risk Management Authority (RMA)	EA Response - NSC Reg 19.pdf
Policy DP64: Adoption of open space and green infrastructure	Yes						We support this policy.	EA Response - NSC Reg 19.pdf
Land at North West Nailsea							We agree with site requirements in areas at risk of future flooding.	
Land off Pound Lane, Nailsea						The Land Yeo (Main River) has flooding issues around Jacklands Bridge near Stone-Edge-Badge. The proposed developments at Land North of Nailsea and Land of Pound Lane needs to consider this issue and not increase flood risk. Additionally, access routes for Environment Agency maintenance could be affected and will need further consideration.		
Pill Green						The development proposals must include details of ongoing maintenance for the Markham Brook watercourse. Vehicle access strips next to the Markham Brook should be retained for future maintenance and emergencies. Flood risk will need to be mitigated within the development sites so as not to increase the flood risk downstream. The nearby culvert and pumping station have a maximum capacity. There must be no increased run off as a result of these developments to ensure the current flow rates are retained (or reduced) into the culvert at the fire station, through to the Markham Book pumping station. Any increase in flow could impact how effectively the pumping station operates at high tides.		
Locking Road Car Park						Flood risk not mentioned - Majority of site in Flood Zone 3, small areas of Flood Zone 2.		
Former Leisuredome allocation/ Parklands site B (phase E)						Flood risk not mentioned - Site Flood Zone 3 to the north, also Flood Zone 2.		
Weston Rugby Club						Flood risk not mentioned - Site mostly Flood Zone 1, Flood Zone 3 in the northern part of the site.		EA Response - NSC Reg 19.pdf
Land west of Winterstoke Road						Flood Zone 3, Main river watercourse, Cross Rhyne runs along southern boundary of the site. The Cross Rhyne is narrow and struggles with conveyance due to the limited capacity within the channel. There are a number of narrow culverts/bridge crossings. Further development is likely to increase flood risk. Operational access must not be restricted along the right-hand bank of the Cross Rhyne downstream of Winterstoke Road to the railway.		
Sunnyside Road						Flood risk not mentioned - Site part Flood Zone 3 (in east) and Flood Zone 1 (in west of site allocation).		
Woodspring Stadium,						Flood risk not mentioned - This site includes areas of Flood Zone 3.		

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Winterstoke Road								
Gas Works						Flood risk not mentioned - Flood Zone 3 to south, Flood Zone 1 in northern part of the site.		
Dolphin Square						Flood risk not mentioned - Site mostly Flood Zone 1, part Flood Zone 2, small areas of Flood Zone 3 on site towards the sea front.		
Land west of Trenchard Road						cannot locate on Policies Map, in site schedule document		
Former Bournville School site						Flood risk not mentioned - This site includes areas of Flood Zone 3.		
Knightstone Road Hotels						Flood risk not mentioned - Flood Zone 3, Seafront Location. Development needs to consider tidal breach and impacts of climate change.		EA Response - NSC Reg 19.pdf
Former Sweat FA site, Winterstoke Road						Flood risk not mentioned - Mostly Flood Zone 3, small area of Flood Zone 1		
Former Police Depot, Winterstoke Road						Flood risk not mentioned - Flood Zone 3 to South, Flood Zone 1 in northern section of the site		
Nightingale Close, Mead Vale						Flood risk not mentioned - This site includes areas of Flood Zone 3.		
Land to the rear of Locking Road						Flood risk not mentioned - This site includes areas of Flood Zone 3.		
Land north of Lyefield Road and Lower Norton Lane						Flood risk not mentioned - Flood Zone 1, Flood Zone 3 along northern boundary. Buffer required to account for future risk of flooding. Site requirements to implement as per planning consent requirements		
69-71 Locking Road						This site includes areas of Flood Zone 3.		
Land south of Manor Farm, north of Lyefield Road						Flood Zone 1, Flood Zone 3 along northern boundary. Buffer required to account for future risk of flooding. Site requirements refer to sequential approach.		
Greenways Farm, Lyefield Road						Flood Zone 1, Flood Zone 3 along northern boundary. Buffer required to account for future risk of flooding.		EA Response - NSC Reg 19.pdf
Former Grand Central Hotel						Part Flood Zone 2 and Flood Zone 1		
London Inn						Flood Zone 2, extant planning permission		
Land to the west of Elborough						A sequential approach must be followed on site, particularly where sites include Flood Zones 2 and 3. Development must be designed to reduce the impact of flooding on the proposed development both today and with climate change. Development to align with NSC Level 1 2025 SFRA. In tidal areas,		

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						development needs to consider the impacts of climate change and a tidal breach. Any works taking place within 8m of Main River (fluvial)/ 16m (Tidal) may require a Flood Risk Activity Permit (FRAP) from the Environment Agency. The developments around Locking and Cross Rhyne will need to ensure that the interaction between tidal, fluvial and surface water flood risks are fully considered. As stated in the site allocations, the existing Weston Villages 2012 modelling will need to be updated to account for the large amount of development that has taken place since this modelling was produced. Future developments in this location may be required to contribute to flood risk management improvements via a Section 106 Agreement.		
Land north of Churchill Avenue						Flood Zone 3, Land Yeo main river watercourse runs along northern western boundary of site. Buffer strip to be provided next to watercourse.		
Great Western Road						Flood Zone 3, Land Yeo main river watercourse runs along northern boundary of site. Buffer strip to be provided next to watercourse.		
Castlewood						Flood Zone 3, Land Yeo main river watercourse runs along southern boundary of site. Buffer strip to be provided next to watercourse.		
Castlewood						Support site requirements for environmental and habitat enhancements to the Land Yeo. FRAP requirement mentioned.		
Wyndham Way Broad Location						Flood Zones 1, 2 and 3, including a Main river. Portbury ditch runs through this area, with known flood risk from the Portbury ditch being unable to discharge due to tide locking. The tidal structure at the Portbury Ditch needs maintenance / upgrading. Detailed hydraulic modelling required in this area. Developer to undertake modelling (if not undertaken by an RMA beforehand) and provide a contribution to the maintenance and upgrade of essential structures in the area.		
Petersfield, Church Road South						This site includes Flood Zone 2 on eastern edge of site. Sequential approach required for future risk of flooding.		
Black Rock, north of Clevedon Road						This site includes Flood Zones 2 and 3 opposite Clevedon Road (outside of site allocation). Sequential approach for future risk of flooding.		
Bleadon Quarry						This site includes Flood Zone 2 along the eastern boundary. Sequential approach for future risk of flooding.		
Woodhill Nurseries						This site is Flood Zone 1. Site requirements mention sequential approach to avoid areas at greater risk of flooding.		
Land south of Station Road						This site includes areas of Flood Zones 2 and 3 along the southern boundary of site. Sequential approach to be applied on site, taking into account future risk of flooding.		
Pineapple Farm, land north of Mulberry Road						Flood Zone 1, Flood Zone 3 in the north east corner of site plus ordinary watercourse. Sequential approach to be applied on site, taking into account future risk of flooding. Access track to the sluice and Congresbury Yeo to be retained. Site requirements to implement in line with planning consent.		
Broadleaze Farm						This site includes areas of Flood Zone 3 via an ordinary watercourse in the centre of the site. Sequential approach to be applied on site, taking into account future risk of flooding. Site requirements mentions addressing fluvial flood risk from the Towerhead Brook and following sequential approach.		
Land at Coombe Farm						This site includes areas of Flood Zone 3 via an ordinary watercourse in the centre of the site. Sequential approach to be applied on site, taking into		

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and Shipham Lane						account future risk of flooding. Site requirements mentions following the sequential approach to flooding.		
Moor Road, Yatton						This site includes areas of Flood Zones 2 and 3 along the north eastern boundary. Sequential approach to be applied on site, taking into account future risk of flooding. Site requirements mentions Landscape buffer along the Stowey Rhyne		EA Response - NSC Reg 19.pdf
North Field, Claverham Works, Claverham						This site is Flood Zone 1 with an ordinary watercourse along southern boundary of the site. Site requirements state to undertaken in accordance with planning permission.		
Rectory Farm, Yatton						This site is mostly Flood Zone 1, but surrounded by Flood Zones 2 and 3 along the boundaries. Site has planning permission. Sequential approach to be applied on site, taking into account future risk of flooding. Site requirements state to undertake in accordance with planning permission.		
Oxford Plasma, Yatton						This site includes Flood Zones 2 and 3 along the southern boundary. Sequential approach to be applied on site, taking into account future risk of flooding.		
Yatton Rugby Football Club, North End Road, Yatton						This site includes Flood Zones 2 and 3 along the north eastern boundary. Sequential approach to be applied on site, taking into account future risk of flooding.		EA Response - NSC Reg 19.pdf
Land north of Colliter's Way, Long Ashton						This site is Flood Zone 1 and next to Strategic Allocation of Woodspring, South Bristol. See comments under LP2.		
Land at Blagdon Water Garden Centre, Bath Road, Langford						This site includes areas of Flood Zone 3 via an ordinary watercourse in the eastern part of the site. Sequential approach to be applied on site, taking into account future risk of flooding.		
The Inn at Yanley						cannot locate on Policies Map, within site schedule document.		
Haywood Village Business Quarter						This site includes Flood Zone 3		
Parklands, Grumblepill employment site						This site includes Flood Zone 3.		
Parklands, West Wick Roundabout						This site includes Flood Zone 3.		
West Wick Business Park						This site includes Flood Zones 2 and 3.		EA Response - NSC Reg 19.pdf
Summer Lane, North of A370						This site includes Flood Zone 3.		EA Response - NSC Reg 19.pdf
Land to the west of Kenn						This site includes Flood Zone 3.		

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Road								
Gordano Gate Portishead						This site includes Flood Zone 2 and 3. Portbury Ditch runs along the north western boundary of the site. 8m Buffer strip required for Main River.		
Gang Wall, Yatton						Ancient flood defence and path mentioned		
Land next to the Village Hall, Kewstoke						Replacement primary school (carried forward from Site Allocations Plan) within Flood Zone 3 and close to the coastline. Risk of tidal breach. Comparison to existing site location required and whether replacement school provides betterment/ reduction in flood risk.		
Land off Smallway, Yatton						This site includes areas of Flood Zone 3 along southern boundary. Sequential approach to be applied on site, taking into account future risk of flooding.		
Land adjacent to village hall, Portbury						The proposed car park extension includes areas of fluvial Flood Zone 3.		
Schedule 6: Town, District and Local Centres						General comment: Follow sequential approach for flood risk both today and with climate change. Flood resilience measures to be included in development design		
J21 Bypass Scheme						This site includes Flood Zone 3 and crosses the River Banwell. Floodplain compensation likely to be required. Further consultation and engagement required with the Environment Agency at early stages of scheme development regarding access and maintenance. A Flood Risk Activity Permit is required.		
Re-opening Portishead Passenger Rail Line including new railway stations at Portishead and Pill with car parking and associated facilities						This includes areas of Flood Zones 2 and 3 at various points along the line. Main River could be affected between Drove Rhyne and The Portbury Hundred/ M5 Junction. Further consultation and engagement required with the Environment Agency at early stages of scheme development regarding access and maintenance. A Flood Risk Activity Permit is required.		
Re-opening Portishead Passenger Rail Line including new railway stations at Portishead and Pill with car parking and associated facilities						Pill Railway Station: Further consultation and engagement required with the Environment Agency at early stages of scheme development regarding access and maintenance. A Flood Risk Activity Permit is required.		EA Response - NSC Reg 19.pdf
Weston Southern Rail Chord – potential future alignment						This railway line crosses through the Cross Rhyne Main River. We query if this was in previous versions of the Local Plan or Infrastructure Delivery Plan (IDP) or is it mentioned in the Joint Local Transport Plan (JLTP4), JLTP4 referred to in Policy LP11? Further consultation and engagement required with the Environment Agency at early stages of scheme development regarding access and maintenance. A Flood Risk Activity Permit is required.		

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Weston Milton railway station						This site includes Flood Zone 3.		
Worle railway station – including Transport Hub and railway station car park expansion						This site includes Flood Zone 3.		
Yatton railway station						This site includes areas of Flood Zone 2 and Flood Zone 3.		
Schedule 8: Gypsy and Traveller Sites					These two allocations proposed at existing and established site locations (allowed on appeal and temporary permissions granted since). These sites are mostly in Flood Zone 3 (tidal and fluvial). The northern part of Moorland Park, close to the A370 is in Flood Zones 1 and 2. This is a policy objection due to Flood Zone 3.			

Name: Epic Systems **I.D:** 39315297

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SP7: Green Belt					Draft Policy SP7 outlines the proposed changes to the Green Belt. The proposed Plan essentially seeks to maintain existing Green Belt boundaries, save for the proposed release of 12 sites from the Green Belt, for the purposes of providing residential development (6,600 dwellings in total). In respect of the Epic employment campus, Epic do not seek the site's removal from the Green Belt. The allocation/designation of this site, via draft Policy SP22, sufficiently recognises the site's strategic significance for the region, and sets out the parameters for which the development can be brought forward in an efficient and timely manner. However, as the Council will be aware, Epic also own a further 37 acres to the north of Colliters Way (as identified in blue at Appendix A - see attached document). This land was purchased after the submission of the planning application but was 'blue-lined' within the application amendments submitted in July 2024. In support of the Reg19 Plan, it is noted that a SGBA has been undertaken. A parcel of land located to the north east of Colliters Way / south east of the A370, which is inclusive of Epic's 37	Epic consider that the Green Belt boundary at the south-western fringe of Bristol should be amended so that the boundary is delineated by Colliters Way (A4174, Feeder Road and the Ashton Vale Trading Estate).		Regulation 19 Local Plan Pre-submission Representations - Epic Bristol Limited 11.12.25.pdf

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					additional acres (Appendix B), has been included in the Assessment (Ref. P-018). This parcel of land has been assessed as having a weak contribution to Green Belt purposes (a), (b), (c) and (d) and a moderate contribution to purpose (e). In consideration that the areas' contribution to Green Belt purposes (a), (b), and (d) has been assessed as weak, the SGBA concludes that the parcel can be considered as an area of search for potential grey belt land. Epic fully support and concur with the conclusions of the SGBA relative to this assessed parcel and note that they also fundamentally accord with the prior conclusions of the Local Planning Authority in their assessment of application ref: 23/P/2185/FU2 whereby members were advised (at paragraph 28 of the Committee Report) that: There is a well-defined boundary within the Green Belt itself (but not the Green Belt boundary), in this case Feeder Road, Ashton Vale Trading Estate and the A4174, creating a strong demarcation of the existing built-up area of Bristol. In this regard, this boundary provides clear distinction between the built-up area and the open countryside. In note of the above, Epic consider that there is clear and convincing evidence to justify the removal of parcel P-018 from the Green Belt. It is notable that the north-eastern component of parcel P-018, commonly known as Longmoor, which falls within the administrative boundary of Bristol City Council, is already proposed to be removed from the Green Belt through the Bristol Local Plan Review due to the prior grant of Outline permission (ref: 21/03166/P) for 510 No. dwellings and 5,000 sq.m of commercial/community floorspace. Epic consider that the Green Belt boundary at the south-western fringe of Bristol should be amended so that the boundary is delineated by Colliters Way (A4174, Feeder Road and the Ashton Vale Trading Estate). As the Local Planning Authority have previously determined, this arrangement would form a well-defined boundary between the urban fringes of Bristol and North Somerset and the parcel would be located within an area, as explained in the Committee Report, that would read as part "of the existing built-up area of Bristol". This approach would support the opportunity for future ancillary campus functions; including the potential for further renewable energy generation within Epic's additional landholding. To further support this opportunity, Epic seek further revision to Policy LP22 that provides a positive framework for such delivery within the Plan period. This is considered further within paras 2.22 – 2.26 of this representation. Ultimately, it is considered that the effect of establishing a positive framework around parcel P-018 would have the effect of 'completing the jigsaw' - with the area of land bounded by Colliters Way (A4174) to the west, the A370 to the north, the urban area of Bristol to the east and south, and the railway line around that on the southern edge.			

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					The SGBA has also undertaken a review of the Epic employment campus land (Ref. P-019). This area of land has been found to make a 'Moderate' contribution to the Green Belt and therefore cannot be classified as potential grey belt. Whilst Epic does not contest this assessment, it would be keen to understand whether there are any segments of grey belt land falling within the site by way of a more granular analysis, as suggested by the SGBA. On this basis, Epic would like to be fully informed about any further assessment of this land, should it occur.			
SP9: Employment							2.15 Draft policy SP9 proposes to allocate 72.8ha of employment land (excluding the Epic campus) across the region. The overarching objective to deliver an increase in jobs and improve the local economy is commendable. 2.16 Within the Policy justification, recognition has been shown of the economic growth opportunities for the local area that may arise as a result of the Epic employment campus. This statement is supported by Epic, and it is pleased to see that the Council has taken a positive view of the important role the Epic employment campus will play within the economic context of North Somerset and the wider region.	Regulation 19 Local Plan Pre-submission Representations - Epic Bristol Limited 11.12.25.pdf
Policy LP9: Extent of the Green Belt					2.13 Draft Policy LP9, in addition to the Policies Map, defines the extents of the Green Belt, and clarifies on those areas to be removed. 2.14 As highlighted at Draft Policy SP7, Epic's 37 additional acres to the north-east of Colliters Way have been defined within the SGBA to be grey belt land. Based upon its overall lack of contribution to the Green Belt, and in the context of Epic's future intentions for this site (e.g. renewable energy generation), Epic consider that this parcel of land should be removed from the Green Belt; and, reflected accordingly within this Policy and the accompanying Policies Map.	Epic's 37 additional acres to the north-east of Colliters Way have been defined within the SGBA to be grey belt land. Based upon its overall lack of contribution to the Green Belt, and in the context of Epic's future intentions for this site (e.g. renewable energy generation), Epic consider that this parcel of land should be removed from the Green Belt; and, reflected accordingly within this Policy and the accompanying Policies Map.		Regulation 19 Local Plan Pre-submission Representations - Epic Bristol Limited 11.12.25.pdf
Policy LP22: Epic employment campus					This formal representation has been prepared by Rapleys LLP (Rapleys) on behalf of 'Epic Systems Corporation' ('Epic'), a multi-national healthcare software company with a global headquarters based in Verona, Wisconsin, USA. 1.2 It has been prepared in relation to the publication version (Regulation 19) of the North Somerset Local Plan. This is the version that the North Somerset Council (NSC) proposes to submit to the Secretary of State for independent examination under the provisions of the Planning and Compulsory Purchase Act 2004.	In summary, Epic respectfully request that the suggested amendments to Policy LP22 are incorporated within any Schedule of Proposed Modifications when the Local Plan is submitted for Examination in Public pursuant to Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). Alternatively, if further consultation is undertaken prior to Regulation 22 submission, Epic would respectfully request that the amendments proposed are incorporated within a further		Regulation 19 Local Plan Pre-submission Representations - Epic Bristol Limited 11.12.25.pdf

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					1.3 The consultation period commenced on the 30th of October 2025 and concludes on the 12th of December 2025. The emerging plan is planned to cover a 15-year plan period, spanning 2026-2041 and will be a ‘composite plan’ - including all strategic allocations, Local Plan policies and Development Management Policies. Upon adoption, it will replace the currently adopted Core Strategy and Parts 1 & 2 of the Sites and Policies Plan. It will also supersede the Joint Waste Core Strategy. 1.4 Planning permission for the development of ‘Epic Long Ashton’ – which will deliver Epic’s office campus for UK, European, and beyond operations was granted by North Somerset Council on the 6th of March 2025 (Ref. 23/P/2185/FU2), further to the Council resolving to grant permission on the 15th of January 2025. 1.5 The formal description of development as referenced on the Decision Notice is as follows: Hybrid planning application (full and outline elements) with Environmental Statement for the construction of new office campus (Use (Class E(g)(i)) with associated external and below ground works. Full application (on a phased basis) comprising three office buildings, culinary building, training centre and auditorium. New accesses from the public highway, internal site roads and footpaths, public realm works, site drainage, landscaping, solar PV field, ancillary plant, servicing and other associated works. Below ground works including ancillary plant, car and cycle parking and geothermal borefield. Outline application comprising two further office buildings (access, layout, scale and landscaping for approval, appearance to be reserved for subsequent approval). 1.6 It is also worth noting that a Section 73 application was granted on the 10th of October 2025 (Ref. 25/P/1496/FU2). This permission incorporates amendments to the approved Office Building One, both utility buildings, the basement car park, sitewide landscaping, the solar PV field, the borefield and sitewide lighting. 1.7 The development permitted by 23/P/2185/FU2 and as amended via 25/P/1496/FU2 has commenced, further to the discharge of all pre-commencement conditions and planning obligations. It is anticipated that the first office building, as part of Phase One of the development, will be completed and ready for occupation in Q2 of 2028. Local Plan Representations 1.8 This representation focuses both on the land commonly referred to as ‘Epic Long Ashton’ (as described within the preceding paragraphs) and a further Epic landholding north east of Colliters Way, which extends to an additional 37 acres. The extent of Epic’s landholding is detailed within Appendix A; with the 85 acres detailed in red and the 37 acres detailed in blue. 1.9 Epic have prepared representations to support the site’s allocation within the Plan during the 2022 Preferred Options Consultation, the 2023 Reg19 consultation, again via the 2024	Regulation 19 consultation draft.		

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					Call for Sites process, and earlier this year during the Additional Sites Consultation. 1.10 Following the Additional Site Consultation (and in the context of the Council's resolution to grant the Epic permission), 'Epic Long Ashton' has now been expressly allocated/designated for a campus-style office development within the Reg19 Plan; Policy LP22, henceforth referred to as 'Epic employment campus'. 1.11 In this context, Epic support the content of the current draft Local Plan, on the basis that NSC clearly recognises the planning status of the Epic employment campus; a consented and 'live' scheme which will provide very special economic benefits to North Somerset and the wider region. Epic consider that the content of Policy LP22 can be further refined to guide the development of the site across the Plan period to 2041. 1.12 Beyond the specifics of the proposed Policy LP22, Epic provide further comment on various elements of the submission, notably in relation to the findings of the Strategic Green Belt Assessment (SGBA) (2025) – principally seeking the removal of their further landholding from the extent of the Green Belt owing to its overall weak contribution to Green Belt purposes. LP22: Epic employment campus Campus: 2.17 Draft Policy LP22 enacts specific allocation/designation of the Epic employment campus (in line with the boundaries defined by the Policies Map), for a campus-style office development in consideration of the unique opportunity that is presented to deliver a high-quality employment use in North Somerset. It is noted and accepted that the drafting of the policy is specific to Epic-only and such an approach is not objectionable. 2.18 The Epic-specific policy is distinct from the wider proposed employment allocations within the Plan and Epic raises no concern with this approach in noting that the grant of planning permission was contingent upon the evidencing of Very Special Circumstances – whereby it was necessary to evidence that the benefits of the proposal clearly outweighed potential harm to the Green Belt and any other identified harms. 2.19 Notably, the Policy reaffirms that the Epic employment campus will remain within the Green Belt, and that any forthcoming development on the site should accord with a number of specified requirements. Again, this approach is not objectionable. 2.20 The Policy, in general terms, sets out that the development shall be consistent or proportionate to the approved scale, use and intend of the extant permission. Epic fully supports the inclusion of a bespoke policy relating to the campus within the Local Plan; however they do contend that the specifics of the policy can be refined further to best assist with the delivery of this most significant proposal across the Plan period.			

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					2.21 Epic's suggested amendment to Policy LP22 insofar as it relates to the campus is set out below: Policy LP22: Epic employment campus (suggested re-wording): This represents a unique opportunity to deliver high-quality employment use to bring significant economic benefits to the district and wider region. The site is located in the Green Belt and will remain so. Within the boundary of the Epic employment campus, as defined on the Policies Map, proposals for a campus style office development for Epic Systems will be supported where they: • Remain consistent or proportionate to the approved scale, use and intent of the extant permissions; • Maintain or enhance the campus style character with high quality landscaping, open space and a low density built form; • Retain the openness of the Green Wedge to the northern side of the site which will remain void of any above ground development and be accessible to the public; • Demonstrate very high quality design in terms of massing, materials, and layout, ensuring visual integration with the surrounding countryside; • Preserve the openness of the Green Belt; • Deliver an exemplar employment location within the Green Belt; and • Prioritise sustainable travel including the provision of active travel infrastructure, electric vehicle charging and links to public transport. Justification This policy recognises the planning status of the Epic employment campus which is a consented scheme which will provide significant economic benefits to North Somerset and the wider region. The site is located in the Green Belt between Long Ashton and Bristol and it was deemed that "very special circumstances" existed to allow this scheme in such a location due to its significant contribution to employment opportunities, the wider economic benefits to the local economy and wider sub-region, and the absence of suitable sites outside the Green Belt. It is therefore important to ensure the scheme delivers the benefits which have justified the "very special circumstances" whilst ensuring that any further development remains consistent with Green Belt objectives. The site is therefore expected to function as a high-value employment campus, accommodating software development for the healthcare sector. Given its location within the Green Belt any future proposals must carefully balance development needs with the preservation of openness minimising visual and spatial impact beyond those already deemed acceptable under the current permissions. Land North of Colliters Way:			

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					2.22 Beyond the proposed amendments to the campus related policy, Epic seek an expansion of Policy LP22 so that it also relates to their further landholding north of Colliters Way. 2.23 As addressed within paragraphs 2.1 – 2.12 of this representation, Epic contend that clear and convincing justification exists to justify the removal of both their land, and all further land as identified within SGBA Parcel P-018 that is located within the administrative demise of North Somerset Council. 2.24 Epic seek an expansion of the drafting of Policy LP22 in order to establish both a safeguarding (Epic only) and positive framework for the utilisation of land north of Colliters Way, where it would support Epic's function and operation of the adjacent campus. 2.25 As such, Epic seek the addition of the following policy test in relation to land north of Colliters Way: Land to the east of A4174 (as delineated on the proposed boundary for the Policies Map) will be reserved for Epic's use and operation subject to demonstrable need to support the operation of the main campus site. Where need is demonstrated, the development of safeguarded land to the east of the A4174 will be permitted, subject to: • Satisfactory environmental safeguards including mitigation/ compensation where appropriate • No significant demonstrable harm to the amenities of nearby residents 2.26 Appendix C to this representation (see attached document) is inclusive of a tracked change version of Policy LP22 and Appendix D provides a clean copy. Both Appendix C and Appendix X detail the amendments sought to both the campus element of Policy LP22 and its sought expansion in relation to Epic's wider landholding. 3 CONCLUSION 3.1 In conclusion, Epic generally supports the contents of the current draft Local Plan, on the basis that NSC clearly recognises the planning status of the Epic employment campus; a consented scheme which will provide significant economic benefits to North Somerset and the wider region. 3.2 Epic commend the Local Planning Authority for their commitment to their proposal, which has resulted in proposed Policy LP22. Epic consider that the content of Policy LP22, as it relates to campus operation, can be further refined to provide a clear steer as to how development of the campus will be considered and achieved through the Plan period. 3.3 However, Epic feel obligated to highlight the conclusions drawn from the SGBA in respect of assessed Parcel P-018 and in particular to the 37 acres of land it owns to the north of Colliters Way. The SGBA confirms that this parcel of the Green Belt does not perform strongly against any of the five Green Belt purposes,			

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					and, ultimately, its weak contribution in respect of purposes (a), (b), and (d) are as such that the SGBA clearly expresses that the parcel should be considered as a grey belt opportunity. 3.4 Epic consider that the evidence base therefore provides clear and convincing evidence to justify the removal of Parcel P-018 from the Green Belt. As a consequence, this provides an opportunity to positively establish a framework that would support the utilisation of this land for purposes associated with the operation of Epic's campus only. To this extent, Epic have suggested further policy wording, for incorporation within LP22, that would guide any such applications within the Plan period. 3.5 In summary, Epic respectfully request that the suggested amendments to Policy LP22 are incorporated within any Schedule of Proposed Modifications when the Local Plan is submitted for Examination in Public pursuant to Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). Alternatively, if further consultation is undertaken prior to Regulation 22 submission, Epic would respectfully request that the amendments proposed are incorporated within a further Regulation 19 consultation draft.			

Name: Eric Arsenault **I.D:** 62856353

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Strategic Policies	Unsure		Unsure	Unsure	I would appreciate more communication between the local population and goverment officers, developers, and the local Member of Parliament to get a wider view and implications of the Local Plan .	It would be interesting to add more concrete supporting documents concerning local economic planning and transportation improvements as we simply see an increase in the number of housing units, without any concrete measures taking into account the economic development of the areas or the improvement of traffic flow on the currently congested roads and highways. The issue of the balance between nature, roads and dwellings needs to be addressed, particularly for Portishead: Tower Farm and Black Rock: these two areas are located in a very sensitive natural area (green belt) and the road network is insufficient, as the existing roads are already congested. Portishead planned dwellings need to get closer to main existing roads and public transport. It is necessary to provide more details on these two subjects: Economic mapping and planning for existing and planed areas: Where will the new residents go to work every day? In Bristol? Will they commute daily? How can we avoid the cities of the Local Plan become even more like dormitory towns? Economic areas must be planned and supported as well as we increase number of dwellings. What about local shops, schools, and amenities? Transport planning To reverse the trend towards road congestion, it is essential to implement an ambitious and incentive-based public transport plan, including, for example, direct buses to Bristol every 15 minutes from each city and carpooling during peak hours.		
Land at Tower	Unsure		Unsure	Unsure	I would appreciate more communication between the local population and goverment	It would be interesting to add more concrete supporting documents concerning local economic planning and transportation improvements as we simply see an increase in the		

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Farm					officers, developers, and the local Member of Parliament to get a wider view and implications of the Local Plan .	number of housing units, without any concrete measures taking into account the economic development of the areas or the improvement of traffic flow on the currently congested roads and highways. The issue of the balance between nature, roads and dwellings needs to be addressed, particularly for Portishead: Tower Farm and Black Rock: these two areas are located in a very sensitive natural area (green belt) and the road network is insufficient, as the existing roads are already congested. Portishead planned dwellings need to get closer to main existing roads and public transport. It is necessary to provide more details on these two subjects: Economic mapping and planning for existing and planed areas: Where will the new residents go to work every day? In Bristol? Will they commute daily? How can we avoid the cities of the Local Plan become even more like dormitory towns? Economic areas must be planned and supported as well as we increase number of dwellings. What about local shops, schools, and amenities? Transport planning To reverse the trend towards road congestion, it is essential to implement an ambitious and incentive-based public transport plan, including, for example, direct buses to Bristol every 15 minutes from each city and carpooling during peak hours.		
Black Rock, north of Clevedon Road	Unsure		Unsure	Unsure	I would appreciate more communication between the local population and goverment officers, developers, and the local Member of Parliament to get a wider view and implications of the Local Plan .	It would be interesting to add more concrete supporting documents concerning local economic planning and transportation improvements as we simply see an increase in the number of housing units, without any concrete measures taking into account the economic development of the areas or the improvement of traffic flow on the currently congested roads and highways. The issue of the balance between nature, roads and dwellings needs to be addressed, particularly for Portishead: Tower Farm and Black Rock: these two areas are located in a very sensitive natural area (green belt) and the road network is insufficient, as the existing roads are already congested. Portishead planned dwellings need to get closer to main existing roads and public transport. It is necessary to provide more details on these two subjects: Economic mapping and planning for existing and planed areas: Where will the new residents go to work every day? In Bristol? Will they commute daily? How can we avoid the cities of the Local Plan become even more like dormitory towns? Economic areas must be planned and supported as well as we increase number of dwellings. What about local shops, schools, and amenities? Transport planning To reverse the trend towards road congestion, it is essential to implement an ambitious and incentive-based public transport plan, including, for example, direct buses to Bristol every 15 minutes from each city and carpooling during peak hours.		

Name: Etta Russell **I.D:** 62864321

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Land east of Backwell	No	• Positively prepared	Unsure	Unsure	Subject: Formal Objection to the NSC Local Plan - Backwell I am writing to express a strong objection to the proposed NSC Local plan especially in relation to Backwell. The scale,			

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		• Justified • Effective • Consistent with national policy			location, and supporting infrastructure for this scheme are wholly inappropriate and pose significant risks to the environment, the character of the area, and the wellbeing of existing and future residents. My concerns are outlined below. 1. Backwell is already under exceptional development pressure, with 800 new houses recently approved—representing a 40% increase in the size of the village. Adding the proposed further allocation would result in complete and unsustainable overdevelopment. 2. The proposed new road would not resolve existing traffic issues in Nailsea or Backwell. It would fail to relieve congestion on Station Road, Backwell Common, or Chapel Hill. Engineering a road across, under, or over the railway would be prohibitively expensive and potentially unfeasible. 3. Infrastructure is already inadequate. There is a shortage of school places and no parallel investment in health services or leisure facilities. Current services cannot support an additional 1,000 homes. 4. Backwell has been disproportionately targeted for growth, being allocated more housing than any other village in North Somerset—and even a higher proportional increase than some towns. Backwell is expected to take 7% of the district's housing allocation, compared with Clevedon's 2%, which is unjustifiable. 5. There is no needs assessment or viability analysis supporting the case for an extra 1,000 houses. 6. Backwell is not an employment hub, and most residents commute. Increasing housing without corresponding employment provision is unsustainable and increases traffic and carbon emissions. 7. No social cohesion impact assessment has been provided, despite the dramatic scale of growth proposed. 8. The development would destroy Grade 1 Agricultural Land, which is currently used for food crops and grazing. Only 7% of such high-quality land remains in North Somerset and should not be sacrificed. 9. Government policy explicitly states that "we must protect our best and most versatile land" to ensure food security. These proposals contradict national policy and jeopardise long-term food supply. 10. The scheme threatens biodiversity, destroying valuable wildlife habitats in a country already recognised as one of the most nature-depleted in the world. 11. The Brockley Maternity Roost and SSSI are at risk, with rare Lesser and Greater Horseshoe Bats dependent on this land for foraging. This development would irreparably damage protected species' habitats. 12. The Infrastructure Delivery Plan is incomplete, lacking analysis, costings, and any guaranteed funding for essential roadworks or community services. 13. Backwell Common and surrounding areas are prone to flooding, and further development would exacerbate this risk. 14. Designation of the area as a strategic growth location raises serious concerns, including loss of Greenbelt and high-quality agricultural land, increased flood risk, harm to the village's character, and uncertainty about road funding and deliverability. 15. Backwell Lake (Reservoir) and adjacent fields lie on a floodplain, where flooding is already frequent. Building roads and houses here is irresponsible and unsafe. 16. Government policy requires 50% affordable housing on Greenbelt land, but this reduces developer contributions toward crucial infrastructure, leaving gaps in funding for vital services. 17. The sheer scale and speed of the proposed growth are destabilising, unsustainable, and undeliverable, given the amount of infrastructure and service investment required. 18. The railway station is not fit for purpose as a transport hub, being inaccessible for people with mobility issues and extremely challenging for families with young children. Expanding housing numbers without improving station access contradicts sustainable-transport goals. _____ In light of the above, I urge you to reconsider the proposals. It is neither sustainable nor justified, and it fails to meet the standards required for responsible planning, environmental protection, and community wellbeing.			

Name: Eve Haines **I.D:** 62851361

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Churchill Avenue	No	• Justified	Unsure	Unsure	This land is an area of community which cannot be built upon. It is in a residential area already and has been a playing field for generations. I played on this field as a child as I lived in Coleridge vale road north and so did my mother (as a child). It is a vital space for the families housed in the flats and is a place of natural habitat for wildlife with the river it regularly floods so would	It is a flood wetland area and as mentioned above should not be built upon. It is a place for community, children to play in the social flats opposite (they do not have a garden) and many of them have been placed there in emergency accommodation.		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					be an awful place to build upon.			

Name: Evelyn Evershed **I.D:** 51287585

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell already has 800 new homes approved. This is a 40% increase in new homes. Despite this, there are no specific plans to upgrade infrastructure of either roads, schools or health services. It seems Backwell has been targeted to allocate a higher number of new homes than any other village in north somerset at approx 7% compared to Clevedon's 2%. Currently the additional 1,000 new homes targeted would be on Grade 1 agricultural land? This would appear to be in direct contravention of the governments own policy which states that 'we must protect our best and most versatile land for agriculture to safeguard food security. Apart from the obvious adverse impacts mentioned above there would also be a huge impact on the already strained wildlife habitats and further deplete biodiversity. In addition Backwell Common is prone to flooding, as is the area around Backwell lake. All in all the plan seems to be very shortsighted and fails to take the wider impacts of such a massive increase of new homes - with huge impact on roads/rail etc. And in addition the quality of life for existing Backwell residents.	I would like there to be further consultation and radical revision of the plan with care and attention given to the points raised above. Backwell cannot become a huge housing site - this is unsustainable. However careful planned development - to a radically reduced scale will naturally form part of Backwell's own future and maintain a balanced environment for its residents and new comers to the village. With careful consideration, Backwell can be a proud reflection of a council who listens and can provide a sustainable way to grow, as a blueprint for other villages.		

Name: Evelyn Grounsell **I.D:** 8064449

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm					Tower Farm and Black Rock should be removed from the Local Plan for housing in Portishead. Those areas are adjacent to protected woodland, and development would lead to damage to those habitats. The land is neither poor, nor does it offer no amenity to the locale. As such those areas read as outside the categories of land worthy of consideration under the Government policy described by the Prime Minister in his speech on this topic. If my memory serves, at least part of the area by the woods was added to green belt in recent years, further confirming the value of land surrounding the woods to the environment and to the community. And the error of considering building there. Moreover Tower Farm and Black Rock are ideal areas to allow extension of the habitat and at low cost provide the expansion of rewilding that is the policy of the current and previous North Somerset councils.			
Black Rock, north of Clevedon Road					Tower Farm and Black Rock should be removed from the Local Plan for housing in Portishead. Those areas are adjacent to protected woodland, and development would lead to damage to those habitats. The land is neither poor, nor does it offer no amenity to the locale. As such those areas read as outside the categories of land worthy of consideration under the Government policy described by the Prime Minister in			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					his speech on this topic. If my memory serves, at least part of the area by the woods was added to green belt in recent years, further confirming the value of land surrounding the woods to the environment and to the community. And the error of considering building there. Moreover Tower Farm and Black Rock are ideal areas to allow extension of the habitat and at low cost provide the expansion of rewilding that is the policy of the current and previous North Somerset councils.			

Name: Evie Jones **I.D:** 62858433

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	I consider the allocation of the Tower Farm / Portishead Down site to be unsound. The Plan does not demonstrate that reasonable alternatives have been properly considered. Brownfield land within Portishead, particularly around Wyndham Way and other underused areas, offers clear opportunities for higher-density development and meaningful town-centre regeneration. Portishead has experienced significant housing growth in recent years, yet its centre remains tired and underdeveloped. Directing development towards brownfield sites would improve the town's vitality while avoiding unnecessary loss of green belt land. The absence of a robust comparison of these alternatives means the allocation is not adequately justified. The environmental impacts of developing this site are unacceptable. The area is a valued natural landscape used by residents and lies adjacent to Weston Big Wood SSSI and within the Gordano Valley Green Corridor. The proposed "ecological buffer" is poorly defined and incapable of preventing indirect harm such as damage to root systems, changes to drainage patterns, increased recreational pressure, and disturbance to wildlife. Once this landscape is lost, the harm is irreversible. The site is also inherently unsustainable. Access relies on a long, steep hill that makes walking and cycling impractical for most people, while public transport to the top of Portishead is infrequent. As a result, residents would be almost entirely dependent on cars. Traffic conditions in the area, particularly around the school during peak times, are already severe and would be significantly worsened by additional development. No realistic mitigation has been demonstrated. For these reasons, the allocation is not justified, not deliverable in practice, and environmentally harmful. It should be removed from the Plan in favour of more sustainable brownfield options within Portishead. No modifications could make this site suitable No I do not support this site			

Name: Exolum Pipeline Systems Ltd **I.D:** 39520353

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP5: Housing, employment and mixed use allocations					Thank you for your email to Exolum Pipeline System Ltd regarding the above. Please find attached a plan of our client's apparatus. We would ask that you contact us if any works are in the vicinity of the Exolum pipeline or alternatively go to www.lsbud.co.uk, our free online enquiry service.			LOCALPLAN2041_plan.pdf

Name: F Gooch **I.D:** 58043937

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	Alternative brownfield or greenfield sites with lower ecological impact have not been considered. This area is of such strategic ecological importance it was classified green belt in 1980s due to its high ecological value. The fields surrounding provide vital infrastructure to inter-connectivity of the ecosystem. Weston Big Wood dates back to Iron Age with rare fauna and flora - a site of special scientific interest. National planning policy only allows green belt changes in exceptional circumstances. These have not been demonstrated. Traffic around The Downs leading onto Down road is extremely congested (and often dangerous) at school drop off and pick up times. More traffic would create unacceptable transport impacts failing national soundness tests. The site cannot provide safe and suitable access. The site fails to be located within easy walking distance of key amenities as claimed by potential developers. It seems that their proposals are not based on sound research of the area. It has restricted access (particularly at peak times) and is located over a mile away with a steep gradient (over 100m) to and from the centre. It is my understanding that a well-known large developer already researched this as a potential site for development and subsequently dismissed it as a result of that thorough research.	Alternative brownfield sites should be considered. Sites allowing safe and suitable access (not on an already highly congested junction adjacent to a primary school) should be considered. This greenfield site which includes the vital inter-connectivity of the woodland and fields should be protected due to its ecological importance and significance.		

Name: F Parry **I.D:** 29291809

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Policy LP3 prioritises provision of new green infrastructure and open space - for this reason the field next to West Leigh infant school should not be developed on. It has current and future value to the local community. Any development here would harm local children's outdoor space provision and inhibit active travel, outdoor learning and physical activity. The Gleeson development south east of Backwell Lake will threaten the strategic gap between Nailsea and Backwell. Also the natural environment that exists at Backwell Lake needs to be protected from the harm that this development would do.	The field in between the Grove Farm/Rodney Road housing allocation and West Leigh school should be designated as a Local Green Space as it provides a buffer between the school and planned housing developments and provides recreational educational health and ecological benefits to the community. Remove the Gleeson development from the Local plan as it infringes upon the strategic gap between Nailsea and Backwell.		
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	IMPACT ON NATURE – this proposal delivers harm to nature, threatening local biodiversity and in particular the habitat of the Brockley Maternity Roost and SSSI. The loss of local greenbelt agricultural land will deprive lesser and Greater Horseshoe bats of their foodsource. FOOD SECURITY - loss of greenbelt land is in contradiction to Government policy to safeguard food security by protecting "our best and most versatile land". CROSS RAIL LINK ROAD – I have little confidence that this will be executed or if it is that it it will be delivered in a timely fashion. The Infrastructure Delivery Plan does not fully address costings and there is no way to know if funding for the cross rail link road or services would be made available in the future let alone in a well-timed fashion. Furthermore the location of the proposed link road is in an area that frequently floods (compare the under-rail bridge at Chapel Hill). TRANSPORT INFRASTRUCTURE - the accessibility issues at Nailsea & Backwell Railway station are well known and there is no proposed funding to make the railway station fully functional for all users in both directions. SOCIAL COHESION - this plan will totally destroy the character of the village and its vibrant community – there has been no social cohesion impact assessment and	Include funding proposals to make Nailsea & Backwell Railway station fully accessible to all users in both directions.		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					the volume of growth in such a short time will be destabilising and have a negative affect on local services and the community. DEVELOPER CONTRIBUTIONS - where the Council has recommended that greenbelt sites are built on, the 50% affordable housing policy means that developers will contribute less towards developing infrastructure, which will increase the difficulty of integrating a large new population into the existing community and services.			

Name: F Russell **I.D:** 21297505

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I very strongly object to the proposed NSC Local Plan for Backwell. The scale, location, and lack of infrastructure make this scheme totally inappropriate. On top of the unsustainable and disproportion current building plans approved in the last few years, it further threatens the environment, village character, and residents' wellbeing. Backwell has already approved 800 more new houses—a further 40% increase on what was already a disproportionate and signficant increase. Adding 1,000 more would be completely unsustainable and destroy the essence of village life. Villages thrive on small-scale facilities, one of each for community cohesion, not several of each. Backwell has a close-knit rural community. The council forcing such extreme expansion will erode this identity. Backwell's rural character, defined by green fields with rich biodiversity and open countryside that has never been built on, would be lost forever. Infrastructure is already inadequate: schools are full, health and leisure services underfunded, and no parallel investment planned. Our existing facilities should be better funded for the current community. The proposed road will not solve congestion and may be prohibitively expensive to deliver. Backwell has been disproportionately targeted, taking 7% of the district's housing allocation compared with Clevedon's 2%, without any needs assessment or viability analysis. There are other areas of the UK with far more open countryside that have even less new building than the national average. The percentage here is unfair and unnecessary. There are large areas of brown field areas that should be developed, including old industrial estates, offices and shops now that so many people are working and shopping online from home. No social cohesion impact assessment has been provided, despite the dramatic scale of growth. Backwell is not an employment hub, so more housing means more commuting, traffic, and carbon emissions. The plan sacrifices Grade 1 Agricultural Land—only 7% remains in North Somerset—contradicting national policy to protect our best land for food security. It also devastates biodiversity in one of the world's most nature-depleted countries. The hedgerows and surrounding land are ancient. Every local walk includes some sitings of wildlife including and often deer and types of bird, butterfly, insects and other mammals and living creatures. The nearby lake has otters and wild fowl whose total area is unknown. These fields are home to rare Lesser and Greater Horseshoe Bats and many other species which will be irreparably lost. Once these ecosystems are gone, they cannot be replaced. Flood risk is another major concern: Backwell Common and Backwell Lake lie on floodplains where flooding is already frequent. Building here is unsafe. The Infrastructure Delivery Plan lacks costings, funding guarantees, and clarity on road deliverability. Designating this area as a strategic growth location means sacrificing Greenbelt land and high-quality countryside—an irreversible loss. Affordable housing requirements on Greenbelt land will further reduce developer contributions for essential services. The scale and speed of growth are destabilising and undeliverable. Even the railway station is unfit for purpose—poor accessibility undermines sustainable transport goals. The building will cause more chaos along the busy A370 for years. In short, this proposal is neither justified, nor sustainable. Backwell has been targeted unfairly and the community is unhappy with the extreme and continual bombardment of building on this village. Once our countryside and village character are gone, they are gone forever. Future generations deserve careful stewardship, not reckless overdevelopment.	Stop targeting this village.		

Name: F Shields **I.D:** 62805569

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I believe the Plan 2041 is not sound, not legally compliant and not in compliance with the duty to co-operate for the following reasons: Backwell is a VILLAGE in a rural setting. It already has approval for 800 new house which is an increase in size of 40%. The scale of proposed development is totally out of proportion and character of the existing village. Food security should be a priority throughout the country, and building on good quality farmland should be avoided wherever possible. This land is Grade 1 agricultural land - the highest quality we have. We are already far too reliant on imports for food and there is only 7% if this high-quality land left in the whole of North Somerset so every acre is precious and should not be built on. Brownfield sites should be developed before any further agricultural land is built on. Government policy states that “we must protect our best and most versatile land” to safeguard food security. The proposal does not comply with this policy at all. This land was designated as greenbelt to prevent un-checked creep of development into farmland. Greenbelt land should not be built on unless all other options have been exhausted. Backwell does not and will never provide significant employment opportunities on a scale needed for the proposed growth in population. Most residents commute to Bristol and Weston for work. This would not change with the building of vast numbers of housing – it would just increase the amount of commuters. School places in the locality are already very limited, and health services and leisure facilities are not adequate for the current population. These services cannot support another 1000 houses. Local roads are frequently gridlocked, with narrow country lanes being used as rat-runs. The lanes around this proposed development have no pavement which causes immense danger to pedestrians and cyclists. Increased development would lead to further traffic on these already overloaded country roads. The proposed new road link would not relieve this congestion – Station Road would still have to absorb huge amounts of extra traffic. There is no funding for the new road link, and the cost to get it under or over the railway would be prohibitive. Backwell Common and Chapel Hill are already far too busy for the size of the lanes. The Infrastructure Delivery Plan lacks analysis and costings, and there is no funding for the proposed new road or any services. These would most likely be ignored until the local area was at breaking point. Backwell has been allocated a higher number of houses than any other village in North Somerset, being expected to take 7% of the district’s housing allocation. This is not feasible or sensible in a rural village – development should be focused on the towns where shops and employment are more accessible. Flooding is a major issue in this area. The development would destroy valuable wildlife habitats and harm biodiversity. We need to be preserving these habitats to ensure the future of our native species. Rare species like Lesser and Greater Horseshoe Bats rely on this land for food and the proposals would threaten the Brockley Maternity Roost and SSSI. The railway station is not fit for purpose as a transport hub for the proposed growth in population. It is not accessible to passengers in wheelchairs or those with pushchairs. In the 21st century this is unacceptable, and yet there is not funding or proposal to rectify this situation. In summary, this proposal represents massive overdevelopment in a rural area where services and facilities are just not suitable for such growth.	Large development sites should be focussed close to the towns of Weston and Clevedon where transport, shops and employement are. Protect the character of the villages.		

Name: Faith Everitt **I.D:** 62774497

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared	Unsure	Unsure	Backwell already has 800 new houses approved which equates to a 40% increase! We have limited facilities in the area - no NHS dentist, an overloaded GP surgery, full school years, chaos in the local streets with parking for shops or schools etc and vast amount of traffic on local roads not built for such heavy use. Congestion into Bristol is evident both on the roads and trains at peak hours - a real bottle neck through Backwell Farleigh			

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		• Justified • Effective • Consistent with national policy			and Flax Bourton. The new plan has no new roads funded and no additional services guaranteed. If Backwell is forced to take over 1000 new houses that means an increase of over 80% which is blatantly wrong and changes the entire character of the area. No such plans should be forced on people who have chosen to live here - we cannot take any more chaos, disruption and congestion. We want to move out already - it is so horrible with all the building work. But our house has lost value - how many more long-standing, council-tax paying residents must suffer in the same way? Enough. Please stop taking our land and ruining our lives.			

Name: Fearne White-Smith **I.D:** 62832833

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I am scared that the new houses will hurt the bats. I love the bats and the other animals in my village. My parents have told me that the land these houses would be built on is very important for food and I don't think it is a good idea to build houses on land that should be used for food or for farm animals when there is other land we can build on instead.	Don't build on that land		

Name: Fern Rebecca Steel **I.D:** 44788929

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell					Backwell is being asked to take on more housing than any other village in North Somerset it already has 800 new homes approved. Adding another 1,000 would overwhelm the village and change its character beyond recognition.The proposed road won’t fix congestion in Nailsea or Backwell. Building under or over the railway would be hugely expensive and may not even work. We already struggle with traffic as it is. Schools are short of places, health services are stretched, and leisure facilities are lacking. More houses without investment in infrastructure is simply unsustainable.Most people commute. More houses here just means more cars on already busy roads. The land earmarked is Grade 1 agricultural — the best we have — and only 7% of this quality remains in North Somerset.This is contrary to government policy: National guidance says we must protect our best land to safeguard food security. Backwell Common and the Lake area already flood regularly. More building here would make it worse. Station not fit for purpose: Backwell’s railway station is inaccessible for many and unsuitable as a transport hub.			Proposed plan for Land East of Backwell.doc

Name: Fi Lamdin **I.D:** 21276833

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective	Unsure	Unsure	I have lived in Backwell for 11 years. My family moved here because we wanted to live in the countryside and be connected to nature. We walk and run through the fields almost every day. These fields are where we spot deer at dawn, watch sparrowhawks circling, and see bats feeding at dusk. My children walk through these same fields on their way to school. This land is not just “open space” on a map — it is part of our daily lives, our wellbeing, and the reason we chose to call Backwell home.			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
		• Consistent with national policy			During the COVID lockdowns, the Common and surrounding fields became a lifeline for the community. People who had never walked there before discovered how peaceful, restorative, and vital these green spaces are for mental health. That use hasn't stopped; if anything, it has grown. In a time when we are constantly told about the importance of protecting the environment, preserving biodiversity, and safeguarding green spaces, it feels devastating that such precious, rare, irreplaceable countryside is now under threat. Once Green Belt is built on, we will never get it back. Backwell is slowly being chipped away, and it feels like the village we moved to is being lost. For these deeply personal reasons — as well as the planning reasons outlined below — I urge you not to approve this development. Planning Reasons for Objection 1. Severe Overdevelopment Backwell already has 800 new houses approved, a 40% expansion. Adding another 1,000 homes is disproportionate and would overwhelm the village. It would fundamentally destroy the rural character that thousands of residents value. 2. Road Proposal Not Feasible or Effective The suggested road would not relieve traffic on Station Road, Backwell Common, or Chapel Hill. The engineering challenges of going under or over the railway are considerable, costly, and potentially undeliverable. This casts serious doubt on the whole strategy. 3. No Supporting Infrastructure There are already not enough school places and no planned investment in health services, GP access, or leisure facilities. The area cannot accommodate thousands of new residents without essential facilities. 4. Disproportionate Housing Burden Backwell is expected to take 7% of the district's entire housing allocation, more than any other village and higher than some towns. This is unreasonable and unjustified. 5. No Needs or Viability Analysis There is no evidence to justify an extra 1,000 homes in Backwell, and no viability assessment to show the development is deliverable. 6. Unsuitable Location for Growth Backwell is not an employment centre. Most residents commute. More housing here increases car dependency and contradicts sustainability aims. 7. No Social Cohesion Assessment The plan lacks an evaluation of the social impacts of nearly doubling the village population in a short period — a major omission. 8–9. Destruction of Grade 1 Agricultural Land The development would build over Grade 1 agricultural land, used for food crops and grazing. Only 7% of such land remains in North Somerset. National policy requires protecting the "best and most versatile land" to ensure food security, yet this proposal does the opposite. 10–11. Harm to Wildlife and Protected Species The fields and hedgerows that would be lost are vital habitats in one of the most nature-depleted countries in the world. The proposals threaten the Brockley Maternity Roost and SSSI, relied upon by Lesser and Greater Horseshoe Bats. These species depend on these very landscapes for foraging.			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					12. Incomplete and Unfunded Infrastructure Plan The Infrastructure Delivery Plan lacks both costings and funding guarantees. There is no reliable delivery strategy for the new road or essential services. 13–15. Flooding Risks Ignored Backwell Common, Backwell Lake, and nearby fields lie on a regularly flooding floodplain. New housing and roads would worsen flooding for existing and future residents, especially given climate change pressures. 16. Green Belt Affordable Housing Policy Issues Government policy requires 50% affordable housing on Green Belt land, but this reduces developer contributions that are essential for infrastructure — making the project even less viable. 17. Growth at an Unsustainable Pace The scale and speed of growth anticipated is undeliverable, destabilising, and will cause long-term harm to the village. 18. Railway Station Not Fit for Purpose The station is inaccessible for many people, including those with mobility issues or families with young children. It cannot operate as a transport hub for a major expansion. Conclusion Backwell is a village with a strong community, a unique landscape, and precious, irreplaceable countryside that residents treasure. This proposal would permanently destroy that character, overwhelm local infrastructure, and undermine national environmental and agricultural policy. For these reasons, the plan is unsound, unjustified, and undeliverable. I respectfully ask that the Backwell allocation and associated road proposal be removed from the Local Plan.			

Name: Flax Bourton Parish Council **I.D:** 16068161

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	Unsure		Unsure	Unsure	We are disappointed to see that the content of Policy LP3 has not evolved significantly from that presented in the previously version of the plan. The policy now confirms the preferred new vehicular route linking Nailsea with the A370, but again fails to acknowledge the impact of the resulting increase in traffic on the villages in the surrounding area, including in Flax Bourton. We raised this issue as our main concern in the last consultation and we are disheartened to see that it has failed to be addressed in this final policy version. The views of our community were clearly expressed in the last consultation, as were our on-going efforts in trying to improve the safety of the A370 for the community. We continue to recommend that the new link road should be for public transport access only to manage the impact on the A370 and to promote sustainable travel prior to the delivery and occupation of the new homes. Failure to do so will only add significant levels of private vehicles	We strongly encourage North Somerset Council to take a much more pro-active stance on promoting sustainable transport in and around Backwell, for example, in a similar manner to that expressed in Policy LP2: Strategic location: Woodspring (south west of Bristol). We also encourage NSC to commit to taking a more proactive stance on the creation of a coherent and cohesive vision for the Backwell area prior to the submission of individual planning applications by different developers. Such a vision, potentially in the form of an SPD, would clearly identify how the needs of Backwell's community, as well as those of the surrounding villages and communities that will be severally impacted by the current proposals, would influence a comprehensive place-based plan that addresses transport, sense of place and identity, and local aspirations. Unfortunately, Policy LP3 promotes a reactive approach that will inevitably lead to an ad-hoc expansion of Backwell to the detriment of the surrounding communities.		

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					passing through Flax Bourton, resulting in increased dangers for residents in the village having to cross the road to get to the school and creche, access bus stops etc.			

Name: Fran Slade **I.D:** 51445569

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP2: Climate Change	No	• Justified • Effective	Unsure	No	Climate change is already being challenged by scientist, Net Zero is not viable, All plants (Food products) require Carbon Dioxide to survive. It will be much too expensive to carry out, The Daily Express reported on the 12th December that Net Zero leaves the UK on a precipice of Industrial Collapse.	Please do not follow all these ridiculouse Net Zero Policies which are completely unaffordable.		
SP8: Housing	No	• Positively prepared • Justified	No	No	What about infrastructure, there will not be enough Hospitals, Schools, Doctors surgeries and all other facilities that affect the population.	Revert back to the housing targets in the initial Local Plan that was based on sound analysis.		
Policy DP53: Best and most versatile land	No	• Justified • Consistent with national policy	No	No	Why build houses and Solar panels on first class agricultural land which is not agreeable by the government. Only class 3b to 5 is allowable. We need food security for this county and that will be lost.	Use car parks for Solar Panels, other countries place Solar Panels above the cars.		

Name: Frances Morris **I.D:** 62765889

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Consistent with national policy	Unsure	No	It is not in compliance with the Environmental Improvement Plan (EIP) 2025, Published 1 December 2025. It does not help the local community, and will obviously cause huge traffic issues. Having this increase with also obviously put a strain on all local doctors surgeries, dentists, pharmacies, and schools to mention the primary ones. Environmental issues such as endangering the wildlife there foxes, hedgehogs, small mammals, badgers, many many types of birds inc red kites. Drainage issues will inevitably become an issue - I'm unsure of you're aware of this, but trees and grasslands tend to absorb moisture and heaving rain much better than concrete. Don't do any of it. It's not wanted by anyone who actually lives in the area. Stop being so weak, and allowing yourselves to be so easily manipulated by these money people. You will be hated by all if you think building more housing is going to improve anything including your reputation. It might be fun to try implementing decisions which actually have a positive influence, worth a try at least I'd say.		Absolutely not.	
Black Rock, north of Clevedon	No	• Consistent	No	No	It is not compliant with the governments Environmental Improvement Plan (EIP) 2025 Published 1 December 2025. It does not help the local community, and will obviously cause huge traffic issues.			

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Road		with national policy			Having this increase with also obviously put a strain on all local doctors surgeries, dentists, pharmacies, and schools to mention the primary ones. Environmental issues such as endangering the wildlife there foxes, hedgehogs, small mammals, badgers, many many types of birds inc red kites. Drainage issues will inevitably become an issue - I'm unsure of you're aware of this, but trees and grasslands tend to absorb moisture and heaving rain much better than concrete. Just don't do it, it goes against public opinion.			

Name: Frances Russell **I.D:** 39205377

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land south of Nailsea	No	• Consistent with national policy	Unsure	Unsure	Development on the land south of Nailsea would lead to the coalescence of Nailsea and Backwell, and would not be a sustainable location in terms of transportation. Station Road is unsuitable for additional traffic. Nailsea and Backwell Station has short platforms, cannot accommodate additional passengers, and has no facilities for disabled users. Development in this location is likely to lead to adverse impact to Brockley Hall Stables SSSI, part of the North Somerset and Mendip Bats SAC. The development would be in conflict with paragraphs 154, 109-111 and 193 of the NPPF.	If further residential development is required, sites should be identified on sustainable brownfield land.		
Land east of Backwell	No	• Consistent with national policy	Unsure	Unsure	The proposed development would take Grade 1 agricultural land which would be in conflict with Paragraph 187(b) of the NPPF which protects best and most versatile land. The proposed development would have potential adverse impacts on the Brockley Hall Stables SSSI, part of the North Somerset and Mendip Bats SAC, which would be in conflict with Paragraph 193 of the NPPF. There is no funding secured for the Cross Rail Link road, which is likely to be so expensive as to be not capable of being funded by the development. Without the Link road congestion on Station Road will be unsustainable. Nailsea and Backwell railway station has short platforms and no additional capacity. The station is not accessible for use by disabled people. Overall, the development would be in conflict with paragraphs 109 - 111 of the NPPF which promotes sustainable transport.	If additional housing is required, then sites should be identified on brownfield land. If the land is to come forward for development, then finding needs to be guaranteed for the Cross Rail link road, and for it to pass under, rather then over, the railway line. Improvements should be made to Nailsea and Backwell railway station.		

Name: Frances Sheridan **I.D:** 16061057

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	No	The allocation for housing in Nailsea is too high due to traffic generation and cannot be solved by the proposed "Backwell Bypass" which is not justified, effective or consistent with national policy. The proposed cross-rail link at Nailsea and Backwell from Station Road to A370 ("Backwell Bypass" in your report) is not justified, effective or consistent with national policy to reduce CO2 emissions, encourage walking and cycling as it will increase traffic overall from Bristol to Clevedon and from Clevedon to the airport as well as around Backwell and Nailsea as it will increase traffic flow. 1.The new road is inconsistent with national planning policy to reduce CO2 emissions	To make the plan sound I consider it neccessary to Remove green belt designation from land south of Bristol and re-allocate the new additional site East of Backwell to land near employment opportunities near Epic Employment Campus and near to Bedminster and Bristol. This would reduce traffic generation, CO2 emissions, provide access to services and		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					and increase use of sustainable transport as it will encourage car use.. 2.The road is contrary to WECA and Bristol City Transport Plans as it will increase traffic into Bristol and reduce use of buses on A370 and trains from nailsea station into Bristol. 3.The road is not justified as the additional site for housing East of Backwell will not need a Major Transport Scheme to the station or to Nailsea as it is in close walking and cycling distance and to bus services.The previous draft plan included a cycle/walking route from the housing site. 4.The road and the additional site for housing East of Backwell is detrimental to Nailsea. Station Road and roads into Nailsea will have more traffic and this will discourage walking and cycling between Nailsea and Backwell, especially schoolchildren. 5.It is not positively prepared as part of a strategy for Nailsea.The proposed road is not justified unless NSC explains and is transparent about its plans for a MajorTransport Scheme in Nailsea and be clear whether it will link up to the M5 at Clevedon.On the map the proposed Major Transport Scheme for Land East of Backwell lines up with that already built at Youngwood Lane and the Reserved Transport Corridor Within Youngwood Lane Development. In addition the proposed Major transport Scheme/ Station Road junction would connect with a road and roundabout previously proposed as part of a housing application on the Backwell Lake side of Station Road.This would link Backwell Bypass with Youngwood Lane Major Transport Scheme and is similar to previous schemes in 1960's to link with the M5 at Clevedon. 6. The additional sites for housing East of Backwell need to have access directly off A370 as in earlier drafts.There should be no road crossing the railway as it is not justified. The plans do not comply with the Duty to Co-operate because housing allocation sites are driven by local politics to prevent the expansion of Bristol. Allocated housing sites will generate traffic in Bristol and will not contribute sufficiently to WECA sustainability targets and WECA Transport Strategy for 2041 .	jobs, provide more sites for affordable housing. It would remove the traffic management problems at Nailsea and Backwell.		
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Policy SP1 is not met .Nailsea is not in a strategic location and is not a main town and is not a main site of employment.It is a commuter town based on the station.The plan ignores the existence of Bristol which is the main town and employment centre for the commuter towns of North Somerset .Administrative boundaries should not be imposed on the economic region around Bristol. The plans for Nailsea do not show how new housing will access employment in Bristol in a sustainable way .The plans promote the increase in car use and traffic. The plans restrict the effectiveness of wildlife corridors at Belmont House and Tyntesfield.They do not support the high level of biodiversity due to the unique geology of Nailsea of coal measures and limestone in close proximity to one another and due to local water courses. Policy LP3 is not effective as the cross rail link will cause traffic congestion in Nailsea .The road will be difficult to build. The road opens up land in the green belt for housing to the south of Nailsea with spurs shown off Backwell Common by developers Rubix but not shown on NSC plan. Policy LP3 needs to consult with local people on how they will use Active Travel and trains and buses not impose them as people won't find them useful and implement Safe Routes to School. Policy LP3 .Active travel routes from housing sites need to be shown on the plan since NSC places so much emphasis on it to justify building in Nailsea at the same time as meeting policy SP1. Policy LP3 does not show how people will use buses and trains more and be discouraged from using private cars.The policy is wishful thinking and ineffective. Rural Quiet lanes .NSC does not show how traffic will be managed to protect Rural "Quiet Lanes around Nailsea. Policy LP3 allows development on Youngwood Lane which will be detrimental to wildlife and effect water courses around Backwell Lake	1.Reduce housing allocation in Nailsea which will generate traffic and which will protect Rural Quiet Lanes around Nailsea and protect biodiversity... 2.Provide Active Travel plans from housing allocation sites which link up with the Station and A370. 3.Have a realistic plan to deal with traffic within Nailsea. 4.Have an effective joint transport plan with WECA that takes into account development in Nailsea and the impact of the Major Transport Scheme on traffic in Bristol. 5.Provide an effective plan to support wildlife corridors and biodiversity around Nailsea. 6.Control levels of lighting at all developments and roads to reduce impact on wildlife.	See my other comments elsewhere sent in 11/ 12/25 yesterday.	

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					Policy LP3 states that it will provide Nature Parks to mitigate loss of feeding grounds for horseshoe bats.These are insufficiently protected under this plan.The Nature Park identified by Rubix does not explain how that will be met given the impact of housing developments nearby and the planned Crossrail road. A Nature Park is a vague concept and needs to be defined by policies including lighting impacting from developments..			
Policy LP11: Transport infrastructure, allocations and safeguarding	No		No	No	The Plan is not legally compliant regarding the revised plans for the Crossrail Link/ major Transport Scheme from A370 to Station Road because it does not comply with NSC Statement of Community Involvement . Not legally compliant because the Crossrail Link was not included in the Local Development Scheme until October 2025 and evidence from traffic studies have not been consulted on properly for Nailsea. The plans for the Crossrail link/Major Transport Scheme from A370 are not legally compliant as they are developer-led and in the developers interest with badly thought out impacts on the local community.They are not in accordance with NSC core strategy CS1 and CS2 to discourage car use and encourage use of public transport and active travel. The plans are not legally compliant as there has been no consultation on the inclusion of the two Major Transport Schemes shown on the map as part of a resurrection of a major road scheme which was designed in 1960's to provide a link from M5 at Clevedon to Long Ashton dual carriageway and increase traffic flow contrary to NSC current policies to reduce traffic.This is not being consulted on .The road is aligned with a) the existing Major Transport Scheme at far end of Youngwood Lane housing development and b) The proposed Crossrail link road ends abruptly at the site for previous plans for a road and roundabout on the Backwell Lake side of Station Road which were refused by NSC on advice from the National Highways Authority in 2023.Application no.23/p/1145/OUT Not sound because it is not justified The Plan does not reduce CO2 emissions by comparison with building more houses in Ashton Vale .The Plan does not allocate a site for a railway station at Long Ashton/new development at Woodspring as proposed in earlier plans and is near a large new Epic employment site and Woodspring Housing development. The plan is contrary to WECA's plans to reduce private car use within Bristol. There will be increased traffic between Nailsea and the station and will not mitigate traffic levels in Nailsea itself due to a Major Transport Link /Cross Rail link from A370 to Station Roadwill as it will generate traffic from Bristol from A370 to Clevedon. It is contrary to the justification for building around Nailsea which is that it has good rail and bus connections within walking distance of housing. The new Crossrail link /Major transport scheme will reduce use of public transport because once people are driving they will drive to their destination and not change to use of the train.If fewer roads are built, more people will use bus and trains. Current traffic is generated largely by schools and out of term traffic levels fall.The traffic can be mitigated by active travel , new entry points to the schools, change in policy on catchment areas, change in school policies on school times, and use of buses. The proposed crossrail link is not Effective. It is being constructed piecemeal and forms part of 1960's plans for a road linking M5 at Clevedon and the Long Ashton Bypass/A370 .It will cause congestion and generate traffic in Nailsea contrary to NSC's policies regarding sustainability. Evidence for the Piecemeal Strategic Link between Clevedon and Long Ashton Bypass: A previous application including a road and roundabout on the opposite side of the Station Road by Backwell lake 23/p/1145/OUT was recommended for non approval by the National Highways Authority in 2023 due to traffic generation concerns at the same site on Station Road.This site is in the draft plan again. The proposed Major Transport Link/Crossrail link can be seen to align with the road within another agreed housing development at the western end of Nailsea on Youngwood Lane.The two proposed Major Transport Schemes on the plan's map do not join, do not end in a logical way yet can be seen to align with past proposals for a road between Clevedon and Bristol which have been shelved .They do not comply with current NPPF policies to reduce CO2 emissions and traffic reduction.This is a road being put together piecemeal and not with	To make it sound it needs to Allocate more land in Ashton Vale and close to Woodspring new development for housing. Allocate a site for a railway station near Long Ashton and Woodspring new developments Remove the Crossrail link road/Major Transport scheme proposed between A370 and Station Road. Reinstate the shared pedestrian/cycle route running between land East of Backwell and Nailsea and Backwell Station proposed in Dec 2024 plans. Delay a proportion of housing allocated for Nailsea until the next Local Plan in 2040 to allow for traffic assessments and Environmental Impacts Assessments NSC to be open and transparent and legally compliant regarding plans for any Major Transport Sceme from M5 at Clevedon to A370 .To make it legally compliant it needs to be included in the Local Development Scheme and comply with the Statement of Community Involvement to include Nailsea Town Council and residents showing the plans for a Major Transport Scheme and consulting fully on views on impact on Nailsea with officers and councillors present. It needs to consider alternatives by providing a Sustainability Appraisal in consultation with Nailsea residents. Not have NSC plans changed by sweeteners provided by RUBIX with promises of "opportunity land". Clarify how sites on Youngwood Lane will provide active travel to the station and car access without generating excess CO2 and traffic movements. NSC needs to consult with WECA regarding the Crossrail link/Major Transport Scheme and a railway station at Ashton Vale.		

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					transparency nor consultation with transport policies from 1960's. The Major Transport Schemes together need to be scrutinised by an Environmental Impact Assessment and assessed against NPPF regarding CO2 emissions , traffic reduction, sustainable transport and alternatives to the Major Transport Schemes as proposed in the draft plan. The traffic-generating Major Transport Scheme of 1960's from Clevedon to A370 appears to still be a NSC objective but is not openly planned .It is piecemeal and developer-led and is not planned in accordance with NSC Statement of Community Involvement. The Major Transport Scheme does not provide an accurate Sustainability Appraisal as traffic flow around Nailsea because the measurements are taking place in Nov/Dec after the draft plan was published in October 2025. The plans for housing adjacent to Backwell School in Dec 2024 promoted active travel and assumed no new road was needed, only a cycle /pedestrian track to the station from housing East of Backwell. The cycle track/pedestrian route is more sustainable and in line with NPPF and promotes walking and cycling to the station and will not cause through-traffic on the housing developments. The new cross-rail link will not be Effective because it will generate more traffic and private cars from Bristol through Nailsea to Clevedon. It will be detrimental to the safety of pedestrians and children through the proposed development East of Backwell. It will reduce cycling and walking between the station and Nailsea due to more traffic on the road creating a pollution and hazards. It will reduce cycling and walking to the station from the housing developments East of Backwell which is only 10minutes away by active travel; It will increase the costs to NSC due to funding for the road and mitigating the detrimental impacts listed above on Nailsea. The Major Transport Scheme will never be built as it is too costly. It will increase the costs to NSC to resist further applications and appeals by developers for housing outside the draft plan adjacent to the proposed road on Backwell Common. It will not be effective because if housing developments are built before the road is built either they will not need the road or there will be congestion for years until funding is found for this expensive scheme. The plans should be made without the influence of developers and a Major Transport Scheme should not depend on developers, which is what is happening.Rubix developers have spurs off the proposed road near to Backwell Common and outside the proposed housing areas.These spurs indicate future plans to develop these fields.The developers have offered "opportunity land" and sports fields which have not been justified.The most popular amenity is provided by country footpaths for walking.The Nature Park and sports pitches will generate the need for parking and traffic movements on Station Road adding to congestion.NSC needs to plan more objectively. It will increase traffic congestion on A370 between Bristol and Clevedon. The new road will be detrimental to active travel between the new housing estate East of Backwell as proposed by Rubix developers.The housing estate is 10 minutes to the station and A370 and would not be as effective as walking and cycling in accessing the station. There is a lack of Duty to Co-operate with WECA because the plans will generate traffic contrary to WECA's plans to reduce traffic into Bristol along A370..			

Name: Frank Cox **I.D:** 28768769

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell already has 800 new houses approved, a 40% increase for the village, with no significant improvement to infrastructure or public amenities. An additional 900 houses is a complete over-development and is not sustainable. These numbers are disproportionate with development proposals for other villages and towns within North Somerset and will totally change the character of Backwell, to its detriment. This proposal totally ignores the views of the local residents and Backwell's Neighbourhood Plan. Backwell is not an employment hub and most residents commute to work. The proposed road will not adequately serve Nailsea's traffic or relieve congestion on Station Road, Backwell Common, or Chapel Hill, and the additional junction will exacerbate congestion on the A370. Engineering the new road under or over the railway will be extremely expensive, possibly unfeasible and there is no believable or realistic delivery plan in place. The railway station is not fit for purpose as a transport hub as it remains inaccessible for people with mobility issues and presents serious challenges when travelling with young children. Backwell Common and surrounding areas are on a floodplain and prone to flooding, which would be aggravated by new development. Much of this land is Grade 1 Agricultural Land and building over it would be contrary to government policy.			

Name: Freddie Harrold **I.D:** 62576161

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Too much housing at 1817 new homes and not enough infrastructure. Surgeries are already under pressure. There are no plans to open new surgeries to cope. Roads will be busier and will not be able to cope. The proposed new road will not serve Nailsea's traffic. The new link road will be problematic. Smaller roads around Nailsea will see hugely increased traffic. Schools and doctors surgeries and leisure centre will be under huge pressure. Bats are protected species on development sites. One hundred homes adjacent to Moor End Spout will totally destroy wildlife habitats Development West and South of Backwell Lake will be on a floodplain which regularly floods. The railway station is too small to cope with influx of population.			

Name: G Britton **I.D:** 62848545

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell cannot sustain the amount of housing proposed. It already has a 40% increase of housing for what is essential a small village. The proposed road is not feasible and is highly unlikely to go ahead, making busy roads impossible to navigate. Development on this land would destroy valuable wildlife habitats and further harm biodiversity- furthermore there is only 7% of grade 1 agricultural land left in the whole of North Somerset. Backwell has one secondary school, one primary school, one GP practise, one dentist etc. There is absolutely no way that the village can sustain these additional residents. It is unreasonable that Backwell takes 7% of the districts housing as it is such a small village with limited resources, unlike other nearby towns such as Clevedon. Backwell is prone to flooding which will be aggravated by the new developments. The lake at Backwell has flooded so badly in the past that the water has reached people's knees - the new developments will only exasperate the situation. There is no way thag Backwell can take these housing demands- they are destabilising, unsustainable and undeliverable.			

Name: G D Brassington **I.D:** 51099969

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No		Unsure	Unsure	This plan is NOT SOUND for they following reasons: There are already 794 new houses either approved or under construction in Backwell yet 1,000 new houses are proposed on Backwell East which is Grade 1, Greenbelt currently used for food production which completely contradicts government policy which states that “use must protect our best and most versatile land” to safeguard food security. There is no needs or viability analysis for these extra houses. In addition 582 houses are proposed next to Backwell Lake which although is in Nailsea, access will be on Station Road, an already congested road which will have a very serious negative impact on the whole of the Backwell Common area. A new road is proposed for this area but its purpose lacks any details, plans, feasibility study, costings or funding. This level of development would mean an 80% population growth completely changing the character of the village but no social cohesion impact assessment has been provided. There are no proposals to tackle the deficit in school places, no investment in health services, no improvements to infrastructure or services to support any of the proposed or approved new houses. The destruction of valuable wildlife habitat and further harm to biodiversity, in particular the threat to the Brockley Maternity Roost and SSSI with rare bats is not taken into consideration. Backwell East and surrounding areas are prone to flooding which would be aggravated by more housing. This local plan with its sheer volume of growth, necessary investment in infrastructure and services over such a short period and given the dire financial straits the local authority is in, is destabilising, unsustainable and undeliverable.			

Name: G Davies **I.D:** 62865825

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP1: Sustainable Development	Yes		Yes	Yes				
SP2: Climate Change	Yes		Yes	Yes				
SP3: Spatial strategy	Yes		Yes	Yes				
SP4: Placemaking	Yes		Yes	Yes				
SP4: Placemaking	Yes		Yes	Yes				
SP5: Towns	Yes		Yes	Yes				
SP6: Villages and rural areas	Yes		Yes	Yes				
SP7: Green Belt	Yes		Yes	Yes				
SP8: Housing	Yes		Yes	Yes				
SP9: Employment	Yes		Yes	Yes				
SP10: Transport	Yes		Yes	Yes				
SP11: Historic and natural environment	Yes		Yes	Yes				
SP12: Minerals	Yes		Yes	Yes				
SP13: Waste	Yes		Yes	Yes				

Name: G Ezulike **I.D:** 62865185

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I believe that North Somerset Council has NOT justified the inclusion of building nearly 1,000 houses on Backwell’s Green Belt or the nearly 600 houses in Nailsea next to Backwell Lake.			

Name: G Faulkner **I.D:** 62755649

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Youngwood Lane	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	A proposed figure of over 1800 houses would overwhelm this small town which has already been heavily developed in recent times. Traffic congestion would be increased leading to more accidents and the current health education transport and leisure facillities would collapse under the increased demand. There is inadequate provision in the Plan for any of the issyes above in the Plan and it must bw rejected as defective.			

Name: G Hone **I.D:** 62503745

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Pill Green	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	I want to object to plans for several reasons; 1. Traffic is already terrible going towards m5 and down into Bristol during rush hour or after an accident. More houses here would cause chaos. 2. No assessment of brownfield alternatives to pill. Eg reg 12/2024 brownfield register 2800+ ignored 3. No duty to cooperate on bristols 8000 unmet need eg no statement of common ground and unilateral 1100 home dump in pill/ Easton in gordano. 4. This has been identified as high performing agricultural land with no sequential test therefore green belt exceptional circumstances not evidenced NPPF 147 5. In relation to traffic, there’s no delivery plan therefore it’s ineffective and undeliverable. 6. The 44% extra population is disportionate and unjustified. We are a very tight knit community in pill and live here because of this. We have 2 shops and a post office and 1 chemist which would not be able to cope with the increase of population. There’s already queues and can get very busy during rush hour times. Extra population would cause many issues and services would not be able to provide (eg doctors) for this increase. 7. Concerned about drainage. Water runs behind site at the back of Davin crescent and crockerne drive when rains heavily and goes into a stream into brookside. Concrete and buildings could result in more water causing floods. Or if lots of draining systems could result in lack of water and stream and water flows through pill drying up.	Delete pill green site from lp8 schedules. Allocations in a small village of less than 10000 people should not have a 5% increase of population from any single site.	N/a	

Name: G Macpherson **I.D:** 32520929

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	Unsure		No	No	The plan was not exhibited in the area this impacts, will 600 homes at Pill Green alone. Response rate was low in this area, so local residents here are underrepresented. The local M5 junction is already extremely congested, this will add to that with no consideration given and impact all local residents. National Highways report stated that transport modelling is required to assess the cumulative impact of developments on Junction 19.	Consultation with local residents for LP4. Proper assessment of J19 impact. Consideration of other sites in		

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					The area around Markham Brook in Pill has a recognised flood risk, so a lower risk area should be considered first.	the county to avoid placing more homes in high risk flood areas. Associated reduction in housing numbers for LP4 to address the above points.		

Name: G McCall **I.D:** 62819649

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	1. Backwell has already been allocated a higher number of houses than any other village in north somerset and even a higher growth percentage than towns. Backwell should not be expected to take 7% of the district's housing allocation compared to Clevedon's 2%. 2. Backwell already has 800 new houses approved, a 40% increase for the village. Additional developments would be a complete overdevelopment for the area. 3. Commuter traffic is already becoming a disaster. No businesses are in the area so all traffic runs through the area. Commuting to Bristol City Centre or Clifton can take over an hour in peak times already (for only 8 miles of driving). 4. There is a severe short supply of green space following the latest round of developments. 5. Any further development on these fields would be destabilising, demoralising for longstanding residents who love the area, unsustainable and completely unjustified. 6. Schools, surgeries, railway station would all be overrun by yet more housing in this area. 7. There is no viability analysis for extra housing here. 8. The proposals threaten wildlife habitat, Brockery Maternity Roost and SSI. 9. There will be higher risks of flooding with further development here.			
Farleigh Fields, Backwell	Unsure		Unsure	Unsure	1. I fully agree that the 2 fields exceptionally warrant LGS designation and that they have exceptional importance to the setting of the grade 1 listed St Andrews Church and public access. My comments below are only in support of protecting the fields from any future development. 2. The nearby roads to these fields are country lanes, many with blind corners and would simply break down if any further housing was entertained in this proximity. 3. Backwell has already been allocated a higher number of houses than any other village in north somerset and even a higher growth percentage than towns. Backwell should not be expected to take 7% of the district's housing allocation compared to Clevedon's 2%. 4. Backwell already has 800 new houses approved, a 40% increase for the village. The 2 fields in question must be protected at all costs as the area could not take any further development. 5. Commuter traffic is already becoming a disaster. No businesses are in the area so all traffic runs through the area. Commuting to Bristol City Centre or Clifton can take over an hour in peak times already (for only 8 miles of driving). 6. There is a severe short supply of green space following the latest		I fully agree that the 2 fields exceptionally warrant LGS designation and that they have exceptional importance to the setting of the grade 1 listed St Andrews Church and public access. My comments above are only in support of protecting the fields from any future development.	

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					round of developments. Following Farleigh fields and the dark lane development, it is imperative we retain the T shaped green space. Further development in these fields would destroy wildlife habitats and further harm biodiversity. 7. The access routes provided by these 2 green fields allows people to navigate the area on foot (saving traffic congestion and keeps dog walking safely off roads). 8. The character of the area would be substantially destroyed without the preservation of this green space, the church is iconic with the green fields behind and Backwell would lose its identity without this vignette. 9. Any further development on these fields would be destabilising, demoralising for longstanding residents who love the area, unsustainable and completely unjustified. 10. Schools, surgeries, railway station would all be overrun by yet more housing in this area.			

Name: G Murdoch **I.D:** 30789793

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The government requires safeguarding of food security. This development would destroy quality agricultural, green belt land. Once lost, top soil for agriculture requires a minimum of nominally 2500 years (100 human generations) and a nominal maximum of 16,000 years to regenerate, Either figure is beyond contemplation. The UK is not self sufficient in food (2025). Attempts to increase production on what land is left to compensate for the loss is unrealistic. In 2017 a past government representative stated that there could be as few as 30 – 40 years before some of UK's farmland would be degraded beyond fertility. Imported food is not secure. Thus anyone, irrespective of any policy, who promotes the destruction of productive farmland and thus putting food supply at serious risk is guilty of wilful recklessness.. Further destruction of farmland must not happen. Public transport is heavily promoted by government to assist in decarbonising the environment and reducing road congestion.. Backwell is not a source of employment thus housing developments in Backwell will be dormitories and simply increase the number of commuter journeys on local roads. Inevitably many of these journeys will be in private cars. The impact of traffic generated by the proposed new road on the public transport along the A370, in particular, will be to increase bus journey times but also add to polluting stationary traffic particularly approaching junctions and intersection. Similarly the 'school runs' will be even more chaotic than at present with all the associated pollution generated by private cars. It is noted that considerable Government funding has been provided to improve public transport, The proposed development and new road would considerably diminish the impact of those improvements by increasing congestion and journey times. Thus the the government money spent on improvement would be simply have been a waste. Impact on the community and character of Backwell. Backwell has a well developed community which has evolved naturally while modest development has historically taken place and adsorbed into the community, The proposed development is very large in proportion to the existing size of Backwell and would, if permitted, not only change the character of Backwell but swamp the evolved community spirit, amenities and services. Large sudden housing developments have proven to produce bland, dystopian unban cultural deserts. Such would destroy Backwell.			

Name: G Rich **I.D:** 62861697

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	It destroys ancient woodlands, removes Green belt land and traffic will double our village overnight.	Delete LP4 and limit to small homes on non-Green belt sites.		
Land at Farleigh Farm	No		Unsure	Unsure	I am unable to couch my comments in any official way, but I wish to make clear in the strongest possible way the exponential growth of anger at the Council by the residents of Backwell at the unremitting attack on the village. It must by now be clear that the ‘village’ has been changed beyond all recognition and has no more ability to absorb the continuing bombardment of development. Your claims that we are ‘sustainable’ because we have a limited use railway station and a bus service do not in any way justify the huge population growth you ascribe to us whilst ignoring other, just as or even more, suitable locations. This latest proposal from a developer looking to make even more profit from what was a desirable place to build is the final nail in the coffin of what was once a thriving community and is, in your opinions, more suited to be a town albeit one without the necessary infrastructure of school places, sufficient medical facilities or shops. We wait, with bated breath, as we have waited for the last thirty years, for a new road and the chances of this one being built considering that it has to cross a railway and ground once prolific in coal production are even more remote. Others, more knowledgeable than I, will doubtless respond with scientific and legal reasons why this is a step too far - I can only speak with the anger and resentment that I, and many, many others in the village feel at your total lack of respect or understanding of our feelings in favour of taking the easy way out.			

Name: G Thomas **I.D:** 14824097

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell						This is the fourth recent Local Plan the local residents have had to comment on and it does seem that the comments made by the Community have again been ignored. The Plan is entirely driven by Central Government specifying the amount of residential development they require to be built whilst they have a complete lack of data on which to base it. With the level of illegal immigration over recent years, the Government have no accurate information on the current population and its potential growth. There is already substantial housing construction in North Somerset and all over the country with virtually no infrastructure improvements and locally there seem to be immigrants moving into the houses just built in the community and not blending in with the local population – people have seen them standing in their gardens, looking into their windows or playing on their drives. Concentrating mainly on Nailsea/Backwell area :- The Plan shows virtually no infrastructure plans which are essential before any more housing is planned. In Nailsea and Backwell, the only new road proposed in the Plan runs from the A370 through to Station Road which links Nailsea and Backwell. This would be madness as Station Road is already beyond capacity – the Planners and Planning Inspector should visit and see the volume of children walking daily from Nailsea to Backwell Comprehensive with Backwell schoolchildren walking the other way to Nailsea School the numbers of which force some children to walk in the road. How this new road could be built is a mystery as it crosses the mainline railway to London and the Southwest – at the existing bridge, the road cannot be lowered or widened as it already floods trapping one vehicle last winter and the railway line cannot easily be raised especially so close to the station.		

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					Schools are already at capacity or beyond, roads are the same as are doctors surgeries and dentists whilst the leisure facilities are minimal with the swimming pool building at the end of its life. The plan involves the breakdown of the Green Belt with the loss of agricultural land. How does this relate to Government policy for food security ? Much of the land is very low lying and if the Government are concerned about global warming and rising sea levels then developments proposed in the Plan would be stupid. Water supplies and drainage are unlikely to cope with all the proposed development that has already been given planning consent before the additional schemes added in this Plan. There is limited employment in Backwell and Nailsea so that the roads across North Somerset will face even more commuters and congestion which has been made worse by the Council's bus lanes, especially on the Long Ashton by-pass where it is rare to ever see a bus in the bus lane. The one bus I saw was in the only remaining lane as there was a cyclist in the bus lane. We now have an empty bus lane and a lost commuter lane. One infrastructure that should now be done before any more developments are even considered is building a link from the end of the Long Ashton by-pass to the empty junction on to the M5 at Clevedon. This would relieve the traffic through Cleeve and Congresbury to the south and Wraxall and Tickenham to the north plus on Station Road linking Backwell with Nailsea as well as all the narrow lanes around Nailsea /Backwell which have become "Rat Runs" – we used to cycle around them but they are not now safe. The proposed extra housing development shown on the draft plan is disproportionate for Backwell and Nailsea with population growth of 55 % for Nailsea and 80 % for Backwell compared with Clevedon 6%, Portishead 14% and Weston 22%. This is totally unbalanced. Housing is proposed to the south of Nailsea which eats into the farmland which provides the separation barrier between Nailsea and Backwell and butts onto the wildlife area around the lake where any development would destroy a very tranquil wild life area and bat habitat. The Station at Nailsea/Backwell is well used by commuters but the access can't cope with disabled people from Bristol who have to get off at Yatton and travel back to be able to get off on the side where there is a ramped access. The Station car park is full with additional cars parking in residential roads following the introduction of parking charges. The number of trains and carriages are not enough for the current commuters let alone any more. The introduction by North Somerset Council of parking charges in the centre of Nailsea will result in even more local shops closing as people will be going to The Mall which is near and has ample free parking. Also the future of the supermarkets becomes more uncertain. It has also resulted in more street parking around the Town so that for example two buses can't pass on Mizzymead Road and other roads have become more congested. The Plan is not fit for purpose.			

Name: G Wild **I.D:** 51462785

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent	Unsure	Unsure	Formal Objection to NSC Reg 19 Local Plan 2041 – Backwell I strongly object to the proposed development and strategic growth allocation for Backwell within the NSC Reg 19 Local Plan 2041. The scale, speed, and location of growth are entirely unsustainable, unjustified, and harmful to the village, its residents, and the surrounding environment. 1. Extreme and Unsustainable Scale of Growth			

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		with national policy			Backwell already has 800 homes approved, representing a 40% increase in population. The Plan would impose a further 1,000 homes, amounting to an 80% total expansion over a short period. This volume of growth is destabilising, undeliverable, and completely inappropriate for a rural village. Backwell is being allocated more houses than any other village in North Somerset, and even a higher growth percentage than some towns. It is expected to take 7% of the district's total allocation, compared to Clevedon's 2%. This is a disproportionate and unfair burden. 2. Inadequate and Unfunded Infrastructure There is no funded plan to provide the infrastructure required to support such large-scale development. Schools: There is already a deficit in school places, with no planned investment. Most new families would have to drive children elsewhere, worsening congestion. Health services: Backwell surgery is at capacity, and the Plan includes no new medical provision. Leisure facilities: Existing facilities are tired, stretched, or charity-run, with no enhancements proposed. Transport: The railway station is inaccessible, unsuitable as a transport hub, and does not serve the majority of commuting destinations. The Infrastructure Delivery Plan is unanalysed, uncosted, and unfunded, with no clarity on who will pay. 3. Road Proposal Is Damaging and Likely Unfeasible The proposed bypass road intended to divert traffic from Backwell village centre: Cuts through Green Belt farmland, wildlife habitats, and the floodplain. Is unfunded, with no guarantee it can be delivered on time (or at all). Would require major engineering to pass under or over the railway, which may be financially or technically unfeasible. Would not relieve congestion on Station Road, Backwell Common, or Chapel Hill. Placing a major road adjacent to Backwell Lake would destroy its tranquillity and threaten surrounding habitats. 4. Traffic and Commuting Pressures Backwell is not an employment hub, so almost all new residents would be commuters. This guarantees: Significant increases in traffic at all times of day Far worse congestion, especially at pinch points Long-term disruption during the 10+ years of construction 5. Loss of High-Grade Agricultural Land and Food Security The development would permanently destroy Grade 1 agricultural land, of which only 7% remains in North Somerset. Government policy requires protecting the "best and most versatile land", yet this Plan directly contradicts that principle. Once this farmland is lost, it cannot be replaced. This undermines local food production and national food security.			

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					6. Severe Environmental and Biodiversity Harm The proposed areas include critical wildlife habitats, peaceful green corridors, and land used by rare and endangered species, including the Lesser and Greater Horseshoe Bats associated with the Brockley SSSI and maternity roost. Development would: Sever wildlife corridors Destroy biodiversity in one of the world's most nature-depleted countries Interrupt feeding patterns of protected bat species Remove large areas of Green Belt that currently preserve landscape character and ecosystem function 7. High Flood Risk Ignored Much of the proposed development lies on or adjacent to flood-prone land, particularly around Backwell Common, the valley bottom, and the fields south of Backwell Lake. Significant additional hard landscaping will: Increase flood frequency Put new homes at direct risk Exacerbate downstream flooding Reduce natural water absorption from existing farmland 8. Harm to Village Character and Community The cumulative impact of an 80% population increase would overwhelm Backwell's rural character, replacing open countryside with dense housing and new roads. Community cohesion would be eroded as local schools overflow, traffic increases, and the village expands beyond recognition. No social cohesion impact assessment has been provided. 9. Lack of Justification or Evidence There is: No proven local need for 1,000 additional homes No viability analysis No evidence that the housing mix meets the needs of older residents wishing to downsize A dominance of 3–5 bedroom homes, rather than the smaller, affordable units the community actually needs 10. Affordable Housing Requirements Not Met Although Government policy requires 50% affordable housing on Green Belt land, developers have shown no willingness to meet this target, and the Plan includes no enforcement mechanism. Reduced contributions will further weaken funding for essential infrastructure.			

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					--- Conclusion The proposed strategic growth in Backwell is excessive, unjustified, unfunded, environmentally destructive, and impossible to deliver responsibly. It contradicts national policy, threatens food security, undermines biodiversity, and imposes disproportionate harm on one village for the benefit of developers—not the community. The Local Plan, as it applies to Backwell, must be rejected.			

Name: G Witcher **I.D:** 62777665

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Nailsea and Backwell should have Green belt land between them. The plan is for land of special interest as it is flood plain land with interesting wild life and not suitable for housing. The proposed new road would be liable to flooding and is unnecessary.			

Name: G Yule **I.D:** 58650337

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Strategic Policies	Yes		Yes	Yes				

Name: GR Norman **I.D:** 62718689

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Justified • Effective • Consistent with national policy	No	No	Portishead is a small village that has expanded as the number of residents has increased, but the infrastructure (roads, schools, dr surgeries, NHS dentists) has not been delivered. Any accident on the M5 or A369 means there instant traffic chaos and gridlock, with the B-roads unable to cope with the volume of traffic that is much greater than when the B-roads were built to cope with. This proposal for 400 homes will add 1,000 approx new cars to local roads, and remove key scientific and ecological landscape, dramatically affecting wildlife that depends on the site. Nature is under threat in North Somerset and this proposal threatens the future of critically important sites for nature, including Weston Big Wood SSSI. This development threatens existing ecological networks, including the loss of Green Belt, by damaging the critical connections between international, national and locally designated sites, and through significant loss of the corridors and stepping stones that connect these sites. Key Reasons to oppose: Opportunities to increase housing density on proposed brownfield sites, which could remove the need to develop Tower Farm and Black Rock. • The strategic ecological importance of these sites in protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor.			

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					• The fact that both areas were added to the Green Belt in the late 1980s due to their high ecological value. • National planning policy allows Green Belt changes only in exceptional circumstances — and these have not been demonstrated. In addition: • Neither site can provide safe or suitable access. • Development would create unacceptable transport impacts, failing national soundness tests. Do not build on Tower farm. Find an alternative brownfield site, with existing amenities and road connections in place, for example the fields around Failand offer, without the risk of flooding. For these reasons, Tower Farm and Black Rock should be removed from the Local Plan. I do not support this proposal.			
Black Rock, north of Clevedon Road	No	‣ Justified ‣ Consistent with national policy	No	No	Portishead is a small village that has expanded as the number of residents has increased, but the infrastructure (roads, schools, dr surgeries, NHS dentists) has not been delivered. Any accident on the M5 or A369 means there instant traffic chaos and gridlock, with the B-roads unable to cope with the volume of traffic that is much greater than when the B-roads were built to cope with. This proposal for new homes will remove key scientific and ecological landscape, dramatically affecting wildlife that depends on the site. Nature is under threat in North Somerset and this proposal threatens the future of critically important sites for nature, including Weston Big Wood SSSI. This development threatens existing ecological networks, including the loss of Green Belt, by damaging the critical connections between international, national and locally designated sites, and through significant loss of the corridors and stepping stones that connect these sites. Key Reasons to oppose: Opportunities to increase housing density on proposed brownfield sites, which could remove the need to develop Tower Farm and Black Rock. • The strategic ecological importance of these sites in protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor. • The fact that both areas were added to the Green Belt in the late 1980s due to their high ecological value. • National planning policy allows Green Belt changes only in exceptional circumstances — and these have not been demonstrated. In addition: • Neither site can provide safe or suitable access. • Development would create unacceptable transport impacts, failing national soundness tests. For these reasons, Tower Farm and Black Rock should be removed from the Local Plan. I do not support this proposal	Opportunities to increase housing density on proposed brownfield sites, which would remove the need to develop Tower Farm and Black Rock. Build a new town in North Somerset that has infrastructure build in from the start as opposed to adding on to places		

Name: Gail Scott-Wilson **I.D:** 62772609

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Land south	No	‣ Positively	Unsure	Unsure	We have lived in Stone Edge Batch for 21 years and are fully aware of the increase in the volume of traffic in the Tickenham area. We live on the corner where the B3128 meets the B3120.			

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of Nailsea		prepared • Justified • Effective • Consistent with national policy			The B3130 at this junction is single lane. We witness on a daily basis pentaclicans blocking the road and creating jams on Tickenham Hill and Clevedon Road. We hear cyclists screaming abuse at motorists who are so frustrated they almost run them over and emergency services - yes, ambulance, police and fire services - they're all here - and oh then we have the double decker buses. All of this impacts hugely on our quality of life. We have to stop conversation in the garden because of the traffic noise and the house rattles as lorries head for the junction. When I let the dog it at night diesel fumes fill the air. It is abundantly clear from where we live that the roads are unsuitable for these lorries and double decker buses and further increase in traffic if more houses are to be built the added volume would be disastrous.			

Name: Gamble-Beresford **I.D:** 39376769

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	1. Overdevelopment of Backwell: Backwell has already had 800 new houses approved, representing a 40% increase in the village's size. This additional development would result in a total increase of approximately 60% in the village population. Such significant growth in such a short space of time risks overdevelopment, and threatens to undermine the character of the area, the local environment, and the quality of life for existing residents. 2. Inadequate Transport Infrastructure: The proposed new road to relieve congestion on Station Road, Backwell Common, and Chapel Hill does not effectively address the traffic problems currently faced in the area. Engineering a solution to bypass the railway would likely be prohibitively expensive and possibly unfeasible. The existing road network cannot cope with the projected increase in traffic without a significant, costly, and potentially unachievable upgrade. 3. Deficit in Local Services and Infrastructure: Despite the approval of 800 new homes, there remains a deficit in local school places, healthcare services, and leisure facilities. There has been no indication that these services will be sufficiently expanded to accommodate the proposed 1,000 additional houses. The infrastructure is simply not in place to support this level of growth, which places further strain on essential community services. 4. Disproportionate Housing Allocation: Backwell is already allocated a disproportionately high percentage of new homes for North Somerset, representing 7% of the district's housing allocation, compared to Clevedon's 2%. This puts an undue burden on the village, both in terms of infrastructure needs and the preservation of the rural character of the area. 5. Lack of Needs and Viability Analysis: There has been no clear needs or viability analysis for an additional 1,000 houses in Backwell. It is unclear why such a large-scale development is required, and whether it is financially feasible or necessary to meet the district's housing targets. 6. Employment and Commuting Issues: Backwell is not an employment hub, and the majority of its residents currently commute to other areas for work. The proposed development does not address the need for local employment opportunities, which means the growth would result in even higher levels of traffic congestion, further increasing the strain on local transport and infrastructure. 7. Impact on Social Cohesion: There has been no social cohesion impact assessment for this development. A large-scale housing project of this nature can have a detrimental effect on the social fabric of the community, creating isolation and reducing the sense of belonging for both new and existing residents. 8. Loss of High-Quality Agricultural Land: The proposed development would take place on Grade 1 agricultural land, which is currently used for food production and grazing. This is some of the best land left in North Somerset, with only 7% of such high-quality agricultural land remaining in the area. Government policy clearly states that we must protect our best and most versatile land to safeguard food security, and this proposal runs contrary to that objective. 9. Threat to Biodiversity: The development would destroy valuable wildlife habitats and further harm biodiversity in one of the world's most nature-depleted countries. The Brockley Maternity Roost and Site of Special Scientific Interest (SSSI) are located nearby, and the proposed development threatens the habitats of rare Lesser and Greater Horseshoe Bats, which rely on this land for food. 10. Flooding Risk: Backwell Common and surrounding areas are prone to flooding, and the development would exacerbate this issue. In			

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					addition, Backwell Lake (Reservoir) and the adjacent fields are located on a floodplain and regularly flood. The development in such an area raises serious concerns about flood risk, both during construction and in the long term. 11. Concerns About Greenbelt and Infrastructure Funding: The designation of this area as a strategic growth location raises concerns about the loss of Greenbelt land, high-quality agricultural land, and the potential for flooding. There is also uncertainty over whether the proposed road and associated infrastructure can be funded and delivered in a timely manner to support the development. 12. Affordable Housing and Impact on Infrastructure Contributions: Government policy requires 50% affordable housing on Greenbelt land, but this reduces the funds developers contribute towards infrastructure. This is a serious concern, as the existing infrastructure needs, such as transport, schools, and healthcare, would remain unmet. 13. Unsustainable Growth: The sheer volume of proposed development and the required investment in infrastructure and services within such a short timeframe is destabilizing, unsustainable, and ultimately undeliverable. The long-term impact of this scale of development would be profoundly damaging to the community and its existing residents. 14. Inadequate Transport Infrastructure: The Backwell railway station is not fit for purpose as a transport hub. It remains largely inaccessible for people with mobility issues, and presents serious challenges for those traveling with young children or heavy luggage. Without significant investment in the station and transport links, the increased demand from a 1,000-home development cannot be adequately accommodated. Given these significant concerns, we strongly urge the planning committee to reconsider this application. The proposed development, as it stands, is not in the best interests of Backwell's current and future residents, nor is it sustainable from an environmental, infrastructural, or social standpoint.			

Name: Gareth Morgan-Schulz **I.D:** 30658241

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	This plan disproportionately allocates housing to Backwell. Backwell already has 800 houses allocated to it, a 40% increase to the village. Policy SP3 - Spatial Strategy - states, "Most of the development which takes place in these areas will be at the relatively more sustainable villages, but this must not be of a disproportionate scale which adversely impacts on the character of the settlement or leads to a significant increase in the number of car journeys", yet this plan is proposing an increase of 80% in population for Backwell, a change that will have a significant impact on the character of the village and vastly increase the volume of traffic. The proposed road would not effectively serve Nailsea's traffic, or relieve traffic on Station Road, Backwell Common or Chapel Hill. The proposals for Active Travel Routes will not have a significant impact on the increased traffic in Backwell, as the principle places of work are beyond cycling distance for most people. Policy DP53 refers to BMV grade 1 land as a "finite resource [that] will be safeguarded from development to ensure its long-term potential for food production and to protect the soil resource", yet this plan proposes to add over 800 houses on grade 1 agricultural land. Development would also destroy wildlife habitats and harm biodiversity. There is no need or viability analysis for the extra houses allocated to Backwell.			

Name: Gary Barnes **I.D:** 21226753

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively	Unsure	Unsure	I am concerned at the proposed loss of grade 1 agricultural land. My understanding is that planning decisions on this point are based on the outdated ALC (Agricultural land classification) which uses rainfall data from 1941 to 1970 and temperatures from 1961 to 1980. This outdated data could result in significant	A reassessment of the impact on grade 1 agricultural land. The "Natural England" -		

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		prepared • Justified • Effective • Consistent with national policy			misjudgement of the impact on the UK's "Food security". Government policy says we should protect our Best & Most Versatile land. This planning proposal seems to be remarkably at odds with government policy. More generally I consider the plan to be unsound based on the impact that the 800 approved new houses will have on Backwell as a village let a lone the prospect of another one thousand new homes. A development on this scale will destroy Backwell's character & create a soulless dormitory town. There is inadequate car parking in Backwell at present for the local shops. An influx of an additional 1000 homes based an occupation rate of 2.3 people per household equates to a population increase of 2300. Add the approved 800 new homes & this totals 2300 + 1620 = 3920. Can the village infrastructure, schools, health centre, dentists etc withstand growth on this scale?	Guide to assessing development proposals on agricultural land dated 5 February 2021 is clearly flawed. I consider the other items mentioned to be more a case of why don't you use common sense? rather than being politically compliant!		

Name: Gary Neale **I.D:** 62853377

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	There are too many houses being built in Backwell already. If any more are approved it will overwhelm the village. Any more houses will add more pressure on the local doctors making it very difficult to get appointments. We shouldn't be building on our agricultural land. We need to keep this for local food production. We need to keep this land to provide a habitat for wildlife.			

Name: Gayle Bennett **I.D:** 62865761

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Justified	Unsure	Unsure	This plan is not justified as it will adversely affect Ancient Woodland and its ecosystem/ inhabits . The extra volume of traffic from both sites will have to go through North Weston Village causing congestion and chaos. This route of traffic will cause significant risk to the public accessing Gordano School and St Joseph's School. There is also not enough school places and doctors as it stands, so to increase any more housing in these two areas will be detrimental to Portishead's current population.			E370E743-EB48-409B-9E9F-575BCA9593BC.jpeg IMG_4672.jpeg IMG_2011.jpeg 65654616-D6FF-46A6-AE1F-C9041C8BC41B.jpeg
Black Rock, north of Clevedon Road	No	• Justified	Unsure	Unsure	This plan is not justified as it will adversely affect Ancient Woodland and its ecosystem/ inhabits . The extra volume of traffic from both sites will have to go through North Weston Village causing congestion and chaos. This route of traffic will cause significant risk to the public accessing Gordano School and St Joseph's School. There is also not enough school places and doctors as it stands, so to increase any more housing in these two areas will be detrimental to Portishead's current population.			

Name: Geoff Ellis **I.D:** 62598145

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified	Unsure	Unsure	The proposed development represents an unacceptable intrusion into the Green Belt, land specifically protected to prevent urban sprawl and preserve the character of our rural communities. Building on this land undermines long-standing planning principles and permanently destroys natural space that cannot be replaced. Once the Green Belt is built on, it is lost forever, and this application sets a dangerous precedent that threatens the very identity of our local landscape.	A significantly smaller development - no more than around 20% of the size currently proposed, focused primarily around South Field Farm on higher ground, extending to the school,		

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		• Effective • Consistent with national policy			This development also proposes far too many houses for a village of this size. People chose to live here precisely because it is a village, a small, close-knit, rural community. Forcing a large-scale housing estate onto this environment will destroy the character that residents have invested in and fought to preserve. It risks overwhelming local services, altering the social fabric, and disrupting the quiet, safe environment that defines our home. Furthermore, the area already has a substantial number of new builds approved or in progress. Adding yet another development is completely disproportionate and ignores the cumulative impact these projects have on infrastructure, traffic, schooling, and medical resources. The community is already stretched, and continuing to add more housing without addressing these pressures is irresponsible and unsustainable. Most concerning of all, this land is prone to serious flooding. The village floods every year, with Chapel Hill regularly underwater and closed twice in just the past week alone. The proposed site sits at a low point in a large valley, meaning any new hard surfaces or drainage disruption will inevitably push even more water downhill—toward existing homes. If our property floods as a result of this development, who is accountable? Who do we sue when preventable damage occurs because decision-makers ignored clear environmental risks? This application is fundamentally unsafe, inappropriate, and incompatible with both the geography and the character of the area. Approving it would not only endanger existing residents, but also permanently and unnecessarily destroy the countryside that the Green Belt exists to protect.	would be far more acceptable.		

Name: Geoff Lister **I.D:** 62808481

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	P40 SP10 NSC has little influence over any rail or rapid transit facilities and, given the unreliable bus service, little influence over First Bus. At the Nailsea & Backwell railway station, there is no disabled access to the west-bound platform. There are no direct public transport routes from Nailsea to Bristol Airport, or WSM. From the southern half of Nailsea, it is quicker to walk to the railway station, than it is to walk to a bus stop for the hourly X7 bus. P65 LP3 3500 houses but proposed relief road unlikely to be built, and certainly not before more housing. Proposed road leads towards already congested Cumberland Basin interchanges, and away from M5, M4, central/north Bristol, WSM and routes southwards. Previous plans have included a relief road from the west of Nailsea to the eastern side of the M5 J20 roundabout. I believe that this should be included. P269 “Land South of Nailsea”, 582 houses with likely access via The Perrings. This road already requires all traffic to access Queens Road, and traffic from recent new housing is already causing significant egress problems from all road junctions to the south of Queens Road. Queens Road effectively isolates the south-west quadrant of Nailsea from the rest of the town. There are no continuous pavements along Queens Road, so pedestrians have to cross using small traffic islands. The recent reduction in speed limit, from 40 to 30 MPH has changed the traffic spacing, making it even more difficult to cross safely.			

Name: Geoff Wells **I.D:** 21457153

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared	No	Unsure	The LP would involve doubling the size of Backwell, which would ruin its character.. The heart of the village is not capable of handling this increase in terms of parking, traffic and facilities . There is little employment in Backwell - this will add to the time, expense and pollution spent in commuting . Much is made in the LP of our railway station. This is very inaccessible, with steep steps on the Weston bound side and no ramp. Those with a	Make the process of commenting much easier. Do not add nearly 2,000		

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		• Justified • Effective • Consistent with national policy			disability or a push chair are not able to use it. The process of commenting on the LP is so complicated that most residents are not able to cope with the technology - this is not democratic. The response from the process 2 years ago was evidence of this with a negligible turn out. NSC CANNOT CLAIM TO HAVE CONSULTED !! Using our best agricultural land for housing should not happen.	houses to double the size of Backwell. Choose a better location near Ashton and S Bristol The transport implications for Backwell have not been thought out or costed. Putting so many houses in Backwell will spoil the village and cost a small fortune to do a crossing of the railway,		

Name: Geoffrey Connock **I.D:** 31069121

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Poplar Farm, Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Local Plan for Nailsea and Backwell: General comments Introduction: I detail below why I believe the draft Local Plan for Nailsea and Backwell as a whole is unsound. Please note any reference below to ”Local Plan” or “Plan” relates to Nailsea and Backwell only. At the end, I summarise how my comments in respect of the Local Plan for Nailsea and Backwell relate specifically to the Poplar Farm development. Housing: Given the current size of Nailsea (and the limited road access, see below), an increase of 1817 houses represents overdevelopment. If such overdevelopment takes place, there will be a significant population growth. However, the Plan does not come to terms with the necessary level of roads, facilities, schools, services etc which need to created either in advance of, or alongside it. Transport and Roads: Active travel and sustainability are “buzz” words used by North Somerset Council (NSC). However, despite these admirable objectives, the fact still remains that until there is properly funded, safe, clean, well maintained, reliable, frequent public transport services with easy access as well as appropriately placed cycle paths, people will still resort to cars, not necessarily fossil fuel driven, but powered by electric, sustainable fuel, hydrogen or whatever is the most commercially available over the next few generations. Therefore, a massive improvement in roads is one of the most important issues when considering any development in Nailsea. Firstly, the proposal in the Plan for a new road is woefully inadequate. Indeed, from cost and engineering perspectives, this may become too difficult to build. In essence the Plan with regard to housing will increase the volume of traffic in and around Nailsea. Furthermore, the Plan’s proposed increase in houses in Backwell will inevitably have a significant impact on the traffic coming through Nailsea to the M5. There is also the matter of the doubtful quality roads in and around Nailsea and below are the current shortcomings drivers of all vehicles face: 1) Access to the centre of Nailsea, via Station Road, already busy. 2) Access to Clevedon and Junction 20, M5 via the busy Tickenham Road and Clevedon Road and/or by narrow rural roads with no pavements (The Causeway, West End Lane, Netherton Wood Lane). 3) Access to Junction 19 of the M5 from Nailsea via the narrow Stone Edge Batch (even now not fit for purpose) to the Failand Road and left at the notorious junction with Portbury Lane. Alternatively, instead of Stone Edge Batch using the			

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					narrow, twisting Wraxall Hill. 4) For commuters needing to drive to Bristol, as many do, it's a choice between Station Road to Backwell (A370), the already busy and occasionally narrow Wraxall Road or Failand Road. Wherever a driver needs to go, none of these options, notably at peak times, are particularly desirable and this is before vast developments in Nailsea and Backwell are built. Rural roads are the most concerning: as aforementioned, they are narrow with no pavements. They are also poorly maintained, well used by agricultural equipment, car and van drivers taking a quicker route to the M5, houseowners in the country as well as cyclists, horse riders, pedestrians and dog-walkers. Given these are currently well used roads, imagine the impact on those roads with buyers of new houses driving on them as well. Please note, when the M5 was closed on 1st December 2025, the rural lanes to and from Clevedon and Nailsea from 8.00am to 9.00am were clogged with commuters. I can only liken the Plan's proposals for new developments and lack of new highways to pouring a pint of milk into an already full pint bottle, without admitting or realising that a two pint bottle was needed in the first place! Until NSC take the highway situation more seriously and decide on major (ie far greater than currently proposed in the Plan) investment in new roads, any new housing developments in the Nailsea / Backwell area must be abandoned altogether. This is, of course, alongside other considerations detailed below. Turning now to public transport. I have made comments above with reference to the level and standard of service required, in particular for buses, but is also relevant to trains. The Nailsea and Backwell Station needs long overdue investment in wheelchair access and improvement for families with young children, eg lifts, ramps, shelters etc. Extended platforms are required for inter-city services. What is the point of building new houses and encouraging residents to use trains when facilities are so underwhelming? Finally for this section, many developments are situated a good distance away from the town centre, therefore making "active travel" by way of walking and cycling redundant (see Poplar Farm comments below). Community Facilities: To cope with the additional population, leisure facilities need to be increased. Where is the direct investment to cope with this? Scotch Horn and Backwell Leisure Centres are no longer new facilities, so investment in new or redeveloped centres has to be made. Nailsea and Backwell are served by three of the Tyntesfied Medical Group health centres. How will these centres deal with the additional number of patients? Will there be new health centres and how will they be funded? Where are the new schools to be located? Much of Nailsea's space in the Plan is taken up by proposed developments. There are many questions in the above comments that need to be answered before housing development takes place. Furthermore, provision must be made to allow these facilities to be created alongside the development. Ecology, Environment and Agriculture: Greater and Lesser Horseshoe Bats are a Protected Species and are found foraging in all the proposed development sites. In recent years there has been signs of serious decline and it seems that NSC has no desire to stop this. The Plan proposes 100 homes close to the Moor End Spout Nature Reserve which has many protected species. Wildlife habitats will be eliminated and biodiversity would be severely reduced. It is very likely that all new developments in the area will have a detrimental effect on water, pollution and safety of residents. Indeed, the new roads and housing development near Backwell Lake will be in a flood plain. Although there is a demand for houses, surely there must be a demand to retain agricultural land. If Covid and the war in Ukraine taught us anything, the more we can grow and rear animals on our own land, the better it must be for the population locally and nationally. In NSC's knee jerk, developer led reaction to creating a Local Plan for primarily house building, other equally important matters like promoting agriculture have been largely ignored.			

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					People need outdoor space and want to be a part of nature. Conclusion: Despite its length, this is a poorly researched and prepared Local Plan. It does not take into account the area with all its current infrastructure shortcomings and does not come to terms with regard to how so many developments will impact detrimentally on the future of the people, the environment etc. This Plan must not go ahead. Comments above relating to the Poplar Farm Development: Having this development included in the Plan is unsound for the following reasons: Housing and Transport Drivers from this proposed estate will have the choice of the various options detailed above relating to the M5 junctions, Clevedon, Station Road, A370, etc., but, in particular, they immediately face a narrow country lane (West End Lane) situated right by the estate. Additionally, to travel to Nailsea, it would mean driving out of the estate into North Road, narrow with no pavements in places. Also alternative access to Clevedon / M5 via Engine Lane and the narrow, winding Netherton Wood Lane is within very easy reach of this estate. The nearest bus stop is 0.7 miles away from the furthest end of the site, whilst the railway station is much further than that. “Active travel” for this proposed development is irrelevant: the site is too far away from the town centre. It is difficult to see families, particularly those with young children, but also the elderly, walking or cycling back from Tesco’s or Waitrose to the Poplar Farm site with multiple bags of shopping. Given the lack of quality roads and the lack of nearby public transport services, Poplar Farm is about the last place in Nailsea where houses should be built. Other considerations: As the nearest primary school is full, where will the young children of a new development start their education? Bats are seen often over the fields. Development is likely to have a detrimental effect on the Parish Brook rhyne and surrounding land. It has been a working farm and keeping its agricultural heritage is key part to the betterment of Nailsea. General With regard specifically to this development within the Plan for Nailsea and Backwell, NSC has obviously seen this as an opportunity to increase CO2 emissions, fill up country roads, destroy green fields and endanger the country feel of this side of Nailsea. It must be removed from the Plan.			

Name: George Donaldson **I.D:** 62836833

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	No assessment of brownfield alternatives to Pill Green has been made; no duty to co-operate on Bristol's 8,000 homes need has been met; Green Belt exceptional circumstances are not evidenced; a disproportionate and unjustified 44% increase in the poulation of Pill and Easton-in-Gordano is proposed; no deliverabiity plan for A369, M5 J19, schools or drainage by 2041 has been devised; the brownfield first policy has been ignored (2,500+ viable urban units are available); village growth should be capped at 5% on all sites. There must be independent verification of 'exceptional	There should be no development on the Pill Green Site unless 'exceptional circumstances' are independently verified and testing confirms that no viable non-Green Belt sites are available; brownfield sites on the Bristol fringe and in Weston-super-Mare and Portishead should be prioritized. The LP8 allocation across all sites should be capped at 5%; full funding should be required for flood defences, 45% climate change allowance, A369 and M5 J19 capacity upgrades, and additional school and GP places, as well as additional associated communal infrastucture, before granting outline permission. Allocations must demonstrate no disproportionate impact on villages with a population under 10,000 (defined as < 5% per site), without evidenced need, unless exceptional circumstances are independently verified and full infrastructure delivery (transport, education, health, drainage) is secured. Cumulative impacts across all sites within a settlement must not exceed 20% without a master	N/A	

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					circumstances' before any consent can be given.	planned and funded delivery strategy.		

Name: George Ricks **I.D:** 25650241

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	"the town (Nailsea) is fortunate enough to be large enough to meet the needs of modern families but small enough to foster community spirit" - Town Guide 2001 Continually adding on housing estates to the town periphery and adding to the population is spoiling the nature of the town. Once a sign on entering Nailsea, on Station Road, read "Welcome to Nailsea. Free Parking". With population increase townspeople now face parking charges, discouraging local shopping, no street cleaning and closed down public toilets. An ancient footpath from The Perrings to Backwell lake in public use for decades has been sealed off forcing people to walk down Bucklands Batch facing even more traffic especially if a new road joins by Backwell lake. Faced with a climate https://climateemergency.uk/ emergency, since the SARS-CoV-2 pandemic, politicians have permitted many more houses to be added to the town with almost all the new dwellings using fossil fuel boilers for heating. As houses are added further from the centre of the town, with no signs of bus stops, more people are likely to drive to shops mostly with fossil fuel powered vehicles instead of walking or cycling if living a reasonable distance from the centre. Suggest that instead new cities, with multi storey dwellings to reduce urban sprawl, plenty of green/blue spaces and designed in electrified public transport that can increasingly use renewable energy, be built to cope with non-EU immigration driving population growth.			

Name: Georgie Van Eker **I.D:** 62734497

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	Unsure	I feel that before including the Tower Farm & Black Rock sites in the local plan, the council has not properly considered alternative brown and greenfield sites, both within Portishead and in the wider North Somerset County, with significantly less ecological impact. The council could consider increasing the density of housing on proposed brown field sites across the county when would mean they could meet their housing targets and thus avoiding building on this unique and precious environment. The unique and strategic ecological contribution to the Black Rock site is protecting the unique environment of the Weston Big Wood (SSSI) and the wider Gordano Valley green corridor. If we lose this valuable field, it will have a significant impact on Weston Big Wood as a whole. Black Rock and Tower farm site were only granted greenbelt status in the 1980s because of their high ecological value and the connection with Weston Big Wood. Therefore, the Tower farm and Black Rock sites should be removed from the Local Plan I believe that no modification short of removing the allocation entirely would make this site appropriate. Given its direct adjacency to ancient woodland, its loss would be irreversible and cannot be mitigated sufficiently. The land should instead be retained as undeveloped green space, managed to enhance biodiversity and provide sustainable public access, in line with the Avon Wildlife Trust's 2030 Strategy and national "30 by 30" nature recovery goals.			
Black Rock, north of	No	• Positively	No	Unsure	I feel that before including the Black Rock sites in the local plan, the council has not properly considered alternative brown and greenfield sites, both within Portishead and in the wider North Somerset County, with significantly less ecological impact.	I believe that no modification short of removing the allocation entirely would make this site appropriate. Given its direct adjacency to		

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Clevedon Road		prepared • Justified • Effective • Consistent with national policy			The council could consider increasing the density of housing on proposed brown field sites across the county when would mean they could meet their housing targets and thus avoiding building on this unique and precious environment. The unique and strategic ecological contribution to the Black Rock site is protecting the unique environment of the Weston Big Wood (SSSI) and the wider Gordano Valley green corridor. If we lose this valuable field, it will have a significant impact on Weston Big Wood as a whole. Black Rock and Tower farm site were only granted greenbelt status in the 1980s because of their high ecological value and the connection with Weston Big Wood. Therefore, the Tower farm and Black Rock sites should be removed from the Local Plan	ancient woodland, its loss would be irreversible and cannot be mitigated sufficiently. The land should instead be retained as undeveloped green space, managed to enhance biodiversity and provide sustainable public access, in line with the Avon Wildlife Trust's 2030 Strategy and national "30 by 30" nature recovery goals.		

Name: Gerry Dawson **I.D:** 32231105

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Strategic Priorities	No		Unsure	No	I have looked into the general principles of Town Planning principles and good practice and, as you will see, have found the basic notion of the proposed expansion of a village constrained in access and facilities to be at significant variance with those guidelines and principles.	I have attached a document which relates to the four identified areas considered for housing as I think it relates to the issues arising from all four. The Development east of Gordano Services raises a particular health risk to this site which also may apply to the site by Beechwood road. Further analysis is required for both. The Gordano Services site also raises the wisdom of residential/family housing near a site of 24hr activity which will have easy pedestrian access through the site and children's play areas. I have also considered issues which may increase the effectiveness of the planned rail link. This rail link has readily identified problems with capacity/ frequency/destinations. I believe there is a simple solution but have not gone into the extra details as this submission is principally concerned with housing.		Gerry Dawson redacted.pdf

Name: Gerry Scott-Wilson **I.D:** 62772481

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I have lived in Wellhouse Farm, Stone Edge Batch for over 20 years. During this time we have seen a gradual build up of traffic particularly heavy goods vehicle passing our house. Over the last four or five years the volume of traffic has grown exponentially due in part to much longer lorries being allowed on our roads and also the increase in courier vehicles delivering online purchases. We are situated between the B3128 and the B3130, the bottom of Tickenham Hill and the Stone Edge Batch pinch point to Naisea. We witness on a daily basis long tailbacks of traffic on Tickenham Hill at the T Junction where we live. from our garden we witness numerous times during the day traffic snarl ups caused by the pinch point between Lavender Cottage and the perimeter wall of our neighbours at Stonewell Barn on the B3130. There is no doubt in our minds that the existing road infrastructure is already reaching a critical stage and would be unable to cope with any future increase in traffic volume			

Name: Giacomo Squintani **I.D:** 58520865

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Vision, Strategic Priorities and Sustainability Objectives	No	• Positively prepared • Justified	Unsure	Unsure	You state: "By 2041 there will be a transformation in the way we live which reflects a more responsible attitude to climate change and the use of resources. New homes, buildings and communities will be highly sustainable, accessible and attractive places with higher quality standards. There will be more diversity in terms of the form and type of new development to increase variety and choice to better meet the needs of all, create jobs and to tackle inequality. Regeneration will transform and breathe new life into existing towns and valued areas will be protected. People's well-being, a strong sense of community, opportunity and fairness will be at the heart of all development in North Somerset." I am wholeheartedly in agreement. Which is why I strongly urge North Somerset Council to work with the local Portishead Council to identify sites that are better suited to deliver on this vision. In particular, at a time when a railway appears to be on its way, "highly sustainable" must surely mean affordable housing within walking distance of the new railway station? I have read comments about the site near Weston Big Wood being earmarked because it is within "cycling distance" of the new railway station. On medical grounds (epilepsy) I neither drive nor cycle, but have run to Bristol Temple Meads, Bristol Parkway, Bristol International Airport and Bristol Bus and Coach Station - so I have first-hand experience of runcommuting and indeed, from further back, cycle-commuting. It tends to require showering and changing facilities, and most people who might be willing to cycle to work will be put off, understandably, by unclement weather, not least when carrying electronics. These are generic points: specifically to Weston Big Wood, the ease with which the gradient has been dismissed, with the focus placed solely on the distance treating a steep climb the same way one would treat a flat stretch, is naive at best and insulting at worst. I am a father of two teenagers. Teenagers who may ultimately find employment in Bristol and wish to commute there by train. Should they ever leave home, they will not be looking at the type of properties most new developments deliver. Should they wish to either get on the housing ladder or even just rent, they will be looking for flats. Affordable, sustainable housing is what is needed: and that means easy access not just to the train station but also bus routes and shops. It means proximity to the new railway station, for example in the area near Old Mill Road which I believe has not yet received the attention it deserves. On a final point: I live on top of the hill, opposite the Merlin Park field which features a ditch that tends to fill up at times of heavy rain. I have had visitors who have expressed surprise when it has not been full, as they believed "the lake" to be a permanent fixture. Whilst I appreciate draining would be considered, the notion of housing at the bottom of this field, but with significant sections covered in tarmac to enable access and allow for two football pitches, sounds utterly unappealing. I moved to Portishead in 1999 and recall houses near the High Street being hit by mild flooding in my first winter here: indeed, it is one of the reasons that made buying at the top of the hill appealing, not least as I was able to drive back then and a railway station was being mooted. Twenty-six years later, the lack of discussion around the risk of flooding in new areas or compounding the risk in areas which already feature housing is concerning.	I believe it necessary to liaise with the Portishead Town Council to identify more suitable sites, prioritising the Old Mill Road area and spaces closer to the proposed railway station site. Anything beyond a ten-minute walk is going to result in unsatisfactory walking / cycling commuting rates.		
Land at Tower Farm	No	• Positively prepared • Justified	Unsure	Unsure	You state: "By 2041 there will be a transformation in the way we live which reflects a more responsible attitude to climate change and the use of resources. New homes, buildings and communities will be highly sustainable, accessible and attractive places with higher quality standards. There will be more diversity in terms of the form and type of new development to increase variety and choice to better meet the needs of all, create jobs and to tackle inequality. Regeneration will transform and breathe new life into existing towns and valued areas will be protected. People's well-being, a strong sense of community, opportunity and fairness will be at the heart of all development in North Somerset." I am wholeheartedly in agreement. Which is why I strongly urge North Somerset Council to work with the local Portishead Council to identify sites that are better suited to deliver on this vision. In particular, at a time when a railway appears to be on its way, "highly sustainable" must surely mean affordable housing within walking distance of the new railway station? I have read comments about the site near Weston Big Wood being earmarked because it is within "cycling distance" of the new railway station. On medical grounds (epilepsy) I neither drive nor cycle, but have run to Bristol Temple Meads, Bristol Parkway, Bristol International Airport and Bristol Bus	I believe it necessary to liaise with the Portishead Town Council to identify more suitable sites, prioritising the Old Mill Road area and spaces closer to the proposed railway station site. Anything beyond a ten-minute walk is going to result in unsatisfactory walking / cycling commuting rates.		

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					and Coach Station - so I have first-hand experience of runcommuting and indeed, from further back, cycle-commuting. It tends to require showering and changing facilities, and most people who might be willing to cycle to work will be put off, understandably, by unclement weather, not least when carrying electronics. These are generic points: specifically to Weston Big Wood, the ease with which the gradient has been dismissed, with the focus placed solely on the distance treating a steep climb the same way one would treat a flat stretch, is naive at best and insulting at worst. I am a father of two teenagers. Teenagers who may ultimately find employment in Bristol and wish to commute there by train. Should they ever leave home, they will not be looking at the type of properties most new developments deliver. Should they wish to either get on the housing ladder or even just rent, they will be looking for flats. Affordable, sustainable housing is what is needed: and that means easy access not just to the train station but also bus routes and shops. It means proximity to the new railway station, for example in the area near Old Mill Road which I believe has not yet received the attention it deserves. On a final point: I live on top of the hill, opposite the Merlin Park field which features a ditch that tends to fill up at times of heavy rain. I have had visitors who have expressed surprise when it has not been full, as they believed "the lake" to be a permanent fixture. Whilst I appreciate draining would be considered, the notion of housing at the bottom of this field, but with significant sections covered in tarmac to enable access and allow for two football pitches, sounds utterly unappealing. I moved to Portishead in 1999 and recall houses near the High Street being hit by mild flooding in my first winter here: indeed, it is one of the reasons that made buying at the top of the hill appealing, not least as I was able to drive back then and a railway station was being mooted. Twenty-six years later, the lack of discussion around the risk of flooding in new areas or compounding the risk in areas which already feature housing is concerning.			
Black Rock, north of Clevedon Road	No • Positively prepared • Justified		Unsure	Unsure	You state: "By 2041 there will be a transformation in the way we live which reflects a more responsible attitude to climate change and the use of resources. New homes, buildings and communities will be highly sustainable, accessible and attractive places with higher quality standards. There will be more diversity in terms of the form and type of new development to increase variety and choice to better meet the needs of all, create jobs and to tackle inequality. Regeneration will transform and breathe new life into existing towns and valued areas will be protected. People's well-being, a strong sense of community, opportunity and fairness will be at the heart of all development in North Somerset." I am wholeheartedly in agreement. Which is why I strongly urge North Somerset Council to work with the local Portishead Council to identify sites that are better suited to deliver on this vision. In particular, at a time when a railway appears to be on its way, "highly sustainable" must surely mean affordable housing within walking distance of the new railway station? I have read comments about the site near Weston Big Wood being earmarked because it is within "cycling distance" of the new railway station. On medical grounds (epilepsy) I neither drive nor cycle, but have run to Bristol Temple Meads, Bristol Parkway, Bristol International Airport and Bristol Bus and Coach Station - so I have first-hand experience of runcommuting and indeed, from further back, cycle-commuting. It tends to require showering and changing facilities, and most people who might be willing to cycle to work will be put off, understandably, by unclement weather, not least when carrying electronics. These are generic points: specifically to Weston Big Wood, the ease with which the gradient has been dismissed, with the focus placed solely on the distance treating a steep climb the same way one would treat a flat stretch, is naive at best and insulting at worst. I am a father of two teenagers. Teenagers who may ultimately find employment in Bristol and wish to commute there by train. Should they ever leave home, they will not be looking at the type of properties most new developments deliver. Should they wish to either get on the housing ladder or even just rent, they will be looking for flats. Affordable, sustainable housing is what is needed: and that means easy access not just to the train station but also bus routes and shops. It means proximity to the new railway station, for example in the area near Old Mill Road which I believe has not yet received the attention it deserves. On a final point: I live on top of the hill, opposite the Merlin Park field which features a ditch that tends	I believe it necessary to liaise with the Portishead Town Council to identify more suitable sites, prioritising the Old Mill Road area and spaces closer to the proposed railway station site. Anything beyond a ten-minute walk is going to result in unsatisfactory walking / cycling commuting rates.		

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					to fill up at times of heavy rain. I have had visitors who have expressed surprise when it has not been full, as they believed "the lake" to be a permanent fixture. Whilst I appreciate draining would be considered, the notion of housing at the bottom of this field, but with significant sections covered in tarmac to enable access and allow for two football pitches, sounds utterly unappealing. I moved to Portishead in 1999 and recall houses near the High Street being hit by mild flooding in my first winter here: indeed, it is one of the reasons that made buying at the top of the hill appealing, not least as I was able to drive back then and a railway station was being mooted. Twenty-six years later, the lack of discussion around the risk of flooding in new areas or compounding the risk in areas which already feature housing is concerning.			

Name: Gill **I.D:** 62865377

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	No definite provisions for any increases to medical, sports and educational services Proposed plans for Nailsea equates to a 55% increase in population. Loss of agricultural land for ever with subsequent liss of wildlife eg the Greater and Lesser horseshoe bat's,			

Name: Gill Bennett **I.D:** 53971713

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Vision, Strategic Priorities and Sustainability Objectives	Yes		Unsure	No	It has not been widely advertised enough to ensure that all residents know about this consultation, there should be more publicity about this to ensure all residents within North Somerset can comment.			
SP3: Spatial strategy	Unsure		Unsure	No	Not widely published and therefore not enough residents can have their say on this plan. Why is the principle location Weston-super-Mare? This town is now gridlocked as there needs to be a new motorway junction.			
SP5: Towns	Unsure		Unsure	No	Lyefield Road in Worle have various comments from the general public about this not being suitable yet it is still included in this plan.			
SP8: Housing	Unsure		Unsure	Unsure	Banwell is so close to what is classed as Weston-super-Mare that this may as well be included in the numbers. There will be too much development in this area. Why not look to Long Ashton for development.			
Land north of Lyefield Road and Lower Norton Lane	Unsure		Unsure	No	This site had many people saying that it was unsuitable for development yet it is still included, the residents views have not been taken into account.	Remove the land north of Lyefield Road, keep the land as it will be needed to expand the crematorium for all the other planned developments happening.		
Greenways Farm, Lyefield Road	Unsure		Unsure	Unsure	As above comment.			

Name: Gill Brown **I.D:** 3332705

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I do not believe that North Somerset Council has demonstrated the exceptional circumstances that justify this land being removed from the Green Belt. Allowing development ignores the strategic importance of the land for wildlife recovery and demonstrates a lack of green infrastructure planning. The area is part of a blue/green corridor between the major rewilding project at Watercress Farm and The Tickenham, Nailsea and Kenn Moors SSI which supports a number of endangered species including otters and dormice. It is adjacent to a Site of Nature Conservation Interest including ancient woodland, alder carr, springs and floodplain meadows. It is part of a historic landscape and has species rich hedgerows with veteran trees. It is in the North Somerset Bat SAC and is an increasingly important foraging area for a nationally important bat roost. It also supports a colony of house martins. Due to the scale of mitigation needed to overcome the danger of flooding, and the constraints of a high pressure pipe line, the area would be challenging to develop and it is hard to see how it would be possible to deliver the required percentage of affordable dwellings. The cost of riparian management will be an ongoing issue now that the management of the Land Yeo has been transferred from the Environment Agency to the riparian landowner. For the reasons stated above, it would be more sound to enhance this already nature rich area and include it in the wildlife recovery strategy than designate it as a site for development. The site has been primarily used for grazing for over 30 years. As insects associated with grazing animals play an important part of the diet of Greater and Lesser Horseshoe Bats, loss of grazing on this site could be catastrophic for the already declining Horseshoe Bat population. There are no A roads leading to Nailsea and the roads that will service this site are inadequate with pinch points and accident blackspots which already cause major hold ups on the B3130 to the east and west of the town. Nailsea and Backwell station is not within walking distance. It is already inadequate for the needs of the current population, the platform is too short for Intercity trains and there are accessibility problems which have not been addressed due to the cost of the extensive engineering works that would be required. It is not a suitable transport hub. The cumulative effect of adopting all the sites in this area would lead to Nailsea and Backwell becoming overdeveloped to the extent that they would lose their rural character and local services, and infrastructure would be stretched to breaking point.	Reallocate the Land North of Nailsea as an undeveloped Nature Park		

Name: Gill Collinson **I.D:** 30497697

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I am objecting to the proposed Local Plan 2041 because; Backwell has already had to accept the approval of 800 new homes. These approved new homes will have a significant effect and impact on the existing village. This will become most noticeable on the existing services such as schools, doctors surgery, pharmacy, and dentist. There is no provision for extending the village centre to increase provision. Similarly the other services such as the leisure centre and the HWRC at the top of Dark Lane will suffer from under capacity for the numbers of people requiring their use, and severely impacting on the road network to access such facilities. In a similar manner, the existing railway station at Backwell / Nailsea is very limited in capacity with virtually no services. There is no accessible access to the platform and is unfit to accept large numbers of additional passengers that would inevitably look to travel from this facility. Backwell is not a major employment location. It has to be anticipated that the majority of those new houses already approved will be for commuters to Bristol. The existing road network is already suffering from new housing built along the A370 passing through Backwell. This particular section of the proposed Plan identifies Grade 1 agricultural land for development, including a new road			

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					indicated (although unspecified) to cross the existing railway line. Such a loss of specific agricultural land should not be used for high density housing, and whilst the proposed new road remains outside the scope of any developer it is unlikely to be completed. This area is also a known flooding hazard which should be left for natural dispersion.			

Name: Gill Norman **I.D:** 62863937

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Churchill Avenue	No		Unsure	Unsure	This land, known locally as Penny Field, is a small area of green space in an already densely populated area of Clevedon. The whole of this area is very well used by local residents and needs to be protected. It is a perfect candidate to be designated a Local Green Space. There have already been two petitions of 600+ signatures calling to protect Penny Field and this is supported by Clevedon Town Council and the consultation for Clevedon Placemaking Strategy. Penny Field is a prime candidate for Local Nature Recovery due to the presence of three priority species. This has been identified by WECA (membership of which I understand NSC is considering, whilst already having some joint working arrangements in place). Also, according to NSC's existing policy, Penny Field is located on a Green Infrastructure Corridor. I am concerned about increased flooding risk in the area if the field is built on as it is an area which currently soaks up considerable excess water. Under any Equalities Impact Assessment, the reduction of green space would adversely affect lower income households in the area.			

Name: Gill Warren **I.D:** 51286017

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	North Somerset Council claims in its mission statement that it centres on being open, fair and green, with values of collaboration and protecting the environment. These proposals are not consistent with those aims and display a lack of “joined up thinking”. There is an overall shortage in housing in this country, and there needs to be an increase in supply to meet that demand. However, the demand is for housing close to places of work, not in rural villages. New housing should focus on the areas around Bristol and Weston-Super-Mare, which provide jobs and amenities, NOT in Backwell. This is about the developers minimising their costs by opting for greenfield sites rather than deal with the expensive of brownfield sites, or regeneration of Weston etc. Backwell already has a 40% increase in houses approved or under construction and cannot sustain further development. Nailsea is also seeing an increase in development requiring additional infrastructure. The proposed road would not relieve the congestion on the already busy roads into Nailsea/ through Backwell. Backwell has more houses proposed than any other village in North Somerset, which is neither fair nor green. New residents would not be able to work in Backwell so would need to commute. Much has been made of the “good transport links”, but we are still waiting for the railway platform to be made accessible as promised at the time of the London Olympics. Also at a maximum of four or five buses an hour, the volume of traffic will significantly increase, with the impact on the environment, safety and desirability of living in Backwell. There is already a deficit in school places, and other services such as doctors and dentists. The infrastructure and services cannot support another 1,000 houses. The proposed developments are either on grade 1 agricultural land, or within a floodplain. This is not sustaining food security and will have a deleterious effect on the environment for all houses and roads. The introduction of so many new houses will also change the demographic of the village – younger people with children, who will have nothing to do in the evenings. It is storing up potential problems for the future. Backwell currently has natural habitats needed for wildlife, bats in particular, which will be threatened by these proposals.	Build on brownfield sites closes to places of employment, Weston and Bristol.		

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					This is not thought out strategically, and has not been considered to be of benefit to the people in North Somerset as a whole. I sincerely trust that the councillors will come to their senses and throw out this plan as it is not open, fair or green.			

Name: Gladman Developments **I.D:** 63107361

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Vision, Strategic Priorities and Sustainability Objectives	Yes						Gladman support the proposed vision for North Somerset which seeks to ensure the delivery of highly sustainable new homes, buildings, and communities to provide accessible and attractive places to live. In addition, Gladman support the strategic priorities identified by the Council which seek to promote the delivery of sustainable development, address the climate emergency, increase the number and range of job opportunities across the district, prioritise the location of new development close to places with a wide range of services, facilities and jobs growth, reducing reliance on car use as well as prioritising the importance and delivery of green spaces when considering new development. Further, Gladman support the strategic priority of delivering a diverse range of housing in a variety of tenures, sizes and forms, particularly genuine affordable housing, to meet future needs of North Somerset residents at locations where they are most needed.	
SP2: Climate Change	Yes						It is acknowledged that the planning system has an important role to play in tackling the effects of climate change. In this respect, the overarching environmental objective of sustainable development cited in paragraph 8 of the NPPF highlights how the planning system should help to mitigate and adapt to climate change and support the transition to a low carbon economy. This objective filters through to other elements of the Framework, including Section 14 that deals specifically with Meeting the Challenge of Climate Change. In this regard, paragraph 157 of the Framework identifies how the planning system should: “support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.” In principle, Gladman support policies which seek to	Gladman Developments - North Somerset Pre-Submission Plan (Reg 19).pdf

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							tackle climate change and reduce carbon emissions. Nonetheless, it is vital that any policy requirements are justified by robust evidence and drafted with reference and consideration to the relevant Building Regulations and emerging Future Homes Standard which offer the most appropriate mechanism to deliver low carbon and energy efficient developments. The Council should continue to take account of climate change in its plan-making, including any updates to guidance in relation to the Framework and PPG. It is important to recognise that mitigating and adapting to climate change must also be compatible with other important objectives for the planning system, including the requirement to boost housing delivery and build a strong, competitive economy. North Somerset Council declared a climate emergency in 2019 and has a target of being carbon neutral by 2030. Gladman is committed to contributing to solutions to address these concerns. Gladman's land interest at land off Elm Grove, Locking can deliver several environmental commitments to assist the Council in meeting its climate change objectives. In line with the criteria identified within draft policy, the scheme will include multifunctional green infrastructure (h), reducing vulnerability to the impacts of climate change through tree shading and CO2 absorption (g). All our schemes deliver a comprehensive package of pedestrian and cycle infrastructure including a suite of measures to reduce traffic impact and the need to travel (f). Land off Elm Grove, Locking has the potential to deliver renewable and low carbon technologies (c) through new electric vehicle charging points and low carbon design approaches (a) and sustainable construction techniques (b) can be considered at the detailed design stage.	
SP3: Spatial strategy	No	• Justified • Effective			It is supported that the emerging Local Plan is directing growth towards both urban and rural areas to meet the growing housing needs of the district's population. Ensuring sufficient growth is directed towards the urban and rural areas strikes a positive balance and helps ensure local communities have access to high quality and affordable housing as well as ensuring the provision and retention of services, employment, social and community facilities. Gladman consider that the spatial strategy included within the Local Plan should be proactive and pragmatic in directing growth to the most suitable settlements in the district (as expressed in draft Policies SP5	Although the wording provides a helpful summary of the spatial strategy the Council has chosen, it is not a policy and should be moved into supporting text. The actual Spatial Strategy of the Local Plan is set out in draft policies SP5 and SP6.		Gladman Developments - North Somerset Pre-Submission Plan (Reg 19).pdf

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					(Towns) and SP6 (Villages and rural areas). Gladman support the HBF's assertion that the wording of draft Policy SP3 is not a policy but rather a statement of intent, as such this policy is ineffective and unjustified. This policy fails to provide any criteria against which a development proposal would be assessed. Although the wording provides a helpful summary of the spatial strategy the Council has chosen, it is not a policy and should be moved into supporting text. The actual Spatial Strategy of the Local Plan is set out in draft policies SP5 and SP6.			
SP8: Housing	Yes						The Government's aim is to significantly boost the supply of housing, setting an aspirational target of building 1.5 million homes. To achieve this goal, the NPPF requires the Council to use the updated standard methodology when setting the housing requirement and Councils must ensure this is met in full. The NPPF is clear that the standard method should be used as a starting point unless there are exceptional circumstances that justify a different approach. The PPG sets out that there will be circumstances where the housing requirement could be increased to a level higher than that identified through the application of the standard method1. These circumstances include but are not limited to: Where growth strategies are in place, particularly where those growth strategies identify that additional housing above historic trends is needed to support growth or funding is in place to promote and facilitate growth (e.g. housing deals); Where strategic infrastructure improvements are planned that would support new homes; Where an authority has agreed to take on unmet need, calculated using the standard method, from neighbouring authorities, as set out in a SoCG; Where previous delivery levels have exceeded the minimum figure identified; and Where recent assessments of need, such as a SHMA, suggest higher levels of need. Gladman support the Council's use of the stock-based standard method, as the basis for determining the minimum annual housing requirement. This results in 1,580dpa equal to a minimum overall housing requirement of 23,700 dwellings over the 2026-2041 plan period. There may be a requirement for the Council to include an apportionment of unmet housing and/or employment need from Bristol. This will be subject to further discussions between the neighbouring authorities under the Duty to Cooperate moving forward with the Local Plan. It is critical that the Council provide sufficient	Gladman Developments - North Somerset Pre-Submission Plan (Reg 19).pdf

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							headroom within the housing supply. Typically, many planning experts advocate the need to identify sufficient deliverable sites to provide a 10-20% buffer between the housing requirement and supply to ensure a responsive supply of housing land is available. As currently drafted, there is only a headroom for a flexibility of 3.35% (+795 dwelling surplus). Gladman are supportive of the distribution of development outlined in draft Policy S8, although suggest that the proposed level of development within the plan period may need to be kept under review up to the point of submission of the Plan as expectations may be revised in response to comments received as part of this consultation.	
Policy LP10: Strategic gaps	No	• Effective			Draft Policy LP10 identifies a series of strategic gaps which the Council considers are necessary to help retain the separate identity, character and/or landscape setting of settlements. The policy outlines that development within strategic gaps will only be permitted where; ◈ The open or undeveloped character of the gap would not be significantly adversely affected; ◈ The separate identity and character of the settlements would not be harmed; and ◈ The landscape setting of the settlements would not be harmed. A strategic gap is identified between Weston-Super-Mare, Locking and Parklands Village. It is currently proposed that a significant portion of the western field of Gladman's land interest at Land off Elm Grove, Locking will be removed from the strategic gap which Gladman fully support. However, Gladman are unsure why the whole western field parcel has not been removed from the strategic gap, since the remaining irregular shaped parcel of the western field is not serving a function or service to the gap. Gladman would strongly encourage the Council to remove the remainder of the western field out of the strategic gap to allow for a comprehensive development to come forward on the wider site in order for the delivery of approximately 110 new market and affordable homes the Council wishes to see be delivered on the site. As an alternative to removing the entirety of the western field of the site outside of the strategic gap, Gladman have included an indicative Development Framework Plan (DFP) at Appendix 1 of this representation.	Gladman would strongly encourage the Council to remove the remainder of the western field out of the strategic gap to allow for a comprehensive development to come forward on the wider site in order for the delivery of approximately 110 new market and affordable homes the Council wishes to see be delivered on the site. As an alternative to removing the entirety of the western field of the site outside of the strategic gap, Gladman have included an indicative Development Framework Plan (DFP) at Appendix 1 of this representation. The DFP shows that a slither of the developable area on the western field currently lies outside of the current boundary of the draft allocation and Gladman would be content if the boundary of the draft allocation is extended slightly northwards to accommodate this. Gladman discussed this issue with the Council's Planning Policy Team on 11th December 2025 and it is hoped that this request can be fulfilled.		Gladman Developments - North Somerset Pre-Submission Plan (Reg 19).pdf

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					The DFP shows that a slither of the developable area on the western field currently lies outside of the current boundary of the draft allocation and Gladman would be content if the boundary of the draft allocation is extended slightly northwards to accommodate this. Gladman discussed this issue with the Council's Planning Policy Team on 11th December 2025 and it is hoped that this request can be fulfilled.			
Policy DP8: Efficient use of land	Yes					Gladman support draft Policy DP8 which sets out that the minimum target density will be 40 dwellings per hectares, however this should be higher at accessible locations. In all cases density should respect and complement the character of the surrounding area. The supporting text notes that 40 dwellings per hectare within the developable area is an average and the appropriate density will vary on local circumstances. For Gladman's draft housing allocation at Land off Elm Grove, Locking, a minimum density of 40 dwellings per hectare would not be in-keeping with the surrounding area, and therefore Gladman are proposing a slightly lower density at 36 dwellings per hectare.	Gladman support draft Policy DP8 which sets out that the minimum target density will be 40 dwellings per hectares, however this should be higher at accessible locations. In all cases density should respect and complement the character of the surrounding area. The supporting text notes that 40 dwellings per hectare within the developable area is an average and the appropriate density will vary on local circumstances. For Gladman's draft housing allocation at Land off Elm Grove, Locking, a minimum density of 40 dwellings per hectare would not be in-keeping with the surrounding area, and therefore Gladman are proposing a slightly lower density at 36 dwellings per hectare.	Gladman Developments - North Somerset Pre-Submission Plan (Reg 19).pdf
Policy DP36: Biodiversity Net Gain	No				Policy DP36 states that 'proposals must demonstrate at least a 10% net gain accounted for in a biodiversity gain plan. Appropriate provision must be made for its planning and design, taking account of habitats and species affected, relevant local plan policies and planning guidance, and relevant biodiversity metrics'. Gladman support a draft policy which states that all development proposals must achieve 10% BNG over the pre-development site value. However, Gladman do not consider that it is sound to seek a higher percentage of BNG above the statutory 10% on new development proposals. PPG on biodiversity net gain states in paragraph 006 that: 'Plan-makers should not seek a higher percentage than the statutory objective of ten per cent biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified" 2. It adds: "To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Therefore any requirements that go beyond	Do not increase BNG above 10%.		Gladman Developments - North Somerset Pre-Submission Plan (Reg 19).pdf

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					10% BNG need to be clearly justified, and evidence demonstrating the implications of delivering a higher BNG percentage needs to be provided. A higher BNG requirement is likely to require extensive areas of land to be removed from the potential developable area of sites and is not making efficient use of land as a result. Furthermore, the provision of BNG can be incredibly costly and can impact the viability of sites as a result. A 10% BNG ensures that developments leave more biodiversity than was previously the case and is not overly burdensome on developers. Increasing BNG above and beyond the minimum 10% statutory figure could also impact upon the overall viability of each scheme and its ability to deliver the much-needed housing (including affordable housing) and supporting other social/ community facilities required.			
Policy DP43: Affordable housing (including rural exception schemes)	Yes				Policy DP43 determines that all developments of 10 dwellings or more (or on sites of 0.5 hectares or above), are expected to provide at least 30% affordable housing on greenfield sites and 20% on previously developed land. Gladman support the reduction from the Council's previous position of 38.5% on greenfield sites which wasn't based on any robust evidence or the latest Local Housing Needs Assessment (2025). Gladman note that the proposed affordable housing mix is now 75% social rented and 25% shared ownership. Gladman support that the Council have adjusted this to align with the most up to date evidence but consider that the policy itself must be worded so that this level of flexibility continues across the course of the plan period and the tenure splits can be adjusted according to changing circumstances. Fundamentally, the provision of affordable housing requires the delivery of market housing. Therefore, to ensure that the necessary level of affordable housing is provided in North Somerset, which is already an unaffordable place to live, the Council must endeavour to meet their housing requirement in full.		Policy DP43 determines that all developments of 10 dwellings or more (or on sites of 0.5 hectares or above), are expected to provide at least 30% affordable housing on greenfield sites and 20% on previously developed land. Gladman support the reduction from the Council's previous position of 38.5% on greenfield sites which wasn't based on any robust evidence or the latest Local Housing Needs Assessment (2025). Gladman note that the proposed affordable housing mix is now 75% social rented and 25% shared ownership. Gladman support that the Council have adjusted this to align with the most up to date evidence but consider that the policy itself must be worded so that this level of flexibility continues across the course of the plan period and the tenure splits can be adjusted according to changing circumstances. Fundamentally, the provision of affordable housing requires the delivery of market housing. Therefore, to ensure that the necessary level of affordable housing is provided in North Somerset, which is already an unaffordable place to live, the Council must endeavour to meet their housing requirement in full.	Gladman Developments - North Somerset Pre-Submission Plan (Reg 19).pdf
Policy DP46: Housing Type and Mix	No				Policy DP46 as drafted requires all new residential developments to meet M4(2) (Accessible and adaptable dwellings) of Building Regulations and development of 10 or more units to provide 5% of affordable	Gladman are of the view that this matter should be left to Building Regulations, however if a policy were to be needed, the wording needs to differentiate between Part a) and part b) of M4(3) technical standards.		Gladman Developments - North Somerset Pre-Submission

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					dwellings which meet M4(3) (Wheelchair user dwellings) or a higher proportion where there is evidence of local need. The requirements to meet Part M4(2) will be superseded by changes to residential Building Regulations. The Government response to 'Raising accessibility standards for new homes' states that the Government proposes to mandate the current M4(2) requirement in Building Regulations as a minimum for all new homes, with M4(1) applying in exceptional circumstances. This will be subject to a further consultation on the technical details and will be implemented in due course through the Building Regulations. The requirement to address this issue in planning policy is therefore unnecessary. Gladman are of the view that this matter should be left to Building Regulations, however if a policy were to be needed, the wording needs to differentiate between Part a) and part b) of M4(3) technical standards. M43a sets out standards for wheelchair adaptable housing, where M43b relates to wheelchair accessible housing which can only be required on affordable housing where the Council has nomination rights. Any such requirements would also need to be fully considered from a viability perspective.	M43a sets out standards for wheelchair adaptable housing, where M43b relates to wheelchair accessible housing which can only be required on affordable housing where the Council has nomination rights. Any such requirements would also need to be fully considered from a viability perspective.		Plan (Reg 19).pdf
Elm Grove Nursery, Locking	No				Whilst the allocation is supported, Gladman are unsure why the boundary (of the Elm Grove proposed allocation) of the draft housing allocation site does not comprise the full extent of the two field parcels as shown in Figure 1 above. It is nonsensical to leave an irregular piece of the northern part of the western parcel as Strategic Gap when it is not serving a function. Figure 2 overleaf shows the current extent of the Proposed Residential Site on the draft interactive Policies Map.	Gladman strongly encourage the Council to re-draw the boundary of the site around the full extent of both parcels of land to ensure that a comprehensive development for up to 110 dwellings and a policy compliant amount of green infrastructure can be delivered on this site. As discussed earlier within this representation at paragraph 3.65, as an alternative solution, Gladman would be content for the boundary of the draft allocation to be extended slightly northwards to accommodate the slither of developable area on the site which currently lies outside of the boundary, as shown on the indicative DFP included at Appendix 1. Gladman have discussed this issue with the Council's Planning Policy Team on 11th December 2025 and it is anticipated the Council would be amenable to making this amendment to the draft allocation boundary prior to the Local Plan being submitted for Examination. See attached rep for full site details.		Gladman Developments - North Somerset Pre-Submission Plan (Reg 19).pdf

Name: Gleeson Land **I.D:** 51732129

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Vision, Strategic Priorities and Sustainability Objectives	No	• Positively prepared • Effective • Consistent with national policy	Yes	No	The NPPF (para 22) expects plans to be prepared to cover a minimum 15 year period from adoption. The February LDS anticipated submission of the plan for examination in October 2025 with adoption November 2026. Slippage has already occurred, pushing adoption into 2027. On this basis, the plan period should extend to 2042.	Extend the plan period to 2042, which would have consequences for development requirements across the plan period.		North Somerset Reg 19 Reps (2025-12-12) - Gleeson Land (Appendix B).pdf North Somerset Reg 19 Reps (2025-12-12) - Gleeson Land (Appendix A).pdf
SP2: Climate Change	No	• Justified • Consistent with national policy	Yes	No	Firstly, it is inappropriate to expect every development proposal to meet/demonstrate compliance with every criterion within SP2, simply some of the criteria just won't apply, and some will be superseded in time by other national policy and regulations. Hence the policy should be amended to acknowledge this. Further, the reference to 'minimise energy use and deliver a net zero energy standard in new building' is unachievable. All buildings will require energy, the point is to contribute towards the national commitment to net zero future with reference to greenhouse gas emissions (carbon). In terms of building, the NPPF consistently refers to 'low carbon' measures, rather than zero carbon. Where net zero carbon is achieved then the NPPF directs this to be given significant weight in the planning balance. A policy expectation for all developments to achieve a net zero (carbon) standard detracts from this benefit weighting.	SP2 should be amended to ready, "…In order to reduce the overall environmental impact of development, where relevant, proposals will be expected to demonstrate how they:…" and then, "Minimise energy use and deliver a low carbon energy standard in new buildings.		North Somerset Reg 19 Reps (2025-12-12) - Gleeson Land (Appendix B).pdf
SP3: Spatial strategy	No	• Consistent with national policy	No	No	Support is given to locating new residential development close to urban areas, broadly termed under the justification as a sequential approach. In order to achieve consistency with the NPPF, there may be a requirement to further update this policy to reflect a presumption in favour of residential development close to well-connected railway stations. This presumption would go beyond a simple 'priority'. Further, whilst the policy intention to restrict development in the countryside is understood, this is not entirely consistent with the NPPF. Whilst it may be appropriate to limit development at a village to that associated with meeting local community needs, development beyond the settlement boundaries of the main settlements may be appropriate to meet district-wide needs, particularly in circumstances where there is a five-year housing land supply. In this respect, the policy should reflect the settlement hierarchy.	SP3 should be amended to read, "…well served by public transport. There will be a presumption in favour of locating residential development in a location close to a well-connected rail station…. Beyond strategic development areas, the amount of development at villages and in the countryside will reflect the settlement hierarchy.		North Somerset Reg 19 Reps (2025-12-12) - Gleeson Land (Appendix B).pdf
SP4: Placemaking	No	• Justified • Consistent with national policy	No	No	Policy requirements to demonstrate 'collaboration' with local communities is inconsistent with the NPPF (para 137), which instead expects community engagement and for designs to "take account of the view of the community." Collaboration is defined as the action of two or more people, entities or organisations working in partnership to produce something together. Collaboration with local communities is often unlikely to be achievable in practice, particularly where there is a strong objector group which acts to frustrate and sabotage community engagement. In any event, there will often be different, and competing, opinion regarding development principle and design approach, sometimes driven by personal preferences. Hence consultation and the need to take account of views is an appropriate and effective approach.	The word 'collaboration' should be replaced with 'consultation'.		North Somerset Reg 19 Reps (2025-12-12) - Gleeson Land (Appendix B).pdf
SP7: Green Belt	No	• Positively prepared • Justified	No	No	Policy SP7 includes an extension of the Green Belt (circa 164 ha) to the south of Nailsea, the stated purpose being to, "…maintain the separation of Nailsea and Backwell and prevent further encroachment into the countryside." The supporting text provides no further justification other than adding "…and environmental and recreational benefits of the Green Belt are available to residents and visitors."	The proposed Green Belt extension between Nailsea and Backwell should be abandoned		North Somerset Reg 19 Reps (2025-12-12) - Gleeson

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		• Effective • Consistent with national policy			Notwithstanding the flawed approach of releasing land from the Green Belt on the north side of Nailsea, whilst designating new areas to the south side, in direct conflict with NPPF para 147, the approach sits uncomfortably both in the context of the overall purpose of the wider Bristol and Bath Green Belt, which is to “check the unrestricted urban sprawl of Bristol” (as stated in Policy SP7), and in the context of further national policy which sets clear prerequisites for new designations. Nailsea is on the outer edge of the Green Belt. This edge is informed, and in many ways defined, by the location of outlying larger towns and villages. The Green Belt protects those towns and villages from merging with Bristol, but intentionally it does not envelop or extend across the land between those outer towns. The proposed extension would alter the approach to Green Belt designation in this area only (between Nailsea and Backwell), introducing an irregularity with an entirely different purpose, well removed from checking the unrestricted sprawl of Bristol. To amend Green Belt boundaries, or establish new areas of Green Belt, exceptional circumstances must be demonstrated. For new areas, NPPF para 144 provides key criteria. The ‘Green Belt Background Paper’ (October 2025) and Green Belt Review Part 3 Green Belt Extension’ (January 2022) are provided in the evidence base as the Council’s case for compliance with the NPPF 144 requirements. However, the case fundamentally fails. First, 3 options for a Green Belt extension are considered and option 2 selected, and whilst there is some inconsistency between the two evidence-base documents, the Background Paper (at para 7.9) confirms that the extended Green Belt only serves two out of the five Green Belt purposes. Significantly it does not serve purposes a), b), or d). This is significant because it means that the area of proposed designation would immediately be classified as Grey Belt, noting the sustainability of the location –supported by the allocations made – and lack of contribution to the overall purpose, i.e. to check the unrestricted sprawl of Bristol. In terms of overall purpose, we would further highlight the significant extent of the existing Green Belt, and it is obvious that because this area of land is not part of that existing Green Belt its development could not rationally be considered to fundamentally undermine the purposes (taken together) of the remaining Green Belt. This is important, because of the NPPFs approach to Grey Belt, and potential for residential development of Grey Belt to be ‘not inappropriate’, where there is a lack of five-year supply. Consequently, the case put that normal development management policies would not provide adequate protection (NPPF para 144a)) is irrational. Whether Grey Belt or strategic gap/countryside, a five year housing land supply shortfall would indicate that important development plan policies are out of date, triggering (without disengaging) the tilted planning balance. In terms of NPPF 144b, whilst development is proposed at South Nailsea, reducing the physical extent of the existing strategic gap, there would remain visual and physical separation between Nailsea and Backwell as a consequence of the rail line and flood plain. Further, it can be seen from the plan at para 7.7 of the Background Paper that the northern most part of the land proposed for Green Belt cuts into the new settlement boundary, contributing little additional benefit to physical separation. In any event the need for a new road through the Green Belt from Station Road (to facilitate delivery of the allocated areas – see our representations on Policy LP11) would introduce an urbanising feature segregating the northern parcels of the proposed Green Belt land from the southern parcels (those southern parcels being also located within the flood plain and close to the railway line). The effect would be that land to the north of the road would be well related to the urban area and retain a highly sustainable location, away from the flood plain. Hence, its designation as Green Belt would frustrate further sustainable development at south Nailsea (see representations to Policy LP3). Compliance with the requirements of NPPF 144 a), b) and c), is clearly not able to be demonstrated. Equally, in terms of NPPF 144 d) and e), the case is not made out in the Background Paper or Green Belt Review. Specifically, there is a need to secure a deliverable LP3 allocation, including the provision of viable, suitable and safe access infrastructure. The Green Belt designation would frustrate this provision, hence providing an inconsistency with strategic policies around sustainable housing development at the main settlements. Further, and put simply, the designation provides an unnecessary and unjustified restriction over otherwise sustainable development, on the edge of a main town and close to a railway station, which is entirely inconsistent with the thrust of the NPPF and current government thinking. Indeed, the Ministry of Housing, Communities and Local Government, The Rt Hon Steve Reed OBE MP and The Rt Hon Rachel Reeves MP have stated (18/11/			Land (Appendix B).pdf

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					25) that housebuilding around train stations which are well-connected, as is the Nailsea & Backwell Station, will be given a default 'yes'. With housebuilders encouraged to build more homes near such transport links. The Rt Hon Rachel Reeves MP added that "Recognising the significant benefits for jobs and growth that can be unlocked by building around train stations, these rules will extend to land within the Green Belt..." It is worth raising here, that neither of the evidence base documents address Green Belt boundary matters (NPPF para 149), which is a further fundamental fail, particularly given the need to look longer-term in the context of future opportunities for sustainable development. Land to the north of the new access road will inevitably offer a sustainable location to meet current and/or future housing needs. Notwithstanding the above, it is unclear how designation of this extended area of Green Belt will provide recreational benefits to residents and visitors, as none of the land relates to development proposals / allocations and therefore none of the new land is available or can be secured, through development, as publicly accessible. The same applies with respect to any opportunities for environmental improvement. There is no demonstrable recreational or environmental benefit to the designation of this area as Green Belt. In conclusion, the proposed Green Belt extension fails to meet the designation requirements and would only serve to frustrate sustainable housing development. It is unjustified and inconsistent with the NPPF			
SP8: Housing	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	SP8 sets the housing requirement for the District, this being 1,580 dpa across the plan period based on the standard methodology (SM LHN). Setting aside concerns regarding the plan period (which is too short), we agree that the starting point for setting the requirement should be the standard method but are concerned that a further uplift has not been contemplated, specifically to help with the unmet need generated from Bristol and Bath, or to assist further with affordability, or to support infrastructure provision. The NPPF is clear about needing to boost housing land supply, to meet objectively assessed needs and to provide for needs that cannot be met within neighbouring areas, supported by the PPG which states, "Where authorities plan for higher growth this should not normally have to be thoroughly justified at examination." In terms of unmet need, whilst the Duty to Cooperate is not being 'saved' under transitional arrangements moving to the new plan-making system, the Government and national policy continues to expect collaboration and effective cooperation over unmet need. For context, North Somerset lies within the wider Bristol City Housing Market Area (comprising Bristol City, North Somerset and South Gloucestershire, where the void in addressing Bristol's unmet need has persisted over several years, through failed attempts at joint strategic planning. At the present time, the Bristol Local Plan emerging requirement of 1,925 homes a year leaves an annual unmet need of 1,037 homes (BC SM LHN 2,962 dpa). Bristol has asked all of the relevant neighbouring authorities to assist but North Somerset's Duty to Cooperate compliance statement states that, "The evidence supporting the local plan demonstrates that North Somerset does not have capacity to meet some of Bristol's needs at this time." However, this is not the case, the evidence does no such thing, and despite differing evidence supporting the Bristol Local Plan examination which clearly anticipates some help from North Somerset, to be actioned through the current local plan preparation, an uplift in North Somerset's housing numbers has simply not been contemplated and has not therefore been tested in the Sustainability Appraisal. The SA is clear that it tests the SM LHN and tests difference spatial options to meet that need (e.g. see SA para 2.28). What it doesn't do is test a higher growth option which renders the plan unsound, it is not positively prepared and not justified or effective in meeting overall housing requirements. The knock-on effect of failing to assist in meeting the unmet need will be to increase affordability issues, as pressure for housing is increased. Whilst the plan will fail to address affordability issues in full, no consideration was given to increasing the housing requirement to better redress the acute problem. Just looking at Nailsea, the Housing Needs Survey confirms that "Around 540 people have moved away from Nailsea in the past 5 years because they could not find a suitable home in the town." and, "There is an annual gross need for 173 affordable dwellings in Nailsea and after taking into account supply there is a net need of 147 each year." The Local Plan doesn't go far enough to boost supply given this context. Finally, in order to deliver the infrastructure necessary to support the delivery of housing, a more flexible and positive approach should be taken to the housing requirement, to ensure development is viable. This particularly relevant with respect to south Nailsea, where development is to support a new railway crossing. In conclusion, the SA is flawed, because it fails to consider the option of a higher housing requirement	An uplift in the housing requirement must be considered and tested through the SA, and if appropriate additional land allocations made to meet the need. An uplift in the housing provision at south Nailsea should be secured in the plan.		North Somerset Reg 19 Reps (2025-12-12) - Gleeson Land (Appendix B).pdf

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					(higher growth scenario) and the plan strategy is therefore unjustified, ineffective, and unsound. Moving to the spatial distribution of the housing requirement, there is greater capacity at Nailsea and Backwell, as set out in our response to LP3. Nailsea is one of only four towns in the district and has a good range of services and facilities as well as access to a rail station. The approach to sustainable patterns of development in the NPPF (para 11) is, in part, to align growth and infrastructure. Further the Government has recently announced intentions to support, through the presumption, growth close to well-connected rail stations. Further growth at south Nailsea and Backwell would clearly align with the national policy direction, and would further support viability/delivery of the necessary infrastructure (LP11) to support growth in a sustainable location			
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Support is given to south Nailsea as an area for growth, given the sustainability of the location. However, the allocation and associated schedule of requirements is flawed in a number of ways. First, taking the Council's assessment of capacity at face value, there is capacity to provide more that 3,500 homes at Nailsea, by extending the allocated area at south Nailsea beyond that shown on the proposals map, as demonstrated by the extant outline planning application and associated masterplan (23/P/1145/OUT). This application confirms the suitability for residential development of all of the land extending from the built up area to the requisite route of the new road (see Policy LP11, linking the Youngwood Lane allocation, across the South Nailsea allocation, to Station Road, and eastwards to the land east of Backwell allocation), which would include parcels south of Youngwood Lane (see attached plan). The local plan allocation, as depicted on the proposals map, is too limiting and unjustified in a) seeking to designate land that is otherwise suitable for residential development as Green Belt (see 'Spatial strategy site selection and capacity paper' for HE20612, which confirms land north and south of Youngwood Lane as suitable and well connected, and our representations to SP7 and LP9), and b) failing to acknowledge the route of the new road (despite the requirements of Policy LP11 and it being shown with respect to adjacent land allocations). In particular, failure to acknowledge the road, provides a fundamental failure to recognise and respond appropriately to its urbanising influence and the ability to create a new built up area boundary. It is strongly contended that omitting (from the allocation) the parcels of land south of Youngwood Land not only misses a positive opportunity for NSDC to identify additional deliverable capacity, but is based on the existing landscape and settlement context, failing to reflect the inevitable changes resulting from the construction of the strategic link road. It also overlooks the proximity to the railway station: the southern parcels of the developable area being closest to the station and their inclusion would add to the connectivity of the wider site/allocation and further improve the sustainability credentials of this already sustainably located site. The new link road is required not only to access the Site but also to enable access to land to the west (HE20591) and to the east (HE202016 and HE203020). The latter of which are not able to access to the The Perrings to the north via the Youngwood Lane due to the width constraints on the land and its junction with the The Perrings. The operation of that strategic link requires a connection to and across Station Road, and would not be suitably served by an indirect route connecting to The Perrings, even if this were possible or feasible, which it is not (see attached note). The new link road will create a new defensible boundary to the southern settlement boundary of Nailsea. The road, which is to be raised, would create an obvious physical feature to the north of the existing railway line. In essence the current development boundary around Nailsea, formed by the existing built form and Youngwood Lane, will be displaced in favour if the new road. Retaining agricultural land north of the new road is nonsensical. It serves no positive purpose, being segregated from a wider agricultural land holding and heavily influenced by the presence of the link road, in physical form, visually and experientially, including as a consequence of new traffic flows. Omitting land south of Youngwood Lane (which is within flood zone 1) from the allocation severely restricts the proper planning of the area and a positive urban design approach. It also fails to maximise the potential to further support the viability of the link road, noting that the full link will need to be subject to some public funding. As a consequence of the link road proposal, the harm resulting from inclusion of the additional land parcels as part of the allocation is limited and localised, and certainly would not significantly and demonstrably outweigh the	An uplift in the housing requirement for Nailsea, to reflect an extended allocation area for the Land south of Nailsea, removed reference to primary school provision in the policy, removed reference to a single masterplan and removed reference to access via The Perrings with a clear indication of the ink road route through the site in accordance with policy LP11. Associated updates to the policies map, SA, HRA (which is necessary due to the potential impact on the SAC) and Sequential Test, given the route of the new road through flood plain		North Somerset Reg 19 Reps (2025-12-12) - Gleeson Land (Appendix B) (3).pdf North Somerset Reg 19 Reps _2025-12-12_ - Gleeson Land _Appendix A_.pdf

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					considerable benefits secured through additional housing and associated developer contributions. Turning back to the policy, we object to the specific reference to three new primary schools, further discussions should be held with the Education Authority, in the context of existing school capacity, to confirm requirements. At the present time we understand that pupil rolls are falling and the nature/size and location of the requisite new schools still open for consideration. In terms of a 'comprehensive approach' to the planning and delivery of the allocation, it should be made clear that this approach can be demonstrated at planning application stage, with individual site masterplans confirming how the planning and delivery of adjacent masterplans would not be prejudiced. There is no mechanism, and should be no requirement, for a single masterplan. With reference to The Perrings, this is not a viable or suitable option, for the reasons set out in the accompanying note to these representations. In short, The Perrings is a relatively narrow residential estate road, which does not take a direct route from the allocations to Station Road but instead weaves its way through a network of other residential roads. Even if access onto The Perrings could be achieved, the road is not suitable as a strategic link carrying significant additional volumes of traffic. As such, a new road link across the flood plain to Station Road is demonstrably required, securing compliance with the sequential test. Please also See Appendix A of these representations which include specific transport representations by i-Transport supporting the above			
Policy LP5: Housing, employment and mixed use allocations	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	This policy simply requires the allocations to comply with the site-specific requirements, but with respect to those site allocations, rather than broad locations for development, the policy is unnecessary because reference to the requirements/schedule is already made within the individual site allocation policies. Notwithstanding, out objections to the requirements are set out under our response to LP3. Please also See Appendix A of these representations which include specific transport representations by i-Transport supporting the above	Delete the policy or limit its application to Board Locations only		North Somerset Reg 19 Reps (2025-12-12) - Gleeson Land (Appendix B).pdf
Policy LP9: Extent of the Green Belt	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	LP9 states, "A new area of Green Belt is proposed south of Nailsea, and west of Backwell to maintain the separation of the settlements and protect the countryside in this area from encroachment." Notwithstanding the flawed approach of releasing land from the Green Belt on the north side of Nailsea, whilst designating new areas to the south side, in direct conflict with NPPF para 147, the approach sits uncomfortably both in the context of the overall purpose of the wider Bristol and Bath Green Belt, which is to "check the unrestricted urban sprawl of Bristol" (as stated in Policy SP7), and in the context of further national policy which sets clear prerequisites for new designations. Nailsea is on the outer edge of the Green Belt. This edge is informed, and in many ways defined, by the location of outlying larger towns and villages. The Green Belt protects those towns and villages from merging with Bristol, but intentionally it does not envelop or extend across the land between those outer towns. The proposed extension would alter the approach to Green Belt designation in this area only (between Nailsea and Backwell), introducing an irregularity with an entirely different purpose, well removed from checking the unrestricted sprawl of Bristol. To amend Green Belt boundaries, or establish new areas of Green Belt, exceptional circumstances must be demonstrated. For new areas, NPPF para 144 provides key criteria. The 'Green Belt Background Paper' (October 2025) and Green Belt Review Part 3 Green Belt Extension' (January 2022) are provided in the evidence base as the Council's case for compliance with the NPPF 144 requirements. However, the case fundamentally fails. First, 3 options for a Green Belt extension are considered and option 2 selected, and whilst there is some inconsistency between the two evidence-base documents, the Background Paper (at para 7.9) confirms that the extended Green Belt only serves two out of the five Green Belt purposes. Significantly it does not serve purposes a), b), or d). This is significant because it means that the area of	The proposed Green Belt extension between Nailsea and Backwell should be abandoned.		North Somerset Reg 19 Reps (2025-12-12) - Gleeson Land (Appendix B).pdf

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					proposed designation would immediately be classified as Grey Belt, noting the sustainability of the location – supported by the allocations made – and lack of contribution to the overall purpose, i.e. to check the unrestricted sprawl of Bristol. In terms of overall purpose, we would further highlight the significant extent of the existing Green Belt, and it is obvious that because this area of land is not part of that existing Green Belt its development could not rationally be considered to fundamentally undermine the purposes (taken together) of the remaining Green Belt. This is important, because of the NPPFs approach to Grey Belt, and potential for residential development of Grey Belt to be 'not inappropriate', where there is a lack of five-year supply. Consequently, the case put that normal development management policies would not provide adequate protection (NPPF para 144a)) is irrational. Whether Grey Belt or strategic gap/ countryside, a five year housing land supply shortfall would indicate that important development plan policies are out of date, triggering (without disengaging) the tilted planning balance. In terms of NPPF 144b, whilst development is proposed at South Nailsea, reducing the physical extent of the existing strategic gap, there would remain visual and physical separation between Nailsea and Backwell as a consequence of the rail line and flood plain. Further, it can be seen from the plan at para 7.7 of the Background Paper that the northern most part of the land proposed for Green Belt cuts into the new settlement boundary, contributing little additional benefit to physical separation. In any event the need for a new road through the Green Belt from Station Road (to facilitate delivery of the allocated areas – see our representations on Policy LP11) would introduce an urbanising feature segregating the northern parcels of the proposed Green Belt land from the southern parcels (those southern parcels being also located within the flood plain and close to the railway line). The effect would be that land to the north of the road would be well related to the urban area and retain a highly sustainable location, away from the flood plain. Hence, its designation as Green Belt would frustrate further sustainable development at south Nailsea (see representations to Policy LP3). Compliance with the requirements of NPPF 144 a), b) and c), is clearly not able to be demonstrated. Equally, in terms of NPPF 144 d) and e), the case is not made out in the Background Paper or Green Belt Review. Specifically, there is a need to secure a deliverable LP3 allocation, including the provision of viable, suitable and safe access infrastructure. The Green Belt designation would frustrate this provision, hence providing an inconsistency with strategic policies around sustainable housing development at the main settlements. Further, and put simply, the designation provides an unnecessary and unjustified restriction over otherwise sustainable development, on the edge of a main town and close to a railway station, which is entirely inconsistent with the thrust of the NPPF and current government thinking. It is worth raising here, that neither of the evidence base documents address Green Belt boundary matters (NPPF para 149)., which is a further fundamental fail, particularly given the need to look longer-term in the context of future opportunities for sustainable development. Land to the north of the new access road will inevitably offer a sustainable location to meet current and/or future housing needs. Notwithstanding the above, it is unclear how designation of this extended area of Green Belt will provide recreational benefits to residents and visitors, as none of the land relates to development proposals / allocations and therefore none of the new land is available or can be secured, through development, as publicly accessible. The same applies with respect to any opportunities for environmental improvement. There is no demonstrable recreational or environmental benefit to the designation of this area as Green Belt. In conclusion, the proposed Green Belt extension fails to meet the designation requirements and would only serve to frustrate sustainable housing development. It is unjustified and inconsistent with the NPPF			
Policy LP11: Transport infrastructure,	No	Positively	No	No	Policy LP11, and the proposals map, refers to a "Potential sustainable transport extension of the reserved transport corridor through the Youngwood Lane site to Station Road, Nailsea."	Add the safeguarded road link across the South Nailsea allocation.		North Somerset Reg 19 Reps

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allocations and safeguarding		prepared • Justified • Effective • Consistent with national policy			Schedule 7 reconfirms the 'reserved transport corridor within consented Youngwood Lane development, Nailsea' and 'Station Road to A370, Cross Rail Link, Nailsea and Backwell' as 'major transport schemes.' The Infrastructure Delivery Plan schedule further confirms that this infrastructure is considered to be 'essential', and to serve and enable development to the south of Nailsea and at Backwell (TR33 & TR34). The plan clearly anticipates a new road to the south of Nailsea, to create sustainable transport links and serve the allocations across the southern edge of Nailsea. However there is a missing section, from Station road to the Youngwood Lane allocation i.e. across the south Nailsea allocation. This is a glaring omission, given the terms of the policy and the lack of viable/ deliverable alternative solution to access the allocated land with road infrastructure that is suitable to perform the necessary strategic function and carry the volume of traffic expected. The associated policy (LP3) asks for access via The Perrings to be investigated, but that access is not deliverable and even if it were the route via The Perrings and other residential roads is unsuitable for a strategic road link (see attached note). The extant outline planning application (Ref: 23/P/1145/OUT), which has all matters reserved except means of access, includes the necessary road link with the formation of a new vehicular access onto Station Road, with pedestrian and cycle access links, to serve the development and which would act to secure improved accessibility to the rail station. The omission fails to represent positive and effective planning and is unsound.Please also See Appendix A of these representations which include specific transport representations by i-Transport supporting the above. The HRA (Aecom, 2025) of the NSLP does not include the proposed Major Transport Schemes set out in Schedule 7 as they have been assessed previously in the HRA (Clearlead, 2019) of the Joint Local Transport Plan (JLTP). The evidence base published with the North Somerset and Mendip Bats Special Area of Conservation (SAC) Supplementary Planning Document Consultation (22 October 2025 - 3 December 2025), namely the 'Radio-tracking Report' and 'Academic Research Paper', was issued after the completion of the HRA for the JLTP. This evidence supersedes that included for the HRA of the JLTP and is relevant to the baseline referenced in the HRA. Accordingly, the HRA of the JLTP can no longer be considered reliable for the NSLP. This should be recognised in the HRA of the NSLP and effects of the Major Transport Schemes assessed accordingly i.e. included for Screening and Appropriate Assessment. Furthermore, the HRA of the NSLP recognises (Paragraph 5.5) that 'One proposed scheme (Station Road to A370, Cross Rail Link, Nailsea and Backwell) is not allocated within the JLTP. As noted above, the safeguarding of this land does not lead to likely significant effects, however if this scheme is brought forward, it would require assessment at that time'. This is an unsound approach to HRA. The scheme is a Major Transport Scheme (forming part of the 'Plan') under Policy LP11 and should be assessed in the HRA of the NSLP, as required by the Conservation of Habitats and Species Regulations 2017 (as amended).	The HRA of the NSLP should include an assessment of the Major Transport Schemes set out in LP11 (and Schedule 7), including Station Road to A370, Cross Rail Link, Nailsea and Backwell		(2025-12-12) - Gleeson Land (Appendix B).pdf North Somerset Reg 19 Reps _2025-12-12_ - Gleeson Land _Appendix B_ (1).pdf
Policy DP6: Net zero construction	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The aspirations of Policy DP6 are certainly positive and supported. However, whilst the policy is largely supported it is inappropriate to require every development proposal to meet every criterion. Some of the criteria won't apply, whilst the requirements may adversely affect the deliverability of schemes due to the prescriptive requirements that could consequently harm the feasibility of large and major schemes. Together with other requirements the burden may make schemes unviable or adversely reduce the ability to provide other equally positive contributions, such as affordable housing or financial contributions. The NPPF consistently refers to 'low carbon' measures, rather than zero carbon. Where net zero carbon is achieved then the NPPF directs this to be given significant weight in the planning balance.	Policy DP6 should reflect the NPPF in that 'low carbon' measures is achievable whilst acknowledging the aim is to achieve, if possible, net zero		North Somerset Reg 19 Reps (2025-12-12) - Gleeson Land (Appendix B).pdf
Policy DP9: Flood risk	No	• Positively prepared	No	No	Given the characteristic of the District, and lack of sustainable alternatives (compliant with the spatial strategy) that completely avoid flood zones 2 & 3 within their red line it is essential that the approach to the sequential test, as set out in policy DP9, is consistent with national guidance and provides a positive and pragmatic approach. Specifically, it is considered that the policy should make it clear that	Amend the wording of the Policy DP9 to make it explicit that a disaggregated approach is acceptable.		North Somerset Reg 19 Reps (2025-12-12)

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		• Justified • Effective • Consistent with national policy			it expressly allows for a disaggregated approach when considering the need for the sequential test, which would facilitate development sites being brought forward where residential development is not proposed to take place in the areas at risk of flooding but other elements of the development – infrastructure/biodiversity/open space etc may be within the red line of an application). This would reflect a sequential approach and meet the national policy aim of preventing inappropriate development in areas of flood risk			- Gleeson Land (Appendix B).pdf
Policy DP19: Parking	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The policy notes support for developments with reduced provision for parking in highly accessible locations, well integrated into the existing settlement with easy and direct access to local facilities via active modes of travel. It notes that such developments must be well served by public transport and should have access to a car club vehicle. The later compulsory requirement of Policy DP19 may be inappropriate in certain circumstances and therefore shouldn't be obligatory.	Remove the compulsory requirement for the provision of a car club vehicle from Policy DP19		North Somerset Reg 19 Reps (2025-12-12) - Gleeson Land (Appendix B).pdf
Policy DP34: Green infrastructure	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The policy notes that the scale and extent required will depend on the nature of the development and the existing quantity and quality of provision in the locality. However, policy DP34 goes on to note that requirements will be higher for large-scale proposals of 10 dwellings or more, particularly where there is a lack of green infrastructure. It is acknowledged and accepted that new developments should make proportionate and related improvements to green infrastructure which is comparable to their scale. However, the policy and its justification text doesn't sufficiently justify the requirement that development should make up for the lack of existing green infrastructure in the area, which the policy due to its wording implies. The policy should be reworded to make it more explicit that large scale developments shouldn't need to make additional provision for existing shortfalls in Green Infrastructure.	Remove the reference to "particularly where there is a lack of green infrastructure" from Policy DP34.		North Somerset Reg 19 Reps (2025-12-12) - Gleeson Land (Appendix B).pdf
Policy DP37: Trees, Woodlands and Hedges	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	A perhaps unnecessary expansion to policy DP35 (Nature conservation). There appears to be some potentially duplicate requirements in relation to the natural environment policies within the draft Local Plan, which whilst commendable, results in an unjustified and inappropriately prohibitive approach to achieving ecological enhancement and biodiversity gains	Combine Policy DP37 with Policy DP35 and delete Policy DP37.		
Policy DP38: Landscape	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	A perhaps unnecessary policy with most points detailed in policy DP38 covered by other policies within the draft Local Plan	Combine Policy DP38 with others and delete the policy.		
Policy DP43: Affordable housing (including rural exception schemes)	No	• Positively prepared • Justified • Effective • Consistent with	No	No	The policy notes that "the affordable housing mix should be 75% social rented and 25% shared ownership." This is considered to be extremely prescriptive and doesn't not allow sufficient flexibility to take into account site viability and specific local need. Policy DP43 also acknowledges that the precise size and type of affordable housing to be provided on individual sites will be determined through negotiation, guided by available information. This approach, which notes that provision will be guided by the Local Housing Needs Assessment, data	Policy DP43 should be amended to allow flexibility in relation to the affordable housing mix, as it does with regards to the size and type		

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		national policy			from the housing needs register and local housing needs surveys, is supported. It allows flexibility of approach to meet the needs of the particular site, location and timing demands. Enabling the ability to maximise affordable housing delivery whilst taking into account other potential influences at the time.			
Schedule 7: Transport Infrastructure, allocations and safeguarded routes	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Policy LP11, and the proposals map, refers to a “Potential sustainable transport extension of the reserved transport corridor through the Youngwood Lane site to Station Road, Nailsea.” Schedule 7 reconfirms the ‘reserved transport corridor within consented Youngwood Lane development, Nailsea’ and ‘Station Road to A370, Cross Rail Link, Nailsea and Backwell’ as ‘major transport schemes.’ The Infrastructure Delivery Plan schedule further confirms that this infrastructure is considered to be ‘essential’, and to serve and enable development to the south of Nailsea and at Backwell (TR33 & TR34). The plan clearly anticipates a new road to the south of Nailsea, to create sustainable transport links and serve the allocations across the southern edge of Nailsea. However there is a missing section, from Station road to the Youngwood Lane allocation i.e. across the south Nailsea allocation. This is a glaring omission, given the terms of the policy and the lack of viable/deliverable alternative solution to access the allocated land with road infrastructure that is suitable to perform the necessary strategic function and carry the volume of traffic expected. The associated policy (LP3) asks for access via The Perrings to be investigated, but that access is not deliverable and even if it were the route via The Perrings and other residential roads is unsuitable for a strategic road link (see attached note). The extant outline planning application (Ref: 23/P/1145/OUT), which has all matters reserved except means of access, includes the necessary road link with the formation of a new vehicular access onto Station Road, with pedestrian and cycle access links, to serve the development and which would act to secure improved accessibility to the rail station. The omission fails to represent positive and effective planning and is unsound.Please also See Appendix A of these representations which include specific transport representations by i-Transport supporting the above. The HRA (Aecom, 2025) of the NSLP does not include the proposed Major Transport Schemes set out in Schedule 7 as they have been assessed previously in the HRA (Clearlead, 2019) of the Joint Local Transport Plan (JLTP). The evidence base published with the North Somerset and Mendip Bats Special Area of Conservation (SAC) Supplementary Planning Document Consultation (22 October 2025 - 3 December 2025), namely the ‘Radio-tracking Report’ and ‘Academic Research Paper’, was issued after the completion of the HRA for the JLTP. This evidence supersedes that included for the HRA of the JLTP and is relevant to the baseline referenced in the HRA. Accordingly, the HRA of the JLTP can no longer be considered reliable for the NSLP. This should be recognised in the HRA of the NSLP and effects of the Major Transport Schemes assessed accordingly i.e. included for Screening and Appropriate Assessment. Furthermore, the HRA of the NSLP recognises (Paragraph 5.5) that ‘One proposed scheme (Station Road to A370, Cross Rail Link, Nailsea and Backwell) is not allocated within the JLTP. As noted above, the safeguarding of this land does not lead to likely significant effects, however if this scheme is brought forward, it would require assessment at that time’. This is an unsound approach to HRA. The scheme is a Major Transport Scheme (forming part of the ‘Plan’) under Policy LP11 and should be assessed in the HRA of the NSLP, as required by the Conservation of Habitats and Species Regulations 2017 (as amended).	Add the safeguarded road link across the South Nailsea allocation. The HRA of the NSLP should include an assessment of the Major Transport Schemes set out in LP11 (and Schedule 7), including Station Road to A370, Cross Rail Link, Nailsea and Backwell		North Somerset Reg 19 Reps (2025-12-12) - Gleeson Land (Appendix B).pdf

Name: Glen Davies **I.D:** 58489761

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Downside	No	• Consistent with national policy	Yes	Yes	The release of greenbelt land around Portishead does not meet the 'exceptional circumstances' rule because other brownfield sites, that could be maximised through the use of high rise accommodation, has not been fully explored - eg Wyndham Way. The council has not reached a 'last resort' to justify losing valuable greenbelt.			

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Downside	No	• Effective	Yes	Yes	this site has no realistic access route, so cannot be sound or effective.			
Land at Tower Farm	No	• Consistent with national policy	Yes	Yes	The site is claimed to comply with sustainability requirements - but claims that people can easily walk or cycle to transport links, the proposed train station, shops or the town centre, are false and misleading. The site is 350 feet higher than the town, the hillside is very steep, I believe is nearly 2 miles away from the town/station etc, so people will be forced to use cars, adding to an already highly congested junction at Down Road, where there is also a school, so traffic pollution and children will be caused, plus the obvious traffic dangers around schools.	A different access road/route is essential, perhaps Tower Road, Merlin, or a new access from Valley Road.		
Land at Tower Farm	No	• Effective	Yes	Yes	To create 400 homes, meaning (say) 550 cars that's only accessible through 1 road (Top of the Downs), which, particularly at school drop off/pick up times, is a single track road cannot be safe or effective from any planning point of view. The No of cars already entering and leaving Portishead - through Junction 19 (M5) is already at a maximum level, with queues on the M5 Avonmouth Bridge, Junction 19 & Portbury Hundred, so additional traffic & the already dangerous traffic levels cannot be ignored. Portishead is already considered a cul de sac, which is gridlocked following any M5 incident. Furthermore, The impact of this No of cars accessing & leaving the site on the top of the Downs road will impact the freedom to access & leave their properties safely	Better & more access routes required - locally & from/to the M5		
Land at Tower Farm	No	• Consistent with national policy	No	Yes	This is green belt - recognised in the 1980's - & should only be declassified as a last resort & in exceptional circumstances. Neither test has been passed in this case - other land is available			

Name: Grace Kasouris **I.D:** 58601633

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Land at Leighton Crescent	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	Unsure	I would struggle to understand how the Plan 2041 in reference to Leighton Crescent is considered legally compliant for the reasons clearly listed in the prior Parish Council minutes where this development was first discussed 10 years ago. https://www.bleadon.org.uk/media/other/24400/Minutes-P54.pdf The land is listed as an SSSI and as referenced in the above document, the Church Commissioners Covenant states that within this proposed plot it states, a maximum of 5 properties can be erected per acre which clearly means the plan for this plot is legally not compliant.	I would kindly refer you study the linked Bleadon Parish Minutes: https://www.bleadon.org.uk/media/other/24400/Minutes-P54.pdf These minutes were generated ten years ago and there has been no changes to the immediate land/environment which would make the proposed build of 81 homes appropriate for Leighton Crescent. Bleadon as a village has accepted three new developments within the last 5 years. Keepers Gate, Edens Green and now the extremely dangerous to access Countrywide Partnerships development. In what other village in Weston Super Mare has seen this type of growth within the same space of time? Fundamentally, the access to the land proposed at Leighton Crescent is not suitable for a housing estate and the motor traffic this brings. Due to establish properties either side, the road width cannot be increased and to accommodate a footpath and would make the already tight road even narrower. The access to Bleadon Hill is already problematic, with Devils Overbridge being closed what seems almost monthly and Totterdown Lane access only one way exiting the top of the hill how do you accommodate, whilst being respectful of current residents the influx of traffic this would incur?	No	Minutes-P54.pdf

Name: Graham Hopkins **I.D:** 32297377

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Pill Green	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I consider the North Somerset Local Plan 2041: Pre-submission Plan to fall short of soundness, legal compliance and, in parts, the Duty to Cooperate for the following reasons: 1. Consultation and legal requirements The “additional sites” consultation (7 February–21 March 2025) introduced five major sites at Pill/Easton-in-Gordano yet did not include a single local exhibition in the community directly affected. Response levels were significantly lower than in comparable settlements, raising concerns about whether engagement was proportionate or inclusive. The Council should demonstrate how this process met its Statement of Community Involvement and duties under the Equality Act 2010, and how it has taken into account the petition signed by over 1,800 residents. 2. Green Belt release and alternatives assessment The evidence underpinning SP7 does not clearly show that all reasonable non-Green Belt options were properly assessed, including optimising brownfield land, higher densities in sustainable locations and cross-boundary capacity through the Duty to Cooperate. Without transparent publication of this work or the viability information relating to affordable housing delivery, the “exceptional circumstances” case remains unproven. 3. Transport evidence and Duty to Cooperate (Junction 19) The plan lacks readily accessible cumulative traffic modelling for M5 Junction 19 and does not clearly demonstrate agreement with National Highways on mitigation. Given National Highways’ request for cumulative assessment, the Plan must show that this has been undertaken and that risks associated with reliance on the proposed rail link have been fully addressed. 4. Environmental protection/HRA Sites around Pill/E-in-G are close to nationally and internationally protected habitats (SAC/SSSI). The Plan requires clearer, published evidence—HRA, ecological surveys, buffer requirements, and Biodiversity Net Gain commitments—to demonstrate that adverse effects will be avoided and that mitigation is deliverable and funded. 5. Flood risk and sequential testing Some locations, particularly around Markham Brook, lie within or adjacent to Flood Zone 3. The Plan must clearly set out the sequential test, and where necessary the exception test, supported by site-specific Flood Risk Assessments. It should also demonstrate preference for lower-risk sites, safe access/egress and appropriate flood compensation measures.	To ensure the North Somerset Local Plan 2041 is both legally compliant and sound, the following modifications are required: 1. Consultation and compliance • Publish a full audit trail showing how the Additional Sites consultation met SCI standards and the Public Sector Equality Duty, including reasons for the lack of a Pill/E-in-G exhibition. • Undertake a targeted, locally accessible re-consultation for the Pill/E-in-G allocations and clearly set out how the 1,800+ petition responses are to be incorporated into decision-making. 2. Green Belt and alternatives (SP7) • Release a transparent analysis of alternative growth options, including maximised brownfield use, increased density in sustainable settlements and cross-boundary discussions under the Duty to Cooperate. • Revise SP7 to contain robust site-specific exceptional-circumstances evidence and demonstrate that each allocation will meet NPPF Green Belt “Golden Rules” on infrastructure, green space and genuinely deliverable affordable housing. 3. Transport and infrastructure (LP4/Schedule 1) • Provide cumulative traffic modelling for all developments affecting M5 Junction 19 and publish evidence of agreement with National Highways on mitigation and delivery funding. • Strengthen transport policies with a committed mitigation programme, clear phasing and contingency measures if rail enhancements are delayed or amended. 4. Environmental/HRA and biodiversity (SP11, DP35–37) • Publish a complete HRA and updated ecological assessments for all Pill/E-in-G sites, demonstrating that protected species and designated habitats will not be harmed. • Enhance policies to secure enforceable biodiversity mitigation, ecological buffers, long-term monitoring and funded Biodiversity Net Gain delivery. 5. Flood risk (DP9 / DP11) • Apply and publish the sequential test for sites near Markham Brook, with site-specific Flood Risk Assessments for any allocations intersecting Flood Zones 2/3. • Strengthen wording to require safe access/egress, compensatory flood storage and long-term management arrangements for any development in		

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						higher-risk areas.		

Name: Graham Paul House **I.D:** 38580961

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Land north of Churchill Avenue		‣ Justified ‣ Effective	Unsure	Unsure	Penny Field/land north of Churchill Avenue is an important urban green space and should be valued as such, once it's built upon it's gone for good, which would be a travesty for the town and local residents. The field has massive potential for leisure, community orchards and veg patches, wildlife and pollinator corridors and riverbank conservation, protecting and encouraging the breeding grounds for frogs, toads, newts, slow worms, river birds, fish, dragonflies, damselflies, butterflies, and much more. It could be a fantastic resource for real community involvement and engagement. The Castlewood site is far better placed in terms of infrastructure and location to maximise/increase housebuilding capacity there, so the quiet residential estate around Penny Field is protected and undisturbed. The plan makes vague and non-specific reference to "part of the site being given over to play/public open spaces facilities" and "may be considered as an LGS in future", so how much of the site would be "given over", which parts, when in the future, these are weak sops/assurances that need clarification, a clear commitment of intent. If this plan goes ahead, you will be taking away a well-used resource from local people e.g. dog walkers, kids hanging out and playing football, cricket, riding their bikes, fishing in the river, families and youngsters having picnics, all this will be taken away from the local community.			

Name: Graham Peter Hunt **I.D:** 51100161

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Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	1 Backwell is not a village which provides significant employment. The plan does not allow for jobs to be created to match the new housing: to avoid congestion and lengthy travel houses should be built nearer to where employment is. 2 There is already an unacceptable level of congestion throughout the village, most notably at the Dark Lane / A370 traffic lights but also in the surrounding roads which are used as "rat runs" which makes the roads dangerous and potentially unsafe. This plan promotes commuting - the Council should be looking to reduce commuting. 3. The number of new houses proposed for the area would be likely to almost double the size of the village. This plan would be about 40% increase alone. this level of development is unreasonable. 4 There is no infrastructure to cope with this development in terms of roads, schools, medical facilities, shops and supermarket, and other services in general. 5 The proposed new road would not cope with Nailsea’s traffic and would not be a sufficient relief for the congestion in the village - history suggests that the road may not even be built! 6 The land near to the railway line and Backwell Common is liable to flooding - it floods regularly|: there is a flood plain in the area. The costs of coping with this and with bringing the proposed road under or over the railway would likely be uneconomic. 7 It appears unreasonable that Backwell is allocated such a high percentage of new houses: higher than any other village in North Somerset and a higher growth percentage than towns. 8 Why is there no needs or viability analysis for an extra 1,000 houses. 9 The plan would build on Grade 1 Agricultural Land currently used for food crops and animal grazing. I understand that there is only 7% of this high quality land left in the whole of North Somerset. 10 Government policy requires that quality land is safeguarded for food security reasons: following this Local Plan 2041 plan goes completely against this requirement and threatens food security. 11 This development would destroy valuable wildlife habitats and further harm biodiversity in one of the world’s most nature-depleted countries. this includes threats to the Brockley Maternity Roost and SSSI, with rare Lesser and Greater Horseshoe Bats relying on the land for food. 12 Where is the cost analysis / risk analysis / harm analysis for the plan. 13 Government policy requires 50% affordable housing on Greenbelt Land, but this reduces the funds developers contribute towards infrastructure.			

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					14This plan will have a serious detrimental impact on the character of the area. It will destroy greenbelt and grade 1 agricultural land, will increase flooding and increase congestion. 15 The railway station cannot provide a transport hub for accessibility and other reasons.			

Name: Graham Scott **I.D:** 18204257

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	1. The proposal to increase the size of Nailsea by 55% is totally disproportionate and will result in the gross over-development of the town, and the loss of its distinctive charm, character and environment. 2. Nailsea is distinguished by its pattern of houses with much-valued patches of green spaces and trees, linked by a network of footpaths. Large and small green spaces and specimen trees were deliberately designed into its plan, for example the small green space off Trendlewood Way opposite Avening Close. These small green spaces are greatly valued by local residents and it is of the greatest importance that they should be protected much more extensively than the Plan currently proposes. Developing them results in no significant gain in housing numbers. 3. New infrastructure, such as schools, clinics, leisure facilities, etc. would be needed by the over-development proposed. However, there are no identified sites, concrete plans or direct investment. The development would totally overstretch existing infrastructure, such as health and leisure provision. Yet there are no proposals to address this. 4. The proposed road will destroy our beautiful green landscape and will not relieve traffic problems on Station Road. The Plan does not properly address the increased traffic load within and around Nailsea that has been modelled as a consequence of the proposed development. 5. Proximity of the link road to the river Kenn is likely to be very challenging due to the need for flood mitigation. Together with the engineering implications of the under-rail crossing, the costs are likely to be massive. 6. High quality, high yielding agricultural land to the south of Nailsea will be destroyed by the housing development. This lush green land with its old field lines, hedges and walls has been farmed for centuries and is part of the historic fabric of the landscape so cherished by local people and visitors to the area for country walks and dog walking. The proposed mitigation is totally inadequate. 7. The development by Backwell Lake is on a flood plain which anyone who walks there will know regularly floods. It would be irresponsible to build there. 8. The protection of wildlife has not been properly considered. Habitats and ecological corridors will be removed and damaged by the development. Protected species such as the rare Greater and Lesser Horseshoe bats, and many other species of bats forage on all of the development areas, yet this seems to have been ignored. Increased light spill from the new homes, the new road and traffic will impact on Horseshoe bats in particular. 9. Increased traffic will lead to more accidents at existing accident black spots, such as Wraxall Hill and Portbury Lane, as there are no proposals to address these. The rural lanes around Nailsea, currently used by commuting cyclists and leisure activities including walking and horse riding will become significantly less safe. 10. The railway station is not suitable as a transport hub as it is not accessible to people with disabilities or families with prams and pushchairs.	See response above. I would stress that the small green spaces within Nailsea need to be more extensively protected from infill housing, as they are part of the designed environment that local residents value so much - this will enhance the well-being of residents and protect the local environment.		
Policy LP15: Local Green Space	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	The Areas of Local Green Space that the plan currently proposes to protect within Nailsea are grossly inadequate. Small green spaces form part of the fundamental character and green environment of Nailsea and are therefore an important part of why people enjoy and want to live there. Despite this they are becoming increasingly subject to speculative, highly unsuitable and repeated and protracted planning applications such as those that have been rejected for the small green space off Trendlewood Way opposite Avening Close, a remnant of the original open landscape of Nailsea and a designed green space. Despite being local amenity spaces freely used by residents in the decades since they were designed into the development of Nailsea, they are increasingly being inappropriately fenced off by developers who have purchased the land from the developers who designed them as green amenity spaces. Building on these small green spaces does not contribute in any significant or worthwhile way to the housing stock but does impact the quality of life and well-being of local residents, as well as damaging the local environment and ecology. The strength of support of local residents and the Town Council for these green spaces as evidenced through the responses to planning applications amply justifies the creation of more Areas of Local Green Space.	See above. The Plan should provide for the creation of far more Areas of Local Green Space within Nailsea, including but by no means limited to the green space off Trendlewood Road, opposite Avening Close.		

Name: Graham Woods **I.D:** 62804385

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Land east of Backwell	No		Unsure	Unsure	The plan involves quality agricultural land which is home to many threatened species of farmland birds such as skylarks and yellowhammers, as well as bats and larger mammals.the land is currently used for growing food crops and is highly productive. There is only 7% of this high quality land left in N Somerset. Backwell Common and the area around Backwell Lake are subject to frequent flooding. Backwell is expected to absorb a higher number of houses than any other village in N Somerset.	The Plan for housing on Green Belt land east of Backwell needs to be scrapped in its entirety.		

Name: Grahame Dixie **I.D:** 49543265

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SP11: Historic and natural environment	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	Unsure	Summary and Conclusion The LP contains noble words about the need for and importance of protecting our county's Best and Most Versatile Land (BMV) The data demonstrates that NSC's actions contradict this stated intension. NSC own data is that 17% of the county is grade 1 and 2 land. If NSC had in place an effective policy of protecting our BMV, then a lower proportion than this of the land area allocated for building would be of grade 1 & 2 land. Analysis of NSC's own report demonstrates this is not the case. The LP identifies 60 sites where housing is projected on existing agricultural land. However, 57% of these sites are on grade 1&2. This evidence shows that far from protecting high quality agricultural land, in reality NSC is preferentially selecting BMV for building. There is then a radical contradiction in the LP between the thought and the action. The LP needs to; (i) Insist that all building application include independent soil evaluations , (ii) Communicate to the developers that preference would be given to applications on poor quality agricultural land, (iii) Benchmark the approval of sites on grade 1 and 2 land against the proportion of NSC land area of this quality land to monitor that the LP's stated BMV objectives are being effectively implemented.		1. Insist that all building application include independent soil evaluation 2. Communicate to the developers that preference would be given to applications on poor quality agricultural land, as well as brown field sites 3. Benchmark the approval of sites on grade 1 and 2 land against the proportion of NSC land area of this quality land	Best and Most Versitale Agricultutral Land DIXIE notes.docx
Policy LP3: Strategic location: Nailsea and Backwell	No		Unsure	Unsure	Summary and Conclusion The LP contains noble words about the need for and importance of protecting our county's Best and Most Versatile Land (BMV) The data demonstrates that NSC's actions contradict this stated intension. NSC own data is that 17% of the county is grade 1 and 2 land. If NSC had in place an effective policy of protecting our BMV, then a lower proportion than this of the land area allocated for building would be of grade 1 & 2 land. Analysis of NSC's own report demonstrates this is not the case. The LP identifies 60 sites where housing is projected on existing agricultural land. However, 57% of these sites are on grade 1&2. This evidence shows that far from protecting high quality agricultural land, in reality NSC is preferentially selecting BMV for building. There is then a radical contradiction in the LP between the thought and the action. The	1. Insist that all building application include independent soil evaluation 2. Communicate to the developers that preference would be given to applications on poor quality agricultural land, as well as brown field sites 3. Benchmark the approval of sites on grade 1 and 2 land against the proportion of NSC land area of this		Best and Most Versitale Agricultutral Land DIXIE notes.docx

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					LP needs to; (i) Insist that all building application include independent soil evaluations , (ii) Communicate to the developers that preference would be given to applications on poor quality agricultural land, (iii) Benchmark the approval of sites on grade 1 and 2 land against the proportion of NSC land area of this quality land to monitor that the LP's stated BMV objectives are being effectively implemented. Comments on : Best and Most Versatile Agricultural Land Globally the issues of increasing risks around food security are evident. For any country the quality and productivity of soil is a vital and treasured resource which reduces those risks. And yet NSC and its LP continues to take a cavalier attitude toward the use of our best agricultural land for building. Trumping long term wise planning with short termism. Strengthening Food Security through national production Food Security Globally is an increasingly threat. Populations continue to grow. Diets are becoming richer in animal protein, requiring larger land areas per person fed. Trade wars, tariff hikes and continuing retreat from globalisation menace future trade in agricultural goods. The effects of climate change on crop productivity (heat stress, flooding, extreme weather events) is of great concern for policy maker globally. The most recent report on Global Food Security emphasises the continuing fragility of agricultural production, markets and trade. Amongst the important points made are; (i) Food prices rose throughout 2023 and 2024, pushing up the average cost of a healthy diet globally (ii) Global food markets have faced persistent pressures in recent years, with food price inflation emerging as a major concern since 2021 (iii) Compounded global shocks have intensified food price inflation worldwide, and (iv) Recommends Invest in resilient agrifood systems. Experience from the last global food crisis in 2008 provides insights as how radically and swiftly the global trade in agricultural products changes. Prices increases; food exporting nations drop trade barriers so as to ensure that they can continue to feed their own populations. Net food importing nations are forced to recognise their vulnerability. And in the last crises even explored the opportunity of purchasing large tracts of land in under-developed in a desperate attempt to shore up their own food supplies. The United Kingdom is a major food importer – being reliant on imported foods for just under a half of the food we eat. We are then vulnerable. This is a vulnerability which is likely to increase for the reasons outlined above; Reducing the area of high-quality agricultural land through building increases that vulnerability. Nationally Productive Land is being lost at an increasing rate Throughout the UK analysis demonstrates that the areas of high-quality land that is being given approval for building has massively increased. New research by CPRE , the countryside charity, found almost 14,500 hectares of the country's best agricultural land, has been permanently lost to development since 2010. There was an exponential rise in Best and Most Versatile (BMV) agricultural land set aside for housing and industry. Between 2010 and 2022, this has increased from only 60 hectares to more than 6,000 hectares per year. The All-Party Parliamentary Group on Science and Technology in Agriculture (APPGSTA) study, led by Dr Derrick Wilkinson, found that that government targets for house building, nature recovery, renewable energy, tree planting and infrastructure could together remove up to a quarter of Britain's farmed land by 2050 — much of it high-quality arable ground. And without a renewed focus on productivity and innovation, domestic food output could drop by 32% by 2050, or 39% per capita, at current growth rates. The APPGSTA is calling for the government to adopt its 30:50:50 mission — a framework aimed at boosting UK agricultural output by 30% while cutting the sector's environmental footprint by half by 2050. Local Plans should reflect National Plans and Policies	quality land		

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					In a letter dated Nov 4th 2025 the Minister of State for Dpt of Environment (Dame Angela Eagle MP) wrote to Sadik Al-Hassan MP for North Somerset setting out the national policy on soil quality. This clearly states that BMV land has greater protection in planning than non-BMV land. National Planning policy relevant to agricultural land and soils is found in paragraph 187(a), 187(b) and 188 (footnote 65) of the National Planning Policy Framework (NPPF) . This states that: 187. Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); b) recognising the intrinsic character and beauty of the countryside and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land and of trees and woodland 188. Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework1, take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries. The point is repeatedly made in the policy paper that; ‘Where significant development of agricultural land is demonstrated to be necessary; areas of poorer quality land should be preferred to those of a higher quality’. The gap between the noble words of NSC LP and their Actions North Somerset in its Local Plans appears to be concerned about the loss of BVM. But analysis demonstrates that in practice that NSC best agricultural land is being lost to house building projects at a disproportionate high rate. It would appear that the NSC is deliberately turning a blind eye to the loss of our BMV land. As well as not enforcing codes of practice for developers to disclose the quality of the agricultural land that they are planning to build on. The earlier draft Local Plan made a number of laudable statements. “The proportion of Grade 1 land in North Somerset is approximately 7% and 10% for Grade 2. 60% falls in Grade 3. The NSC BMV policy recognises the benefits of all BMV and provides even stricter safeguards for the limited amount of grade 1 and 2 in North Somerset”. And continues to state that “The use of areas of poorer quality land instead of higher quality land is preferred”. The draft plan then goes onto say Development will not be permitted unless it is for: • Infrastructure or community uses that require that specific location. or • Outdoor recreational use; or • A limited temporary use where the land and soil could be returned to its former quality and plans for its reinstatement are secured. or • Is necessary for the associated agriculture or forestry use. In other words, it precludes the building of permanent housing. These same views are echoed in the latest draft of the NSC LP. However, in the background paper entitled “Best and Most Versatile Agricultural Land “ tells a different story, backed by data. It estimates that some 7% of the land area is Grade 1 land (i.e. 2,522 ha), another 10% is grade 2 (i.e. 3,842 ha). 60% is grade 3 (22,469 ha) and 12% grade 3 and 4 land. This report, helpfully, goes onto categorise the soil quality in some 59 rural potential and existing housing sites in in NSC. Although only 17% of NSC land is categorised grade 1 and 2, just under 60% of these sites are defined as having soil in the very high quality categories of grade 1 and 2.			

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					(see annex 1) This implies that NSC are in practice are disproportionately approving sites of high quality land. If they were following their own statements in the LP, then the sites that are approved for building would be skewed towards sites with poorer natural soil resources. This failure to take proper account of soil quality is particularly evident in Backwell. In Backwell, every major property development is on the highest quality of soil (see table below). In Backwell the draft plan includes proposals for increasing the number of houses in the village by some 1800, (i.e +80%) and including the previous appeals for housing development at Farleigh Field West (95 homes), Farleigh Field East (125 homes) and Rodney Road (65 houses) that data demonstrates that the council has approved or contemplating going approval to 5 major developments. All of which (122.8 ha)) are on Grade 1 &/or Grade 2 land. Where/Soil Grade/Hectares/Houses/Density per Ha HE20595/Land around Grove Farm/1 & 2/58.09/515/8.9 HE203013/Western part of Farleigh Fields/1/6.09/125/20.5 HE203035/Land east of Backwell B/1/28.59/450/15.7 HE201087/Farleigh Fields/1/5.52/94/17.0 HE202012/Land east of Backwell A/1/22.18/500/22.5 NA Rodney Road/2/2.29/65/28.4 TOTALS 122.76 1749 14.2 Note: Figures taken from NSC Background Paper Best and Most Versatile Agricultural Land Oct 2025 What is particularly galling is the explanation in the report why the NSC is inclined to allow the development of nearly 1,000 houses on the land East of Backwell (i.e. the land A and B in the table above) which amounts to some 50 Ha of grade 1 land. The report claims that: “The allocation of this large site, as part of a wider package of strategic allocations around Nailsea and Backwell is considered justified on the basis that without it the development of key infrastructure in the form of a new link road connecting Nailsea and Backwell would not be deliverable. This wider sustainability benefit outweighs the loss of BMV land in this location”. This statement suggesting that NSC is allowing 50 Ha (+120 acres) of the finest agricultural land to be destroyed, because of the new road that will be built through the two sites will solve the transport congestion in Nailsea and Backwell. This is a spurious argument. The developers are suggesting the new link road in phase 3 of their development to ameliorate the traffic congestion that will be caused by the new traffic generated by the 1000 new households. If the link road was a viable and important infrastruaral investment for the area, the amount of grade 1 land absorbed by the process would be far less than the 50 ha. This would be allowed by the LP policy for using BMV land for infrastructure. The large land area of grade 1 is required majorly needed for house building. In practice the cost of the new link road, needing to include a tunnel through the railway embankment has been estimated by NSC to cost some £75 to £150 million. (Personal communication with Cllr Mike Bridge, whose cost estimate was provided to him by NSC) Working on the assumption of £ 100 million and 1,000 houses this would be some £ 100,000 per household. Informed opinion is that this will be prohibitively expensive, and will never happen. The result being that 1,000 houses will be built on our nation’s very best land, which is also Greenbelt. NSC maybe being naive on hoping/expecting the developers to provide a significant capital investment in the new road. Firstly, it would significantly increase the costs of each house, rendering them as uncompetive and unafforbale for the type of house buyer the national Govermanst’s policies are aimed at supporting. And secondly, Developers are been seen to increasingly make commitments of generous contribution to capital cost during the approval process, but subsequently renege on this commitment after project approval (see Developer			

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					builds 6,000 homes but backtracks on pledge to contribute to new school and roads) Additionally, the analysis of the housing density of houses development in Backwell is low, averaging 14.2 – well below the figures used by NSC to estimate land are requirement at a minimum of 20 house / ha. The implication is that more land is being used than necessary, and/or that the majority of houses being built are not the small, affordable, 1st homes that the market is short of. Mapping below demonstrates that the vast majority of the major property developing proposals and developments are the very best soils (i.e. Garde 1 and 2) Summary and Conclusions We are a country which must import 40-50% of our food. When the 2008 food crisis struck, it was shocking how quickly the shutters on food exports came down. The knee jerk reaction of many of major food importing countries – like Saudi Arabia, UAE, Japan – was to realise their vulnerability and even consider buying large tracks of land to farm offshore. Today the world is an even more febrile place. Food security is an issue that is acknowledged in policy papers. And prohibits any permanent development on our best land (i.e. Grade 1 and 2) The 1972 soil map of the SW identifies that the fields proposed for development is almost certainly grade 1 or 2. And yet no soil analysis is carried out. The question is why not? See the elliptical circles indicating that these sites in Backwell are Blue, most probably Grade 1 soil. The draft LP, rightly, places emphasis on the importance of not spoiling high quality land (i.e. Grades 1, 2 and 3a) with any permanent buildings. High quality agricultural land is in short supply in N Somerset, and future food security issues are important considerations (see DP55). However, in the supplementary paper on 'Strategic Land Availability' paper no mention is made of this issue. For example, this report identifies some 74.7 hectares (i.e. Around 185 acres) of land as possible for housing. Including the land at Grove Farm. Yet the Southwest Agricultural Land Classification map clearly shows that the land east of Backwell is of extremely high-quality land. Predominately Grade 1 land, and also Garde 2. In total NSC amounts to some 33,215 ha, of agricultutral and plus 40% is green belt (i.e. 15, 490 ha). The new target for houses is 23,900 in the next 15 years – this would require some 1000 Ha. This is about 3% of the agricultural area. The question raised is – why is NSC allowing such a disproportion of our top-grade land being used for housing, when so much of the poorer quality land is being ignored? Annex 1 Soil Grade at NSC House Building Project Sites % Grade 1 & 2 sites/Nos Grd 1/Grd 1+2 /Grd 2/Grd 2-3/Grd 3 + 4 Backwell 100% 5 3 1 1 Barnwell 100% 1 1 Churchill 86% 7 1 5 1 Congersbury 100% 2 2 Bleadon 0% 1 1 Long Ashton 100% 2 2 Nailsea 50% 8 4 4 Pill & Gordano 60% 5 1 2 2 1 Portishead 0% 2 2 Sandford 0% 2 2 Weston-S-Mare 27% 15 4 11 Winscombe 60% 5 1 1 1 1 1 Yatton 80% 5 2 1 1 1 Totals 60 7 4 23 3 24 Percentages 12% 7% 38% 5% 40% P/C of Grade 1 & 2 = 57%			

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					Note: Figures taken from NSC Background Paper Best and Most Versatile Agricultural Land Oct 2025			
Policy DP35: Nature conservation	No	• Effective	Unsure	Unsure	Summary Conclusions and Actions The total population of GHB in the UK was estimated in 2023 to stand at 10,200 (+/- 3000-4000). At their peak there was an estimated 300,000 GHB in the UK. The overall aim is to raise the numbers to some 62,000. At its peak Brockley Stables housed some 1000 GHB (adults and juveniles) and would then have accounted for about 10% of the UK's population. The latest figures are massively down, i.e. some 180 adults, and 144 juveniles. That is a drop of 2/3. This is deeply concerning. The LP is taking a high risk in exposing this diminished population to multiple new housing developments in Backwell (e.g. Grove Farm, Rodney Road) Farleigh Fields West and East, as well as the Land East of Backwell) These 1800 houses will take up some 125 ha of land in the A grazing zone for GHB. The population is additionally threatened by the proposed developments in Nailsea. The NSC have made heroic efforts to support the local bat populations. But despite this the numbers appear to be falling. The reasons for the fall are not understood. NSC's approach can be strengthened by the SAC adding a more grounded and practical elements to their program.	The refined LP needs to address issues of. Taking a view on the overall population and health of the bat community in NSC's SAC Reducing the number of housing projects in and around Backwell. Showing a greater understanding and developing effective approaches to working with the NSC's farming community, especially cattle farmers. By being able to provide, proven, clear and practical advice that is adapted to the changing farming practices in the area. Building on the experiences of practitioners a body of knowledge on the effective techniques, technologies, locations for creating sustainable, and effective replacement foraging sites for GHB and LHB, (i.e. roosts, corridors, foraging), In view of changes in cattle farming, and research demonstrating that GHB feed on a much more diverse prey spectrum than previously understood (e.g. site management, plant species introduction, creation of diverse habitats) Although encouraging bats to new foraging sites, (e.g. coupled with suitable roosts and flight paths that are not interrupted by strong light) does have some science behind it. There is no guaranteed that new corridors will work. Hence the wisdom of monitoring and providing the bat population with multiple options. Setting out a clear recommendation that when a building development is going to destroy and existing and important foraging site, a replacement site must be set up and shown to be effective, before the main foraging site is destroyed.		Bat comments on SAC in the LP.docx

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Land east of Backwell	No	• Positively prepared • Justified • Consistent with national policy	No		I am deeply concerned with the plans to build houses (+/- 950) on the grade 1, greenbelt land East Backwell. The LP suggests that the building on the very Best and Most Versatile (BMV) is justified because it will open land for a relief road. There are multiple reasons why this statement by the NSC doesn't stand up to any analysis. The first is, whether such a road can/will ever be built. Building a tunnel under an active railway embankment, at the bottom of a flood plain, at best is going to be extremely difficult and expensive. Second is, who and how this is going to be afforded is not explained. The cost will be massive. We understand from a local councillor that NSC's own engineers provided a figure in the range of £75 to £ 150 million. If we use $ 100 million – this would be an added capital cost per house of +£100.000. A prohibitive figure. NSC are being naive if they believe that the two developers will cover the bulk of this cost. (NB the increasing number of developers who have made generous capital offers to get planning permission, and then renege of the agreement – see (see Developer builds 6,000 homes but backtracks on pledge to contribute to new school and roads) Being hopeful that the National Government will fund such a large project which will deliver such a limited 'club good' is a combination of highly risky and suggests either ..... naïve over optimism, or that they know the relief road is not ever going to happen, but a useful screen to reach the national Government's housing targets. development of nearly 1,000 houses on the land East of Backwell (i.e. the land A and B in the table above) which amounts to some 50 Ha of grade 1 land. The draft LP report claims that "The allocation of this large site, as part of a wider package of strategic allocations around Nailsea and Backwell is considered justified on the basis that without it the development of key infrastructure in the form of a new link road connecting Nailsea and Backwell would not be deliverable. This wider sustainability benefit outweighs the loss of BMV land in this location". This statement suggesting that NSC is allowing 50 Ha (+120 acres) of the finest agricultural land to be destroyed, because of the new road that will be built through the two sites will solve the transport congestion in Nailsea and Backwell. This is a spurious argument. The developers are suggesting the new link road in phase 3 of their development to ameliorate the traffic congestion that will be caused by the new traffic generated by the 1000 new households. If the link road was a viable and important infrastructure investment for the area, the amount of grade 1 land absorbed by the process would be far less than the 50 ha. This would be allowed by the LP policy for using BMV land for infrastructure. The large land area of grade 1 is required majorly needed for house building This building development is in contradiction on NSC's LP stated policy on Best and Most Verstile land.	NSC's revised LP should (i) reconsider their explanation for justifying building on some 50ha of Grade 1 land, (ii) determine, using independent engineering consultants, if the proposed link road is technically feasible, and generate an accurate estimate of its likely costs, (iii) consider the feasibility of the link road as a standalone and necessary project to strengthen Backwell/Nailsea's inadequate infrastructure (iv) before any approvals are given, build up a financing package which includes irrevocable commitments to finance the program (plus any over shoots of budget) from the developers and National Government.		

Name: Green Belt Working Party for the Parish Councils of Long Ashton and Dundry **I.D:** 63069761

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Policy LP9: Extent of the Green Belt	No	• Justified	Unsure	Yes	We submitted our responses to the Pre-Submission Local Plan on the 28 November 2025. Since then, we have spent time examining in more detail the two reports prepared by ARUP on the Bristol and Bath Green Belt for WECA and for Bristol,Bath & NE Somerset, and North Somerset Councils contained in the Local Plan evidence base. We have examined both the Strategic Green Belt Assessment interim report and the more fine grained and detailed Stage 2 Green Belt Assessment report. We have then applied these findings to the development sites prioritised for development within the Local Plan making process. Whilst we would like to know more and be able to understand more about the analysis by Arup's, nevertheless, if our understanding is correct,we are particularly surprised about the apparent contradictions between the Arup analysis and assessment and the NSC process for prioritising the sites for development within the Local Plan policy making process. Our conclusion at this stage is that these contradictions lead us to question the 'soundness' of the plan making process in respect of the findings emerging from the green belt review by ARUP's. There seems to be a series of mismatches which lead us to question why some sites are not included for development and			Greenbelt Working Party second submission 11.12.25.pdf

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					others are included. For example, Parcel 2: South of Long Ashton/ Fenswood Farm with low scores for the Green belt, and an overall assessment as Weak, is not included for development, and why others, for example, Parcel 3: the Woodspring Golf Club and, Parcel 4: Castle Farm score relatively highly in relation to green belt, Moderate, but are then a priority as a large development site. Similarly, Parcel 5: Land inside the South Bristol Link Road is scored Moderate but is designated for development. Parcel 6: Land south of A38 is scored as Moderate but with Purpose A as a Strong contribution and yet is designated for development. These examples are related to where we have focussed our comments in relation to the Pre Submission Local Plan consultation however, we notice a similar and wider discrepancy across the Local Plan and draw this to the attention of the North Somerset Local Plan officers and members. We recognise that the ARUP reports have probably been completed and received by NSC after the NSC work on defining the key sites for development had been completed within the Local Plan process.			

Name: Greg Sturdy **I.D:** 62640129

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I have no objection to sensible and managed expansion of the village of Backwell. The local plan does not display this. A slow absorbtion of new properties would ensure Backwell as a village would retain its character while also help the necessary inevitable growth. However an additional 889 properties on grade 1 agricultural land East of Backwell on top of the 794 properties also earmarked is not sustainable. This increase of dwellings would result in traffic gridlock on the A370 and surrounding roads. There are no jobs in Backwell resulting in everyone commuting to work. There are no large Supermarkets in Backwell resulting in everyone driving to shops and Supermarkets in nearby Nailsea. To encourage people to use public transport has been tried and doesn't work. The number of empty buses I see driving around the area is quite frankly depressing. Infrastructure to facilitate the proposed increase of residential properties is sadly lacking. The development plan of a vital new link road to cope with the increase of traffic is non existent. There is no suggestion as to how this road would be funded and the cost involved for the link road to cross the busy railway line would be astronomical. I asked SP Broadway about this at the their consultation meeting and was told it's not an issue and would be addressed after the houses had been built in phase three of the development in East Backwell. The destruction of valuable farm land is scandalous. The figure of only 7% grade one farm land in North Somerset should say it all. Let's talk about this farm land. It is flat, easy to cultivate and has good access for farm machinery. But it is also an area with many mature species of trees. There are Oak trees several hundred years old. The root system of these trees is three times bigger than the crown, consequently once the land is disturbed these trees will die. Examples of mature oak trees dying as a result of residential development can be seen at the nearby Elms estate in Nailsea. Land for growing food and sustaining nature will be lost forever. SP Broadway displayed on their plans small areas that would be retained as nature reserves. We all know that this doesn't work as Nature areas require maintenance and looking after which costs money that won't be available. These areas will descend into scrubland. We are not told why there is a need to build this great volume of properties. We don't know who will be able to afford to pay the mortgages to buy these. It's all quite astonishing. In this day and age we are experiencing extreme weather patterns due to global warming, periods of heavy rain which will inevitably lead to an increase in flooding incidents which are already affecting the area. The development of land East of Backwell must not proceed.			

Name: Guy Herrington **I.D:** 50390497

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Land east of Backwell	No	• Positively	Unsure	Unsure	Backwell is being allocated a huge increase in dwellings, approx 7%, when other towns and villages are only taking 2%. This is too much of an increase. We are on a floodplain so the proposed dwellings on Farleigh Farm will struggle to cope with the water flow.			

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		prepared • Justified • Effective • Consistent with national policy			There will be a deficit in school places, despite the increase, and no investment in health and leisure facilities for the village. This will lead to a degradation in living standards for existing and new residents, The idea that the large development could be considered without a definite commitment to build the connecting road to station road (from the new development) is very concerning as the Backwell Crossroads will not cope with new traffic routing via the A370. Finally the land proposed for the large development is grade 1 agricultural land, how does this makes sense when Government policy is to protect such land?			

Name: Guy Stone **I.D:** 62810017

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Sustainable development objectives	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The vast amount of new housing and infrastructure proposed on green belt land or otherwise green field sites is unacceptable on many levels. 1. Not compliant with parish council policy or residents views. 2. A cumulative disaster for biodiversity, resulting in loss of habitats, disturbance to habitats and species, increased pollution and general degredation and edge effects on what fragmented tatters are left. This cannot be mitigated for on this scale with biodiversity net gain etc. The hierarchy of avoid, reduce and then as a final resort, mitigate. 3. Urbanisation of rural communities and degredation of way of life and quality of life. 4. Increased noise, pollution and too many people in too small a space. 5. An outright lie in justifying that the proposed development will consist of 'badly needed affordable homes for local people'. This most definately is not the case in many areas, such as Backwell, where developers recognise the area as a desirable place to live and will not be building houses for locals, but developing commuterville for high paid and qualified individuals coming to the area from elsewhere in the country and working in Bristol, Cardiff, Birmingham, London etc. 6. Loss of productive farmland needed for food resilience. 7. A complete slap in the face in not considering neighbourhood plans and the needs of local people who already live in areas that are affected by the proposals.	1. Development must be restricted to brownfield land. 2. Run down areas should be redeveloped to afford more and higher quality housing. 3. The poor attitude to nature and biodiversity held by local and national government must change. Newts don't hold up development, people do, who have not planned their projects properly or sought advice on biodiersity at an early stage. Nature must be given more value and considered as part of development rather than being siloed off into BNG etc. 4. The huge numbers of houses which are empty need to be put back into use as housing. 5. Developers need to be forced to develop on brown field land. Many land bank, purchasing green field sites knowing as some point a change of political will shall enable them to get planning permission. This practice is predatory and unethical and must stop. 6. The local planning authority needs to stop overwhelming small or moderate sized villages with vast numbers of new homes, in some cases more than doubling their size. Local's feel under siege and are having their quality of life destroyed. 7. Local planning authorities need to admit that they are trying to hit an unsustainable quota of new homes for rich people moving in from other parts ofthe uk, not affordable housing for local people.		

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SP8: Housing	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The approach to new housing is unsustainable and a knee jerk reaction from North Somerset Council to satisfy the polital aims of central government. Huge areas of green field sites, including existing greenbelt, are proposed for permanent destruction under tarmac. Very little focus has been placed on development of the use of existing developed land and brownfield sites. This will be a disaster for biodiversity and will not satisfy the local housing needs of existing residents as the bulk of housing will end up being occupied by wealthy professional people with no connnection to North Somerset moving in from other parts of the UK, who will commute to big urban centres such as Bristol, Cardiff or Birmingham. This adds nothing to our area apart from more pollution, noise and overcrowding and a decrease in quality of life.	North Somerset Council need to listen to its residents rather than pandering to developers and central government. I struggle to see who the council represents as it certainly isn't its existing residents. More effort and focus needs to be placed on development of brownfied and developed land rather than destroying the environment that is greatly valued by those who currently live here.		
Policy LP3: Strategic location: Nailsea and Backwell	No		No	No	The vilage of Backwell is just that - a village. It has never been targeted for extensive development or lumped in with Nailsea. Nailsea is a small town with a shopping centre and amentities and has been recornised as a growth area. Backwell has not. Backwell is not a 'suburb' of Nailsea. For many years those in the village of Backwell have fought off large scale development proposals - I point out the case of Farleigh Fields where the same developers have repeatedly put in applications for housing since the 1980s. These developers have operated though past acquisition of large areas of farmland surrounding the village in a cynical attempt to exploit weakness in the planning system, as are occuring at present. Those of us who live in Backwell feel badly let down by North Somerset Council on it's proposals to urbanise the village and consequent destruction of residents quality of life, many of which are long established families who have been in the village for generations (mine for over 300 years). The vast majority of these development proposals are on greenfield land, of high agricultural productivity and of significant value for biodiversity, including strategically for species such as horseshoe bats. Not only does the proposed plan diminish the habitats available for biodiversity, they are eliminating any chances of future recovery or increase in biodiversity through increased land take, noise, pollution and disturbance through yet more people and their domestic pets. The tattered fragments of habitat left will be far below the sizes required to support flora and fauna of the diversity and quality that we currently have or could have in the future. Attempting to sell this proposed excessive development on the basis of more 'badly needed' affordable homes is laughable. No way will this happen, developers target Backwell because it is a nice place to live and can ensure nice fat profits for their companies and individuals working within them. Housing will be bought up by wealthy professionals, working in major cities such as Bristol, Cardiff and London, etc. and certainly not 'local people' as implied by the planning authority. Backwell is a village in it's own right, not commuterville. In relation to the 'high frequency bus corridor' we do not need improvements for this in Backwell. I am a frequent user of the bus service and usually sail through the village. The delays are in urban areas such as Brisol, with it's plethora of traffic lights, roadworks, lack of bus priority and way too many bus stops. This is where the focus needs to be.	Target brownfield areas for development as set out in the councils own policies, not greenfield land in vilages cherished by those who live there. Start forcing developers to develop sites that may be less desirable to them such as ex industrial land. Yes, this might cost more in cases where for example contamination is an issue but is the right thing to do and vastly better than permanently destroying greenfield land. Be more proactive in putting unoccupied housing into use. Listen to those who are living in Backwell before forcing this awful destructive plan onto them. Stop putting nature into silos. It needs to be recognised and given value rather than crammed into land that fits with policies for growth and development, where or not this is appropriate and sustainable in the long term. Develop a backbone and stand up to national misguided policy.		
Policy LP12: Bristol Airport	No	• Positively prepared • Justified • Effective • Consistent	No	No	I disagree with the expansion of the airport. I fail to see how this fits with climate change policy. Saying that the airport has targets is very different from this actually hitting these targets. I feel sorry for the residents of Felton, Winford, Cleeve, Congresbury etc. who already have to put up with noise and traffic (air and road). It's bad enough now in Backwell with roaring aircraft preparing for take off and the whole background to the hill illuminated with brilliant white light through the night. The light pollution is already appalling.	Bristol Airport is on a hill in a rural setting. It really is not in the right place for an airport and the impacts on the environment are already massive. Developing airports in urban settings, such as Filton,		

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		with national policy				would have been a far better idea and this needs to be looked at on a UK wide scale rather than locally.		
Policy DP34: Green infrastructure	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	This policy is not specific, there are a lot of 'could be' and 'perhaps' proposals rather than 'will'. There is no indication of how the contribution of developers and landowners will be 'policed' to ensure targets are met. Are North Somerset Council going to send officers to sites to ensure the management prescribed under section 106 agreemets and planning conditions are met? What penalties will apply if developers ignore or only partially apply the mannagement of habitats specified under section 106 agreements and planning conditions?	This policy needs to focus more on delivery and actions. It is too general and could lead to very little action being undertaken. There is insufficient focus on monitoring the measures that will be applied and the actions/ penalties that will happen if companies or individuals do not meet planning conditions or section 106 agreements for their developments or go bust/ sell land on.		
Policy DP34: Green infrastructure	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Where green infrastructure aims to satisfy the needs of biodiversity, through Section 106 agreements or planning conditions, this needs to be monitored and policed . There needs to be a means whereby proof is required to show that appropriate management is taking place and this needs to be followed up by site visits through North Smerset Council and penalties issued where not undertaken.	More focus needs to be placed on developers proving they are applying the management required to hit biodiversity targets. This needs to be followed up by North Somerset Council and there need to be consequences if targets are not met.		
Policy DP35: Nature conservation	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Where green infrastructure aims to satisfy the needs of biodiversity, through Section 106 agreements or planning conditions, this needs to be monitored and policed. There needs to be a means whereby proof is required to show that appropriate management is taking place and this needs to be followed up by site visits through North Smerset Council and penalties issued where not undertaken.	More focus needs to be placed on developers proving they are applying the management required to hit biodiversity targets. This needs to be followed up by North Somerset Council and there need to be consequences if targets are not met. More emphasis needs to be placed on the needs of biodiversity rather than it being forced into specific areas due to development wrongly being the focus over environmental needs. An example being 'Nature Parks' for horseshoe bats. These are wide ranging species that forage over large areas, primarily using grazed pasture where there is an abndance of chafer beetles. I fail to see how isolated 'Nature Parks' surrounded by vast areas of residential development are going to benefit horseshoe bats in a manner that exceeds the impacts of the excessive development proposed and		

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						strongly believe that this is in itself an unmitigated Likely Significant Effect on the North Somerset and Mendip Bats Special Area of Conservation.		
Policy DP36: Biodiversity Net Gain	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Where green infrastructure aims to satisfy the needs of biodiversity net gain, through Section 106 agreements or planning conditions, this needs to be monitored and policed. There needs to be a means whereby proof is required to show that appropriate management is taking place and this needs to be followed up by site visits through North Smerset Council and penalties issued where not undertaken.	More focus needs to be placed on developers proving they are applying the management required to hit biodiversity targets. This needs to be followed up by North Somerset Council and there need to be consequences if targets are not met.		
Policy DP53: Best and most versatile land	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	This policy seems to be being completely ignored in the face of the vast aount of residential housing proposed on high quality greenfield land at Backwell.	Take out the excessive housing on greenfield sites.		
Grove Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	This development will swamp the village of Backwell with people, traffic, noise and pollution. It is entirely on valued green field sites without any justification and in contravention of planning policy. Insufficient effort has been made to ensure development is on brownfield or developed land. It will not cater for local people in need of 'affordable homes' but will be occupied by professionl and wealthy people from the rest of the UK who work in major urban centres, with no connection to the village or its surroundings. The ongoing development of the green field sites around Backwell is entirely develop led, with no opposition from North Somerset Council in any shape or form.	Go back to the drawing board, look at what brownfield and developed areas are available, insist they are used and stop pandering to developers.		
Land at Farleigh Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	I am appalled that this development has been granted planning permission. The developers own this site and every application they have submitted since the 1980s has been rejected up until now due to a lack of robust knock back from North Somerset Council and poorly made judgement from the planning inspectorate. There is no chance of these proposals offering 'affordable homes for locals', they will be sold to wealthy professionals moving in from elsewhere in the uk, exacerbating the local housing need. North Somerset Council need to stop pandering to developers and be more robust in their defence of the precious green space that is seen as a vitally important resource for the existing local residents. I'm not sure who the council think they represent, but it is certainly not the communities that currently live in the areas affected by this awful destructive approach to development.			
Land west of Rodney Road	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Yet another unwanted development that will impact on the residents of Rodney Road and surrounds and swallow up yet more precious greenspace and biodiversity. Residents did not want this development, it was not one of the sites put forward by the Parish Council; hoever, yet again North Somerset Council hae ignored.	North Somerset Council need to stop pandering to developers and be more robust in their defence of the precious green space that is seen as a vitally important resource for the existing local residents. I'm not sure who the council think they represent, but it is certainly not the communities that currently		

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						live in the areas affected by this awful destructive approach to development.		
Dark Lane, Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	I am appalled that this development has been granted planning permission. The developers own this site and every application they have submitted since the 1980s has been rejected up until now due to a lack of robust knock back from North Somerset Council and poorly made judgement from the planning inspectorate. Not only would this development impact on me personally and reduce my quality of life, the access that would be be created on Dark Lane would be downright lethal for pedestrians and create traffic chaos. The road improvements that have been floated to date are not wanted by residents, we don't want double yellow lines, speed humps, constant traffic noise and fumes from cars speeding up, slowing down, changing gear and banging each time they go over a hump. There is no chance of these proposals offering 'affordable homes for locals', they will be sold to wealthy professionals moving in from elsewhere in the uk, exacerbating the local housing need. North Somerset Council need to stop pandering to developers and be more robust in their defence of the precious green space that is seen as a vitally important resource for the existing local residents. I'm not sure who the council think they represent, but it is certainly not the communities that currently live in the areas affected by this awful destructive approach to development.			
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	I am appalled by these proposals that would effectively destroy Backwell and merge it with Nailsea. This development would impact on me personally and reduce my quality of life. It is vastly out of proportion to the size ofthe vuilage and would completely swamp residents with fumes, noise, traffic and people. Residents do not want this because Backwell is a village, it is not an extension of Nailsea. Nailsea is a town with facilities an town prvides, Backwell is not a town, but have valued resources in terms of its rural setting, biodiversity and greenspace. If residents wanted to live in an urban environment they would not be living here, yet North Somerset Council appears to have completely overlooked this and blindly gone along like puppets to central government demands. There is no chance of these proposals offering 'affordable homes for locals', they will be sold to wealthy professionals moving in from elsewhere in the uk, exacerbating the local housing need. This huge overdevelopment would completely alter the character of the village and leave the valued biodiversity that we do have in tatters.	North Somerset Council need to stop pandering to developers and be more robust in their defence of the precious green space that is seen as a vitally important resource for the existing local residents. I'm not sure who the council think they represent, but it is certainly not the communities that currently live in the areas affected by this awful destructive approach to development.		
Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Filling in 90% of the greenspace existing within the settlement boundary is hardly sustainable or desirable for local residents.	Insufficient focus has been made on the development of brownfield and previously developed land. I'm not clear how doubling the size of the village is meant to benefit local residents who North Somerset Council are supposed to represent, but clearly don't.		

Name: H Barclay **I.D:** 62774273

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Policy LP3: Strategic location: Nailsea and Backwell	No	• Justified • Effective	Unsure	Unsure	The plan says it will protect valued areas and that development will be proportionate and I don't agree that this is sound. Our few remaining, and much valued, fields in and around the village are proposed for housing, ridding the village of precious green space, dog walking routes and important wildlife. There is no plan for required investment into services and infrastructure, and the village is already increasing by 40% with the new developments already underway. The % growth being asked of Backwell is more than any other settlement in North Somerset, and the village simply can't support this. We	Only significant investment in infrastructure and services could make this plan feasible - doctors, dentists, another school, wider roads, new and wider pavements, ideally a new bypass from Long Ashton to Nailsea to reduce traffic through the centre of the village. Already the walk to school for children in the village is very precarious, especially		

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					have many new housing developments already and have reached our limit without significant, costly investment in crucial infrastructure and services.	with all the heavy goods vehicles already in the village due to the existing house developments.		

Name: H Bray **I.D:** 61125793

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Land west of Rodney Road	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure		The field to the east of West Leigh Primary School should be removed from the Grove Farm / Rodney Road housing allocation. It currently provides a vital green buffer between the school and the new Rodney Road development, and has real present and future value for children, families and the wider community. The land functions as an important environmental buffer between the school and surrounding housing, helping reduce noise, air pollution, overheating and loss of biodiversity affecting children. Crucially, housing numbers can be met through existing allocations, meaning this field is not required to deliver the North Somerset Draft Local Plan's overall housing target. Further, Policy LP3 prioritises the provision of new green infrastructure and open space. This field already fulfils that purpose and should be protected, not built on. It is nonsensical to justify the destruction of existing green infrastructure and open space, which has established environmental value, with promises of creation of new such areas. Development here would represent avoidable harm to children's outdoor provision, at a time when national policy strongly emphasises active travel, outdoor learning, physical activity and mental wellbeing. The site has strong potential for designation as Local Green Space, as it is demonstrably special to the local community, local in character and offers clear recreational, educational, health and ecological benefits. Thank you		
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Deficiencies in planning application: No needs or viability analysis has been carried out for the proposed additional 1,000 houses. No social cohesion impact assessment has been provided. Contrary to Government Policy: Grade 1 agricultural land should not be built on: there is only 7% of this quality land left in North Somerset. Further, development of such land is contrary to Government policy: 'we must protect our best and most versatile land'. Food security risks being undermined. Conflicts with existing environmental protections: The Brockley Maternity Roost and SSSI will be adversely impacted. Flood risk: increased housing puts the existing houses at even greater risk of flooding in the changing climate. The reliance on the railway station to justify this extraordinary level of development is ill-informed and nonsensical: the majority of			

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					houses are not within walking distance of the station and no research has been carried out to support the claims that everyone will use the train. Crucially, the station is inaccessible to people with mobility issues and families with young children.			

Name: H Brown **I.D:** 51427969

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	This proposed development of 889 new houses is in addition to the 784 already approved - together this would mean complete and unsustainable overdevelopment of the village which hasn't yet felt the effect of the first approved development at Farleigh Fields - it's unlikely the existing infrastructure and services will cope with the new approved developments , let alone another 889 houses . The A370 / Backwell crossroads road situation simply wouldn't cope with all the potential new traffic - especially if the proposed further 582 houses near Backwell Lake were approved - there appears to be no analysis or funding guarantees for the required new road or how it would intersect at the railway line in an area that's already prone to flooding.			

Name: H Burnand **I.D:** 62866369

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Land at Ham Green	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Sustainability appraisal fails SEA Directive - Brownfield sites not considered Green Belt exception circumstances not evidenced No deliverability plan for A369 - mitigation is not evidenced 44% population bomb	delete the Land at Ham Green site from Schedule of Sites adhere to climate change allowance adhere to claims not to increase village sizes disproportionately	n/a	

Name: H Coombs **I.D:** 62857409

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell cannot sustain any further development.. 800 new houses already approved which is an increase of 40% - these additional numbers would lead to disastrous overdevelopment. The proposed new road would not effectserve nailsea's traffic or relieve congestion on Station Road, Backwell Common or Chapel Hill. Constructing a road and negotiating the railway line by going under or over would ne expensive and unfeasible. The village has lack of infrastructure and services and could not support an additional 1000 houses. There is a deficit in school places and no investment in health services. The existing health services are already under strain without the completion of the planned 800 houses at Grove farm and Farleigh fields. Backwell is allocated a higher number of houses than any other village in North Somerset and a higher growth percentage than other towns. Backwell is expected to take 7% of the district's housing compared to Clevedon's 2%. There is no needs or viability analysis for an extra 1,000 houses. Backwell is not an employment hub - most residents commute. No social cohesion impact assessment has been provided. I am particularly concerned that there is only 7% of high quality grade 1 agricultural land left in the whole of North Somerset - building on grade 1 agricultural land is short sighted - we need to have land available fir crops abd grazing. Government policy states that "we must protect our best and most valuable land" to safeguard food security. The proposals contradict this policy and undermine food security.			

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					Development would destroy valuable wildlife habitats and further harm biodiversity in one of the world’s most nature-depleted countries. The proposals the Brockley Maternity Roost and SSSI, with rare Lesser and Greater Horseshoe Bats relying on the land for food. The Infrastructure Delivery Plan lacks analysis and costings and there is no funding guarantees for the new road or services. Backwell Common and surrounding areas are prone to flooding which would be aggravated by more housing. Concerns regarding the strategic growth location designation include the impact on the area’s character, the loss of Greenbelt and high-quality agricultural land, the risk of flooding,and uncertainty over whether the road can be funded and delivered on time to support the proposed housing. Backwell Lake and adjacent fields where the new roads and housing is planned and are on a floodplain, which floods regularly- given climate changes this us going to get worse in years to come and floodplain needs to be preserved. Government policy requires 50% affordable housing on Greenbelt, but this reduces the funds developers contribute towards infrastructure. The sheer volume of growth with the required investment infrastructure and services over such a short period is destabilising, unsustainable and undeliverable. The railway station is not fit for purpose as a transport- it remains inaccessible for people with mobility issues and presents serious challenges when travelling with young children. Backwell can not sustain 80% population growth and loss of grade 1 agricultural land. I strongly object to the proposals.			

Name: H Dale **I.D:** 51285793

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	My folIowing comments are an objection to the NS Local Plan 2041. I and my wife have lived in Backwell for over 57 years. We have always disliked large housing developments, these being out of character with the village and we have always opposed these. The thought of a further 515 houses in the Grove Farm area, with 60 houses off Rodney Road and 219 houses in Farleigh Fields already being in progress, is dreadful. Along with the potential 889 houses which might be built to the East of Backwell, all of these represent an additional 1683 houses in our village. The current Neighbourhood Plan proposed just 100 houses to be built. The potential for nearly 1700 houses to be built from now on is simply unacceptable. There is very little scope for additional employment within Backwell and the surrounding area. Backwell's facilities are not adequate to support further increases in population. These facilities, such as roads, parking, shops, schools and medical organisations, are already at capacity. The railway station is not suitable for disabled access in one direction and the car park is not suited to additional parking. A potential addition of perhaps 5000 people and 4000 cars using our already inadequate facilities is unrealistic. Inadequate roads would be a major problem. The A370 and Station Road are apparently at capacity and the other roads in and out of Backwell are not really suited to current traffic volumes. Within Backwell, Rodney Road, Westfield Close, Westfield Road, Moorfield Road, Moor Lane and Embercourt Drive have become ‘rat runs’, caused by drivers avoiding delays at the A370/Station Road traffic lights. This problem is made worse by parked cars (which should be allowed) and often worn out white lines at junctions (which should be better maintained). Worn out white lines at junctions are being ignored by many drivers and this is a risk to drivers and also pedestrians, particularly when many cars are being driven too fast. The proposed road across Backwell Common, along with all the extra traffic, will probably make little difference to the overall traffic problems in the area. The Grove Farm and East Backwell areas are good Grade 1 Agricultural Greenbelt land and should be retained for agricultural purposes. The fields around Backwell support wildlife and enable residents to walk around the village and enjoy the current views. It is usually the case that large scale housing developments by one developer simply result in a blot on the landscape, particularly when agricultural land is built upon - see, for example Youngwood Lane, Nailsea and new houses at Tickenham. Similar blots on the landscape will occur with all the current situations in Backwell. In conclusion, please take into account all the objections made by, in particular, Backwell residents. Although current sites have been given planning permission without due regard to the sensible views of the majority, please do not allow the East Backwell area to be developed in the future. Please help Backwell to attempt to remain as it has been in the past, a very pleasant place to live.			

Name: H Gardner **I.D:** 62675681

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Positively prepared	Unsure	No	I feel this plan has not been thoroughly thought through Will the infrastructures needed schools surgeries safe and efficient traffic access be completed before the houses? The plan with the different sites considerably increases the size of the village/s and with the railway opening, traffic and parking is going to be a worse nightmare than it already is at peak times	I am aware housing is needed but these plans are impractical and maybe one most appropriate site could be chosen rather than all		

Name: H Kenyon **I.D:** 32521089

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP15: Local Green Space	No	• Justified • Effective	Unsure	Unsure	Lack of evidence and reasoning to justify why Pill Green and Land at Pill Road have been selected for development on Green Belt other than owned by a developer. Lack of information / research into infrastructure, eg GP surgery / schooling for these two sites. Lack of information / research into traffic management including: 1 The A 369 is already at capacity 2 The A369 now frequently is blocked at both ends with substantial queues - J19 to the M4 and at Cumberland Basin into Bristol 3 Traffic forecasts do not even take into account airport expansion and Bristol Clean Air Zone. Often non-compliant vehicles reroute to the A 369 to avoid charges. 4 Traffic noise is already unbearable in Abbots Leigh. The plan talks of the new rail network and station in Pill. Trains of 3 coaches are planned ONE per hour. This will not resolve traffic issues for an additional well over 1000 houses.	Further research needed on the issues mentioned above - site justification for Pill Green and Land at Pill Road sites. Justification needed why this Green Belt is to be allowed for development.		

Name: H Mohan **I.D:** 51323169

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell already has 800 courses approved (a 40% increase for the village), these additional numbers will lead to overdevelopment. There is a lack of infrastructure and services to support this number of additional houses. This is building on grade 1 agricultural land currently used for crops and grazing - there is only 7% of this high quaility land left in North Somerset. Government policy states that "we must protect our best and most versatile land' to safeguard food security. The area is prone to flooding and building large number of houses here would cause issues both on the site and to surrounding areas. Some areas of development are on a flood plane which floods regularly. The proposed road would not effectively receive congestion or increase road safety. Engineering under/ver railway bridge likely very expensive and technically difficult - the plan lack analysis and costings and no funding has been put forward to this. Backwell is not an employment hub and the translation is not fir for purpose as a transport hub. it remains inaccessible for people with mobility issues and presents serious challenges when	This plan is not sustainable and no modifications can be done to make it so. This plan should be scrapped.		

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					travelling with your children. The proposals threaten the Brockley Maternity Roost and SSSI, with rare lesser and Greater Horseshoe Bats replying on the land for food. Serious concerns about road safety for cyclist and pedestrians along station road with increased traffic volumes. This road as narrow payments and there are frequent near misses and sadly more recently a fatal accident (pedestrian vs lorry).			

Name: H Moody **I.D:** 58342433

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP7: Green Belt	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Yes	Unsure	I do not believe the land at Tower Farm or Black Rock, Portishead should be released from green belt or therefore be developed on. Environment: These sites were specifically added to the Green Belt in the late 1980’s because of their high ecological value. Section 40 of Natural Environment and Rural Communities Act 2006 places a duty on public bodies to contribute to the coherence and resilience of ecological networks. There are alternative brown and green field sites with much less ecologic impact and developing it will impact negatively on the wildlife, flora and ecology of the whole Gordano Valley. At least 2 existing brownfield sites in Portishead have not been included in the Plan - Wyndham Way and Cheviot Meadow, these have already been given planning permission. The opportunity to increase housing on brown field sites across North Somerset would mean Black Rock and Tower Farm sites are not required to meet local housing targets. These fields are as important for nature as they are for us - mentally and physically. I do not believe there are exceptional circumstances to change these green belt boundaries - there are exceptional reasons to protect it.	The use of brown field sites for development, many of which have not been included in this local plan.		

Name: H Murray **I.D:** 29291521

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No		Unsure	Unsure	1 Backwell is at risk of over development, with significant number of houses planned already. 2 roads are already unsafe with narrow pavements, children are particularly at risk without further traffic. Increase in air pollution is also a huge concern with many health conditions now linked to harmful pollution. 3 little attention has been paid to already over stretched community resources, gp, school, leisure spaces. 4 we are fortunate to live surrounded by precious Grade 1 Agricultural Land currently used for food crops, grazing and mitigating flood risks. As we live in a climate emergentcy, declared by North Somerset council, fertile land is an essential resource to ensure our food security while ensuring there is no further harm to already depleted biodiversity in the area. 5 How beautiful to live near the roost of rare Lesser and Greater Horseshoe Bats relying on the land for food. What a privilege! When home owners have jump through hoops to show that small home			

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					renovation projects will not harm these bats, how ironic then that hundred of houses will be destroying their hunting grounds. 6 The Infrastructure Delivery Plan lacks analysis and costings, and there are no funding guarantees for the new road or services. The village cannot cope with existing traffic let a lone more congestion. 7 The railway station is not fit for purpose as a transport hub; it remains inaccessible for people living with disabilities impacting mobility. As a health professional I find it disgusting that people living with restricted mobility are denied access to local train travel.			

Name: H Parry **I.D:** 21234145

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell already has significant development underway, but this proposal is disproportionate and would essentially see Backwell (a small village with limited resources, services and already significant traffic issues) taking 7% of the overall district's housing allocation. This would effectively create a suburban population with village-scale amenities - this is a poor outcome for all existing and new residents. The land that's being proposed is grade 1 agricultural land. There are brownfield sites in other parts of the district which have been overlooked. The government cites that we need to "protect our best and most versatile land", yet this proposal does not adhere to that sentiment, erasing prime greenbelt. Infrastructure locally is already at breaking point, and this is before the completion of existing 'in-flight' developments (Farleigh Fields, Rodney Road). Traffic congestion is already a major issue – a development of this size is counterproductive in that while it may have strategic proximity to Bristol and employment opportunities, all approaches to Bristol are already beyond workable capacity (also, the local train station is not fit-for-purpose and does not meet basic needs today, especially for accessibility). There is no guarantee that funding is in place for any large infrastructure project to support this development. Furthermore, any such infrastructure would be devastating for the wildlife and ecology of the area.	Other sites need to be considered before erasing grade 1 agricultural land. There are brownfield sites closer to centres of employment that should be considered.		

Name: H Pirouet **I.D:** 58638305

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP7: Green Belt	No	• Justified • Effective	No	Unsure	NSC has not properly considered: Alternative brownfield or greenfield sites with far lower ecological impact, both in Portishead and across North Somerset Opportunities to increase housing density on proposed brownfield site, which could remove the need to develop Tower Farm and Black Rock The strategic ecological importance of these sites in protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor The fact that both areas were added to the Green Belt in the late 1980s due to their high ecological value. National planning policy allows green belt changes only in exceptional circumstances - and these have not been demonstrated In addition: Neither site can provide safe and suitable access Development would create unacceptable transport impacts, failing national soundness tests.	For the above reasons, Tower Farm and Black Rock should be removed from the Local Plan.		

Name: H Power **I.D:** 10388545

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land south of Nailsea		• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	This site will have a negative impact on the water flow to Backwell Reservoir. With more houses in the location the lake will almost certainly overtop and spill down the hill into Backwell. This could also have effect on the railway embankment. This proposal on this open space is plain wrong!			
Grove Farm	No		Unsure	Unsure	The proposed housing at Grove Farm on high class agricultural land is simply wrong. No supporting infrastructure, disturbance to wildlife habitats, and destruction of land which supports our food makes no sense at all.			
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I've lived in Backwell for more than 30 years, and I've seen the village grow slowly with small, appropriate building, bringing new people who have added to our community. However, the growth proposed now in North Somerset's Local Plan would be overdevelopment in an area with what is now poor infrastructure support. The volume of new building proposed is excessive when the 800 houses already approved are taken into account, as this alone brings the proposed development up to 40%. Were the additional new building be accepted, that would rise to 80%, nearly a doubling of population in a village with little or no infrastructure to support the additional population. Roads, schools, doctors, dentists already at full capacity with no room to expand to serve an 80% increase in need. Backwell has been allocated a higher number of houses than any other village in North Somerset (NS), and an even higher growth percentage than towns. 7% of NS's housing allocation, compared to 2% for well-resourced Clevedon. No needs or viability assessment has been carried out, nor has a social cohesion impact assessment been provided. The sheer volume of growth with the required investment infrastructure and services over such a short period would be destabilising, unsustainable, and undeliverable. Considering infrastructure as I have referred to it above, considerations which may sound good on paper do not stand up to scrutiny. The railway station is inaccessible to people with mobility difficulties, and very difficult for pushchair users to use. Many years of solid research has failed to come up with a solution to this major problem. The A370 which transects Backwell is almost at capacity and as Backwell is not an employment hub, most new inhabitants would commute. Station Road to Nailsea is a very unsafe and impractical road, walked by many students twice a day to the station, with no cohesive continuous pavements. Roads that might be used a 'get arounds' such as Chapel Hill and Backwell Common form part of the National Cycleway, and are very narrow in parts, bringing the danger to cyclists and walkers to an unacceptably high level. When it comes to roads, you will see that a totally impractical and unfunded road has been proposed across Backwell Common between Station Road and the A370 (Farleigh Road). Impractical- The proposed road crosses Backwell Common which is prone to flooding and would require considerable engineering to prevent it sinking. Furthermore, it is proposed that it would pass under or over the main railway line, a massive and desperately expensive undertaking. It is highly unlikely that Network Rail would allow the project as the embankments are unstable, and the work would be too disruptive on the main London to Cornwall line. Unfunded – building a road across marshy ground which is also near old coal workings is prohibitively expensive in itself. Add in the railway line and it clearly cannot be built without central Government investment. This is not a strategic location, so that will not forthcoming. This has been confirmed by our MP. (A Flooding is not only a problem for the road. It is also a problem for any houses in the proposed development areas. I have walked there many times, up to my ankles in mud and unable to literally wade under the bridges. Wildlife and other environmental issues are threatened by these proposed developments. Rare bats from the Brockley Maternity Roost will be disturbed from their normal flight and hunting areas, and other animals, badgers, deer, foxes, hedgehogs (all of which I have seen on my walks) for example will be negatively affected. No consideration has been given to the fact that the developments would be built on Grade one agricultural land where cereal and green crops are grown every year. There is only 7% of this high Quality land left in the whole of North Somerset. It can never be replaced. Where will be get our food from if this continues? To sum up. The plan for Backwell is completely unsound - Volume of new housing with no infrastructure support - Excessive number of new houses - an 80% increase on today's village size - Proposed land is in green belt - Proposed land is in a flood plain			

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					- Proposed land is Grade 1 agricultural land, of which there is only 7% in North Somerset - Environmental concerns - Transport infrastructure is already close to saturation. The proposed new road is practicably and financially unachievable			

Name: H Pullen **I.D:** 62852097

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Churchill Avenue	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	No	Penny Field should be protected as a Local Green Space. It’s one of Clevedon’s last true greenspaces, a Nature Recovery priority site, and vital for wildlife, community wellbeing, and access to nature. Better brownfield and greyfield sites across the town exist for development. We are killing our green spaces and making environments for families to live less clean as a result. This area and Clevedon in general, must be protected. Wild species are declining as a direct result of your actions. Stop wasting money on poorly put up houses and start saving our spaces and the environment.	Why fill an already full town with ugly houses.		

Name: H Shalders **I.D:** 18206593

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Eight hundred houses have already approved to be built in Backwell, a 40% increase in the village. This is pushing the local infrastructure to its limits. Anything further would be a massive overdevelopement. The allocation for Backwell is higher than any other village in North Somerset. It has a higher growth percentage than the towns. Clevedon is set for 2%; Backwell is set for 7%. Further, there is no viability of needs analysis for building an extra thousand houses in Backwell. There is no employment hub- attempts to draw in business have continually fallen flat. Many people commute to work. Addition people commuting by rail is unviable as the rail services are at capacity already. The lines cannot be increased. The services cannot be increased. Additionally, the station is inadequate with disabled passengers travelling from Bristol unable to leave the platform. There has been no social cohesion study in relation to this proposal. A dramatic increase in population with no consideration of this sort risks creating social problems where there were none. North Somerset’s agriculture land is varied with only 7% classed as Grade 1. The local plan proposal to build on Grade 1 land in Backwell affects local and national food security. The land is currently framed and stewarded to ensure future productivity. In these uncertain times to use top quality farmland for anything other than farming is a national betrayal and runs contrary to the government’s policy statement ‘we must protect our best and most versatile land.’ This farmland is wildlife rich; a valuable resource in one of the world’s most nature depleted countries. The immediate threats are to the Brockey Bat Maternity Roost and SSSI and the Lesser and Greater Horseshoe Bat feeding zones. The existing approvals will bring a substantial increase in road traffic. This would not be resolved by the proposed road across Backwell Common and would be even more meaningless should any further house building be approved. The route of the proposed road is an engineering nightmare, the water table and the elevated railway will drive up the costs into the prohibitive bracket. The above throws into sharp relief the lack of analysis and costings in the Infrastructure Delivery Plan. The land proposed for housing is prone to flooding; not just a few puddles but proper submerging. That the settlement has	Abandon as unsound.		

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					historically been on higher ground and that lower lying structures have been abandoned is with reason: flood land is a stupid place to build. Concerns regarding the strategic growth location such as the character of the area, loss of Greenbelt, loss of agricultural land, flood risk have not been addressed. The intent for rapid development of such a vast scheme would be destabilising, unsustainable and, ultimately, undeliverable but with significant risk for wreaking mayhem in its failure.			

Name: H Sykes **I.D:** 61631521

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	‣ Positively prepared ‣ Justified ‣ Consistent with national policy	Unsure	Unsure	My comments pertain to area HE2015 only. 1. Google Maps shows a lane hedged on both sides extending from Cross Lanes diagonally to intersect with a north-south track which terminates at Martcombe Road. It is hedged on both sides, a bridle path/footpath and a wildlife corridor (I have observed many birds, such as Blue Tits, nesting along it, and Skylarks in the field on the western side. This is likely a medieval 'green lane' or drovers' track, and should be preserved. 2. When housing estates are built we all know that people these days are more likely to pave over front gardens etc. for car storage than to maintain lawns and borders. During heavy rain (Met Office national trend is to wetter, warmer winters) this will find an easy route to run off, and will no longer be readily absorbed into the ground like it does with the existing farmland. Eventually much of the run off will need artificial drainage or boost the flow in Markham Brook. This brook has been known to flood Brookside further north. 3.There has been no public exhibition or event to draw the attention of the local populace to this drastic change in local amenity. This suggests that house construction businesses are being favoured over environmental interests. 4. I'm not sure it has been demonstrated that brownfield sites in the North Somerset area are no longer available for housing development. 5. It is unclear where the proposed new primary school could be situated. 6. It has not been demonstrated as to how the medical needs of such an enlarged community could be served by the existing Heywood Surgery medical practice.	1. To effect a compromise, housing development for area HE2015 should be more modest, leaving the area from the diagonal green lane to the Markham Brook a greenfield area to preserve some of the visual amenity for new and existing residents. Perhaps in addition some trees could be planted in this area to actually improve carbon capture and aesthetic appeal. 2. An exhibition should be mounted in the village to make it clear which areas are at risk of development. It should be clear to local people whether or not there are no suitable alternative brownfield sites in the county. 3. It should be demonstrated how an increase in residents could be supported by the existing Heywood Surgery and where the new school could be with all the necessary supporting infrastructure.		

Name: H Thomas **I.D:** 62850049

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Effective	Unsure	Unsure	I recognise the need for additional housing in North Somerset however this Plan makes huge changes to the character of Nailsea & Backwell rather than spread the additional housing requirement across the North Somerset council area. The new road across Backwell Common would bring far more vehicles onto road existing roads in the area and could become a short cut for Bristol airport traffic cutting through Nailsea from the M5 or other routes. It would adversely impact the biodiversity of the area. I regularly see deer on Backwell Common and every summer night at dusk see bats in the fields between Station Road and Backwell Bow. Bats rely on this area and putting a road through would disrupt their habitat. The proposed level of new housing in Nailsea and Backwell puts too much pressure on already inadequate community facilities compared to other areas of North Somerset (e.g. Backwell Pool and Scotch Horn Leisure	Do not proceed with the new road across Backwell Common to protect the area and wildlife habitat. Spread the additional housing requirement across the North Somerset area. Where development does happen ensure that new community facilities (e.g.		

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					centre are dilapidated compared to Portishead and Hutton Moor) and Nailsea & Backwell station is in need of an upgrade. Developers should pay to provide new community facilities e.g. leisure centre and astroturf pitches for residents of both Nailsea and Backwell.	leisure centre, pool etc), railway station upgrade are provided.		

Name: H.l.Walton **I.D:** 27306113

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The proposed figure of 1,817 new homes in Nailsea would lead to over development of the town. Any significant increase in the number of homes, and in consequence vehicles, in Nailsea will have an adverse effect on the already inadequate rural road system. The proposed new road doesn't appear to help the situation. No locations identified for new schools. MEDICAL facilities are already stretched. The developments infringe on the supposedly sacrosanct "Strategic Gap" land between Nailsea and Backwell.			

Name: HC Campbell **I.D:** 38760929

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared • Effective • Consistent with national policy	Unsure	Unsure	Weston big wood is a site of special scientific interest and must be protected. This means protecting the surrounding areas from development too as the wildlife spills out into these natural spaces. The surrounding space is also identified as green belt and should not even be considered for development. Furthermore the small narrow roads could not possibly absorb the traffic which would inevitably come with a large number of new houses and would cause severe congestion and significant danger to school children attending high down school. The road entering the downs is already gridlocked at school drop off, rush our and pick up times and a significant increase in traffic would only result in local residents being trapped in the cul de sac of The Downs.			

Name: Hallam Land **I.D:** 63057537

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Vision, Strategic Priorities and Sustainability Objectives	No	• Justified • Consistent with national policy	Yes	Yes	Neither the Vision nor the Local Plan Strategic Priorities as drafted, respond to the clear and evidenced need for the Council to Plan strategic employment needs into the future. The NPPF (December 2024) includes a renewed and targeted kickstart to economic growth through planning for key growth sectors – to include industrial and logistics. North Somerset has very recently made strides in capturing this spirit, planning positively for economic growth, with the recent (May 2025) approval of the new North Somerset Economic Growth Plan 2035 that commits to ambitious objectives to enhance the economy and prosperity of North Somerset. The policy objectives that govern SP1 Sustainable Development reference the need to “Support the delivery of opportunities for economic growth and job creation at accessible locations”. To some degree this is echoed in the SO’s “to increase the number and range of job opportunities	The need to support the economic growth potential of the area, diversify employment land and encourage new job creation must form part of the Vision and be reflected as a Strategic Priority. Reference should be made to the Economic Plan as providing the recently agreed mandate for economic growth and investment for the Local Plan to deliver through suitable allocations that will help to realise the economic objectives for the area.		

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					across the district, particularly at the towns to give people the opportunity to work near to where they live", however this does not adequately drive a 'Pro- Business Strategy' as it is articulated in the Economic Growth Plan, which rightly conveys a critical delivery dimension that requires the Local Plan to "allocate and promote commercially attractive and ambitious employment sites" which should be "the right quality and quantity in the right location to support long term growth" (Page 11) whilst recognising there is "significant competition for land across the area and a shortage of suitable and commercially viable land that is 'shovel ready' for investment" (Page 12). The Council intended the Local Plan to play a role as the spatial and land use expression that will deliver the Economic Plan. This intention has not followed through the drafting of the Local Plan which has no reference to the strategic economic objectives recently endorsed. The consequence of this clear oversight is a Plan that fails to adequately plan for economic growth, ignores the strong locational competitive advantages of the area and the enduring strength of the logistics market, and simply allocates small quantums of employment land to strategic growth areas already identified to bring forward housing. An approach that will do very little to bring significant benefit by way of economic activity, inward investment and job creation.			
SP3: Spatial strategy	No	• Justified • Effective • Consistent with national policy	Yes	Yes	The overarching spatial strategy to locate new residential and mixed-use development in or close to urban areas is supported. So too is the encouragement of employment opportunities at accessible locations well-related to urban areas. However, the draft allocations that are proposed in the document do not follow this strategy. The Draft Plan, having required amendment from the Local Plan 2039 (Regulation 19 document previously consulted upon in November 2023) due to the revisions arising from the new 2024 Framework and consequential uplift in standard method figure, has resulted in a plan strategy that has materially shifted in its focus, at a late stage, from its evolution (including the testing of spatial options) to now propose a stronger focus on strategic development areas, including those not within the main towns, and including areas within green belt, including, Wolvershill (north of Banwell), Woodspring (south-west of Bristol), at Nailsea and Backwell and at Pill and Easton-in-Gordano. Despite this shift in strategy, Policy SP3 text remains largely unchanged from the previous Regulation 19 version. The Council, within the previous North Somerset Choices for the Future (Autumn 2020), has acknowledged the contribution that Land East of Clevedon can make in shaping the future growth strategy for North Somerset, specifically its locational benefits that deliver a significant and strategic employment opportunity The site was a component presented as part of all four strategic growth options expressed within the Issues and Options Plan, and consequently an allocation which was then carried forward to Pre-Submission Draft Plan 2039. There is no sound basis for the Plan to now move forward, with itshigher housing requirement, without 'inclusion of this important strategic employment site. Indeed, considering the balance of employment land and housing, the draft Plan now provides for some 63% more homes (at 23,700) compared with	In order to make the plan sound, Land East of J20 at Clevedon should be allocated as a strategic employment site (of some 25 ha) to proactively meet the evidenced demand from the distribution, logistics, and warehousing sector. Its inclusion can help remedy the failure of the Plan, meet strategic employment needs in North Somerset and help build resilience in terms of economic development and employment growth		NSC Pre-submission Plan - Part B SP3 Spatial Strategy on behalf of Hallam Land.pdf

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					just 14,900 in the previous draft Plan, yet the amount of employment land to be planned for has reduced to just 72.8 ha, a reduction of some 10ha. It is interesting to note that in the 2023 Draft Regulation 19 Plan refer to a minimum amount of employment land of 50 ha in both cases, despite the current 2025 Draft Regulation Plan having a 63% uplift in homes. Hallam Land's representations to SP9 Employment provide more information on the misalignment of evidence that demonstrates that the employment strategy as presented, that relies to a significant extent upon employment land being released as part of large scale housing, without due regard to the locational characteristics of employment demand, particularly from a strong industrial and logistics sector associated with the M5 corridor, is fundamentally unsound. The Plan as currently presented fails to provide for the employment needs of the district and evidenced market demand and will lead to the relocation of key local employers as already experienced, prevent the attraction of new jobs/ investment, limit business growth within the district, and result in the creation of an imbalance between housing and jobs in Clevedon. The updated strategy and site selection documents that support the revised Regulation 19 document are wholly focused on the SHLAA and choice of housing sites. There is limited if any robust assessment on employment sites, particularly in relation to those that have been omitted from the Plan such as Land East of Clevedon. The Sustainability Appraisal provides little justification for the removal of the site from the Plan, having performed comparatively strongly against other sites that have been assessed. Significant negative effects are reported in only two areas: Achieve reasonable access to a wide range of community, educational, town centre and healthcare facilities (SA objective 2.3) and Minimise vulnerability to tidal & fluvial flooding, without increasing flood risk elsewhere. Also minimise surface water flood risk and harm to water quality and availability (SA objective 3.2). There appear to remain questions around the potential impact of other objectives: Provides opportunities to improve economic wellbeing and reduce inequalities (SA objective 1.3); and Protect and enhance Biodiversity, Geodiversity and Green Infrastructure, particularly with respect to protected habitats and species (SA objective 3.6). Hallam Land and their consultant team have worked closely with the Council to consider how development could be brought forward, integrating the existing site features, considering the relationship between design of access road (both its indicative alignment and gradient) and existing residential properties and Clevedon Craft Centre. A draft framework plan is appended to these representations that indicates the spatial relationship of built form contained within the southern part of the site; access arrangements (vehicular and active travel opportunities including connections into Clevedon); and landscaping, including new areas of structural planting, green infrastructure corridors that include provision of surface water drainage features through enhancement of the rhyne network to provide both water quality and biodiversity betterment. The drainage			

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					strategy will seek to reduce flood risk to other areas such as Clevedon by improving on site rhyne network and offsite flood defences. Hallam strongly maintain that development in areas benefitting from flood defences, are inherently sustainable. Defended land is not at the same risk of flooding as the high-risk flood zone it is otherwise categorized within and are a feature of the historic pattern of growth, and indeed the approach taken to growth in the current plan, demonstrated through the allocation at Weston Villages. A Vision Prospectus is also provided which draws together the site opportunity and wider sustainability benefits for the local community and district as a whole, providing additional detail on the master planning approach taken to the site, the use of structural landscaping and natural rhyne network, and active travel and wider connectivity opportunities. The Prospectus reports the significant economic benefits that could be delivered in both the construction and operation phase of the development. The proposed site has the potential to deliver up to 1,000,000 sq. ft. of distribution and logistics space with the capacity to accommodate c.1,250 full time equivalent jobs with increasing focus on higher skills, and training and apprenticeship opportunities for its residents. The reported SA conclusion of this site is short and does not comment on any physical nor qualitative site characteristics, but is in fact limited to comments on delivery and expressing a policy choice for how employment needs will be planned for. “Business in this location was proposed as part of the Regulation 19 plan in 2023, however has since been removed due to concerns on its impact and deliverability of associated infrastructure. The allocation of this site is not considered a necessity within the plan as the plan is meeting business needs identified through the evidence on alternative sites”. In respect to the first part, Hallam Land submit that there is no evidence to support the claim that the site impacts nor presents delivery challenges for associated infrastructure (noting ‘associated infrastructure’ is not defined). Hallam Land has engaged with North Somerset Council as Local Highway Authority and National Highways, on potential access and improvements to the Junction 20, including opportunities to improve access travel links into Clevedon. Two technical notes (Site Access Design and Connectivity) are appended to these representations and demonstrate the breadth of work and engagement undertaken. The Draft Plan through Policy LP11 identifies improvements to J20 M5, which the Infrastructure Delivery Plan reports as being funded through developer contributions. There appear to be no grounds to support the assertion that the site cannot come forward due to infrastructure challenges, the Council have provided no evidence to support this position. In respect to the second point, the allocation of Land East of Clevedon is patently very much a necessity. It would enable the delivery of up to 1,000,000 sq. ft of flexible commercial floorspace for the enduring distribution and logistics market with the potential to deliver over 1,250 full time equivalent jobs. From a strategic spatial perspective, this site enables the provision of a key employment hub within the north of the district, providing a viable and alternative location to			

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					Avonmouth and Bristol, to counterbalance the potential leakage of investment to the wider Avonmouth and Bristol Area. Making a very significant contribution towards meeting the economic ambitions very recently endorsed by the Council through its Economic Growth Plan. Hallam Land make a strong objection to the Plan as drafted. The Council has not collated the evidence base necessary to demonstrate the site should not be selected. Opting not to select the site is a huge, missed opportunity and fundamentally threatens the ability for North Somerset to attract and benefit from economic investment from a dynamic commercial logistics market that is active, burgeoning and demonstrably seeking favourable locations such as this. There is no other site that offers the economic opportunity that Land East of Clevedon would bring to the area to accommodate an expanding demand associated with the strategic road network (M5 corridor) particularly with regard to logistics, distribution, and warehousing occupiers. It is an attractive and compelling location for a strategic employment site with the potential to deliver significant benefits: • up to 1,000,000 sq. ft. of distribution and logistics space; • over 1,250 full time equivalent jobs; • potential to generate an additional £90million GVA per annum within the local economy, with an additional £36m GVA per annum and over 500 additional jobs across the wider region (beyond those employed on site) through wider supply chains; and • new local employment opportunities with increasing focus on higher skills, and training and apprenticeship opportunities for residents. The case for the allocation of this site is overtly clear; there are no credible reasons to the contrary. Negative expressions for the site submitted to the previous regulation 19 stage related entirely to the perceived impact of the proposals. Hallam Land and its consultant team, have tested and evolved the proposals for a number of years, and have complete confidence that impacts referred to in relation to Clevedon Craft Centre, heritage setting and living conditions of local residents can addressed through appropriate masterplanning of the scheme, as presented in the enclosed Prospectus. Hallam Land has engaged with National Highways and North Somerset Council to evolve the access strategy and are confident that the access proposals are indeed viable and capable of delivery			
SP8: Housing	No	• Justified • Effective • Consistent with national policy	Yes	Yes	Housing Requirement Paragraph 62 of the NPPF refers to strategic policies using the standard method to provide the “minimum” number of homes that need to be planned for. Paragraph 69 states that the housing requirement may be higher than the identified local housing need in some circumstances, for example, where it reflects growth ambitions linked to economic development or infrastructure investment. Hallam Land consider the recent endorsement of the Economic Growth Plan which contains a key thread of “Pro-Business” and a recognition to drive forward “a new investment approach to enable a step change in the North Somerset economy” recognising the potential to make a greater contribution to the West of England regional economy provides justification for this.	The Plan only provides for the minimum number of new dwellings. A minimum of 23,700 dwellings within North Somerset 2026-2041, equivalent to 1,580 dwellings per annum. Should the examination conclude that additional housing sites must be found to meet additional needs identified, Hallam propose that additional land at East of Clevedon, (east of the proposed employment allocation), could deliver a sustainable new community, with the capacity to accommodate some 2,200 new homes, supported by a range of retail uses, co-located with a community and health provision to meet the needs of the resident population, in a location that is already well connected and accessible to Clevedon and can support improvements in active and sustainable travel in the locality. Hallam Land strongly maintain that development in areas benefitting from flood defences, are inherently sustainable. Defended land is not at the same risk of		

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					The “Employment Site and Premises Requirements Evidence” (ESPRE) study prepared by Hardisty Jones Associates and Lambert Smith Hampton and published in March 2025, concludes that in order to maintain a balanced labour market within North Somerset there will be a need for 20,000 additional jobs to be created over the period 2023-43. This is an increase from the estimated 13,000 additional jobs required at the time of the 2023 ESPRE. The ESPRE reports that this is a substantial uplift to the level of job growth indicated by baseline economic forecasts from both Oxford Economics and Cambridge Econometrics (para 6.3). The NPPF also refers to consideration of a higher housing requirement to reflect housing needs of different groups in the community for example those who require affordable housing. The Economic Growth Plan identifies one of the barriers to the district economic growth is high property prices relative to wages, and the need for more affordable, high-quality housing (Page 4). Taking a 5-year average for North Somerset, the median house price is 9.7 times higher than the median workplace-based annual earnings (ONS 2024). Hallam Land’s view is that the Council should be considering if there are any factors which justify a higher requirement figure, two such examples are put forward, however that exercise has not been undertaken by the Council. The government have made clear that Council’s must do all they can to address the housing crisis and boost the delivery of housing and help to drive economic growth. The current approach constrains economic potential and undermines the delivery of affordable housing. Housing Trajectory There is no housing trajectory provided as part of this Plan, contrary to paragraph 78 of the NPPF. It is therefore not possible consider the deliverability of the selected strategy, nor how much reliance is placed on delivery of strategic growth locations across the Plan period, nor the reliance placed on supply from windfalls. A trajectory that sets out the amount of homes from different sources of supply is a fundamental part of the demonstrating the effectiveness of a strategy. Plan Period Paragraph 22 of the NPPF requires strategic policies to “look ahead over a minimum 15-year period from adoption”. The Plan proposes a Plan period of 2026 to 2041, and whilst a Plan period of 15 years, the Framework requires the period to be taken from the date of adoption. The Council’s LDS (February 2025) targeted adoption of the Plan at the end of 2026 (November 2026), that date was predicated on a Regulation 19 stage occurring in June 2025 with submission of the Plan for examination in October 2025. The Council are now some 6 months behind target and therefore adoption of a Plan in 2026 is considered to be most unlikely. The Council must therefore extend the Plan period by at least an additional year in order to demonstrate 15 years at the time of adoption.	flooding as the high-risk flood zone it is otherwise categorized within and are a feature of the historic pattern of growth, and indeed the approach taken to growth in the current plan, demonstrated through the allocation at Weston Villages. The Plan must be supported by a housing trajectory and the Plan period be extended to demonstrate 15 years from adoption.		
SP9: Employment	No	• Justified • Effective • Consistent	Yes	Yes	The proposed employment supply does not present market-driven opportunities and therefore is set up to deliver more of the same, at a time where the commercial and employment market is undergoing significant structural changes. The policy text for SP9 “identified for business purposes across	In order to make the plan sound, some 25 of land East of J20 at Clevedon should be allocated as a strategic employment site to proactively meet the evidenced demand from the distribution, logistics, and warehousing sector.		NSC Pre-submission Plan - Part B SP 9 Employment

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		with national policy			North Somerset to meet needs and aspirations across a range of economic sectors over the plan period" is not being delivered. Supply of sites is not fleet of foot nor aspirational. The employment strategy does not follow the evidence insofar as its lack of positive planning for important and growing sectors such as manufacturing, industrial and logistics, as required by National Policy that directs an uplift in planning for such growth; and having regard to the uplift in homes now to be planned for as set out in the revised Draft Plan. Planning for Economic Development: Supporting the Industrial and Logistics Sector These representations are supported by a Statement prepared by Claire Pearce, Real Growth, providing independent advice to Hallam Land in respect of current government economic policy and national planning policy which are material considerations to be taken into account in planning policy and development management decision making. The statement provides further detail and clarity on the national policy position which should directly inform a Councils corporate plan, its strategic ambitions, as well as its and economic development, local planning and highway functions. Specific consideration is given to North Somerset. It makes clear that a basic input to any local plan or planning decision process, the industrial strategy and its sector plans and the South West strategy, represents a key material consideration. The North Somerset Economic Growth Plan 2025 that supports the argument for additional logistics land. The Growth Plan confirms that Logistics is explicitly part of the Foundational Economy priority sector (Section 2.5) and is linked to enabling growth in other sectors like green economy and advanced manufacturing. The Plan warns that without unlocking strategic sites, North Somerset could lose investment to competing areas. It stresses the need to signal that the area is 'open for business' (Section 4.1 Conclusion and Key Asks). It highlights the following key considerations stating there is "significant competition for land across the area and a shortage of suitable and commercially viable land that is 'shovel-ready' for investment" and calls for "allocating and promoting commercially attractive and ambitious employment sites in the new Local Plan". The Growth Strategy is clear in its focus, that the Local Plan should allocate additional land specifically suited to logistics and distribution, ensuring alignment with national policy objectives to support the modern economy and strategic employment sectors. This approach reflects the need for fit-for-purpose sites, rather than an increase in headline floorspace figures, and will help future-proof the area's economic offer. The draft Local Plan is also supported by a new June 2025 "North Somerset Employment Land Evidence Report" (NSELER) study prepared by Stantec. Is an example of a business as usual approach being taken to assess and make recommendations on employment plan provision within a local plan process. It builds on a previous study (HJA 2025) which specifically assesses the level of employment land required to			on behalf of Hallam Land.pdf

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					meet the new levels of population growth. The report does not seem to integrate the ambitions of the North Somerset 10 year Economic Plan. Despite this compelling evidence, this has patently not followed through into the Plan strategy. The allocation of Land East of Clevedon as a strategic employment site, adjacent to the M5, with access directly from Junction 20, is now removed from the Draft Plan. The NSELER does not appear to fully consider the requirements of the NPPF to make provision for modern industrial strategy needs to accommodate high growth sectors, nor take into consideration the regional and cross boundary opportunities presented to the South, as a result of supply chain development needs for the Somerset enterprise zone, Gravity - home to the new Agratas gigafactory. Gigafactories being one of the specific economic needs identified and therefore this is a missed opportunity. Land East of the M5 at Clevedon, Junction 20, would appear to be of sufficient scale to host supply chain development/ advanced manufacturing for the gigafactory or indeed other strategic economic land use needs in the M5 corridor, required by the MIS. The conclusions of the report for large scale logistics and phasing from 2035 – 2045, does not take sufficient account of the MIS to 2035 or the supply chain requirements to support the UK’s largest gigafactory in the South West, just south of North Somerset. Jobs and Homes Imbalance: The draft policy SP9 identifies the provision of 72.8ha of employment land within North Somerset to “ensure the area has sufficient capacity to continue to provide a range of local employment opportunities and support a balance/sustainable form of growth”. This quantum has reduced from 81.25 ha in the previous Regulation 19 Consultation. Taking account of the uplift in homes now proposed to be required compared with that presented in the previous Regulation 19 plan (uplift of some 63%) this now must be aligned to an appropriate uplift in jobs growth, critically spatially distributed to meet evidenced need. The NSELER recognises the significant risk of an imbalance of housing to employment, as demonstrated by the net out-commuting of residents (c.5,000 source: ONS/Census). It refers to data and commentary from local commercial agents and developers, which suggests that NSC has high demand, particularly for industrial and logistics uses, and a relative shortage of appropriate space. The quantitative demand estimates based on employment forecasts, as set out in the HJIA ESPRE report, suggest that NSC requires around 50 to 60 hectares of new employment land. The assessment of potential employment at the six NS sites/locations assessed in this study suggest a higher level of employment land could be delivered than the ESPRE figure. A recommendation of the report sets out the suggestion of including further			

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					employment land for logistics and goes on to identify J20 as a suitable site for this purpose. The draft Local Plan is supported by a new “Employment Site and Premises Requirements Evidence” (ESPRE) study prepared by Hardisty Jones Associates and Lambert Smith Hampton and published in March 2025, which concludes that in order to maintain a balanced labour market within North Somerset there will be a need for 20,000 additional jobs to be created over the period 2023-43. This is an increase from the estimated 13,000 additional jobs required at the time of the 2023 ESPRE and has a significant influence on future floorspace requirements. Lack of industrial and logistics sites – the case for Land east of Clevedon. The ESPRE also encourages the Council to consider the need for more strategic capacity for uses such as transport and logistics or datacentres. The Plan now commits to an increase of 63% in homes from the previous Regulation 19 Plan, yet the amount of employment land has reduced by 10ha. The Draft Plan now takes an approach to align the scale of employment to the updated housing requirement through additional employment allocations as part of new mixed use strategic development locations. Small allocations at mixed use sites will not support strategic employment needs, nor does it support expedient timescales (given the long -lead in times associated with bringing such sites forward and an inherent focus on delivery of new homes) to react sufficiently quickly to capitalise on the a dynamic commercial market for larger sites that can accommodate logistics and distribution close to the strategic road network. More of the same will not provide opportunities for real choice in the market (driven by changing consumer and business demand, changing space requirements, increased automation, sector diversification and a new focus on sustainability). Supplementing employment supply with additional employment land allocations to be delivered as part of proposed strategic growth areas which by their nature have not been selected having regard to their unique locational drivers to support economic growth and satisfy proven market demand, but instead are generic employment allocations that are part of larger residential-led growth, is questionable and lacks a clear and coherent economic strategy. While the inclusion of employment land within proposed strategic growth areas may appear to address economic needs, this approach does not respond effectively to the evidence-based requirement for logistics and industrial land identified in the updated evidence base documents. Indeed, the ESPRE identifies a limited supply of sites within North Somerset that meet the locational and operational requirements of modern logistics occupiers, which risks limiting the area’s ability to capture growth in this sector and respond to market demand. Contrary to the ESPRE report,			

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					Hallam do not agree that Land west of Kenn (at some 8/9 hectares) could provide a similar number of jobs to Land East of Clevedon once fully developed. The site characteristics and opportunities are inherently different. The Council's own evidence does not support the Sustainability Appraisal conclusions reported for Land East of Clevedon "The allocation of this site is not considered a necessity within the plan as the plan is meeting business needs identified through the evidence on alternative sites". An Economic Assessment prepared by Avison Young is appended to these representations, and provides a commentary on how market data demonstrates the need for, and supply of, employment land and floorspace from a market perspective, concluding that, based both on local employment growth projections and strategic market signals, there remains considerable demand for large scale (100,000sqft+) industrial/warehouse space within the Clevedon/North Somerset area. It reinforces that the Council's proposed approach to planning for employment will not meet need nor demand from the active commercial market. The market/site analysis presented by Avison Young highlights the important and active role the industrial and distribution sector plays in the North Somerset economy now and the ongoing role it will play in the future and therefore is at odds with the current draft Local Plan which limits the provision of sites for logistics. The stock and market data clearly concludes that the existing stock of land and floorspace within North Somerset is simply not fit for purpose to meet future needs. Its scale, location and quality all act as barriers to the area being able to accommodate the identified need and realise the full economic potential of the area. Avison Young evidence provides an analysis of the local employment floorspace market, evidencing a lack of recent delivery with a net increase of only c.32,000 sq. ft. delivered since the start of 2024 at a time when demand was increasing. Looking ahead this is likely to be exacerbated going forward with CoStar recording just c.26,000sqft under construction, suggesting the area will continue to be constrained by a lack of modern stock. Avison Young reviewed a range of industrial sites that have the ability to provide units over 100,000sqft, identifying major schemes in North Somerset and then considering adjacent areas of Somerset and WECA geography. It is notable that the majority of space in the pipeline remains focussed at Severnside and the Somerset Council area, with a much smaller pipeline within North Somerset. 60% of the employment being planned for is directed at Weston Super Mare. This lack of supply leads to the significant danger that North Somerset will be losing out to other locations within the WECA geography which are delivering new high-quality stock, which could see North Somerset being left behind in terms of economic development and employment growth. A risk identified by the Council's own Economic Growth Plan. A commitment to deliver on the ambition committed to by			

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					Members through the Economic Plan to promote the area, capitalise on its competitive advantage and capture investment in the context of not keeping up with demand and trends is not being fulfilled. The evidence points to an even more acute need for new employment land in North Somerset. The reduction in available stock, negligible development pipeline, and ageing nature of existing premises underscore the urgency of delivering modern logistics and distribution space. Land East of Clevedon, Junction 20 M5, is evidenced to be necessary, in order to make the Plan sound. The benefits of this site as a key strategic employment allocation are compelling, and provide an opportunity which although acknowledged, is not currently realised in the draft Plan to attract nationally significant employers, including distribution and logistics occupiers. It can unlock significant direct benefits to the area, likely to generate an additional 1,267 FTE jobs in the local area and contribute over £90mn in GVA per annum to the local economy once fully operational. A further 500+ jobs and £36mn in GVA per annum would be created in the wider region. The site is therefore not only aligned with policy objectives but is critical to addressing a worsening supply-demand imbalance and safeguarding North Somerset's economic competitiveness.			
Policy LP5: Housing, employment and mixed use allocations	No	• Justified • Effective • Consistent with national policy	Yes	Yes	Hallam propose that additional land at East of Clevedon, (east of the proposed employment allocation), could deliver a sustainable new community, with the capacity to accommodate some 2,200 new homes, supported by a range of retail uses, co-located with a community and health provision to meet the needs of the resident population, in a location that is already well connected and accessible to Clevedon and can support improvements in active and sustainable travel in the locality. Hallam Land strongly maintain that development in areas benefitting from flood defences, are inherently sustainable. Defended land is not at the same risk of flooding as the high-risk flood zone it is otherwise categorized within and are a feature of the historic pattern of growth, and indeed the approach taken to growth in the current plan, demonstrated through the allocation at Weston Villages.	Hallam propose that additional land at East of Clevedon, (east of the proposed employment allocation), could deliver a sustainable new community, with the capacity to accommodate some 2,200 new homes, supported by a range of retail uses, co-located with a community and health provision to meet the needs of the resident population, in a location that is already well connected and accessible to Clevedon and can support improvements in active and sustainable travel in the locality.		
Policy LP5: Housing, employment and mixed use allocations	No	• Justified • Effective • Consistent with national policy	Yes	Yes	The proposed employment supply does not present market-driven opportunities and therefore is set up to deliver more of the same, at a time where the commercial and employment market is undergoing significant structural changes. The policy text for SP9 "identified for business purposes across North Somerset to meet needs and aspirations across a range of economic sectors over the plan period" is not being delivered. Supply of sites is not fleet of foot nor aspirational. The employment strategy does not follow the evidence insofar as its lack of positive planning for important and growing sectors such as manufacturing, industrial and logistics, as required by National Policy that directs an uplift in planning for such growth; and having regard to the uplift in homes now to be planned for as set out in the revised Draft Plan. Planning for Economic Development: Supporting the Industrial and Logistics Sector	In order to make the plan sound, some 25 of land East of J20 at Clevedon should be allocated as a strategic employment site to proactively meet the evidenced demand from the distribution, logistics, and warehousing sector.		

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					These representations are supported by a Statement prepared by Claire Pearce, Real Growth, providing independent advice to Hallam Land in respect of current government economic policy and national planning policy which are material considerations to be taken into account in planning policy and development management decision making. The statement provides further detail and clarity on the national policy position which should directly inform a Councils corporate plan, its strategic ambitions, as well as its and economic development, local planning and highway functions. Specific consideration is given to North Somerset. It makes clear that a basic input to any local plan or planning decision process, the industrial strategy and its sector plans and the South West strategy, represents a key material consideration. The North Sommerset Economic Growth Plan 2025 that supports the argument for additional logistics land. The Growth Plan confirms that Logistics is explicitly part of the Foundational Economy priority sector (Section 2.5) and is linked to enabling growth in other sectors like green economy and advanced manufacturing. The Plan warns that without unlocking strategic sites, North Somerset could lose investment to competing areas. It stresses the need to signal that the area is ‘open for business’ (Section 4.1 Conclusion and Key Asks). It highlights the following key considerations stating there is “significant competition for land across the area and a shortage of suitable and commercially viable land that is ‘shovel-ready’ for investment” and calls for “allocating and promoting commercially attractive and ambitious employment sites in the new Local Plan”. The Growth Strategy is clear in its focus, that the Local Plan should allocate additional land specifically suited to logistics and distribution, ensuring alignment with national policy objectives to support the modern economy and strategic employment sectors. This approach reflects the need for fit-for-purpose sites, rather than an increase in headline floorspace figures, and will help future-proof the area’s economic offer. The draft Local Plan is also supported by a new June 2025 “North Somerset Employment Land Evidence Report” (NSELER) study prepared by Stantec. Is an example of a business as usual approach being taken to assess and make recommendations on employment plan provision within a local plan process. It builds on a previous study (HJA 2025) which specifically assesses the level of employment land required to meet the new levels of population growth. The report does not seem to integrate the ambitions of the North Somerset 10 year Economic Plan. Despite this compelling evidence, this has patently not followed through into the Plan strategy. The allocation of Land East of Clevedon as a strategic employment site, adjacent to the M5, with access directly from Junction 20, is now removed from the Draft Plan. The NSELER does not appear to fully consider the requirements of the NPPF to make provision for modern			

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					industrial strategy needs to accommodate high growth sectors, nor take into consideration the regional and cross boundary opportunities presented to the South, as a result of supply chain development needs for the Somerset enterprise zone, Gravity - home to the new Agratas gigafactory. Gigafactories being one of the specific economic needs identified and therefore this is a missed opportunity. Land East of the M5 at Clevedon, Junction 20, would appear to be of sufficient scale to host supply chain development/ advanced manufacturing for the gigafactory or indeed other strategic economic land use needs in the M5 corridor, required by the MIS. The conclusions of the report for large scale logistics and phasing from 2035 – 2045, does not take sufficient account of the MIS to 2035 or the supply chain requirements to support the UK's largest gigafactory in the South West, just south of North Somerset. Jobs and Homes Imbalance The draft policy SP9 identifies the provision of 72.8ha of employment land within North Somerset to "ensure the area has sufficient capacity to continue to provide a range of local employment opportunities and support a balance/sustainable form of growth". This quantum has reduced from 81.25 ha in the previous Regulation 19 Consultation. Taking account of the uplift in homes now proposed to be required compared with that presented in the previous Regulation 19 plan (uplift of some 63%) this now must be aligned to an appropriate uplift in jobs growth, critically spatially distributed to meet evidenced need. The NSELER recognises the significant risk of an imbalance of housing to employment, as demonstrated by the net out-commuting of residents (c.5,000 source: ONS/Census). It refers to data and commentary from local commercial agents and developers, which suggests that NSC has high demand, particularly for industrial and logistics uses, and a relative shortage of appropriate space. The quantitative demand estimates based on employment forecasts, as set out in the HJIA ESPRE report, suggest that NSC requires around 50 to 60 hectares of new employment land. The assessment of potential employment at the six NS sites/locations assessed in this study suggest a higher level of employment land could be delivered than the ESPRE figure. A recommendation of the report sets out the suggestion of including further employment land for logistics and goes on to identify J20 as a suitable site for this purpose. The draft Local Plan is supported by a new "Employment Site and Premises Requirements Evidence" (ESPRE) study prepared by Hardisty Jones Associates and Lambert Smith Hampton and published in March 2025, which concludes that in order to maintain a balanced labour market within North Somerset there will be a need for 20,000 additional jobs to be created over the period 2023-43. This is an increase from the estimated 13,000 additional jobs required at the time of the 2023 ESPRE and has a significant influence on future			

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					floorspace requirements. Lack of industrial and logistics sites – the case for Land east of Clevedon. The ESPRE also encourages the Council to consider the need for more strategic capacity for uses such as transport and logistics or datacentres. The Plan now commits to an increase of 63% in homes from the previous Regulation 19 Plan, yet the amount of employment land has reduced by 10ha. The Draft Plan now takes an approach to align the scale of employment to the updated housing requirement through additional employment allocations as part of new mixed use strategic development locations. Small allocations at mixed use sites will not support strategic employment needs, nor does it support expedient timescales (given the long -lead in times associated with bringing such sites forward and an inherent focus on delivery of new homes) to react sufficiently quickly to capitalise on the a dynamic commercial market for larger sites that can accommodate logistics and distribution close to the strategic road network. More of the same will not provide opportunities for real choice in the market (driven by changing consumer and business demand, changing space requirements, increased automation, sector diversification and a new focus on sustainability). Supplementing employment supply with additional employment land allocations to be delivered as part of proposed strategic growth areas which by their nature have not been selected having regard to their unique locational drivers to support economic growth and satisfy proven market demand, but instead are generic employment allocations that are part of larger residential-led growth, is questionable and lacks a clear and coherent economic strategy. While the inclusion of employment land within proposed strategic growth areas may appear to address economic needs, this approach does not respond effectively to the evidence-based requirement for logistics and industrial land identified in the updated evidence base documents. Indeed, the ESPRE identifies a limited supply of sites within North Somerset that meet the locational and operational requirements of modern logistics occupiers, which risks limiting the area's ability to capture growth in this sector and respond to market demand. Contrary to the ESPRE report, Hallam do not agree that Land west of Kenn (at some 8/9 hectares) could provide a similar number of jobs to Land East of Clevedon once fully developed. The site characteristics and opportunities are inherently different. The Council's own evidence does not support the Sustainability Appraisal conclusions reported for Land East of Clevedon "The allocation of this site is not considered a necessity within the plan as the plan is meeting business needs identified through the evidence on alternative sites". An Economic Assessment prepared by Avison Young is			

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					appended to these representations, and provides a commentary on how market data demonstrates the need for, and supply of, employment land and floorspace from a market perspective, concluding that, based both on local employment growth projections and strategic market signals, there remains considerable demand for large scale (100,000sqft+) industrial/warehouse space within the Clevedon/North Somerset area. It reinforces that the Council's proposed approach to planning for employment will not meet need nor demand from the active commercial market. The market/site analysis presented by Avison Young highlights the important and active role the industrial and distribution sector plays in the North Somerset economy now and the ongoing role it will play in the future and therefore is at odds with the current draft Local Plan which limits the provision of sites for logistics. The stock and market data clearly concludes that the existing stock of land and floorspace within North Somerset is simply not fit for purpose to meet future needs. Its scale, location and quality all act as barriers to the area being able to accommodate the identified need and realise the full economic potential of the area. Avison Young evidence provides an analysis of the local employment floorspace market, evidencing a lack of recent delivery with a net increase of only c.32,000 sq. ft. delivered since the start of 2024 at a time when demand was increasing. Looking ahead this is likely to be exacerbated going forward with CoStar recording just c.26,000sqft under construction, suggesting the area will continue to be constrained by a lack of modern stock. Avison Young reviewed a range of industrial sites that have the ability to provide units over 100,000sqft, identifying major schemes in North Somerset and then considering adjacent areas of Somerset and WECA geography. It is notable that the majority of space in the pipeline remains focussed at Severnside and the Somerset Council area, with a much smaller pipeline within North Somerset. 60% of the employment being planned for is directed at Weston Super Mare. This lack of supply leads to the significant danger that North Somerset will be losing out to other locations within the WECA geography which are delivering new high-quality stock, which could see North Somerset being left behind in terms of economic development and employment growth. A risk identified by the Council's own Economic Growth Plan. A commitment to deliver on the ambition committed to by Members through the Economic Plan to promote the area, capitalise on its competitive advantage and capture investment in the context of not keeping up with demand and trends is not being fulfilled. The evidence points to an even more acute need for new employment land in North Somerset. The reduction in available stock, negligible development pipeline, and ageing nature of existing premises underscore the urgency of delivering modern logistics and distribution space. Land East of Clevedon, Junction 20 M5, is evidenced to be necessary, in order to make the Plan sound. The benefits of			

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					this site as a key strategic employment allocation are compelling, and provide an opportunity which although acknowledged, is not currently realised in the draft Plan to attract nationally significant employers, including distribution and logistics occupiers. It can unlock significant direct benefits to the area, likely to generate an additional 1,267 FTE jobs in the local area and contribute over £90mn in GVA per annum to the local economy once fully operational. A further 500+ jobs and £36mn in GVA per annum would be created in the wider region. The site is therefore not only aligned with policy objectives but is critical to addressing a worsening supply-demand imbalance and safeguarding North Somerset's economic competitiveness.			
Policy DP6: Net zero construction	No	• Justified • Effective • Consistent with national policy	Yes	Yes	Viability of the proposal is a critical factor which is omitted and which could therefore undermine delivery. Furthermore, the decision to apply the 900kg/sqm target to all buildings in excess of 5,000m² will create significant challenges in that average embodied carbon intensities vary substantially across different building types. For example, offices and schools typically have a higher embodied carbon content and this should be considered when developing this policy. The Council need to consider how Policy DP6 would be monitored (having regard to wider construction practices and processes that are outside of the development management process) in order to demonstrate its effectiveness and therefore soundness. It is not appropriate for the Plan to move away from carbon reduction methods as set out in Building Regulations and the energy targets likely to be introduced by the Future Homes Standard in favour of it own assessment of energy use. There is no justification for the policy to push significantly above the requirements set out nationally. There does not appear to be any technical evidence that confirms the commercial and technical viability of these standards. Please set	Hallam Land suggest the policy is amended to require an Energy and Sustainability Statement which looks at the issues and opportunities more widely rather than a prescriptive unevidenced requirement for an Embodied Carbon Assessment.		

Name: Ham Green Residents and other Supporters **I.D:** 28903201

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SP3: Spatial strategy	No	• Justified	No	No	The Plan has been prepared against a centrally imposed housing target set by Government which bears no relation to existing environmental constraints and designations including flood risk, nor heeds local capacity constraints to construct 24,000+ homes in the Plan period to 2041. The Plan relies on ignoring these constraints and on weakening Green Belt protections by designating high visual amenity value productive areas of Green Belt as Grey Belt contradicting policy advice in the National Planning Policy Framework. The Plan is not Sound, Legally Compliant, Sustainable or Positively Prepared, nor in compliance with the Duty to Cooperate which it has negated for those reasons, and should be referred back to North Somerset Council for review and revision. No further comment on the Plan is appropriate in light of this response.	The Plan should be referred back to North Somerset Council for review and revision against a lower more realistic housing target that can be sustainably delivered within existing environmental and construction capacity constraints to build something in the order of 15-16,000 new homes in the Plan period.	Not applicable	

Name: Harriet Perkins **I.D:** 58584161

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Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	No	The heavy focus on Backwell suggests that North Somerset Council has not properly worked with neighbouring authorities to test other strategic development options. The available evidence does not indicate: - meaningful collaboration on wider transport planning, - a shared approach to locating housing near major employment areas, or - joint efforts to minimise the release of Green Belt land. Overall, there is no clear demonstration of a coherent, cross-boundary strategy that supports sustainable growth.	I object to the proposed housing allocation east of Backwell because it fails every major test of soundness, is not legally compliant, and does not meet the duty to co-operate required by national planning policy. 1. The plan is not based on realistic or up-to-date housing need Recent demographic data shows that the UK is experiencing a dramatic fall in projected household growth. The national fertility rate has reached a historic low of 1.4, indicating that long-term population and household formation will be far lower than assumed when the Council derived its housing figures. Building large new estates in Backwell on the basis of inflated or outdated forecasts is unjustified. There is unlikely to be demand for the volume of housing proposed, especially in a small rural village. 2. The choice of site is not justified when considering alternatives The eastern Backwell site contains Grade 1 agricultural land, of which only 7% now remains in North Somerset. This land is vital for food production and represents a scarce resource. Despite this, the plan has not demonstrated that all other realistic options—particularly brownfield or less sensitive land—have been properly assessed before proposing to release this land for development. The proposal would also remove open countryside that forms a key part of Backwell's rural setting, causing irreversible landscape harm. 3. The development is not deliverable in a sustainable way Local roads, the A370, public services, schools and healthcare facilities are already under heavy pressure. No funded or credible infrastructure strategy has been presented to show that the village can support such a substantial scale of growth. Although the plan points to the Bristol–Exeter rail line as a sustainable transport benefit, Nailsea & Backwell station is not step-free and cannot be used independently by people with mobility impairments. This undermines the claim that the allocation supports sustainable travel. 4. The proposal conflicts with national planning policy The release of Green Belt and the loss of best and most versatile agricultural land require exceptional justification, which is not provided. The development also fails to meet national expectations on sustainable transport, protection of countryside, and long-term environmental resilience. 5. Concerns over joint working and strategic planning There is no clear evidence that the Council has worked effectively with neighbouring areas on housing distribution, strategic transport planning, or avoiding unnecessary Green Belt loss. The outcome is an over-concentration of growth in Backwell without a coherent, regionally aligned strategy. Conclusion The allocation east of Backwell is unsound. It is based on unrealistic housing need, chosen without proper consideration of alternatives, unsupported by		

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						infrastructure planning, inconsistent with national policy, and not underpinned by robust cross-authority co-operation. For these reasons, the site should be removed from the Local Plan.		

Name: Harrow Estates **I.D:** 63094305

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SP1: Sustainable Development	No		No	No		Harrow Estates note there is no difference in the draft policy wording between the Pre-Submission consultation version dated July 2024 and the current October 2025 version. Whilst Harrow support the intention of Policy SP1 to embed sustainable development at the heart of the Local Plan, the policy is not effective and does not meet its legal requirement to be prepared with the objective of achieving sustainable development. We say this because: • The policy does not enable a positive contribution to address and demonstrate resilience to the impacts of climate change and delivering the net zero target due to 46% of planned growth being located within the western part of the district maintaining and increasing the high levels of long-distance commuting across the district. • To be found sound, SP1 must be supported by a spatial strategy that directs growth to the most sustainable locations; including eastern settlements such as Failand, rather than locations that exacerbate unsustainable commuting patterns. • Harrow consider that development should be located where services and facilities are accessible, reducing dependence on the private car and providing opportunities for activeand sustainable forms of travel. • The draft LP fails to align its spatial distribution of growth with the sustainable development principles set out in Policy SP1. This results in a fundamental disconnect between the Policy SP1 principles and the proposed growth locations at Policy SP3.Delivery of resilient to impacts of climate change and delivering net zero target. Policy SP1 requires development to “make a positive contribution to addressing and demonstrating resilience to the impacts of climate change and delivering the net-zero target”. However, the draft Plan places a disproportionate amount of growth (46%) in western locations such as Weston-Super-Mare (WSM) and Banwell, which are remote from Bristol, as the primary economic centre of growth from other western settlements. Harrow reiterates that residents are commuting from Weston-Super-Mare to Bristol for work. This pattern is unsustainable and increases carbon emissions, in conflicts with the Council’s Climate Emergency declaration. The level of out commuting is demonstrated by Calibro’s Carbon Modelling report, Figure 2.1(below), which shows that commuting flows between WSM and Bristol dominate, highlighting the unsustainability of the proposed spatial strategy. Figure 2.1 Calibro carbon Modelling Report The study concludes that to reduce the distance and number of vehicular trips into Bristol, housing must be allocated closer to the city, particularly within the northwest of the district given its proximity to jobs, services and facilities in Bristol. Failing to do so directly undermines the Council’s climate ambitions and contradicts the requirements of Policy SP1. Paragraph 1.45 of the Local Plan Transport Assessment identifies concerns about the sustainability of several western settlements, such as Locking, Banwell, Wolvershill, Sandford and Winscombe, where the deliverability of public transport services and reliance on private car use present significant challenges. Conversely, Failand benefits from short journey distances, active		251211 Land East of Failand Reg 19 Reps.pdf

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						travel routes and frequent existing bus connections into Bristol City Centre, meaning it is significantly better aligned with climate and sustainable travel objectives of SP1. As such, by failing to allocate sustainable, well-connected eastern settlements the emerging LP cannot demonstrate that Policy SP1's for Sustainable Development can meet the council's climate objectives for reduced need to travel and less dependent on the private vehicles have been meaningfully applied. Delivery of economic growth and job creation at accessible locations Policy SP1 seeks to "support the delivery of opportunities for economic growth and job creation at accessible locations". However, directing growth away from Bristol, the principal economic hub, contradicts this aim. The Plan fails to acknowledge that Bristol is the principal economic hub of the West of England and notably for a large proportion of North Somerset residents and therefore directing growth to Weston-Super-Mare is inconsistent with economic reality and exacerbates unstainable travel distances. In contrast, eastern settlements such as Failand already benefit from inherently more sustainable travel relationships with Bristol and public transport connections, yet these locations have been excluded solely on the basis of Green Belt status rather than of their sustainability credentials. As a result, this omission demonstrates that Policy SP1 is not supported by evidence-based, justified policy which does not deliver sustainable development objectivise. The Council has does not recognise its relationship with Bristol through delivering its stated objectives for economic growth, climate resilience, and reduced car dependence through allocating development to western area of district, we see this as not sound. Walking, Cycling and Public Transport Ambition Policy SP1 emphasises prioritising walking and cycling and maximising the use of public transport. However, the Sustainability Appraisal identifies the A370 and A38 transport corridors as already under stress, with limited potential for significant modal shift due to distance from strategic employment areas. In contrast, eastern locations such as Failand are positioned to genuinely support active travel and public transport use benefiting from direct bus links to Bristol and National Cycle Route connections. Yet these locations are excluded from the site selection framework. As a result, SP1's transport objectives remain aspirational rather than deliverable. Reallocating a proportion of growth to sustainable eastern settlements is needed to ensure SP1's transport and climate objectives can be met. Commitments to Healthy, Safe, and Cohesive Communities are undermined by Growth Distribution Policy SP1 states that development should contribute to "healthy, safe and cohesive communities and tackle inequality", yet the Plan's spatial strategy reinforces unsustainable long-distance commuting patterns from western settlements, which will not improve health conditions and will exacerbate dependence on private vehicles. The continued reliance on long-distance, car-based commuting from western settlements increases emissions and reduces local air quality and exposes communities to higher levels of congestion and pollution. Growth should instead be directed to settlements such as Failand, where shorter travel distances and viable sustainable transport alternatives align with public health and wellbeing objectives. As drafted, this policy neither widens access to housing across the district nor strengthens under-served communities, and, therefore, SP1's social aims are not achieved		
SP3: Spatial strategy	No	• Positively prepared • Justified	No	No		Harrow Estates notes there is no difference in the draft policy wording between the Pre Submission consultation version dated July 2024 and the current October 2025 version. However, the unchanged wording fails to resolve the fundamental shortcomings previously raised and continues to result in a spatial strategy that is neither justified nor consistent with national		251211 Land East of Failand Reg 19 Reps.pdf

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		• Effective • Consistent with national policy				policy. The draft Plan's Spatial Strategy remains heavily skewed towards western settlements, particularly Weston-Super-Mare, despite clear evidence that this distribution of development does not support sustainable patterns of development, does not align with the district'sprimary economic relationships, and does not optimise opportunities for active and sustainable travel. This results in a failure to align the Spatial Strategy with Sustainable Development Principles. SP3 must operate synergistically with SP1, yet the two policies currently conflict. As demonstrated in Section 2 (SP1), the draft LP reinforces long-distance commuting patterns, fails to direct growth to the most sustainable locations, and overlooks the strategic relationship with Bristol. Failand, a settlement with short journey times to Bristol; established public transport connections; potential for enhanced active travel routes; and proximity to major employment centres, has been excluded from the spatial strategy without a transparent or evidence⟐based justification. The omission of eastern settlements, such as Failand, conflicts with the principle that Plans should promote sustainable patterns of development by focusing growth in locations that reduce reliance on private cars and shorten travel distances. Over concentration of Growth in the West SP3 directs 46% of all new housing to Weston-Super-Mare and nearby areas, despite the Council's own evidence highlighting: • entrenched commuting to Bristol from Weston, • significant environmental impacts associated with this pattern, • limited ability of the A370 and A38 corridors to support meaningful modal shift, and • concerns raised within the Transport Assessment about the sustainability of western settlements. This over concentration is not supported by the evidence base and appears to be based primarily on historic patterns of development and land availability, rather than sustainability or strategic need. For the Plan to be sound it must distribute growth more evenly across the district and, critically, allocate a greater proportion of development in the east where the relationship with Bristol is strongest. Failure to Consider Reasonable Alternatives The NPPF requires Local Plans to test reasonable alternatives. However, the draft LP does not provide transparent comparative assessment of alternative growth distributions, including scenarios that increase development in the east of the district. The Council has not demonstrated why sustainable eastern settlements, including Failand, were discounted at an early stage, despite: • SHLAA confirmation that the site is suitable for further assessment, • the Spatial Strategy and Capacity Paper acknowledging Failand as a settlement with development potential, • Sustainability Appraisal conclusions showing strong performance in terms of accessibility to jobs and services, and • the site's ability to directly address Bristol's unmet housing needs. Harrow consider that the spatial strategy has not, therefore, fully considered all viable, achievable and deliverable sites. The Plan's evidence base states that "the Stage 1 [WECA Green Belt] assessment is being undertaken in stages, with the final full assessment to be published in 2026." As this WECA⟐wide review provides the strategic baseline for understanding Green Belt performance, its incomplete status means North Somerset is advancing a local plan without sight of the full evidence needed to justify decisions on Green Belt release, retention, or boundary changes. North Somerset's Stage 2 Assessment considers only parcels adjacent to preferred settlements and does not provide a full, plan-wide parcel assessment. This contradicts guidance requiring sufficiently granular assessments across all		

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						Green Belt land and not just a small number of large areas. By narrowing the scope prematurely, the Council has not shown that all reasonable Green Belt options have been examined, as required by NPPF paragraph 147. Without the complete WECA Stage 1 assessment, the Council cannot justify why certain parcels are proposed for release while others are ruled out. The absence of this strategic baseline prevents a clear understanding of how chosen sites relate to the wider Bristol & Bath Green Belt or whether alternatives elsewhere may perform less strongly or offer more sustainable opportunities. This casts doubt on the consistency, comparability, and soundness of the Council's release decisions. This evidential gap means the spatial strategy does not meet the requirement to be "the most appropriate strategy when considered against reasonable alternatives." The Council acknowledges that Steps 1 - 4 of its site-selection process do not meet identified housing needs, yet potential Green Belt alternatives have not been fully assessed. Despite recognising the Stage 1 review is incomplete, the Council proceeded to identify 12 release sites based only on its partial Stage 2 assessment. This sequencing error undermines the reliability of the spatial strategy and the claim that all reasonable options have been properly tested. Although the Council argues that exceptional circumstances exist because need cannot be met outside the Green Belt, this conclusion is not robust without a complete evidence base. The partial Green Belt review, the absence of the final WECA Stage 1 assessment, and the narrowed scope of Stage 2 mean the Council has not provided proportionate or comprehensive evidence to justify its proposed boundary changes or to demonstrate that the selected Green Belt releases are necessary, sustainable, or optimal. The absence of a robust assessment of reasonable alternatives is not justified and draft Policy SP3 is therefore unsound. Inconsistency With Cross-Boundary Relationships and Unmet Need As set out earlier in these representations, the West of England authorities form a single functional housing market area. Paragraph 24 of the NPPF states that: "Effective strategic planning across local planning authority boundaries will play a vital and increasing role in how sustainable growth is delivered, by addressing key spatial issues including meeting housing needs." SP3 does not reflect this requirement. Specifically: • it fails to direct growth to the locations closest to Bristol, • it does not contribute meaningfully to addressing Bristol's unmet need, and • it does not reflect the North Somerset Council's role as a "growth gateway" to the West of England. A spatial strategy that does not respond to strategic housing needs across functional boundaries cannot be considered positively prepared. Excessive Reliance on Strategic Locations with Long Lead-In Times As detailed later in these representations, the Plan's proposed Strategic Locations at Woodspring, Wolvershill, and Nailsea/Backwell face significant uncertainties regarding infrastructure delivery, phasing, and achievable build-out rates. For example, even assuming a build-out rate of 200 dwellings per annum, Woodspring would only deliver around 1,700 homes, falling substantially short of the 3,500 home trajectory set out in the draft Plan. The effectiveness of Policy SP3 therefore relies on unrealistic delivery assumptions, undermining the delivery of the Plan's housing requirement. Allocating smaller, deliverable sites such as Land East of Failand would: • reduce reliance on long-lead strategic sites, • diversify the housing land supply, and • improve delivery rates early in the plan period. Need for Reassessment and for a More Balanced Strategic locations In light of the updated evidence base, Harrow Estates maintains that a reassessment of the Strategic Locations is essential. The Council should: • undertake a finer-grain Green Belt review around inset villages; • assess sustainable locations such as Failand on a consistent basis with		

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						western settlements; • incorporate eastern settlements into sustainability testing; and • reconsider distribution to reflect functional ties to Bristol. Such work would help ensure that the Plan is positively prepared, justified, effective, and consistent with national policy none of which can be demonstrated on the basis of the updated evidence in its current form. In conclusion, Policy SP3 is not sound because it is not: • Positively prepared. It does not meet identified needs or respond to Bristol's unmet need. • Justified. It does not consider reasonable alternatives or align with sustainability evidence. • Effective. It relies heavily on strategic sites unlikely to deliver required housing within the plan period. • Consistent with national policy. It fails to promote sustainable patterns of development and does not address cross-boundary needs. A sound spatial strategy must: • Allocate growth in accessible eastern settlements such as Failand; • Reduce reliance on long-lead strategic allocations; • Reflect the functional relationship with Bristol; and • Align with the sustainability objectives of SP1		
SP6: Villages and rural areas	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No		Policy SP6 sets out the approach to managing development in villages and rural areas. While the intention of the policy is understood, the drafting of SP6 is not justified, effective, or consistent with national policy because it is overly restrictive and does not acknowledge the important role of rural settlements, such as Failand, in contributing to sustainable development, supporting rural services and helping to meet the districts' housing needs. The policy relies heavily on a rigid settlement hierarchy that fails to reflect functional relationships, accessibility to higher-order centres, or the opportunities presented by sustainably located edge of village sites. This results in a blanket constraint-based approach that conflicts with both national rural planning objectives and the draft LP's wider growth strategy.Lack of Recognition of Rural Settlements' Strategic Role The draft LP categorises Failand as a Category C settlement. As stated in the evidence base: "Category C settlements are defined as villages with limited services and facilities such as just a primary school, village shop or pub and lack good access to higher order settlements by walking, cycling or frequent transport." However, this description does not accurately reflect the realities of Failand's connectivity, accessibility, or functional role. Failand is served by: • Failand Village Hall • A Local Village Store and Café (Honey & Ginger) • The Failand Inn • Failand Observatory – Local Landmark • Tyntesfield House (National Trust Park and Gardens) • Wraxall Piece (National Forest) • Ashton Hill Plantation (National Forest includes walking and cycling routes) • Bristol & Clifton Golf Club • Long Ashton Golf Club • X6 bus service connecting Failand to Bristol Failand is sustainably located on major transport corridor between Bristol and Clevedon, benefiting from a total of number of stops. The existing provision, the First X6 service provides Failand with a bi-hourly service with strategically connections to Bristol and Clevedon. The journey time into Bristol is circa 15 minutes to the city centre. Furthermore, Long Ashton Park & Ride is 4km east, connecting to the Metro Bus network as another form of sustainable travel option. The existing level of service provision, together with its proximity to Bristol and established transport links, demonstrates that Failand performs		251211 Land East of Failand Reg 19 Reps.pdf

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						significantly stronger than a Category C settlement and should be treated as a sustainable location for growth. Failure to Apply NPPF Principles to Rural Settlements Paragraphs 79-80 of the NPPF (2024) support rural housing where it enhances or maintains the vitality of rural communities. SP6, however, adopts a restrictive approach that: • prevents sustainable edge-of-settlement growth; • does not recognise the ability of rural settlements to accommodate modest development; and • disregards the functional relationship between villages and nearby towns or cities. This approach is inconsistent with the NPPF's recognition that rural communities cannot remain static and require positive, sensitively designed new development to remain viable. The above is evident in the Taylor Review of Rural Economy and Affordable Housing (2008), which highlights that rural communities cannot remain static, and that without positive intervention, villages face long-term decline in population, housing affordability, and service provision. The review emphasises that planning policies should act as an "engine of regeneration," delivering affordable housing, enabling local enterprise, and sustaining vibrant rural life. Without modest levels of ongoing development, local services such as schools, shops, pubs, public transport, and community facilities risk decline or closure, further undermining rural vitality. Housing Affordability, Social Balance, and Local Needs SP6 does not provide any mechanism for meeting locally generated housing need in rural communities, nor does it account for the worsening affordability pressures evidenced in the LHNA (2025). Failand, with access to jobs in Bristol and a demonstrable ability to deliver affordable housing through grey belt policy, is well placed to support balanced communities and address rural housing inequalities. Misalignment Between SP6 and the Spatial Strategy (SP3) SP6 and SP3 must be consistent; however, the restrictive nature of SP6 undermines the draft LP's ability to deliver growth where it is most sustainable. SP3 directs growth toward Weston-Super-Mare despite evidence of unsustainable commuting patterns and infrastructure constraints. Meanwhile, Failand, which is located 5-minutes from Bristol, with existing bus services, proximity to the Long Ashton Park & Ride, and well-established active travel routes, is excluded on the basis of an oversimplistic settlement categorisation. The evidence clearly shows that the categorisation of Failand fails to recognise its existing relationship with Bristol and the benefits from existing public transport routes into the city. This omission prevents the Plan from achieving a sustainable distribution of homes across the district. Lack of Flexibility to Support Rural Sustainability SP6 does not acknowledge these considerations and instead restricts opportunities for modest, well-located, sustainable growth that could support the vitality of rural communities. A sound Policy SP6 must: • Allow appropriate edge-of-settlement growth where it demonstrably supports local needs and sustainability. • Recognise the strategic role of villages with strong accessibility, such as Failand. • Integrate rural policy with wider spatial strategy objectives, rather than applying an inflexible hierarchy. Policy SP6 is unsound because it is not: • Positively prepared. It constrains opportunities for sustainable rural growth and fails to respond to local needs. • Justified. It misapplies the settlement hierarchy and does not reflect the		

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						functional role of places like Failand. • Effective. It undermines the spatial distribution of development and limits delivery of affordable and market housing. • Consistent with national policy. It conflicts with NPPF directives on rural vitality, community sustainability, and enabling modest rural growth. A revised Policy SP6 should explicitly support growth in sustainable rural settlements, including Failand, to ensure the long-term viability of rural communities and deliver a balanced spatial strategy.		
SP7: Green Belt	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	Policy SP7 sets out the Council's approach to the Green Belt. However, the policy and supporting evidence do not meet the requirements of the 2024 NPPF or PPG, and therefore the policy is not justified, not effective, and not consistent with national policy. The Green Belt Background Paper acknowledges that the 2024 NPPF introduced two major changes: • "the introduction of 'grey belt'… land in the Green Belt… that does not strongly contribute to any of purposes (a), (b) or (d)" • "if a Local Planning Authority is unable [to] meet its identified housing need this constitutes an exceptional circumstance for reviewing Green Belt boundaries" Despite this, the draft Local Plan does not apply these requirements consistently or transparently. The Green Belt evidence is incomplete and is not consistent with national policy The Stage 1 Strategic Green Belt Assessment (SGBA) published for the Regulation 19 consultation confirms that the SGBA is: • "an interim report" • "undertaken in stages, with the final full assessment to be published in 2026" This means the Council is preparing a Regulation 19 Plan without the complete strategic evidence required by the 2024 NPPF. The NPPF (para 147) requires that exceptional circumstances for Green Belt release must be demonstrated as part of the plan-making process, informed by a complete understanding of how the Green Belt performs across the housing market area. The national policy and guidance requires: • "Effective strategic planning across local planning authority boundaries," specifically to address shared spatial issues, including meeting housing needs. (NPPF para 24) • "Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development," which requires a proper, evidence-led Green Belt review before making choices in the Plan. (NPPF para 147)			251211 Land East of Failand Reg 19 Reps.pdf

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					• "…authorities should review Green Belt boundaries in accordance with the policies in this Framework and propose alterations to meet these needs in full..," which requires an understanding of Green Belt purposes across the area of the Plan (NPPF para 146) • The PPG (2025) requires a complete, proportionate, plan-wide Green Belt assessment (004 Reference ID: 64-004-20250225) NSC does not yet have this information. This means the Council is preparing a Regulation 19 Plan without the complete strategic evidence required by the 2024 NPPF. As demonstrated above, the NPPF requires that exceptional circumstances for Green Belt release must be established as part of the plan-making process, informed by a complete understanding of how the Green Belt performs across the housing market area. NSC does not yet have this information. Stage 2 Assessment covers only selected parcels, contrary to PPG North Somerset's Stage 2 Green Belt Assessment (Oct 2025) states that it assesses only land adjacent to the more sustainable settlements: "A review of the area adjacent to the more sustainable settlements in North Somerset, in line with the local plan's spatial strategy, has been undertaken" (para 1.6). However, the PPG requires authorities to: • "consider all Green Belt within their Plan areas in the first instance" • ensure parcels are "sufficiently granular… to identify areas of grey belt" • avoid "a small number of large assessment areas" NSC did not assess: • all Green Belt land, • all settlement edges, or • all areas with potential for Grey Belt classification. This failure is fundamental. Under the 2024 NPPF, Grey Belt identification is mandatory, not optional. Failand has not been assessed at all, despite being a logical location for Grey Belt review. The Stage 2 Assessment lists settlements assessed at para 2.1, including: Portishead, Clevedon, Nailsea, South West Bristol, Backwell, Long Ashton, Easton-in-Gordano/Pill, Yatton, Congresbury and Wrington. Failand is not included. This is despite the Background Paper stating: • the Green Belt Review should assess areas adjacent to the more sustainable settlements (Para 3.10 states "…a Stage 2 Green Belt Assessment has also been undertaken to assess sites at the more granular level			

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					around the large urban areas, towns and more sustainable villages in line with the local plan's spatial strategy and the national planning practice guidance on Green Belt…"); and • the NPPF requires identification of Grey Belt land that "does not strongly contribute to purposes (a), (b) or (d) Failand clearly meets the criteria that warrants re-assessment: • Immediately adjacent to Bristol's administrative boundary; • Washed-over villages with existing built form (reducing contribution to purposes); • Strong connectivity to Bristol; and • Suitable, available land identified in the SHLAA. By not assessing any parcels around Failand, the Council has failed the PPG requirement to consider all Green Belt land and identify lower-performing (Grey Belt) parcels. The Green Belt Stage 1 Assessment identifies numerous weak-performing parcels that aren't included in the Spatial Strategy The Stage 1 SGBA identifies that 12 parcels make a 'weak' overall contribution to Green Belt purposes: "12 no. have been assessed as making a 'weak' overall contribution to Green Belt purposes." However, NSC does not map these parcels in its site selection process; nor does it explain why weak-performing land in the east (including the Failand - Long Ashton corridor) was not considered. To that end, the Plan does not link the Stage 1 outcomes to Policy SP7 or the Spatial Strategy This means the required process of a Green Belt review, which shapes spatial strategy; and then identifies allocations has not been followed. Instead, the Council chose a spatial strategy first (western-focused); and then used partial Green Belt analysis to support those choices. This directly contradicts paragraphs 147 to 151 of the NPPF. Exceptional circumstances exist but are not applied consistently The Stage 2 Green Belt Assessment states that "exceptional circumstances exist to consider land in the Green Belt for housing allocations" (para 1.6) because North Somerset cannot meet its housing need without looking beyond non-Green Belt options (para 5.1 LHNA 2025) and cannot accommodate growth without Green Belt release. However, the Council applies exceptional circumstances only in the west of the district while			

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					excluding sustainable, well-connected eastern locations such as Failand without: • Stage 1 evidence being complete • Stage 2 assessment covering the area • Grey Belt identification • Parcel-level analysis • Any comparative sustainability assessment This selective application of exceptional circumstances is contrary to national policy. The Local Plan conflicts with spatial sustainability evidence: The Spatial Strategy (Document 1) acknowledges that eastern parts of the district have the strongest relationship with Bristol, which is the principal economic centre. The Transport Assessment and Sustainability Appraisal also show that western growth locations are less able to achieve modal shift; associated with long-distance commuting; and less accessible to Bristol. Yet Policy SP7 protects the majority of eastern Green Belt land, while releasing western land in less sustainable locations. This contradicts the NPPF (para 151), which requires that Green Belt changes promote sustainable patterns of development and take account of transport corridors and accessibility. Failand is well placed to meet these criteria, but it is excluded from assessment: The SHLAA and Additional Sites evidence show Failand is suitable, available, and developable. The SHLAA identifies the edge of Bristol as an area of search and includes sites in this broad location for further assessment. The Additional Sites Consultation Report confirms the need for further deliverable sites; that Failand is in close proximity to Bristol; and that the discounting of Failand is disputed. Failand therefore meets all three tests for Green Belt consideration under the NPPF: • There is a proven housing need in the district; • The site is sustainably located, with strong accessibility to Bristol; and • The site qualifies as Grey Belt land. In conclusion, Policy SP7 is not sound because: • It is not Positively Prepared. It does not ensure adequate Green Belt release to meet the housing requirement. • Not Justified: – Stage 1 is interim and incomplete. – Stage 2 is selective and excludes Failand entirely. – Grey Belt is not identified.			

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					• Not Effective: – Key assessments will not be completed until 2026, after the Local Plan is submitted. – Not Consistent with National Policy – Fails NPPF paragraphs 147 to 155 and does not follow PPG methodology. • To comply with national policy, NSC must: – Complete the full Stage 1 SGBA and update Stage 2 assessments accordingly once the 2026 SGBA is published. – Assess all Green Belt parcels in North Somerset, including Failand in line with PPG requirements; and – Identify Grey Belt parcels and prioritise these for release as required by NPPF paragraph 148; – Reassess the Plan's Spatial Strategy, which follows the Plan's Green Belt evidence. – Reconsider Land East of Failand as a suitable, sustainable Grey Belt release based on SHLAA availability, proximity to Bristol, and ability to deliver early in the plan period.			
SP8: Housing						As drafted the LP is not sound and does not meet its legal requirements to be prepared with the objective of contributing to the achievement of sustainable development. To be found sound this must be addressed alongside identifying additional housing allocations to deliver the housing requirement over the plan period. We say this because: • The Plan is unlikely to be examined or adopted in 2026 and as a result the plan period should be amended to start from 2027 and extend for a minimum 15-year period. • The Plan's spatial strategy has a reliance on the delivery of Strategic Locations, notably 6,660 dwellings are expected to be delivered on allocated sites at Weston Super Mare and a further 3,300 identified at Wolvershill representing 46% of the Plans supply within the west of the district. Despite the Council having increased the distribution of homes elsewhere across the district, additional homes should be provided to the east of the district; • The Plan has been prepared in isolation, despite being functionally part of the West of England Housing Market Area; there is a chronic significant under supply of market and affordable housing; and the Plan fails to address Bristol's unmet need. • The significant under supply of affordable housing within the district, is not considered by the Council's alternative housing needs assessment. Plan Period Given the delays to LP making to date, and historic delays experienced with the adoption of the Core Strategy, the plan period should be amended. In accordance with paragraph 22 of the NPPF, strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Accordingly, the plan period should be amended to read 2027 (at the earliest, if the LP is able to be examined and adopted within the same year) to 2042. Delivery of Strategic Locations Aside from the delivery of substantial growth at Weston-Super-Mare, the Plan includes the allocation of four Strategic Locations which concentrates substantial growth at a limited number of strategic sites. This is considered high-risk with the draft LP reliant on optimistic assumptions. Large-scale		251211 Land East of Failand Reg 19 Reps.pdf

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						strategic developments, require extended timeframes to secure the necessary planning permissions, implementation and delivery. Consequently, the Council needs to take a realistic delivery approach. Notably, the strategic developments at Wolvershill (north Banwell), Woodspring (south west of Bristol), Nailsea and Backwell all require large scale infrastructure which will inevitably have a knock-on consequence in terms of the timescales for delivery and the draft LP's ability to deliver much needed homes. Currently, the Council's approach places excessive dependence on a small number of large sites and, assumes large-scale infrastructure will be delivered on time and on budget without incurring delays. This directly undermines SP8's effectiveness, as the policy relies upon unrealistic build-out assumptions that cannot deliver the required housing. Delivery of Affordable Housing There is significant under supply of affordable housing within the district, which is not considered by the Council's alternative housing needs assessment. North Somerset's evidence base demonstrates a long-term and severe failure to meet affordable housing needs, with delivery far below both locally identified need and the requirements of the wider West of England Housing Market Area. The latest AMR (2023–24) confirms just 200 affordable homes were delivered last year which is above the long-term average of only 161 per year since 2006; however, this is a 50% reduction in comparison to the last reported year. This level of delivery is wholly inconsistent with successive strategic assessments: the West of England SHMA (2009) identified 904 households per year in need, the Wider Bristol SHMA (2015) calculated a requirement of 240 per year, and subsequent updates have maintained similarly high figures. The 2021 LHNA identified a need for 224–320 per year, and the previous 2023 LHNA shows worsening pressure whilst the most recent LHNA 2025 again shows the annual requirement of 271 affordable homes per year across the space of the emerging LP 2026–2041. These assessments consistently demonstrate that the affordable housing need in North Somerset is many times greater than the modest outputs historically achieved. The emerging LP's highlights that NSC is not planning positively in providing level of affordable homes across the district. The authority's historic under-delivery means that level of affordable housing in North Somerset is worsening. A sound plan must increase its housing requirement to ensure that affordable housing can be delivered at scale, and it must participate in a coordinated West of England strategy to address unmet need across the HMA. The current approach does neither, and therefore the Plan cannot be considered positively prepared, justified, or effective		
SP10: Transport	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No		Harrow Estates notes that the intention of LP Policy SP10 is to deliver a transport network that supports sustainable development, reduces carbon emission and prioritises active and public transport. However, as drafted, SP10 does not align with the spatial strategy or pattern of allocations proposed in the draft LP. The policy's transport objectives cannot realistically be achieved while the Plan directs the majority of growth to less sustainable locations, such as Banwell, that do not perform well in terms of accessibility. In its current form, Policy SP10 is neither effective nor consistent with national planning policy. The NPPF requires transport policies to promote sustainable patterns of development based on accessibility. Harrow draws attention to the Spatial and Local Accessibility Study prepared by Calibro, which establishes the most sustainable locations for housing growth. The study demonstrates that when combined, both Bristol and South Glos represent 71% of all out commuting from North Somerset. It is therefore vital that additional residential allocations are provided closer to the City to allow people to live closer to where they work. These findings reinforce that the Plan's transport objectives can only be achieved if growth is directed towards eastern settlements that have functional		251211 Land East of Failand Reg 19 Reps.pdf

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						accessibility to Bristol. For Policy SP10 to be effective and deliverable, the distribution of growth must reflect transport evidence and enable sustainable travel patterns. This is only achievable by allocating development at highly accessible eastern settlements such as Failand, rather than concentrating growth in locations known to exacerbate long-distance car commuting. Without realignment of the spatial strategy to follow the transport evidence, Policy SP10 cannot be considered justified or consistent with the NPPF's requirement to promote sustainable transport and reduce the need to travel		
Policy LP1: Strategic location: Wolvershill (north of Banwell)	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No		The draft LP identifies three additional strategic locations for growth, Wolvershill, Banwell(Policy LP1), Woodspring, South West Bristol (Policy LP2) and Nailsea/Backwell (Policy LP3)and Housing Allocations (Policy LP5). However, the evidence base demonstrates that all three locations face substantial barriers to delivery, infrastructure dependencies, viability constraints and uncertainties over timescales. As a result, the reliance placed upon them makes the Spatial Strategy ineffective and undermines the delivery of the housing requirement set out in Policy SP8 over the Plan Period. Harrow remain seriously concerned that the Banwell Bypass, which the Council identifies as the essential gateway infrastructure to enable the Wolvershill strategic allocation, lacks a credible and evidenced delivery programme. The updated Stage 7 Transport Assessment continues to treat the Bypass as a committed scheme, yet provides no confirmed construction timetable, no funding certainty beyond the headline HIF allocation, and no risk assessment demonstrating that the scheme can be delivered early in the plan period. The Assessment itself acknowledges that existing congestion, safety issues and severance on the A371 will persist in the absence of the Bypass, and that Wolvershill's entire access strategy is dependent upon the Bypass being operational. However, no modelling is presented to confirm its performance under Local Plan growth scenarios. Several associated interventions (including active travel links and bus service upgrades) also remain unprogrammed and unfunded. In short, the evidence base relies on optimistic assumptions rather than evidence, exposing the allocation to serious delivery risk. Given that the Stage 7 Assessment confirms Wolvershill is wholly reliant on the Bypass for safe access, network capacity, and the delivery of sustainable transport modes, the absence of a secured delivery programme renders the allocation premature and unsound. Any delay or change to the Bypass would immediately compromise the ability of Wolvershill to come forward, with knock-on effects for dependent schemes across the A371 corridor and the wider network. The allocation therefore represents a high-risk strategy built on infrastructure that is not yet guaranteed, not yet modelled in detail for cumulative impacts, and not yet aligned with a confirmed phasing plan. On this basis, Harrow Estates considers that reliance on the Banwell Bypass fundamentally undermines the deliverability and effectiveness of Policy LP1. Notwithstanding this, it is noted that the Banwell Bypass is funded through Homes England's Housing Infrastructure Fund (HIF). However, despite the availability of headline funding and the recent condition amendment, the Council continues to rely on an indicative delivery date of 2026 without providing any robust programme, contractual certainty, or mitigation strategy should this timescale slip. As the strategic modelling outputs remain unknown, the real effects of the bypass its timing, capacity benefits, and wider impacts are still speculative. It is therefore entirely premature for the Council to propose such a substantial strategic allocation where the foundational infrastructure is neither secured nor understood in operational terms.		251211 Land East of Failand Reg 19 Reps.pdf

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						The delivery of development at Wolvershill is wholly reliant on the effective implementation and full integration of the Banwell Bypass with the wider transport network. This dependency arises before the Council has even commenced collaborative masterplanning or design coding work with landowners and developers as required by LP1. Harrow Estates note that the Infrastructure Delivery Plan (IDP, November 2023) identifies the Bypass (TR3) as “time critical,” yet simultaneously lists several further dependent schemes such as the A371, Banwell and Sandford active-travel improvements (TR34) as essential. These remain undeliverable until the Bypass is completed. The implication is that a single delay in one major scheme will halt multiple others, rendering the entire spatial strategy fragile and at high risk of failure. In terms of viability, Harrow welcome the Council’s recognition that Wolvershill requires a more detailed viability review. However, the high-level viability evidence prepared by DixonSearle Partnership raises fundamental concerns:“3.5.24… Values around VL3 (c. £4,000/sq.m) likely being needed to support viability at 35–40% AH, without the school provision… Rising costs potentially reducing the VL3 40% AH outcome to a deficit… VL5 plus, a significant increase from current, would be needed to support all cumulative costs…3.5.25… Indications appear only slightly more positive… pointing upwards of 30% AH at this time rather than clearly at 40% or thereabouts.” Whilst Harrow Estates acknowledge that the assessment is high level and may shift over time, it remains the case that the viability of this allocation is uncertain, fragile, and heavily dependent on optimistic assumptions about future market conditions. DixonSearle’s own commentary confirms that the policy requirements set by NSC are ambitious to the point of risk, and that achieving the full policy burden including affordable housing, strategic infrastructure contributions, school provision, and net zero requirements is unlikely without a major and unproven increase in values. 8.9 It is noted in the council Viability Addendum (October 2025) highlights the fact that delivery of strategic allocations identified in the Regulation 19 Plan, and Wolvershill in particular, face material deliverability risks arising from marginal development viability. The Addendum shows that viability at the policy’s expected affordable housing levels is not achievable in current market conditions, with positive outcomes only at very low affordable housing proportions and viability becoming marginal even at 25 per cent. At 35 per cent affordable housing, the Addendum concludes that development is unlikely to be viable without substantial changes to cost assumptions, increased sales values or significant public subsidy. This is reinforced by the fact that there are no direct new-build comparable in the strategic area to evidence the level of value uplift the Plan implicitly relies on. While nearby schemes such as Parklands Village (Weston) currently achieve values in the region of £3,500 to £4,000 per square metre, the Addendum emphasises that large-scale development at Wolvershill would need to establish its own stronger value something which cannot be assumed at plan-making stage. The strategic allocations are also heavily dependent on major infrastructure that is both costly and, in several cases, not yet confirmed or fully defined. This creates a further viability burden that erodes the capacity of these sites to meet policy requirements. Taken together, the Council’s own evidence indicates that the deliverability of the strategic sites is uncertain, reliant on unproven value growth and contingent upon infrastructure that may not be secured in practice. On this basis, the Plan’s reliance on these locations to deliver significant housing growth and policy-level obligations is not supported by the available evidence, nor does it meet the NPPF expectation that allocations should be demonstrably viable and deliverable at the point of		

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						adoption. Harrow therefore maintain that allocating such a large, infrastructure-dependent strategic site at Banwell is fundamentally flawed. It is detached from the region's primary economic centre (Bristol), contradicts the Plan's sustainability objectives, and cements an inherently less sustainable pattern of development that increases car dependency and infrastructure strain. The allocation at Wolvershill is not justified, not effective, and not supported by robust or complete evidence and therefore cannot be considered sound.		
Policy LP2: Strategic location: Woodspring (south west of Bristol)	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No		Harrow welcomes the release of grey belt land in sustainable locations close to Bristol. The draft allocation recognises the need for housing to be located closer to Bristol given its role as major employer for the west. Whilst it is an initial step in the right direction to meeting theunmet need of Bristol, it does raise questions on whether the proposed allocation will deliver the targeted 2,500 homes during this plan period. We do not share the Council's optimism towards the targeted number of homes to be completed by 2041. Lichfield's in their 2024 "Start to Finish" paper provide detailed research which provides key insight into the timeframe for the delivering large-scale, greenfield development, from achieving planning permission to the construction of the first dwelling; and subsequent build out rates. The evidence demonstrates that overall lead in time for sites of 2,000+ dwelling take on average 6.5 years to get through various stages of planning. The table above clearly highlights that even for the development to get through various planning application stages including gaining an outline consent, detailed design stage and then planning to first dwelling could take on average 6.5 years. This is a significant time constraint that places large implications on the associated site, requiring securing the necessary permissions and, potential phasing of the scheme, all before the end of the plan period where there are no already live planning applications for the site. Given the plan has a length of 15-years this equates to almost half of the Plan's life span before the first dwelling is completed on average taken from the above table. Lichfield's analysis of large-scale sites indicates that on occasion, some developments can achieve high build rates, like Oakley Vale in North Northampton and Berryfields Development in Buckinghamshire, which reached peak build out rates of 520 and 562 dwelling per annum (dpa). However, maintaining such rates is challenging due to various complexities and uncertainties that influence developers' build-out pace, including economic fluctuations and market conditions. Over their respective lifespans of the named developments they averaged respectively build out rates of 162 and 251 dpa. Furthermore, Lichfield's analysis of schemes of 2,000+ dwellings indicated an upper and lower quartile range for build out rates of between 100 and 188 dpa, as demonstrated in the table below. Assuming a planning application is submitted for the proposed allocation concurrently with adoption of the Local Plan in late 2026, it will be unable to contribute positively towards the first five years of the Plan period. The earliest feasible contribution from the proposed development is expected from late-2032 onwards. This timeline leaves 8.5 years for the proposed allocation to be completed within the remaining plan period. Even under favourable market conditions and with a contractor capable of delivering the necessary build rate, a minimum build out rate of 437.5 dpa is required to achieve the full number of proposed homes within the remaining 8.5 years of the plan period. This represents an extremely unrealistic expectation for both the council and the developer to meet in order to fulfil the Plan's housing requirement by 2041.		251211 Land East of Failand Reg 19 Reps.pdf

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						The research provided above indicates that build out rates could peak at around this number, however, it is unlikely this level of building rates to be sustained over the duration of remaining years of the plan would be near impossible to achieve. It is more likely the development would have an average of between 100-188 dpa as stated for schemes over 2,000+ units. The table below provides an indication on the likely timeframes which the Woodspring site would likely be built out and the number of years it would take for the development to be completed by: (Table. Please see attached document) On this basis, it is a reasonable assumption that the Woodspring site will deliver around half the number of homes before 2041, approximately a 50% short of the Plan's requirement for 3,500 dwellings at Woodspring by 2041. For the plan to be deemed sound, NSC must find alternative small sites that are available and ready to deliver with live planning application at the start of the Local Plan period. Whilst they should also allocate additional housing to meet this shortfall on sites close to Bristol.		
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	No		While Policy LP3 identifies that extensive new infrastructure is essential to support the proposed quantum of development, at Strategic Location: LP3 Nailsea and Backwell, there is a fundamental lack of certainty that such infrastructure particularly strategic transport interventions will be delivered in a timely or coordinated way. The strategy is underpinned by12 separate sites coming forward broadly in tandem, yet no mechanism is in place to ensure that these sites will contribute synchronously to the required infrastructure. Without a binding delivery framework or specific commitment for each individual sites, could ultimately prevent the council from unlocking this growth area. The Local Plan risks enabling housing growth ahead of critical infrastructure, exacerbating existing pressures on the road network, community facilities, and local services. The council's reliance on incremental planning applications to deliver the required infrastructure is particularly problematic. As noted above, several sites within the Nailsea and Backwell Strategic Growth Location have already been permitted or are under construction, yet the cumulative infrastructure burden identified in LP3 has not been secured. This raises legitimate concerns over how North Somerset Council will retrospectively coordinate contributions from a patchwork of partially approved or ongoing schemes. In the absence of a comprehensive, front-loaded infrastructure strategy, the result is likely to be piecemeal growth, where development outpaces the infrastructure needed to mitigate its impacts. This undermines the very purpose of designating the area as a strategic growth location. The proposed East of Backwell Link Road is a central pilar to unlock growth in this location and the infrastructure strategy and is repeatedly cited as essential to alleviating severe congestion on the A370 corridor and at Backwell Crossroads. However, the			251211 Land East of Failand Reg 19 Reps.pdf

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					emerging evidence base provides no assurance that the route is financially viable or technically deliverable within the plan period. With no commitment or funding from central government being cited. The proposed link road will have to work with Network Rail due to the requirement to cross the railway line and extensive works across sensitive and constrained land carries significant engineering complexity and environmental implications. Yet neither cost estimates nor confirmed funding mechanisms have been published. The absence of a secured funding for the proposed link road does raises question whether the council are being overly optimistic. This uncertainty is compounded by the heavy dependence on developer contributions to deliver the relief road and associated transport infrastructure. Developer-led funding is inherently unpredictable for such a high-cost, strategic scheme, particularly when development is fragmented across multiple land parcels and multiple land promoters. Harrow have serious doubt on whether the relief road can be delivered in time to support the planned 3,728 homes. In the DixonSearle Additional Sites Viability Addendum it highlights the Transport Infrastructure cost at a Total of £38,053,154 for the new link road. This equates to £25,825 per dwelling but only for 2,195 dwellings accounted for in the viability assessment. This goes back to the question of the council's lack of control of the amount of development already happening in this location and whether the patchwork of application will all contribute to the infrastructure requirements. This in turn raises questions whether the 2,195 homes can viably achieve the level of transport infrastructure developer contribution required in order to aid the delivery of the link road. In addition to the transport issues, the Plan remains vague about the delivery of essential non-transport infrastructure such as education, health, green infrastructure and community facilities. While LP3 lists categories of infrastructure required, bar outlining Grove Farm, Backwell providing a primary school, there is a lack of specifically identifying which key infrastructure will be delivered by each of the 12 allocated sites. This lack of detail undermines the robustness of the spatial strategy and fails to demonstrate that the growth is sustainable or compliant with national tests of soundness particularly "effectiveness" and "justified." Given these issues, Harrow maintains significant concerns regarding the deliverability of the infrastructure that underpins Policy LP3. Until the council provides a comprehensive or a full commitment for the proposed infrastructure plan to be			

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					completed. Harrow questions whether the Strategic Growth Location can be considered capable of delivering the scale of development proposed in a sustainable manner. In its current form, the policy risks permitting substantial growth without ensuring the timely provision of the supporting infrastructure that is essential to its success. Over-reliance on windfall sites North Somerset emerging LP Policy SP8 for 24,495 supply that are proposed over the plan period 3,000 homes are considered to be windfall sites. The policy justifies its approach by stating that small scale windfalls will account for 12% of the draft housing requirement. 8.30 Historic data from North Somerset Annual monitoring report shows that between 2006-07 and 2023-24 a total of 3,112 dwellings were delivered via small-site windfall (over 9 dwellingsthat are unallocated or not pre-identified in the plan), averaging approximately 173 dwellings per annum which evidently underpins the Council's windfall allowance assumption. However, the annual completions are ranging from 96 to a high of 292 in a given year, underscoring the inherent unpredictability of windfall supply. This fluctuation means that over a 15-year plan period, relying on a fixed 200 dpa allowance risks under-delivery if windfall rates decline even modestly for a few years. Embedding that allowance in the baseline supply treats windfall as certain rather than contingent. Effectively converting a historically irregular source into a foundation for future housing supply. The 2025 Spatial Strategy paper explicitly includes a "small site windfall allowance" as part of its baseline under Step 1: Existing commitments and windfall which sites alongside sites that already have consent or extant allocations. The paper states that this allowance is "trend based with a small uplift to account for national policy changes," and quantifies the allowance at 200 dwellings per annum, amounting to 3,000 dwellings over the 15-year plan period. That is a substantial number, representing a core part of the "baseline supply" not just a minor buffer or contingency. Given that NSC have proposed an average windfall allowance that is above the council's average windfall during the period of 2006-07 and 2023-24 raising concerns that the council have overcompensated their windfall allowance in their housing supply; which could amount to a shortfall of 405 homes over the plan period. In summary, the evidence base demonstrates that the three strategic locations (Wolvershill, Woodsrping and Nailsea/Backwell) cannot deliver the quantum of development relied upon by the draft LP.			

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Policy LP5: Housing, employment and mixed use allocations	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No		The draft LP identifies three additional strategic locations for growth, Wolvershill, Banwell (Policy LP1), Woodspring, South West Bristol (Policy LP2) and Nailsea/Backwell (Policy LP3) and Housing Allocations (Policy LP5). However, the evidence base demonstrates that all three locations face substantial barriers to delivery, infrastructure dependencies, viability constraints and uncertainties over timescales. As a result, the reliance placed upon them makes the Spatial Strategy ineffective and undermines the delivery of the housing requirement set out in Policy SP8 over the Plan Period. These representations make specific reference to Land East of Failand, which offers an opportunity to deliver a high-quality residential led development to the East of Failand. See attachment for full submissions.		251211 Land East of Failand Reg 19 Reps.pdf

Name: Harvey Lilley **I.D:** 31109409

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP2: Strategic location: Woodspring (south west of Bristol)	No	• Positively prepared • Justified	Unsure	No	In terms of Duty to Cooperate I am concerned that many of the projects will be purely developer led particularly the massive development of 3500 houses at Woodspring. This will encourage a too dense footprint, a mix that will abandon social and affordable housing when it comes to the crunch and will ignore reasonable calls for all developments going forward to be as close to carbon neutral as possible, have real consideration for environmental concerns and be purely housing estates reliant on cars. Local voices as already articulated by on of your planning officers will be steamrollered by what in the short term is being used as a vehicle for growth that will do untold damage to the countryside/ greenbelt and will not deal with the real housing issues faced by the young and those at the lower end of the income scale.			

Name: Hayley Hayes **I.D:** 39304545

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	1. Traffic and Commuting Issues: The A370 is already incredilbly congested during rush hour. Given the distance from the train station and the absence of local employment opportunities, residents would have to rely on increasingly busy roads for commuting. 2. Impact on Wildlife and Biodiversity: The proposed development would destroy valuable wildlife habitats, further harming biodiversity in a country already facing significant nature depletion. 3. Concerns about Strategic Growth Location: - Loss of Greenbelt and high-quality agricultural land, specifically Grade 1 agricultural land, of which only 7% remains in North Somerset. - Potential flooding risk and uncertainty regarding timely funding and delivery of necessary road infrastructure to support the new housing. 4. Food Security: Building on fertile fields undermines food security, particularly as farmland is already being lost on the other side of Backwell. Preserving agricultural land is essential for local food production.			

Name: Heather Barbara Streeter **I.D:** 62858721

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	‣ Positively prepared ‣ Justified ‣ Consistent with national policy	Unsure	No	Traffic and congestion: Success of the plan hinges on good transport links between Junction 19 of the M5 and Bristol via A369. The A369 is already at capacity as is Junction 19 itself. The plan's suggested improvements along the A369 between Junction 19 and Pill has not acknowledged the current major issues along the A369 where there are 2 pinchpoints, at Abbots Leigh at the junction with the George Inn and at the roundabout linking the A369 to the A370 into Bristol and to Winterstoke Road where there is the Bristol City Stadium and retail parks. An additional 1,100 homes in the LP4 site will be using the A369 for both work and pleasure. Due to the close proximity of listed buildings at the Abbots Leigh pinchpoint there is limited scope to widen the road and improve traffic flow. Whilst the plan states that the railway with its proposed station in Pill is offered as an alternative route into Bristol, it cannot link to the stadium and shopping at Winterstoke Road, so it is unrealistic to expect the train service to relieve any further stress on the A369. Furthermore, a 5-carriage (initially 3 carriage) train running once per hour is way insufficient to serve the increased population resulting from the implementation of this plan. Also, the distance from the Pill Green HE2015 and Pill Road HE20197 sites to schools and services including the train station in Pill, is too far for young children and older residents to walk. Details of public transport options that omit travelling along the A369 from these sites to village services in Pill are missing from the plan. Under the current plan, the Portishead - Bristol railway will not accommodate travel from the Pill area to places of work, in Bristol, Portishead or the new EPIC area. Thus travel will need to be by car or bus, i.e the A369 will also need to support the 44% increase in population to travel to work. Currently, during rush hour, the bus service is woefully inadequate. I am a regular bus user (X4 Portishead to Bristol) in the evening rush hour and buses are unreliable and often 40 min late, putting off people from using public transport. The plan does not increase available work within the direct local environment, rather it is providing housing for other areas like Bristol, EPIC, Portishead and further afield to areas connected to the M5. This is at a cost to the local population currently residing along the A369 corridor. There are no details in the plan addressing increased needs in medical services. The local GP practice in Pill, in Lodway Gardens has very limited parking. Most patients attend by car as use of public travel is either unwise when unwell or difficult for the elderly. If it was possible to add another storey to the GP practice building, there would still be insufficient parking to support the building in its current location. North Somerset Council has not had adequate consultation with the locals affected by the LP4 area of the North Somerset Plan, although they have had public consultation with other LP areas. As a result, the LP4 plan is weak as it does not reflect the opinions and suggestions of how best to adopt and implement any such plan locally. This should be even more important to address as the plan requires most new buildings to be sited within Green Belt land. Without a public consultation with North Somerset Council, residents have been unable to see any evidence that the council has for failing to identify brownfield sites within the county rather than develop on Green Belt land..	For this plan to have any success, the traffic issues at Junction 19 of the M5 and along the A369 road to Bristol has to be addressed. The A369 road needs to be widened to accommodate the increased traffic, or it will become one large traffic jam. To do this the council will require to issue compulsory purchase orders on both land and property. The plan need to provide local public transport from the new housing sites to the services and schools in Pill village, avoiding the A369. To reduce the dependence on transport to localities outside of the village, the council needs to ensure inward investment of businesses into Pill and Easton-in-Gordano. A new GP practice should be supplied to accommodate servicing the increased population and this should be in a new position with increased parking facilities.		

Name: Heather Barham **I.D:** 62848737

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared	Unsure	Unsure	We do not require any more homes in our village. 800 new homes have already been approved. Already this is a 40% increase in the number of dwelling. The local distinctiveness of the North Somerset village will be lost and completely over developed if each spare piece of land is built on.			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
		• Justified • Effective • Consistent with national policy			The proposed new road would be completely inadequate. It would not serve to ease any congestion on Station Road which is already dangerous. It's location on Backwell Common and through the railway line somehow make it an unfeasible proopsal. It's entrance onto Farleigh Road, creating a second crossroads from a residential area would be inadequate and would cause issues for commuters. I don't understand why Backwell seems to proportionally have so much of North Somerset's development proposals. 7% of the Housing allocation is too great. We are already nearly doubling in size in a short space of time - this is enough. Our roads and current infastructure would not be able to bear another 1,000 homes. Most residents commute and it would cause roads to be overloaded into the City. We do not have enough schools, doctors, dentists, leisure facilities to be able to bear this pressure on our already creaking infastructure. The proposed development are on grade 1 agricultural land. We need to safeguard this land for future food security - it is short sighted in the extreme to sacrifice this land I walk these fields daily. They are a haven for Wildlife. I have seen bats, slow worms, numerous rare birdlife such as Egrets, yellow hammers and skylarks. The meadows are an alive haven in the summer with a mosaic of interesting grassland species. We have a rewilding programme on our doorstep. These plans will cancel out their progress These creatures rely on this land and hedgerows for their food sources. I saw on the propsed plans a community orchard! We already had an orchard that was a historical relic of Nailsea's cider industry. This is part of our local heritage. it should not be destroyed. I do not think the road plan is well thought through. developers are not communicating and I fear we could have a new road which destroys habitats which leads to nowhere and would be unfinished. Building on Greenbelt land would reduce Community Infastructure contributions. It is not worth the payoff to lose valuable greenbelt. The volume of change in a short amount of time is unsustainable, dangerous, destabilising and undeliverable. the plans are poorly thought through. Our current station would not cope with the increases in population proposed. the population of Backwell would increase by 80% if this is carried out. It is totally disporoprtionate, backwell has already taken it's share of development, other bigger places in teh authority should take an equal share to meet targets I belive the area will be prone to more flooding which is already an issue on Backwell Common. More building = less land for natural drainage.			

Name: Heather Evans **I.D:** 62856225

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No		Unsure	Unsure	I realise comments made will probably be ignored but how on earth can the traffic system and roads around the Down Road area of Portishead and Tower Farm cope what will almost certainly be at least 500-700 extra cars and the traffic they will create? Saying that people can cycle is ridiculous, Portishead isn't a cycling town there are too many hills. Saying that people will use the railway, they will want to drive to the station and where will they all park? Crazy proposal all round!			

Name: Heather Lee-Herbert **I.D:** 62851233

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I consider this development to be complete overdevelopment which would lead to an 80%increase to the size of the village. The new road will not relieve congestion on station road, chapel hill or nailsea. A road under or over the railway would be very expensive and probably not feasible. This is a flood plain building on it does not make sense, there is no employment in backwell save very small businesses with small numbers employed. Therefore every one will commute. The land is grade 1 agricultural land/ only 7% existing in the whole of North Somerset, this undermines uk food security. Local infrastructure cannot cope with the scale of this development e.g. doctors dentist primary and infants schools and our roads are already saturated according to North Somerset. This development will destroy valuable wildlife habitats. There will be a significant impact on wildlife habitats particularly rare bars. The trains are often full during peak times for travel to Bristol and beyond and additional buses can not be accommodated in Brit is station as it is already too small for purpose.			

Name: Heather Rosser **I.D:** 62841729

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Churchill Avenue	No	• Justified • Effective	Unsure	No	1.Penny Field should be protected and made a Local Green Space. Clevedon Town Council, two petitions (2022 and 2025) of 600+signatures and the consultation for Clevedon Placemaking strategy all call to protect Penny Field 2.Penny field is a prime candidate for Local Nature Recovery, as identified by WECA due to the presence of 3 priority species. Penny Field is also located on a Green Infrastructure Corridor under NSC's own policy. 3. Publication of the plan has been poor. I only heard of it recently from a neighbour. There has been no general publication by any means which is brought to public attention. 4. Policy LP5: Housing, employment and mixed use allocations has a section for housing on "Land north of Churchill Avenue" and has an "indicative capacity" of 44 dwellings and "Access off Wordsworth Road". Because of the low levels of employment sites in Clevedon, 44 dwellings will result in at least 30 extra vehicles accessing the roads approaching Wordsworth Rd. These roads are unsuitable for this extra vehicle use, due to the many bends, and are already dangerous - with a crash outside our house in recent years. Therefore this access point is not suitable for the additional level of traffic a development of this size would entail. 5. Also recent problems with plants clogging the flow of the Land Yeo has highlighted the need to keep clear access for the Environment Agency, or any other party to have good access to clear future plant growth to avoid aggravated flooding risk from the Land Yeo.	remove this site from consideration for residential development, or make a major reduction in the number of dwellings proposed.		

Name: Heidi Chapman-Mercer **I.D:** 62741633

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Justified • Consistent with national policy	No	Unsure	Alternative brown sites could be used rather than those proposed in Portishead, these are present elsewhere in Portishead and would have less impact that the locations chosen. The Weston Big Wood and Gordano Valley Green Corridor have both been part of the Green Belt since the 1980s - the Pre-submission Plan ignores this. Whilst the reality of the incoming train line will bring more interest in the area and the prospect of more inhabitants, this needs to be done well with solid infa-structure.	Alternative brown sites could be used rather than those proposed in Portishead, these are present elsewhere in Portishead and would have less impact that the locations chosen. These would have much lower ecological impact and project the wildlife within these areas for future generations. How much more does our green space and wildlife have to be affected?! Green Belts must only be looked at in exceptional circumstances and these have not been met, especially with other sites available within the town and local area that would meet the needs of the developments but with less ecological impact. Neither site proposed includes any additional service developments for the town - our High Street is failing with large shops closing and only one pharmacy, the secondary school recently only just passed Ofsted inspections, the Police local unit are stretched already, the parking is far from acceptable for a town this size - the pre-submission needs to include details of how it will support these elements of the town.		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Black Rock, north of Clevedon Road	No	• Justified • Consistent with national policy	No	Unsure	Alternative brown sites could be used rather than those proposed in Portishead, these are present elsewhere in Portishead and would have less impact that the locations chosen. The Weston Big Wood and Gordano Valley Green Corridor have both been part of the Green Belt since the 1980s - the Pre-submission Plan ignores this. Whilst the reality of the incoming train line will bring more interest in the area and the prospect of more inhabitants, this needs to be done well with solid infa-structure.	Alternative brown sites could be used rather than those proposed in Portishead, these are present elsewhere in Portishead and would have less impact that the locations chosen. These would have much lower ecological impact and project the wildlife within these areas for future generations. How much more does our green space and wildlife have to be affected?! Green Belts must only be looked at in exceptional circumstances and these have not been met, especially with other sites available within the town and local area that would meet the needs of the developments but with less ecological impact. Neither site proposed includes any additional service developments for the town - our High Street is failing with large shops closing and only one pharmacy, the secondary school recently only just passed Ofsted inspections, the Police local unit are stretched already, the parking is far from acceptable for a town this size - the pre-submission needs to include details of how it will support these elements of the town.		

Name: Helen Adams **I.D:** 62864929

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP7: Green Belt	Unsure		Unsure	Unsure	Development of the land bordering Weston Big Wood would badly affect the ecology of the wood (an SSSI). The process of building would disturb wildlife and the presence of people so close would permanently damage the ecology of the wood and surrounding areas. The increased traffic would have an adverse effect on wildlife. Traffic around High Down school is already very bad at certain times of day. This would only get worse. The likelihood is that people living in the area would use cars as the steep hill deters people from walking into the town from their homes. This is directly against the aim of decreasing use of cars and increasing walking/ public transport. The fields are used regularly by a lot of people walking. This is valuable green space.			

Name: Helen Barker **I.D:** 62830145

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP7: Green Belt	Yes		Yes	Yes				

Name: Helen Chuter **I.D:** 62861825

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The additional houses would result in Backwell being completely overdeveloped, nearly doubling the existing housing stock The proposed road would be logistically challenging and costly to build, potentially meaning it being dropped. Even if it were built its unlikely to have a positive impact on traffic flow. There is not enough infrastructure in Backwell to support these houses, ie doctors, schools, sports facilities. Where is the evidence to support the need for these additional houses and they clearly won't be affordable which is what the nation wants. The vast majority of residents commute to work from Backwell, it is not an employment hub so why build more houses here, why not focus on the outskirts of Bristol. The proposed land is grade 1 agricultural land, why on earth would this be built upon given the need to feed ourselves as a country. More food would have to be shipped in creating a carbon footprint greater than would otherwise be the			

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					case. Madness. This is in direct contravention of government policy. The land is also rich in wildlife and their associated habits, is this really the best solution and location. The infrastructure solutions are not fully costed and when the developer tries to recover their outlay and profit the chances are that a) the houses will be unaffordable to those most in need and b) of a poor quality to minimise costs and drive profits. Therefore this is not a long term viable solution. To the point of government policy being that 50% of home on green belt land are affordable, this will only incentivise the developer to cut costs both in build quality and provision of infrastructure solutions. That much is obvious.			

Name: Helen Lewis **I.D:** 58506593

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP6: Villages and rural areas	Yes		Yes	Yes	I am a resident of Claverham, a very small village. I am aware of 2 recent speculative development plans for parts of our village. Wain Homes intend to submit a planning application to build 130 houses on land towards the Moor on the north side of Claverham Road. Litchield, acting for Latimer Developments Limited intend to submit a planning application to build 120 houses on land off the High Street. NEITHER of these sites are allocated for development in the emerging North Somerset Local Plan 2041. Our village is very welcoming to newcomers – we have a friendly village hall but that is the only community facility. The housing development of the old “brownfield” site of Claverham PLC was very much welcomed. We are severely lacking amenities and employment, and most villagers rely on car use to drive to the doctor, dentist, work, shops and other services. Public transport options are extremely limited. It is a 20-minute walk to catch a bus to Bristol – a service which, from personal experience is unreliable. It takes 35 minutes to walk to the train station – at speed – from the ‘Old Post Office’. Another 2 large developments would put extreme pressures on our local roads which are barely 2 cars wide. There will be a severe impact on our farming community, and the extra traffic will cause enormous risk to the safety of pedestrians. Especially any with small children and buggies that are walking to and from our village school during the rush hours. Our local roads are extremely popular with cyclists, horses and riders and those exercising. Some of our roads have no pavements at all or intermittent pavements requiring one to cross backwards and forwards across roads or extremely narrow pavements. I have witnessed many instances of vehicles mounting the few pavements we have to avoid oncoming traffic. I believe the proposed development plans by Wain and Litchield should not be supported for the following reasons: • They DO NOT enhance the local character or contribute to placemaking and the reinforcement of local distinctiveness. They CANNOT be readily assimilated into the village; • The size, type, tenure and range of housing DOES NOT reflect local community needs; • They WILL CAUSE significant adverse impacts on local services and infrastructure, including cumulative impacts; • The location of the developments DOES NOT maximise opportunities to reduce the need to travel and DOES NOT connect to local facilities by high quality walking and cycling infrastructure, with good public transport connections for longer trips; • The developments DO NOT complement the defined local centres and contribute to their vitality and viability.			Claverham resident SP6 comments 10.12.25.docx

Name: Helen Mac **I.D:** 30919905

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with	Unsure	Unsure	1 Increase in size of Backwell of 80% over a relatively short period is UNSUSTAINABLE. 2 The proposed road to avoid the village centre goes through GREENBELT FARMLAND, WILDLIFE HABITATS AND FLOOD PLAIN. It is also UNFUNDED 3 DEVELOPERS HAVE NOT PLANNED OR SHOWN CONCERN for the increased requirement for school places, medical provision (our surgery is at capacity) or leisure facilities for a massively increased population. Backwell only has a tired and over-used swimming pool, and a charity-run playing field which is being totally encroached on by current housing construction. 4 DISPROPORTIONATE ALLOCATION of housing development in Backwell compared to other villages in North	DO NOT INCLUDE THIS AREA IN THE LOCAL PLAN. Leave it as greenbelt farmland		

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		national policy			Somerset. 5 UNPROVEN that Backwell needs/can support a market for SO many new houses. No plan to cater for the increasing number of older people living in existing large houses who could down-size if suitable small houses were built – its all 3-5 bedroom houses. 6 Additional traffic at ALL times, esp. peak times as there is very little employment in Backwell – mostly COMMUTERS. 7 I am concerned that our COMMUNITY SPIRIT WILL BE ERODED by so many new residents. There will NOT BE ROOM AT THE LOCAL SCHOOLS for such an influx, so many will drive their children elsewhere for education, adding to TRAFFIC CONGESTION. 8 Loss of high quality farmland – once built on it will never be farmland again – LOSS OF FOOD SECURITY 9 Proposals go against Government's stated policy of "PROTECTING BEST AND MOST VERSATILE LAND" Food security ignored. 10 HABITATS AND WILDLIFE CORRIDORS will be destroyed, along with space and tranquillity for residents. 11 ENDANGERED/RARE SPECIES of Horseshoe bats threatened by development. 12 Infrastructure Development Plan inadequate – NOT ANALYSED, COSTED OR FUNDED. Who pays? 13 All the proposed land is PRONE TO FLOODING, especially at the bottom of the valley around Backwell Common. Housing would be AT RISK. 14 The CHARACTER OF THE VILLAGE would be changed out of all recognition. Loss of greenbelt land and the massive increase in hard landscape will lead to FREQUENT FLOODING, eroding of FOOD SECURITY, loss of QUALITY OF LIFE for existing residents, TRAFFIC CHAOS with huge disruption to roads both during the 10+ years of construction and afterwards with the 80% increase in residents. 15 At Backwell lake the TRANQUILLITY, AMBIENCE AND THE MANY WILDLIFE HABITATS will be destroyed by building a bypass road opposite. Plus this road will pass right through the floodplain. 16 The 50% AFFORDABLE HOUSING government policy will be IGNORED by the developers with seemingly no consequences. 17 This volume of growth is completely UNSUSTAINABLE for a RURAL village of Backwell's size. 18 The RAILWAY is not a suitable transport hub. The station totally is INACCESSIBLE for anyone with mobility issues or children in pushchairs. Also the train does not go to most places people need to go to, it is only relevant to people who work near the stations – so most COMMUTERS WILL DRIVE. 19 There is already a huge amount of development approved for Backwell. Why is it not shared more evenly around the surrounding villages? No development of any consequence planned at Cleve or Flax Bouton and yet they too are surrounded by farmland.			

Name: Helen Sackett **I.D:** 62775809

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	This land is prime farming land. If things in the world get any worse we have to be more self sufficient. We need our land! Once it's gone it's gone. We already have a massive increase of housing in our village. It's been allocated a higher number of houses than any other village in North Somerset. The government policy says we must protect our best and most versatile land. This country is losing its nature and biodiversity more than most other countries in the world. There is no employment here so people have to commute. The train station is too small, can't cope with mobility problems or small children. Backwell common and surrounds suffer from flooding. A new road is proposed but there is no detail, plans, feasibility study, coatings or funding and would have a very serious negative impact on Backwell common area. Backwell cannot cope with the sheer volume of growth, it is madness.there are no funding guarantees for the new road or services. This will definitely destroy valuable wildlife habitats. This is grade 1 agricultural land used for food crops and grazing, there is only 7 o/o of this land left in North Somerset. There is no viability analysis for an extra 1,000 houses. There lack of infrastructure and services cannot support this amount of housing. Backwell already has 800 new houses approved this is a 40o/o increase. This is overdevelopment and overwhelming.			

Name: Helen Sparey **I.D:** 21276641

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell					I am writing to strongly oppose the planning on Greenbelt to the east of Backwell. There are many reasons for my opposition. We've already had many houses approved for the village and the additional number of houses would lead to a complete overdevelopment. The infrastructure is just not there in Backwell and would cause terrible congestion on station Road and Backwell Common and Chaple Hill. Building a road over or under the existing railway line would be extremely costly and unfeasible. There has been no investment in increasing health services or leasire facilities. The infrastructure lack of and services cannot support another thousand houses. Backwell station is a very small station. It only has the capacity for three carriages for passengers to get on and off the trains. There is limited rolling stock and often the trains are over full. The green belt, once it is built on can never be turned back, the green belt is grade one agricultural land used for growing crops and keeping livestock. There is only 7% of this high-quality Land left in the whole of North Somerset, government policy stated that Greenbelt should only be used and should be protected unless it is ugly green belt i.e. a factory site or an old service station. The green belt at Backwell is used by many people for leisure. Cycling, walking, running and many wild animals and birds use this beautiful green space. I feel that North Somerset Council are blinked and not looking to the future, to keep our beautiful landscape for recreational practice. You have already had houses built in the area. Backwell Common is prone to flooding. Only this week the road was closed because of severe flooding. The houses built so far by the developers in Backwell are not inexpensive enough for the people that need housing. A two bedroom house on Farley Fields is nearly £400,000. The people who need affordable housing cannot afford these types of housing, they need smaller houses, smaller and more affordable houses. The developers are loath to build these as it affects their bottom line. I feel that the developers are pushing on North Somerset Council and the government without thinking outside the box. I feel that there are more suitable places for the developers to build. We all know that building on Greenbelt is far easier than building on brown or grey belt, please could you take my points into consideration when looking at building on our beautiful green belt which is grade on listed? It is currently used for grazing and growing of food crops.			

Name: Helen Watkins **I.D:** 62849985

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell is not a major centre for employment so most residents will need to commute to Bristol, Clevedon or Weston. The proposed new road will not be adequate to relieve traffic congestion on Station Road. The railway station is not appropriate as a transport hub. There is no access for those with mobility issues, despite many years of lobbying. The land to be used is of grade 1 agricultural quality, a rarity in North Somerset. It should not be used for housing. Government policy states that "we must protect our best and most versatile land" to ensure food security. The proposed land is prone to regular flooding and housing, as well as the new road, would be built on a recognised flood plain. This huge development would include a new primary school, but there is no mention of extra services or infrastructure for secondary schooling. Nor does the plan mention any investment in the necessary health services or leisure facilities which would be required to support such a large addition to the population of Backwell.	The whole plan is so misconceived and inadequate, coming from apparent ignorance of the local factors or what would be required to sustain the additional people, that no modifications can make it fit for purpose.		

Name: Helen Wills **I.D:** 62741313

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	This further additional development of 1000 houses would amount to a 40% increase in the size of the village, without any provision for additional facilities and with only hints of a promised new road to alienate the already heavily congested (who has walked down Station Road in the rush hour ?) and over crowded roads. Station Road is frequently gridlocked and the A37 regularly solidly blocked (Friday afternoons and when the M5 is shut especially). Our services, ie schools, GP surgery and infract-structure are unable to support a further 1000 houses, on top of the already additional 800 new houses approved, the impact of which is already being seen. Has there been any consideration of the social impact such a further development on the village would have? What serious consideration been given to the fact that this is agricultural land, and development will not only break the Grade 1 listed code for agriculture and grazing, but will further diminish our ability to feed ourselves as a nation? Do you want to rely on imported food to feed yourself and your families? Using this land will diminish the amount of this land to 7% in the whole of north Somerset, and disregards the protection of wildlife in the area. I urge the council to refuse planning permission for this proposal - it will be a short term knee jerk reaction to placate government panicking which will have disastrous and cause long term and irrevocable damage to the health, wellbeing and security of our countryside and life. So what do we do when we've done it we've done that right here so what do I do with that? What do I do with it? I don't know how to save it. I'm completely. I do not know how to save anything I'm never done.			

Name: HelenMW **I.D:** 62863809

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Churchill Avenue	Unsure				Land off Churchill Avenue is critical for wildlife and the wellbeing of residents. There is no mention on how the site will be enhanced for wildlife. I'm one of the many toad patrollers in the area and the number of toads have drastically declined in the last 5 years. This area of grassland and access to the river is essential. There are many far more suitable town sites across Clevedon and residents are sick of the most beautiful, nourishing and nature rich sites always being first to go. There are local residents who wish to take on stewardship of this space which will bring great value to Clevedon. There are hardly any other open green spaces in this area of Clevedon. It needs to be a protected site. The designation of this site in the local plan for housing is inapproprtaiet and not want residents want.	Land off Churchill Avenue is critical for wildlife and the wellbeing of residents. There is no mention on how the site will be enhanced for wildlife. I'm one of the many toad patrollers in the area and the number of toads have drastically declined in the last 5 years. This area of grassland and access to the river is essential. There are many far more suitable town sites across Clevedon and residents are sick of the most beautiful, nourishing and nature rich sites always being first to go. There are local residents who wish to take on stewardship of this space which will bring great value to Clevedon. There are hardly any other open green spaces in this area of Clevedon. It needs to be a protected site. The designation of this site in the local plan for housing is inapproprtaiet and not want residents want.		

Name: Helena Markovic-Buck **I.D:** 58489121

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP6: Villages and rural areas	No	• Positively prepared • Justified • Effective	Unsure	Unsure	These proposals would have significant and irreversible impacts on Wrington's infrastructure, environment, and heritage. The shortfall of houses NSC need to find outside of identified strategic growth locations is 1139 , of which 411 are proposed in Wrington, that equates to Wrington taking 36% of this shortfall, representing a 35% increase in population increase within the village. This is not sustainable as laid out below: 1. Butts Batch • Threat to Heritage and Infrastructure: Previous applications for this site have been refused due to serious impact on heritage assets and lack of adequate infrastructure. These concerns remain unchanged and still apply. • Environmental Destruction: This area supports important biodiversity and wildlife habitats. Development would lead to irreversible ecological damage. 2. Cox's Green • Loss of Agricultural Land: This is active, thriving farmland that would be lost forever if development proceeds. • Increased Traffic and Safety Concerns: Wrington's narrow, rural roads already face congestion and safety risks for			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					pedestrians and cyclists. Additional housing would significantly worsen these conditions. • Strain on Local Services: o Schools: Wrington Church of England Primary School is usually oversubscribed, with no capacity for additional students. o Healthcare: Local GP services are under increasing pressure, with extended waiting times. More housing will exacerbate these issues. o Sewerage and Drainage: Wrington's drainage system struggles during heavy rainfall. Further development could increase the risk of flooding. • Flooding Risks: This site has a history of flooding. Building here would exacerbate drainage problems and increase risks to surrounding properties. 3. Land East of Wrington (Rickyard Road and Rydings Farm Area) • Traffic and Infrastructure Overload: Development in this area would place excessive pressure on Wrington's roads and services, worsening congestion and accessibility for residents. 4. Land at The Alburys/West Hay Road • Loss of High-Quality Farmland: This is Grade 2 agricultural land, a valuable and irreplaceable resource that should be protected. Developing this land contradicts sustainability principles. 5. Garston's Orchard • Severe Flooding and Environmental Damage: Previous applications for this site have been refused due to its high flood risk. Development here would jeopardise properties and worsen existing environmental issues. • Loss of Natural Habitats: This site plays an important role in local wildlife conservation. Construction would permanently destroy critical ecosystems. 6. Cumulative Impact on Wrington Beyond the concerns associated with individual sites, the combined effect of these developments would: • Overwhelm local roads and increase congestion – particularly near the A38, West Hay Road, and Butts Batch. • Place an unbearable strain on public services, including schools, healthcare, drainage, and transport infrastructure. • Encroach on Wrington's countryside, permanently altering its rural character. • Exacerbate flood risks, especially in Cox's Green and Garston's Orchard. 7. Contravention of Planning Policies These proposals do not align with the North Somerset Local Plan or National Planning Policy Framework (NPPF) principles of sustainable development. • Policy CS5 – Countryside Protection: The North Somerset Core Strategy states that countryside should be protected from unnecessary development. These proposals contradict this policy. • Policy CS32 – Development in Service Villages: Wrington is a service village, where only small-scale, community-led development should be permitted. The proposed developments exceed this scale and are unsustainable. 8. Cumulative Impact of Bristol Airport Expansion Wrington is already negatively affected by Bristol Airport's expansion, which has led to: • Increased traffic congestion, particularly along the A38 and surrounding roads. • Unauthorised airport parking on local green spaces. • Higher levels of noise and air pollution. Further large-scale development would intensify these existing issues, significantly diminishing residents' quality of life. Conclusion: Wrington is Not a Sustainable Location for Large-Scale Development For the reasons outlined above, I strongly urge North Somerset Council to reject these proposals. These plans do not align with local planning policies and will have detrimental and irreversible impacts on Wrington's infrastructure, environment, and community. Finally, on a personal note, our property is opposite The Alburys. We have bat conservation measures. We have a direct line of site to All Saints Church, a heritage intererest and any planting development would impact this. In fact the previous Butts Batch development was rejected for this reason. Furthermore we have a field opposite The Alburys and instead of building houses we have planted a woodland in cooperation with the Forest of Avon trust, to support local wildlife and ecological systems, increasing biodiversity. We are not adding to traffic or flooding. These are the kinds of initiatives the council should focus on. I trust that my concerns, along with those of many other residents, will be fully considered in the decision-making process.			

Name: Henry Andrew Bullock **I.D:** 62848961

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Farleigh Fields, Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	No				

Name: Highgrove Strategic Land **I.D:** 39325825

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP3: Spatial strategy	No	• Positively prepared • Justified • Effective	Yes	No	The Plan is not sound because it is not positively prepared (test of soundness 36.a), justified (test of soundness 36.b) or effective (test of soundness 36.c). Please see the attached letter.	We consider that the settlement hierarchy should be amended to give status to the more sustainable settlements, as evidenced by the Council's own supporting documents. Proportionate growth should be directed to Wrington via a site allocation at Cox's Green for 80 dwellings. Please see attached letter for further details.		Highgrove Strategic Land - Local Plan Reg 19 Reps 2025.10.12.pdf
SP6: Villages and rural areas	No	• Positively prepared • Justified • Effective	Yes	No	The Plan is not sound because it is not positively prepared (test of soundness 36.a), justified (test of soundness 36.b) or effective (test of soundness 36.c). Please see attached letter for further details.	Policy SP6 should be redrafted to be consist with the Council's evidence to acknowledge that development at sustainable settlements is supported. Flexibility should be added for sustainable sites to come forward outside of settlement boundaries for service villages subject to criteria. Please see attached letter for further details.		Highgrove Strategic Land - Local Plan Reg 19 Reps 2025.10.12.pdf
SP7: Green Belt	No	• Justified • Consistent with national policy	Yes	No	The Council has not examined fully all other reasonable options for meeting its identified need for development prior to identifying sites for Green Belt release. As a result, the strategy is not justified (test of soundness 36.b) or consistent with national policy (test of soundness 36.d). Please see attached letter for further details.	The land at Cox's Green is a non-Green Belt site that would help to address NSC's housing needs. Sites such as this require further detailed consideration to meet housing need prior to confirming the extent of all Green Belt sites. Please see attached letter for further details.		Highgrove Strategic Land - Local Plan Reg 19 Reps 2025.10.12.pdf
SP8: Housing	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	No	The Plan period is unlikely to be sufficient to cover a minimum 15-year period in accordance with para. 22 of the NPPF. Policy SP8 does not provide flexibility to maintain sufficient supply to meet North Somerset's needs, has not been sufficient evidenced to demonstrate deliverability, nor does it evidence effective joint working with neighbouring authorities (i.e. Bristol) in accordance with the Duty to Cooperate. Please see attached letter for further details.	An increased buffer should be applied to the local housing requirement, the deliverability of the large strategic sites should be robustly evidenced and that additional sites in sustainable locations are made to ensure that SP8 can deliver the housing that is required. Please see attached letter for further details.		Highgrove Strategic Land - Local Plan Reg 19 Reps 2025.10.12.pdf
Policy LP5: Housing, employment and mixed use allocations	No	• Positively prepared • Justified • Effective	Yes	No	The assumed delivery rates and therefore overall delivery within the Plan period of strategic locations identified within Schedule 1 associated with Policy LP5 is higher than evidence suggests. This undermines the effectiveness of the Plan. A review of the Council's evidence has demonstrated that sites such as Cox's Green, Wrington, have not been properly considered and should form part of the residential allocations within Policy LP5. Please see attached letter for further detail.	A detailed trajectory should be published as part of the Plan evidence to demonstrate how sites are anticipated to be delivered and to allow interested parties to review assumptions. A range of site locations and sizes such as at Cox's Green should be allocated within Policy LP5 to make up for current and pressing shortfalls. Please see attached letter for further detail.		Highgrove Strategic Land - Local Plan Reg 19 Reps 2025.10.12.pdf
Policy LP7: Settlement boundaries	No	• Positively	Yes	No	The extension to Wrington's Settlement Boundary is supported, however it should be extended to include the land at Cox's Green as this is a sustainable location for development outside of the Green	Wrington's Settlement Boundary should be extended to include the land at Cox's Green as this is a sustainable location for development outside of the Green Belt that is		Highgrove Strategic Land - Local Plan

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		prepared • Justified			Belt that is suitable and available. Please see attached letter for further details.	suitable and available.		Reg 19 Reps 2025.10.12.pdf
Policy DP63: Infrastructure delivery and development contributions	No	• Positively prepared • Justified • Effective	Yes	No	The land at Cox's Green, Wrington, does not require significant infrastructure upgrades to make it acceptable in planning terms and is deliverable within the first five years of the Plan period. This means it is a prime candidate for allocation, particularly given the lack of identified constraints. Development at Cox's Green could support the delivery of the proposed Active Travel Route 'Strawberry Line Extension'.	The land at Cox's Green, Wrington, should be allocated for residential development to meet housing needs without the need for significant infrastructure upgrades.		Highgrove Strategic Land - Local Plan Reg 19 Reps 2025.10.12.pdf

Name: Hilary Crisp **I.D:** 62832193

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The plan cannot be considered sound or deliverable in its current form because several fundamental issues have not been addressed. Backwell is already committed to around 800 new homes, representing an unprecedented expansion for a village of this size. Adding a further allocation of roughly 1,000 properties would amount to disproportionate development, far beyond what the settlement or its infrastructure can reasonably absorb. This level of growth is significantly higher than that proposed for other villages and even exceeds the proportional increases planned for some towns; Backwell is expected to accommodate around 7% of the district's housing target, while places such as Clevedon are asked to take far less. The transport proposals are neither justified nor viable. The A370 is already overloaded at busy times and when Flax Bourton floods in heavy rain (which is no infrequent). The suggested new road would not meaningfully resolve congestion on key routes including Station Road, Backwell Common, or Chapel Hill. Creating a crossing under or over the railway is likely to be technically challenging, prohibitively expensive, and may not be feasible. There is no evidence that the scheme would improve traffic flow for Nailsea or Backwell. Despite the scale of housing growth proposed, there is no corresponding plan to expand school capacity, health provision, or leisure facilities. Essential services are already stretched, and the Infrastructure Delivery Plan does not set out costings, funding certainty, or realistic timelines. As a result, the infrastructure needed to support such intensive development is neither assured nor planned to an adequate standard. There has been no needs assessment or viability case presented to justify an additional 1,000 dwellings in Backwell, nor any assessment of the social impact on the community. Backwell is not a major employment centre; most residents commute, meaning significant further pressure on an already congested transport network. The proposed development site includes Grade 1 agricultural land, which is now extremely scarce in North Somerset. National policy is clear that the most productive farmland should be safeguarded for food security, yet the plan contradicts this requirement. The land also supports important ecological habitats. The area forms part of the feeding grounds for Lesser and Greater Horseshoe Bats linked to the Brockley Maternity Roost and SSSI, and development would cause irreversible harm to wildlife in a region already facing severe biodiversity decline. Flood risk has not been adequately addressed. Backwell Common, the fields around Backwell Lake (the Reservoir), and other surrounding areas flood regularly. Adding extensive hard surfaces and housing in these locations would intensify flood risk both locally and downstream. Finally, the strategic growth location designation is unsound. It threatens the character of the village, relies on the loss of Green Belt and high-quality farmland, offers no clear evidence that required infrastructure can be funded or delivered in time, and proposes a volume of development that is neither sustainable nor achievable. Affordable housing requirements on			

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					Green Belt sites may also limit developer contributions to the infrastructure that is urgently needed. Given these issues, the plan fails key tests of soundness: it is not justified, not effective, and not consistent with national policy. It therefore cannot be considered legally compliant in its current form.			

Name: Hilary Holley **I.D:** 20752737

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Black Rock, north of Clevedon Road	No	• Justified • Consistent with national policy	No	No	These fields are green belt for a reason, Weston Big Wood is an SSSI building house that close will be detrimental to the woods. You cannot change green belt unless there are exceptional circumstances these have not been demonstrated. The doctors, school, dentists cannot cope now. Bus service does not cover North Weston. No modifications unless you class removal of the plans a modification.			

Name: Hill Residential Ltd **I.D:** 58613377

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP3: Spatial strategy	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	1.1 The following representations have been prepared by Marrons on behalf of Hill Residential Ltd (our “Client”), with regard to land interests at Land west of Failand, Bristol (the “Site”), in response to the North Somerset Council (the “Council”) Local Plan 2041 Pre-submission Plan Regulation 19 Consultation (the “NSLP”). 1.2 Our Client has previously made representations to the NSLP in March 2025, via the ‘additional sites consultation’. We understand that the contents of these representations will still be considered and therefore for brevity are not repeated here. 1.3 A planning application has recently been submitted for development on the Site, which is now under consideration by the Council. This confirms the technical ability of the Site to accommodate sustainable development and the Council is encouraged to consider the application alongside these representations with regard to the Site’s suitability, availability and achievability. The associated description of Proposed Development is as follows: “Outline application (with all matters reserved except access) for a phased development of up to 200 dwellings with landscaping and open space, a flexible retail/café/community unit (non-residential uses to include Use Classes E and F2), and associated infrastructure”. 1.4 Hill Residential Ltd (“Hill”) is an award-winning 5-star housebuilder, creating a range of high-quality homes across London and southern England in an area stretching from Cambridge to Oxford and across to Bristol. Hill’s vision is to be the UK’s leading, most trusted housebuilder, creating exceptional homes and sustainable communities. 1.5 Hill considers sustainability a fundamental part of its business strategy and believe that a sustainable future is achievable only through a holistic approach that encompasses environmental, social, and governance considerations. Supporting Documentation 1.6 These representations should be read alongside the following supporting documents: • Site Location Plan – prepared by Marrons (Appendix 1); • Parameters Plan – prepared by Marrons (Appendix 2); • Illustrative Masterplan – prepared by Marrons (Appendix 3); • Grey Belt Report – prepared by Marrons (Appendix 4);			Marrons on behalf of Hill Residential - Reg 19 Representations Final w_a.pdf

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					Scope of representations 1.7 The Council confirms as part of the consultation that representations are invited within the specific remit of the 'tests of soundness', as set out in the National Planning Policy Framework 2024 (NPPF) at Paragraph 36. The Framework notes that plans are 'sound' if they are: "a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant." 1.8 In the context of Paragraph 36 of the NPPF our Client also considers it imperative that the NSLP accounts for effective forward planning, given the emerging Spatial Development Strategy and the role North Somerset play within the West of England Combined Authority (WECA) in terms of spatial planning. 2. Land west of Failand, Bristol The Proposed Development: 2.1 The key elements in relation to the Site and the Proposed Development are best summarised as follows its characteristics are best summarised as follows: • Up to 200 new homes, delivering a mix of dwelling sizes to meet local housing needs. • Space for a flexible retail/café/community unit (uses to include Use Classes E and F2). • 45% affordable housing (up to 90 homes), ensuring a range of tenures to support local families and key workers. • Creation of a high-quality residential development to provide new housing for the village and help the Council meet its chronic undersupply. • Increases in biodiversity value, equating to 12.03% increase in the biodiversity value of habitats and 168.83% in relation to hedgerows post development. This will include new native woodland planting, trees, wildflower meadows and grassland. • New pedestrian, cycle and vehicular networks within the Site with pedestrian connections to existing pedestrian infrastructure on the curtilage of the Site to improve pedestrian connectivity within Failand. • A comprehensive Sustainable Urban Drainage Strategy (SuDs), which could include swales, rain gardens, attenuation basins and permeable surfaces. • A landscape and heritage sensitive development that responds thoughtfully to the Site's topography and maintains appropriate separation from the Tyntesfield Estate Registered Park and Garden (RPG), balancing new housing with protective measures and high-quality green infrastructure that delivers environmental, social, and visual benefits. • New open-space areas with enhanced planting and green buffers, a thoughtfully located public open space, which includes children's play space and improved biodiversity. • Retention of existing hedgerows and trees where possible with additional planting to minimise visual impact. • Significant financial contributions including a population contribution to the village to support local services and facilities (S106 and Community Infrastructure Levy (CIL) contributions). Planning History: 2.2 The Site was submitted to the Council's Regulation 19 Additional Sites Consultation in March 2025, where the Site was promoted for allocation in the Local Plan update following the reforms to the National Planning Policy Framework (NPPF) in December 2024. As stated, for brevity the Regulation 19 Representations are not repeated here. 2.3 We note that the outcomes from the Regulation 19 consultation were presented to Cabinet on 18 June 2025. Notably, the Site was not selected for allocation in the updated plan. Our position, as set out in our Regulation 19 representations, remains that the emerging Local Plan fails to adequately address Bristol's unmet housing need. These concerns were echoed by Council members at the Cabinet meeting on 18 June 2025. 2.4 A request for pre-application advice was submitted in August 2025. The Council provided formal written advice on 29 October 2025. The advice acknowledged the proposal for up to 200 dwellings at the Site, and assessed its alignment with planning policy, site constraints, and sustainability considerations.			

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					2.5 Critically, the Council's advice recognised that the Site could be considered 'grey belt' in accordance with the current NPPF, given that it does not strongly contribute to the key purposes of the Green Belt. 2.6 Notably, several aspects of the proposal were not disputed in the advice provided. The Council acknowledged the potential for a layout that respects the Site's landscape and heritage context, including the offset from the RPG and the containment provided by surrounding woodland and built form. The indicative design approach, including perimeter block layout and active frontages, was broadly supported from an urban design perspective. The provision of affordable housing in line with policy requirements was also accepted, subject to further detail at application stage. 2.7 While the Council's advice raised some concerns regarding the sustainability of the Site, particularly in relation to access to services and reliance on private car travel, the submitted planning application, with reference to its suite of supporting technical documents, demonstrates that the Site can be considered sustainable. Moreover, the Council's advice did not take into account relevant planning appeal decisions that support the sustainability of the Site. These decisions are discussed in detail at Paragraphs 6.73 to 6.75 of the submitted Planning Statement. The demonstrable sustainability of the Site is addressed throughout the planning application, and the inclusion of a shop provision within the proposals further enhances this position. 2.8 The Council also outlined a range of technical matters to be addressed at application stage, including transport, ecology, flooding, heritage, and affordable housing provision. These matters have been considered and are addressed through the supporting documentation submitted with the application. 3. Response to the NSLP Grey belt: 3.1 A key aspect of the Government's planning reforms was the introduction of the 'grey belt' alongside the revised Standard Method for calculating housing need. The Government is very clear on its objective of delivering 1.5 million homes and considers national planning policy measures such as the grey belt, key in doing so. 3.2 The initial draft of the NSLP did not consider the role of the grey belt and therefore our Client is keen to understand how it has now been introduced to this latest version and what changes have been made as a result. 3.3 The term 'grey belt' is mentioned 3 times within the NSLP. Indeed, within Policy SP7: Green Belt, grey belt is mentioned just once within the supporting text. Paragraph 148 of the NPPF confirms that where it is necessary to release Green Belt land for development, plans should given priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. The Council states on page 30 of the NSLP that "a sequential approach to Green Belt release as been taken prioritising previously developed land, followed by grey belt sites and then other Green Belt locations". 3.4 Paragraph 3.3 of the Council's Green Belt Review Background Paper includes reference to Paragraph 148 of the NPPF but neglects to include the final sentence, which reads as follows: "…Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary." 3.5 With regard to the above Paragraph 148 includes reference to Paragraph 110, which states: "The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making." (our emphasis - see attached doc) 3.6 With reference to the NPPF and grey belt, it can reasonably be assumed that villages within North Somerset which are inset from the Green Belt, are strong contenders for having a presence of grey belt land and therefore present opportunities for sustainable development in line with the sequential approach as set out in the NPPF. By way of example, Failand, where our Client's Site is located, is inset within the Green Belt and pre-application discussions have confirmed that it is considered grey belt land, which a technical Grey Belt Report (Appendix 4) in support of the submitted application now confirms. Despite this, Policy SP8: Housing confirms just 12% of the housing supply will be			

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					met in ‘villages and rural areas’. 3.7 With regard to the above, the Council is reminded that Paragraph 73 of the NPPF states the following: “Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes, and are often built-out relatively quickly.” 3.8 The NSLP continues to prioritise new residential development in or close to urban areas, optimising opportunities to encourage active and public transport modes of travel. Whilst our Client supports this in principle, in our view it does not provide the context to fully consider the role of the grey belt and opportunities to promote/improve sustainable transport options in rural areas. 3.9 It is not clear from the Green Belt Assessment undertaken or the wording within the NSLP if the Council has undertaken an objective exercise to determine whether or not it has grey belt land within the North Somerset, which can support sustainable development. Grey belt land provides a sustainable opportunity to provide housing within close proximity to Bristol, without affecting the purposes of the Green Belt in relation to the Bristol urban area. However. This has not been explored. Bristol’s unmet need: 3.10 No mention is made within the NSLP regarding Bristol City Council’s demonstrable and increasing unmet need. Bristol currently has an unmet need well in excess of 10,500 homes which it cannot meet within its boundary. Both South Gloucestershire to the north and Bath and North East Somerset to the south have confirmed difficulties in meeting their own needs, and therefore an inability to meaningfully assist Bristol in meeting its unmet needs. 3.11 The West of England Combined Authority (WECA) was established in 2017, following a devolution deal between Bristol, Bath and North East Somerset, and South Gloucestershire. In line with the Government’s proposed move to strategic planning authorities, WECA is now taking a more active role in planning across the strategic region, and recently announced work had commenced on a Spatial Development Strategy. Alongside this, North Somerset continues to confirm its intention to join WECA, becoming the fourth local authority alongside Bristol, Bath and North East Somerset, and South Gloucestershire. 3.12 Our Client’s Site is located in close proximity to the western edge of Bristol and therefore provides an opportunity to enhance connectivity between Bristol and North Somerset, whilst assisting with the unmet housing needs of Bristol. This in turn will also accord with the wider strategic objectives of WECA, in strengthening the connections between the local authority areas. 3.13 When considering a neighbouring authorities unmet need there is also a requirement to consider and support development that can come forward quickly to address this unmet need. Housing supply: 3.14 Paragraph 61 of the NPPF states that it is important to support the Government’s objective of significantly boosting the supply of homes, for a sufficient amount an variety of land to come forward where it is needed. Paragraph 62 of the NPPF also states the following: “To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.” (our emphasis - see attached document) 3.15 Since the previous consultation, the Council has addressed its updated housing need and proposes allocations to meet the delivery of a minimum of 23,700 dwellings within North Somerset. Overall, our Client considers this to be a positive step. 3.16 Notwithstanding. Policy SP8: Housing confirms the Council’s proposed housing supply totals 24,495 dwellings, when compared to the minimum requirement of 23,700, this represents only a 3% uplift. When divided across the plan period, the Council has given itself a 53 dwelling per annum tolerance. 3.17 The Planning Practice Guidance states that the Standard Method for calculating housing need provides a minimum number of homes to be planned for and suggests authorities use this as a starting point1. Our Client therefore does not consider the calculated housing requirement should be seen as a ‘target’, particularly where			

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					exceptional circumstances existing in Bristol which require neighbouring authorities to consider whether further need can be accommodated. 3.18 Moreover, it is essential that the housing trajectory is robust and attempts to sustain a rolling five year housing land supply throughout the Plan period, in accordance with the NPPF. Paragraph 72 of the NPPF states that planning policies should identify the supply of specific, deliverable sites for five years following the adoption of the plan. Paragraph 78 of the NPPF states the following: “Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites.” 3.19 We have been unable to find, either within the strategic policies or within the evidence base of the NSLP, a housing trajectory which details which sites are expected to come forward and when, alongside confirmation that this also enables the Council to demonstrate a five-year housing land supply upon adoption. 4. Summary and Conclusions 4.1 These representations have been prepared by Marrons on behalf of Hill Residential Ltd, with regard to its land interests at Land west of Failand, Bristol, in response to the North Somerset Local Plan 2041 Pre-submission Regulation 19 Consultation. 4.2 It should be noted that our Client is in broad support of the NSLP and the draft allocations noted within, though does consider modifications are required in order for the NSLP to pass the relevant tests of soundness. The areas of the NSLP which we consider need to be addressed are set out below. 4.3 The Council requires the NSLP to be considered against the tests of soundness within the Framework at Paragraph 36. In response to these and with reference to the commentary made within these representations, our Client notes the following: 4.4 Positively prepared – The NSLP is not considered positively prepared. The strategy seeks to meet the Council’s minimum housing requirement, however, there are concerns about the effectiveness of delivery across the Plan period and ability to maintain a rolling five year housing land supply. The NSLP pays no attention to the acute unmet need arising from Bristol and its ability to assist with this. In so doing, the Council has also failed to accurately assess the role of the grey belt and the ability to allocate sites close to Bristol, which are of a size that can deliver in the short-term. This is despite the Council confirming on an individual bases that such sites exist. It is our Client’s position that the Council has sought to retrofit the requirement to consider the grey belt within a Plan and spatial strategy that had already been conceived. This is plainly evident from the lack of times ‘grey belt’ is mentioned within the NSLP or its evidence base. Given the grey belt represents one of the most significant changes to national policy in some time, it should feature heavily within the plan-making process for Green Belt authorities. 4.5 Justified – The NSLP is not considered justified. Whilst our Client considers the strategy is appropriate in part, there is potentially an over-reliance on strategic scale development which is not complemented by development of smaller sites, to enable effective delivery across the Plan period. However. This cannot be accurately determined given the absence of a site trajectory and anticipated delivery rates. Our Client therefore reserves the right to comment on this further once this evidence is made available. For the reasons stated above, our Client considers that a blended strategy is more appropriate, which the Council has not considered. 4.6 Effective – The NSLP is not considered effective. Our Client considers that there is a lack of recent evidence to demonstrate effective joint working on cross boundary strategic matters, and considers that a distinct lack of effort has been made to address housing requirements in and around Bristol, despite the clear opportunities to do so. As stated above, sufficient evidence also does not exist to be able to determine whether or not it is deliverable over the plan period. 4.7 Consistent with national policy – The NSLP is not considered consistent with national policy. Whilst the NSLP seeks to address national policy in some areas, there are clear omissions which mean it cannot be considered consistent with national policy overall. The Council appears to have taken a conservative approach, particularly with regard to housing supply, which is considered to go against the Government’s objectives of delivering 1.5 million homes and boosting significantly the supply of homes, as set out at Paragraph 61 of the NPPF. Nor has it considered properly the requirements of Paragraph 62 of the NPPF, in not seeking to meet the unmet needs of its neighbouring			

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					authority, Bristol. 4.8 Consequently, our Client does not consider the NSLP to be sound in its current form and confirms that it would like to participate in any hearing sessions held at the examination in public, particularly on matters raised in these representations and those submitted earlier in the process. Our Client is willing to engage proactively with a view to assisting the Council in making the NSLP sound. 4.9 Our Client also re-affirms that Land west of Failand, Bristol is available for development now, represents a suitable location for development, and that development of the Site is achievable with a realistic prospect that housing can be delivered within the first five years of the draft plan period. The Site is deliverable and should therefore be favourably regarded in relation to its potential allocation for residential development within the emerging Local Plan. This is demonstrated via a live planning application, where supporting technical information is provided which the local plan team is invited to consider.			
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					undertaken an objective exercise to determine whether or not it has grey belt land within the North Somerset, which can support sustainable development. Grey belt land provides a sustainable opportunity to provide housing within close proximity to Bristol, without affecting the purposes of the Green Belt in relation to the Bristol urban area. However. This has not been explored. Bristol's unmet need: 3.10 No mention is made within the NSLP regarding Bristol City Council's demonstrable and increasing unmet need. Bristol currently has an unmet need well in excess of 10,500 homes which it cannot meet within its boundary. Both South Gloucestershire to the north and Bath and North East Somerset to the south have confirmed difficulties in meeting their own needs, and therefore an inability to meaningfully assist Bristol in meeting its unmet needs. 3.11 The West of England Combined Authority (WECA) was established in 2017, following a devolution deal between Bristol, Bath and North East Somerset, and South Gloucestershire. In line with the Government's proposed move to strategic planning authorities, WECA is now taking a more active role in planning across the strategic region, and recently announced work had commenced on a Spatial Development Strategy. Alongside this, North Somerset continues to confirm its intention to join WECA, becoming the fourth local authority alongside Bristol, Bath and North East Somerset, and South Gloucestershire. 3.12 Our Client's Site is located in close proximity to the western edge of Bristol and therefore provides an opportunity to enhance connectivity between Bristol and North Somerset, whilst assisting with the unmet housing needs of Bristol. This in turn will also accord with the wider strategic objectives of WECA, in strengthening the connections between the local authority areas. 3.13 When considering a neighbouring authorities unmet need there is also a requirement to consider and support development that can come forward quickly to address this unmet need. Housing supply: 3.14 Paragraph 61 of the NPPF states that it is important to support the Government's objective of significantly boosting the supply of homes, for a sufficient amount an variety of land to come forward where it is needed. Paragraph 62 of the NPPF also states the following: "To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for." (our emphasis - see attached document) 3.15 Since the previous consultation, the Council has addressed its updated housing need and proposes allocations to meet the delivery of a minimum of 23,700 dwellings within North Somerset. Overall, our Client considers this to be a positive step. 3.16 Notwithstanding. Policy SP8: Housing confirms the Council's proposed housing supply totals 24,495 dwellings, when compared to the minimum requirement of 23,700, this represents only a 3% uplift. When divided across the plan period, the Council has given itself a 53 dwelling per annum tolerance. 3.17 The Planning Practice Guidance states that the Standard Method for calculating housing need provides a minimum number of homes to be planned for and suggests authorities use this as a starting point1. Our Client therefore does not consider the calculated housing requirement should be seen as a 'target', particularly where exceptional circumstances existing in Bristol which require neighbouring authorities to consider whether further need can be accommodated. 3.18 Moreover, it is essential that the housing trajectory is robust and attempts to sustain a rolling five year housing land supply throughout the Plan period, in accordance with the NPPF. Paragraph 72 of the NPPF states that planning policies should identify the supply of specific, deliverable sites for five years following the adoption of the plan. Paragraph 78 of the NPPF states the following: "Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites." 3.19 We have been unable to find, either within the strategic policies or within the evidence base of the NSLP, a housing trajectory which details which sites are expected to come forward and when, alongside confirmation that this			

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					also enables the Council to demonstrate a five-year housing land supply upon adoption. 4. Summary and Conclusions 4.1 These representations have been prepared by Marrons on behalf of Hill Residential Ltd, with regard to its land interests at Land west of Failand, Bristol, in response to the North Somerset Local Plan 2041 Pre-submission Regulation 19 Consultation. 4.2 It should be noted that our Client is in broad support of the NSLP and the draft allocations noted within, though does consider modifications are required in order for the NSLP to pass the relevant tests of soundness. The areas of the NSLP which we consider need to be addressed are set out below. 4.3 The Council requires the NSLP to be considered against the tests of soundness within the Framework at Paragraph 36. In response to these and with reference to the commentary made within these representations, our Client notes the following: 4.4 Positively prepared – The NSLP is not considered positively prepared. The strategy seeks to meet the Council's minimum housing requirement, however, there are concerns about the effectiveness of delivery across the Plan period and ability to maintain a rolling five year housing land supply. The NSLP pays no attention to the acute unmet need arising from Bristol and its ability to assist with this. In so doing, the Council has also failed to accurately assess the role of the grey belt and the ability to allocate sites close to Bristol, which are of a size that can deliver in the short-term. This is despite the Council confirming on an individual bases that such sites exist. It is our Client's position that the Council has sought to retrofit the requirement to consider the grey belt within a Plan and spatial strategy that had already been conceived. This is plainly evident from the lack of times 'grey belt' is mentioned within the NSLP or its evidence base. Given the grey belt represents one of the most significant changes to national policy in some time, it should feature heavily within the plan-making process for Green Belt authorities. 4.5 Justified – The NSLP is not considered justified. Whilst our Client considers the strategy is appropriate in part, there is potentially an over-reliance on strategic scale development which is not complemented by development of smaller sites, to enable effective delivery across the Plan period. However. This cannot be accurately determined given the absence of a site trajectory and anticipated delivery rates. Our Client therefore reserves the right to comment on this further once this evidence is made available. For the reasons stated above, our Client considers that a blended strategy is more appropriate, which the Council has not considered. 4.6 Effective – The NSLP is not considered effective. Our Client considers that there is a lack of recent evidence to demonstrate effective joint working on cross boundary strategic matters, and considers that a distinct lack of effort has been made to address housing requirements in and around Bristol, despite the clear opportunities to do so. As stated above, sufficient evidence also does not exist to be able to determine whether or not it is deliverable over the plan period. 4.7 Consistent with national policy – The NSLP is not considered consistent with national policy. Whilst the NSLP seeks to address national policy in some areas, there are clear omissions which mean it cannot be considered consistent with national policy overall. The Council appears to have taken a conservative approach, particularly with regard to housing supply, which is considered to go against the Government's objectives of delivering 1.5 million homes and boosting significantly the supply of homes, as set out at Paragraph 61 of the NPPF. Nor has it considered properly the requirements of Paragraph 62 of the NPPF, in not seeking to meet the unmet needs of its neighbouring authority, Bristol. 4.8 Consequently, our Client does not consider the NSLP to be sound in its current form and confirms that it would like to participate in any hearing sessions held at the examination in public, particularly on matters raised in these representations and those submitted earlier in the process. Our Client is willing to engage proactively with a view to assisting the Council in making the NSLP sound. 4.9 Our Client also re-affirms that Land west of Failand, Bristol is available for development now, represents a suitable location for development, and that development of the Site is achievable with a realistic prospect that housing can be delivered within the first five years of the draft plan period. The Site is deliverable and should therefore be favourably regarded in relation to its potential allocation for residential development within the emerging Local Plan. This is demonstrated via a live planning application, where supporting technical information is provided which the local plan team is invited to consider.			

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SP7: Green Belt	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The following representations have been prepared by Marrons on behalf of Hill Residential Ltd (our "Client"), with regard to land interests at Land west of Failand, Bristol (the "Site"), in response to the North Somerset Council (the "Council") Local Plan 2041 Pre-submission Plan Regulation 19 Consultation (the "NSLP"). Our Client has previously made representations to the NSLP in March 2025, via the 'additional sites consultation'. We understand that the contents of these representations will still be considered and therefore for brevity are not repeated here. A planning application has recently been submitted for development on the Site, which is now under consideration by the Council. This confirms the technical ability of the Site to accommodate sustainable development and the Council is encouraged to consider the application alongside these representations with regard to the Site's suitability, availability and achievability. The associated description of Proposed Development is as follows: "Outline application (with all matters reserved except access) for a phased development of up to 200 dwellings with landscaping and open space, a flexible retail/café/community unit (non-residential uses to include Use Classes E and F2), and associated infrastructure". Hill Residential Ltd ("Hill") is an award-winning 5-star housebuilder, creating a range of high-quality homes across London and southern England in an area stretching from Cambridge to Oxford and across to Bristol. Hill's vision is to be the UK's leading, most trusted housebuilder, creating exceptional homes and sustainable communities. Hill considers sustainability a fundamental part of its business strategy and believe that a sustainable future is achievable only through a holistic approach that encompasses environmental, social, and governance considerations. Supporting Documentation These representations should be read alongside the following supporting documents: • Site Location Plan – prepared by Marrons (Appendix 1); • Parameters Plan – prepared by Marrons (Appendix 2); • Illustrative Masterplan – prepared by Marrons (Appendix 3); • Grey Belt Report – prepared by Marrons (Appendix 4); Scope of representations The Council confirms as part of the consultation that representations are invited within the specific remit of the 'tests of soundness', as set out in the National Planning Policy Framework 2024 (NPPF) at Paragraph 36. The Framework notes that plans are 'sound' if they are: "a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant." In the context of Paragraph 36 of the NPPF our Client also considers it imperative that the NSLP accounts for effective forward planning, given the emerging Spatial Development Strategy and the role North Somerset play within the West of England Combined Authority (WECA) in terms of spatial planning. Land west of Failand, Bristol The Proposed Development: The key elements in relation to the Site and the Proposed Development are best summarised as follows its characteristics are best summarised as follows: • Up to 200 new homes, delivering a mix of dwelling sizes to meet local housing needs. • Space for a flexible retail/café/community unit (uses to include Use Classes E and F2). • 45% affordable housing (up to 90 homes), ensuring a range of tenures to support local families and key workers.			Marrons on behalf of Hill Residential - Reg 19 Representations Final w_a.pdf

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					• Creation of a high-quality residential development to provide new housing for the village and help the Council meet its chronic undersupply. • Increases in biodiversity value, equating to 12.03% increase in the biodiversity value of habitats and 168.83% in relation to hedgerows post development. This will include new native woodland planting, trees, wildflower meadows and grassland. • New pedestrian, cycle and vehicular networks within the Site with pedestrian connections to existing pedestrian infrastructure on the curtilage of the Site to improve pedestrian connectivity within Failand. • A comprehensive Sustainable Urban Drainage Strategy (SuDs), which could include swales, rain gardens, attenuation basins and permeable surfaces. • A landscape and heritage sensitive development that responds thoughtfully to the Site's topography and maintains appropriate separation from the Tyntesfield Estate Registered Park and Garden (RPG), balancing new housing with protective measures and high-quality green infrastructure that delivers environmental, social, and visual benefits. • New open-space areas with enhanced planting and green buffers, a thoughtfully located public open space, which includes children's play space and improved biodiversity. • Retention of existing hedgerows and trees where possible with additional planting to minimise visual impact. • Significant financial contributions including a population contribution to the village to support local services and facilities (S106 and Community Infrastructure Levy (CIL) contributions). Planning History: The Site was submitted to the Council's Regulation 19 Additional Sites Consultation in March 2025, where the Site was promoted for allocation in the Local Plan update following the reforms to the National Planning Policy Framework (NPPF) in December 2024. As stated, for brevity the Regulation 19 Representations are not repeated here. We note that the outcomes from the Regulation 19 consultation were presented to Cabinet on 18 June 2025. Notably, the Site was not selected for allocation in the updated plan. Our position, as set out in our Regulation 19 representations, remains that the emerging Local Plan fails to adequately address Bristol's unmet housing need. These concerns were echoed by Council members at the Cabinet meeting on 18 June 2025. A request for pre-application advice was submitted in August 2025. The Council provided formal written advice on 29 October 2025. The advice acknowledged the proposal for up to 200 dwellings at the Site, and assessed its alignment with planning policy, site constraints, and sustainability considerations. Critically, the Council's advice recognised that the Site could be considered 'grey belt' in accordance with the current NPPF, given that it does not strongly contribute to the key purposes of the Green Belt. Notably, several aspects of the proposal were not disputed in the advice provided. The Council acknowledged the potential for a layout that respects the Site's landscape and heritage context, including the offset from the RPG and the containment provided by surrounding woodland and built form. The indicative design approach, including perimeter block layout and active frontages, was broadly supported from an urban design perspective. The provision of affordable housing in line with policy requirements was also accepted, subject to further detail at application stage. While the Council's advice raised some concerns regarding the sustainability of the Site, particularly in relation to access to services and reliance on private car travel, the submitted planning application, with reference to its suite of supporting technical documents, demonstrates that the Site can be considered sustainable. Moreover, the Council's advice did not take into account relevant planning appeal decisions that support the sustainability of the Site. These decisions are discussed in detail at Paragraphs 6.73 to 6.75 of the submitted Planning Statement. The demonstrable sustainability of the Site is addressed throughout the planning application, and the inclusion of a shop provision within the proposals further enhances this position. The Council also outlined a range of technical matters to be addressed at application stage, including transport, ecology, flooding, heritage, and affordable housing provision. These matters have been considered and are addressed through the supporting documentation submitted with the application. Response to the NSLP Grey belt: A key aspect of the Government's planning reforms was the introduction of the 'grey belt' alongside the revised Standard Method for calculating housing need. The Government is very clear on its objective of delivering 1.5 million			

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SP8: Housing	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Policy SP8: Housing confirms just 12% of the housing supply will be met in 'villages and rural areas'. With regard to the above, the Council is reminded that Paragraph 73 of the NPPF states the following: "Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes, and are often built-out relatively quickly." The NSLP continues to prioritise new residential development in or close to urban areas, optimising opportunities to encourage active and public transport modes of travel. Whilst our Client supports this in principle, in our view it does not provide the context to fully consider the role of the grey belt and opportunities to promote/improve sustainable transport options in rural areas. Bristol's unmet need:			Marrons on behalf of Hill Residential - Reg 19 Representations Final w_a.pdf

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					No mention is made within the NSLP regarding Bristol City Council's demonstrable and increasing unmet need. Bristol currently has an unmet need well in excess of 10,500 homes which it cannot meet within its boundary. Both South Gloucestershire to the north and Bath and North East Somerset to the south have confirmed difficulties in meeting their own needs, and therefore an inability to meaningfully assist Bristol in meeting its unmet needs. The West of England Combined Authority (WECA) was established in 2017, following a devolution deal between Bristol, Bath and North East Somerset, and South Gloucestershire. In line with the Government's proposed move to strategic planning authorities, WECA is now taking a more active role in planning across the strategic region, and recently announced work had commenced on a Spatial Development Strategy. Alongside this, North Somerset continues to confirm its intention to join WECA, becoming the fourth local authority alongside Bristol, Bath and North East Somerset, and South Gloucestershire. Our Client's Site is located in close proximity to the western edge of Bristol and therefore provides an opportunity to enhance connectivity between Bristol and North Somerset, whilst assisting with the unmet housing needs of Bristol. This in turn will also accord with the wider strategic objectives of WECA, in strengthening the connections between the local authority areas. When considering a neighbouring authorities unmet need there is also a requirement to consider and support development that can come forward quickly to address this unmet need. Housing supply: Paragraph 61 of the NPPF states that it is important to support the Government's objective of significantly boosting the supply of homes, for a sufficient amount an variety of land to come forward where it is needed. Paragraph 62 of the NPPF also states the following: "To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for." (our emphasis - see attached document) Since the previous consultation, the Council has addressed its updated housing need and proposes allocations to meet the delivery of a minimum of 23,700 dwellings within North Somerset. Overall, our Client considers this to be a positive step. Notwithstanding. Policy SP8: Housing confirms the Council's proposed housing supply totals 24,495 dwellings, when compared to the minimum requirement of 23,700, this represents only a 3% uplift. When divided across the plan period, the Council has given itself a 53 dwelling per annum tolerance. The Planning Practice Guidance states that the Standard Method for calculating housing need provides a minimum number of homes to be planned for and suggests authorities use this as a starting point. Our Client therefore does not consider the calculated housing requirement should be seen as a 'target', particularly where exceptional circumstances existing in Bristol which require neighbouring authorities to consider whether further need can be accommodated. Moreover, it is essential that the housing trajectory is robust and attempts to sustain a rolling five year housing land supply throughout the Plan period, in accordance with the NPPF. Paragraph 72 of the NPPF states that planning policies should identify the supply of specific, deliverable sites for five years following the adoption of the plan. Paragraph 78 of the NPPF states the following: "Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites." We have been unable to find, either within the strategic policies or within the evidence base of the NSLP, a housing trajectory which details which sites are expected to come forward and when, alongside confirmation that this also enables the Council to demonstrate a five-year housing land supply upon adoption.			
Policy LP5: Housing, employment and mixed	No	• Positively prepared	No	No	LAND WEST OF FAILAND 1.1 The following representations have been prepared by Marrons on behalf of Hill Residential Ltd (our "Client"), with regard to land interests at Land west of Failand, Bristol (the "Site"), in response to the North Somerset Council			Marrons on behalf of Hill Residential - Reg 19

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use allocations		• Justified • Effective • Consistent with national policy			(the “Council”) Local Plan 2041 Pre-submission Plan Regulation 19 Consultation (the “NSLP”). 1.2 Our Client has previously made representations to the NSLP in March 2025, via the ‘additional sites consultation’. We understand that the contents of these representations will still be considered and therefore for brevity are not repeated here. 1.3 A planning application has recently been submitted for development on the Site, which is now under consideration by the Council. This confirms the technical ability of the Site to accommodate sustainable development and the Council is encouraged to consider the application alongside these representations with regard to the Site’s suitability, availability and achievability. The associated description of Proposed Development is as follows: “Outline application (with all matters reserved except access) for a phased development of up to 200 dwellings with landscaping and open space, a flexible retail/café/community unit (non-residential uses to include Use Classes E and F2), and associated infrastructure”. 1.4 Hill Residential Ltd (“Hill”) is an award-winning 5-star housebuilder, creating a range of high-quality homes across London and southern England in an area stretching from Cambridge to Oxford and across to Bristol. Hill’s vision is to be the UK’s leading, most trusted housebuilder, creating exceptional homes and sustainable communities. 1.5 Hill considers sustainability a fundamental part of its business strategy and believe that a sustainable future is achievable only through a holistic approach that encompasses environmental, social, and governance considerations. Supporting Documentation 1.6 These representations should be read alongside the following supporting documents: • Site Location Plan – prepared by Marrons (Appendix 1); • Parameters Plan – prepared by Marrons (Appendix 2); • Illustrative Masterplan – prepared by Marrons (Appendix 3); • Grey Belt Report – prepared by Marrons (Appendix 4); Scope of representations 1.7 The Council confirms as part of the consultation that representations are invited within the specific remit of the ‘tests of soundness’, as set out in the National Planning Policy Framework 2024 (NPPF) at Paragraph 36. The Framework notes that plans are ‘sound’ if they are: “a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.” 1.8 In the context of Paragraph 36 of the NPPF our Client also considers it imperative that the NSLP accounts for effective forward planning, given the emerging Spatial Development Strategy and the role North Somerset play within the West of England Combined Authority (WECA) in terms of spatial planning. 2. Land west of Failand, Bristol The Proposed Development: 2.1 The key elements in relation to the Site and the Proposed Development are best summarised as follows its characteristics are best summarised as follows: • Up to 200 new homes, delivering a mix of dwelling sizes to meet local housing needs. • Space for a flexible retail/café/community unit (uses to include Use Classes E and F2). • 45% affordable housing (up to 90 homes), ensuring a range of tenures to support local families and key workers. • Creation of a high-quality residential development to provide new housing for the village and help the Council meet its chronic undersupply.			Representations Final w_a.pdf

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					• Increases in biodiversity value, equating to 12.03% increase in the biodiversity value of habitats and 168.83% in relation to hedgerows post development. This will include new native woodland planting, trees, wildflower meadows and grassland. • New pedestrian, cycle and vehicular networks within the Site with pedestrian connections to existing pedestrian infrastructure on the curtilage of the Site to improve pedestrian connectivity within Failand. • A comprehensive Sustainable Urban Drainage Strategy (SuDs), which could include swales, rain gardens, attenuation basins and permeable surfaces. • A landscape and heritage sensitive development that responds thoughtfully to the Site's topography and maintains appropriate separation from the Tyntesfield Estate Registered Park and Garden (RPG), balancing new housing with protective measures and high-quality green infrastructure that delivers environmental, social, and visual benefits. • New open-space areas with enhanced planting and green buffers, a thoughtfully located public open space, which includes children's play space and improved biodiversity. • Retention of existing hedgerows and trees where possible with additional planting to minimise visual impact. • Significant financial contributions including a population contribution to the village to support local services and facilities (S106 and Community Infrastructure Levy (CIL) contributions). Planning History: 2.2 The Site was submitted to the Council's Regulation 19 Additional Sites Consultation in March 2025, where the Site was promoted for allocation in the Local Plan update following the reforms to the National Planning Policy Framework (NPPF) in December 2024. As stated, for brevity the Regulation 19 Representations are not repeated here. 2.3 We note that the outcomes from the Regulation 19 consultation were presented to Cabinet on 18 June 2025. Notably, the Site was not selected for allocation in the updated plan. Our position, as set out in our Regulation 19 representations, remains that the emerging Local Plan fails to adequately address Bristol's unmet housing need. These concerns were echoed by Council members at the Cabinet meeting on 18 June 2025. 2.4 A request for pre-application advice was submitted in August 2025. The Council provided formal written advice on 29 October 2025. The advice acknowledged the proposal for up to 200 dwellings at the Site, and assessed its alignment with planning policy, site constraints, and sustainability considerations. 2.5 Critically, the Council's advice recognised that the Site could be considered 'grey belt' in accordance with the current NPPF, given that it does not strongly contribute to the key purposes of the Green Belt. 2.6 Notably, several aspects of the proposal were not disputed in the advice provided. The Council acknowledged the potential for a layout that respects the Site's landscape and heritage context, including the offset from the RPG and the containment provided by surrounding woodland and built form. The indicative design approach, including perimeter block layout and active frontages, was broadly supported from an urban design perspective. The provision of affordable housing in line with policy requirements was also accepted, subject to further detail at application stage. 2.7 While the Council's advice raised some concerns regarding the sustainability of the Site, particularly in relation to access to services and reliance on private car travel, the submitted planning application, with reference to its suite of supporting technical documents, demonstrates that the Site can be considered sustainable. Moreover, the Council's advice did not take into account relevant planning appeal decisions that support the sustainability of the Site. These decisions are discussed in detail at Paragraphs 6.73 to 6.75 of the submitted Planning Statement. The demonstrable sustainability of the Site is addressed throughout the planning application, and the inclusion of a shop provision within the proposals further enhances this position. 2.8 The Council also outlined a range of technical matters to be addressed at application stage, including transport, ecology, flooding, heritage, and affordable housing provision. These matters have been considered and are addressed through the supporting documentation submitted with the application. 3. Response to the NSLP Grey belt: 3.1 A key aspect of the Government's planning reforms was the introduction of the 'grey belt' alongside the revised Standard Method for calculating housing need. The Government is very clear on its objective of delivering 1.5 million homes and considers national planning policy measures such as the grey belt, key in doing so.			

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					3.2 The initial draft of the NSLP did not consider the role of the grey belt and therefore our Client is keen to understand how it has now been introduced to this latest version and what changes have been made as a result. 3.3 The term 'grey belt' is mentioned 3 times within the NSLP. Indeed, within Policy SP7: Green Belt, grey belt is mentioned just once within the supporting text. Paragraph 148 of the NPPF confirms that where it is necessary to release Green Belt land for development, plans should given priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. The Council states on page 30 of the NSLP that "a sequential approach to Green Belt release as been taken prioritising previously developed land, followed by grey belt sites and then other Green Belt locations". 3.4 Paragraph 3.3 of the Council's Green Belt Review Background Paper includes reference to Paragraph 148 of the NPPF but neglects to include the final sentence, which reads as follows: "…Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary." 3.5 With regard to the above Paragraph 148 includes reference to Paragraph 110, which states: "The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making." (our emphasis - see attached doc) 3.6 With reference to the NPPF and grey belt, it can reasonably be assumed that villages within North Somerset which are inset from the Green Belt, are strong contenders for having a presence of grey belt land and therefore present opportunities for sustainable development in line with the sequential approach as set out in the NPPF. By way of example, Failand, where our Client's Site is located, is inset within the Green Belt and pre-application discussions have confirmed that it is considered grey belt land, which a technical Grey Belt Report (Appendix 4) in support of the submitted application now confirms. Despite this, Policy SP8: Housing confirms just 12% of the housing supply will be met in 'villages and rural areas'. 3.7 With regard to the above, the Council is reminded that Paragraph 73 of the NPPF states the following: "Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes, and are often built-out relatively quickly." 3.8 The NSLP continues to prioritise new residential development in or close to urban areas, optimising opportunities to encourage active and public transport modes of travel. Whilst our Client supports this in principle, in our view it does not provide the context to fully consider the role of the grey belt and opportunities to promote/improve sustainable transport options in rural areas. 3.9 It is not clear from the Green Belt Assessment undertaken or the wording within the NSLP if the Council has undertaken an objective exercise to determine whether or not it has grey belt land within the North Somerset, which can support sustainable development. Grey belt land provides a sustainable opportunity to provide housing within close proximity to Bristol, without affecting the purposes of the Green Belt in relation to the Bristol urban area. However. This has not been explored. Bristol's unmet need: 3.10 No mention is made within the NSLP regarding Bristol City Council's demonstrable and increasing unmet need. Bristol currently has an unmet need well in excess of 10,500 homes which it cannot meet within its boundary. Both South Gloucestershire to the north and Bath and North East Somerset to the south have confirmed difficulties in meeting their own needs, and therefore an inability to meaningfully assist Bristol in meeting its unmet needs. 3.11 The West of England Combined Authority (WECA) was established in 2017, following a devolution deal between Bristol, Bath and North East Somerset, and South Gloucestershire. In line with the Government's proposed move to strategic planning authorities, WECA is now taking a more active role in planning across the strategic region, and recently announced work had commenced on a Spatial Development Strategy. Alongside this, North Somerset continues to confirm its intention to join WECA, becoming the fourth local authority alongside Bristol, Bath and North			

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					East Somerset, and South Gloucestershire. 3.12 Our Client's Site is located in close proximity to the western edge of Bristol and therefore provides an opportunity to enhance connectivity between Bristol and North Somerset, whilst assisting with the unmet housing needs of Bristol. This in turn will also accord with the wider strategic objectives of WECA, in strengthening the connections between the local authority areas. 3.13 When considering a neighbouring authorities unmet need there is also a requirement to consider and support development that can come forward quickly to address this unmet need. Housing supply: 3.14 Paragraph 61 of the NPPF states that it is important to support the Government's objective of significantly boosting the supply of homes, for a sufficient amount an variety of land to come forward where it is needed. Paragraph 62 of the NPPF also states the following: "To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for." (our emphasis - see attached document) 3.15 Since the previous consultation, the Council has addressed its updated housing need and proposes allocations to meet the delivery of a minimum of 23,700 dwellings within North Somerset. Overall, our Client considers this to be a positive step. 3.16 Notwithstanding. Policy SP8: Housing confirms the Council's proposed housing supply totals 24,495 dwellings, when compared to the minimum requirement of 23,700, this represents only a 3% uplift. When divided across the plan period, the Council has given itself a 53 dwelling per annum tolerance. 3.17 The Planning Practice Guidance states that the Standard Method for calculating housing need provides a minimum number of homes to be planned for and suggests authorities use this as a starting point1. Our Client therefore does not consider the calculated housing requirement should be seen as a 'target', particularly where exceptional circumstances existing in Bristol which require neighbouring authorities to consider whether further need can be accommodated. 3.18 Moreover, it is essential that the housing trajectory is robust and attempts to sustain a rolling five year housing land supply throughout the Plan period, in accordance with the NPPF. Paragraph 72 of the NPPF states that planning policies should identify the supply of specific, deliverable sites for five years following the adoption of the plan. Paragraph 78 of the NPPF states the following: "Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites." 3.19 We have been unable to find, either within the strategic policies or within the evidence base of the NSLP, a housing trajectory which details which sites are expected to come forward and when, alongside confirmation that this also enables the Council to demonstrate a five-year housing land supply upon adoption. 4. Summary and Conclusions 4.1 These representations have been prepared by Marrons on behalf of Hill Residential Ltd, with regard to its land interests at Land west of Failand, Bristol, in response to the North Somerset Local Plan 2041 Pre-submission Regulation 19 Consultation. 4.2 It should be noted that our Client is in broad support of the NSLP and the draft allocations noted within, though does consider modifications are required in order for the NSLP to pass the relevant tests of soundness. The areas of the NSLP which we consider need to be addressed are set out below. 4.3 The Council requires the NSLP to be considered against the tests of soundness within the Framework at Paragraph 36. In response to these and with reference to the commentary made within these representations, our Client notes the following:			

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					4.4 Positively prepared – The NSLP is not considered positively prepared. The strategy seeks to meet the Council's minimum housing requirement, however, there are concerns about the effectiveness of delivery across the Plan period and ability to maintain a rolling five year housing land supply. The NSLP pays no attention to the acute unmet need arising from Bristol and its ability to assist with this. In so doing, the Council has also failed to accurately assess the role of the grey belt and the ability to allocate sites close to Bristol, which are of a size that can deliver in the short-term. This is despite the Council confirming on an individual bases that such sites exist. It is our Client's position that the Council has sought to retrofit the requirement to consider the grey belt within a Plan and spatial strategy that had already been conceived. This is plainly evident from the lack of times 'grey belt' is mentioned within the NSLP or its evidence base. Given the grey belt represents one of the most significant changes to national policy in some time, it should feature heavily within the plan-making process for Green Belt authorities. 4.5 Justified – The NSLP is not considered justified. Whilst our Client considers the strategy is appropriate in part, there is potentially an over-reliance on strategic scale development which is not complemented by development of smaller sites, to enable effective delivery across the Plan period. However. This cannot be accurately determined given the absence of a site trajectory and anticipated delivery rates. Our Client therefore reserves the right to comment on this further once this evidence is made available. For the reasons stated above, our Client considers that a blended strategy is more appropriate, which the Council has not considered. 4.6 Effective – The NSLP is not considered effective. Our Client considers that there is a lack of recent evidence to demonstrate effective joint working on cross boundary strategic matters, and considers that a distinct lack of effort has been made to address housing requirements in and around Bristol, despite the clear opportunities to do so. As stated above, sufficient evidence also does not exist to be able to determine whether or not it is deliverable over the plan period. 4.7 Consistent with national policy – The NSLP is not considered consistent with national policy. Whilst the NSLP seeks to address national policy in some areas, there are clear omissions which mean it cannot be considered consistent with national policy overall. The Council appears to have taken a conservative approach, particularly with regard to housing supply, which is considered to go against the Government's objectives of delivering 1.5 million homes and boosting significantly the supply of homes, as set out at Paragraph 61 of the NPPF. Nor has it considered properly the requirements of Paragraph 62 of the NPPF, in not seeking to meet the unmet needs of its neighbouring authority, Bristol. 4.8 Consequently, our Client does not consider the NSLP to be sound in its current form and confirms that it would like to participate in any hearing sessions held at the examination in public, particularly on matters raised in these representations and those submitted earlier in the process. Our Client is willing to engage proactively with a view to assisting the Council in making the NSLP sound. 4.9 Our Client also re-affirms that Land west of Failand, Bristol is available for development now, represents a suitable location for development, and that development of the Site is achievable with a realistic prospect that housing can be delivered within the first five years of the draft plan period. The Site is deliverable and should therefore be favourably regarded in relation to its potential allocation for residential development within the emerging Local Plan. This is demonstrated via a live planning application, where supporting technical information is provided which the local plan team is invited to consider.			

Name: Historic England (R Torkildsen) **I.D:** 12476353

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Policy LP2: Strategic location: Woodspring (south west of Bristol)					The North Somerset Site Allocations Historic Environment Assessments (HEA) (Avalon, September 2025) considers the likely impact of proposed allocations on the affected heritage assets and helpfully indicates a potential design approach to positively respond and limit harm to their significance. The application of this evidence to do so will help to ensure the Plan provides a positive strategy for the conservation of the historic environment in accordance with paragraph 203 of the National Planning Policy Framework.	We would recommend that the potion of the greater site on rising land (B) to the south of the A38 be omitted and other opportunities are considered, perhaps informed by an urban capacity study and Grey Belt assessment.		20251210 NSCLP Reg 19 response Dec 2025 RT.docx

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					In relation to the proposed allocation to the south west of Bristol, the North Somerset Local Plan Landscape Sensitivity Assessment (LSA) by Wardell Armstrong in 2017 defines the site as highly sensitive, and the HEA emphasises the positive contribution it makes to the significance of many important heritage assets. As local authorities have a legal duty under Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to “have special regard to the desirability of preserving” the settings of listed buildings, and need to afford great weight to the conservation of designated heritage assets (NPPF paragraph 212), it is appropriate for you to take account of the HEA “to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal” (NPPF paragraph 208). The HEA declares the likely significant adverse impact on many designated heritage assets unless certain measures are deployed. It highlights how, with care, heritage and landscape-led masterplanning can help to ensure a development to the north of the A38 and a portion (I) to the south west of the site, that might be delivered which minimises harm and positively responds to the immediate and wider heritage sensitivities. It identifies areas for strategic landscaping and an appropriate built form. There is however no such mitigation offered by the HEA in relation to a portion of the site on rising land (B) to the south of the A38. The impact on the significance of affected heritage from development here would therefore be notable, particularly in relation to the urbanisation of views from Ashton Court, Dundry and Bristol’s townscape where panoramic views are evident towards Dundry from the Suspension Bridge and Clifton & Hotwells Conservation Area. No doubt Bristol City Council may wish to comment on this significant cross-boundary matter. As the HEA was only completed in September, it may be understandable that its recommendations may not have informed, nor its advice, included in the Plan. To address this matter and ensure it can be demonstrated that the Plan has been positively prepared, is justified, effective and accords with national policy, we strongly recommend that modifications are undertaken. The North Somerset Green Belt Assessment (Stage 2) (October 2025) considers the contribution of the site to the five purposes of Green Belts. 1) To check the unrestricted sprawl of large built-up areas 2) To prevent neighbouring towns from merging into one another 3) To assist in safeguarding the countryside from encroachment 4) To preserve the setting and special character of historic towns 5) To assist in urban regeneration by encouraging the recycling of derelict and other urban land As with the HEA, it emphasises that the portion of the proposed allocation to the south of the A38 is the most significant. The assessment also considers that this parcel is the only portion of the greater site that could not, potentially, be defined as Grey Belt. The purpose of the Green Belt Assessment and of identification of potential Grey Belt is to allow for a consideration of more focused development on less valuable parts of the Green Belt and conversely safeguard those areas of Green Belt of particular significance. Consequently, due to the importance of conserving the historic environment in an appropriate manner to secure the delivery of sustainable development in accordance with national policy, we would recommend that the potion of the greater site on rising land (B) to the south of the A38 be omitted and other opportunities are considered, perhaps informed by an urban capacity study and Grey Belt assessment.			
Policy LP3: Strategic location:					The land east of Backwell is a large greenfield site in the Green Belt within the wider setting of a number of highly graded heritage assets including Tyntesfield House (Grade I), Tyntesfield Registered Park and Garden (Grade II*) and the Grade I listed churches at Wraxall	The HEA refers to two areas of the site marked as (B) that are of ‘high heritage sensitivity’ due to the		20251210 NSCLP Reg 19 response

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Nailsea and Backwell					and Backwell Church Town. The significance of the Grade II Listed Woolley's Farmhouse would also be directly affected. However, the HEA has indicated how, with care, a heritage-led masterplan could establish a sensitive layout and massing response to the existing topography and levels, locating development to the west of the site and away from the higher ground. This masterplan could illustrate how to utilise new and existing woodland and orchard planting to break up the development in views from Tyntesfield, Wraxall and Backwell Church Town. Figure 11 on page 115 of the HEA also illustrates the existing woodland that should be retained as a buffer to lessen intrusion on views from Tyntesfield. It indicates where buffers and a zone of vernacular development would be important. This response would go some way to limit the impact of the affected heritage assets and their settings. Without these mitigations we assume that the development would cause notable harm to the significance of numerous heritage assets affecting its suitability. The HEA refers to two areas of the site marked as (B) that are of 'high heritage sensitivity' due to the impact on the Backwell Farleigh Conservation Area and an intrusion on important views from Tyntesfield. It is unclear, but appears to imply, that development here should be avoided to limit unacceptable harm. It will be helpful for the council to clarify this matter to indicate whether the proposed allocation, and its capacity, could be justified, be evidence led and in accordance with national policy.	impact on the Backwell Farleigh Conservation Area and an intrusion on important views from Tyntesfield. It is unclear, but appears to imply, that development here should be avoided to limit unacceptable harm. It will be helpful for the council to clarify this matter to indicate whether the proposed allocation, and its capacity, could be justified, be evidence led and in accordance with national policy.		20251210 NSCLP Reg 19 response Dec 2025 RT.docx
Policy LP4: Strategic location: Pill and Easton-in-Gordano							The 'site requirements' on page 276/277 in the Plan appear to reflect to the HEA recommendations to positive respond and minimise harm to affected heritage assets.	20251210 NSCLP Reg 19 response Dec 2025 RT.docx
Policy LP5: Housing, employment and mixed use allocations					In our previous consultation responses, we emphasised the importance of presenting evidence to demonstrate how you had considered the potential impact of proposed allocations on the national planning objective of achieving sustainable development which protects and enhances the historic environment (NPPF paragraph 8). With the availability now of your Historic Environment Assessment it is apparent that several of the proposed allocations would affect the significance of designated heritage assets and their settings. That harm could however be minimised in many, but not all cases. I hope our comments can help you in the exercise of judging the suitability of these sites and or adjusting proposals to positively respond, and or minimise harm, as expected by legislation, national policy, guidance and specific advice prepared by Historic England.			20251210 NSCLP Reg 19 response Dec 2025 RT.docx
Policy LP11: Transport infrastructure, allocations and safeguarding					Due to the proximity of this proposed new road to Moorside Farmhouse Road and Wooleys Farmhouse, both Grade II Listed buildings, great care should be taken to limit the impact by a restrained and landscape led design response. Special regard must be had to the preservation of their setting in accordance with Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.			20251210 NSCLP Reg 19 response Dec 2025 RT.docx
Land off Pound Lane, Nailsea					As the Plan (Reg 19) was prepared prior to the completion of the HEA, its findings and recommendations may, understandable, not be fully reflected in the 'Site requirements' on page 267 of the Local Plan. For example, on page 93 of the HEA refers to the following mitigations: • a generous buffer of orchard planting around Jacklands Farmhouse and along the B3130, to reinstate a sense of the historic agricultural curtilage to the building and to retain a sense of separation between Nailsea and Stone-Edge Batch; • retain greenspace and include planning buffer, particularly at Moorend Spout, where the site	We strongly recommend the mitigations are reflected in the Plan.		20251210 NSCLP Reg 19 response Dec 2025 RT.docx

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					• abuts the Moorend Nature reserve, and is visible in distant views from Tickenham Church, and • create new, easily accessible views of Tickenham Church. We strongly recommend these are reflected in the Plan. To ensure any allocation is justified and addresses a legal duty under Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to “have special regard to the desirability of preserving” the settings of listed buildings, and the need to afford great weight to the conservation of designated heritage assets (NPPF paragraph 212), we feel it is appropriate for you to take account of the HEA “to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal” (NPPF paragraph 208). We note that the HEA may also not have been available to inform the Sustainability Appraisal.			
Land at Lodway Farm							The ‘site requirements’ on page 276/277 in the Plan appear to reflect to the HEA recommendations to positive respond and minimise harm to affected heritage assets.	20251210 NSCLP Reg 19 response Dec 2025 RT.docx
Land west of Hutton					This discrete site is adjacent to the Grade II Listed Grange Farmhouse and Hutton Conservation Area. The HEA indicates that even with a series of mitigations, there would still be a residual harm to the setting of the Farmhouse; that degree of harm is not defined. If the site is to be allocated the council will need to justify that harm and demonstrate it has afforded great weight to the conservation of the Listed Building consistent with paragraph 212 of the NPPF and Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.	If the site is to be allocated the council will need to justify that harm and demonstrate it has afforded great weight to the conservation of the Listed Building consistent with paragraph 212 of the NPPF and Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.		20251210 NSCLP Reg 19 response Dec 2025 RT.docx
Woodhill Nurseries					The proposed allocation site is directly to the south of the Cadbury Hillfort, a scheduled monument that was originally designed to be seen and to have surveillance over a wide area meaning that views to and from it in all directions are important. The site falls within the setting of the monument and contributes to its significance. The Plan does not however indicate whether and if so how 100 new homes could be delivered here within the setting of the monument without causing considerable harm. For the allocation to be justified and consistent with national policy further evidence needs to be presented and clear associated policy advice included.	The Plan does not however indicate whether and if so how 100 new homes could be delivered here within the setting of the monument without causing considerable harm. For the allocation to be justified and consistent with national policy further evidence needs to be presented and clear associated policy advice included.		20251210 NSCLP Reg 19 response Dec 2025 RT.docx
Land off Smallway, Yatton					The HEA identifies those heritage assets that would be affected and the relationship of the site to their significance. The urbanisation and erosion of the open rural setting to the Cadbury Hillfort scheduled monument and Grade II Listed Cadbury Farm is regrettable. However, the HEA has demonstrated how, with great care, the degree of harm can be reduced via a heritage-led masterplan to establish a sensitive layout and massing in response to the existing topography and levels, locating development to the north and west of the site as far as possible, and the introduction of a generous landscape buffer along Smallway to the east as articulated in figure 8 on page 75. It is recommended this specific mitigation in the HEA is referred to in the Plan.	It is recommended this specific mitigation in the HEA is referred to in the Plan.		20251210 NSCLP Reg 19 response Dec 2025 RT.docx

Name: Holger Laux, Dundry **I.D:** 31003713

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Dundry	Yes		Yes	No	I am writing to you with regards to a specific element in your plan that has only come to my knowledge now. Perhaps I should have seen it earlier but it did not catch my attention in the wealth of documents supporting the plan. I also feel that I should have been contacted about this issue because it affects me personally and I therefore would like to contest it under the "Meet the Duty to Cooperate" test. This is with regards to the 2022 Settlement Boundary Review, now part of Schedule 5. I live in the village of Dundry within the southern settlement area. I note that two of my neighbours are potentially going to benefit from an adjustment to the boundary that will in the future include their large back gardens (marked on your map as "6"). The justification is that this is for "Inclusion of dwellings and curtilages" and apparently it was assessed in particular that the following part of the rules: "Where large gardens on the edge of settlements are currently part of the Green Belt they will be excluded from the settlement if potential development would harm openness and the purposes of the Green Belt" does not apply to their properties. I own the triangular piece of land to the east of this extension. Up to now, I fully accepted that it is part of the Green Belt and I had no intention of building on it. This is also the reason why this change did not catch my attention. However, with the proposed extension over my neighbours' properties, my piece of land will then form an odd "wedge" of Green Belt into the settlement area. Moreover, it is not really part of the Green Belt openness as it is fenced and walled in from all sides. It is also close enough to my home to be considered part of my garden. At the moment, it looks not much different from my neighbours' plots. If such a change in the boundary is being considered, it would make much more sense to draw a straight line from the south eastern corner of Lakedene towards the back of Crabtree Close (see map attached). The dry stone wall and field gate along this line form a very obvious and visible boundary, if - for instance - you were taking the public footpath coming towards us over the fields from the east. I also own the access lane to my and my neighbours' properties, coming from Crabtree/Winford Lane in the north. It has very specific and limited rights of way. If my neighbours ever decided to build houses in their now included gardens, I will come under pressure to grant additional access rights and would have to accept an increased amount of traffic and need for maintenance. I feel it would be unfair (and perhaps in respect of your criteria for soundness "not justified") being expected to help them and watch them build houses on their land while I would be specifically prevented from doing the same on mine. I would therefore like to request a further adjustment to the boundary to include my piece of land. I realise this comes rather late in your planning process. I do not know whether you contacted my neighbours about the proposed change, but if you did, you should certainly have spoken to me as well. Hence my complaint about meeting the duty to co-operate. If somebody does find the time to come out to Dundry and look at the situation on the ground, I will be more than happy to meet you.	I would therefore like to request a further adjustment to the settlement boundary at Dundry to include my piece of land.		Schedule 5 - Dundry Settlement Boundary - Proposed Change to item 6.jpg View from the open field.jpg

Name: Home Builders Federation **I.D:** 9138657

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Vision, Strategic Priorities and Sustainability Objectives	No	• Justified • Effective • Consistent with national policy			The Plan does not include a Housing Trajectory as such is not considered to be sound as it is not justified or effective or in compliance with national policy. A Housing Trajectory needs to be provided which shows as a	The wider housing context Although we note the recent changes to national planning policy removes the Duty to Cooperate requirement, good planning still requires collaboration across boundaries for effective plan-making. HBF notes that the significant interaction between housing issues across the wider Bristol housing market remain and are still not being adequately addressed. The LPAs that make up the former county of Avon- Bristol City, South Gloucestershire, North		North Somerset 2nd Reg 19 Dec 25.docx

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					minimum the site-by-site breakdown of housing delivery over the plan period. This must also link into the Monitoring Framework.	Somerset and Bath and North-East Somerset (BANES) have a long and unfortunate history of unsuccessful collaboration around plan-making, which has led to the housing needs of the City Region being unmet for many years. We remain concerned that this Plan is not doing enough to overcome this history of under-delivery and demonstrates a lack of cooperation around planning for housing that results in a failure to properly plan for the both the North Somerset and wider area. HBF remain concerned that this plan will not deliver against the national, regional and local housing objectives, which are even more important as we are in the midst of a housing crisis. HBF note that the Plan for North Somerset is still being prepared against a complete absence of joined-up local plan making for the City-Region. Following the abandonment of the West of England Joint Spatial Plan it was hoped that the strategic planning context for the Bristol Local Plan would be set out in the West of England Combined Authority Spatial Development Strategy. However, this is now also not being progressed and therefore there is no established wider strategic planning context for the wider Bristol HMA, which includes parts of North Somerset. This is despite Bristol having a long established unmet housing need. HBF recognise the challenges facing Bristol City in being part of the wider Bristol HMA. We have seen in the past how the closely bounded nature of the City, the challenges of Green Belt release, and the ongoing, fractious and controversial debates around the level of housing need and unmet in the City have created difficult relationships with neighbouring authorities. These factors however must be reasons to work harder at collaboration and good plan-making and not excuses for a failure to meet housing need. We therefore agree there are exceptional circumstances that justify the release of Green Belt sites within North Somerset, and indeed would support Green Belt release. North Somerset Council should be aware that HBF has objected to the proposed approach that Bristol City is proposing to take in relation to its housing need because the policies are inconsistent with national policy, ineffective, unjustified, and therefore unsound. HBF are very frustrated by the neighbouring authorities' failures to recognise and address these needs through their own plans, and as such HBF continue to be concerned this issue is remaining not fully addressed including in this North Somerset Reg 19 Plan, on this basis, as set out in our representations. HBF are very concerned that there remains an unmet need generated from within Bristol which neighbouring authorities are not looking to meet through their Local Plans. This is evidence of a failure of joint-working and Cooperate and effective plan-making. In our previous Reg 19 response we noted that as part of the Bristol Local Plan Reg 19 consultation the City have prepared cross-boundary issues statement, Appendix 1 of which is the letter sent from Bristol City Council to Bath and North East Somerset Council, South Gloucestershire Council and North Somerset Council, dated 31 October 2023. HBF have been unable to locate any evidence that shows North Somerset Council's response to this letter, but the policies in the North Somerset Plan indicate no action is being taken by North Somerset to explore or address the issues raised by Bristol. For the North Somerset Plan to be completely silent on these issues means it is ineffective, unjustified and contrary to national policy. Legal compliance		

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						Missing evidence In our previous Reg 19 we raised concerned that Regulation 19 consultation version on the Plan was not been accompanied by all the necessary evidence. For example, one of the frustrations of the HBF's members is the lack of housing land data allowing transparency in the methodology underpinning the housing methodology. A Residential Land Survey Report to April 2023 has been long delayed and is, at the time of that consultation was still unavailable. Such established and normally expected evidence is key to the preparation of the Local Plan and the formulation of robust and sound policies which is necessary to ensure that the North Somerset Plan is founded on a justifiable strategy. The Council's Spatial Strategy and Capacity Report is simply no substitute. There was no clear reason why this information is not available and there is no clear justification as to how a Local Plan can progress to Regulation 19 consultation without it. HBF also had concerns about the timelines of some of the evidence that has been made available. Some of the reports and evidence which should have been informing the development of policy and strategy appear to have been being prepared at the same time as the previous Reg 19 Local Plan was progressing through the Council's governance processes. We still remain unclear if and how this As such HBF would question if and how the findings of such report can have fed into both the Plan-making process, and elected members consideration of the Plan. HBF would request further information is provided on this matter to show that due process has been followed. Need to reflect new Government Policy It will also be important for the Council to consider the provisions to the Biodiversity Net Gain (BNG) and Guidance which are expected imminently. HBF would suggest that revisions to the Plan may be needed before its submission to reflect this latest guidance and we would suggesting additional time for considering the implications of this new guidance would be useful. HBF would strongly welcome further consultation on this issue. We believe BNG should be a significant factor in emerging Local Plans and may require additional research, evidence work, policy and guidance of it to be made to work in practice. Plan-making is the appropriate stage for many BNG issues to be considered and we therefore suggest that the North Somerset Plan need to be reviewed and revisited to ensure that it is doing all it can to support the delivery of the national mandatory BNG policy through providing clear advice guidance and, wherever possible, certainty for developers and landowners and communities on what is expected. Need for a shared approach to unmet need Bristol City Council as part of their Reg 19 Local Plan consultation have published a paper entitled 'planning for strategic cross boundary matters: progress report', dated (Nov 23). This appears to be a statement from the Bristol Council acting individually, rather than an agreed joint approach to planning in the wider Bristol area with the benefit of express support for the neighbouring authorities, which would be expected under the Duty to Cooperate. A comprehensive and agreed statement would seem to be an essential requisite for plan-making in the Bristol City Region, especially as the Bristol Plan envisages much of the housing need for Bristol City being met outside of the City boundary in neighbouring authority areas. Despite the change to the Duty to Cooperate HBF would still have expected to see a clearly set out agreed approach, or at the very least a Statement of		

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						Common Ground setting out if there was an agreement on how the unmet housing need of Bristol are to be addressed. The failure of this Plan to even mention this issue is greatly concerning. North Somerset's position in this regard needs to be clearly set out in evidence and should be explicitly referred to in the Plan. For the housing policy and justification to make no reference at all the formal request from Bristol to accommodate some of its unmet housing need and what the Council has done, and not done as a result, fails to comply with the requirements for both good plan-making and the Duty to Cooperate. HBF note that the consultations on neighbouring authorities Local Plans suggest there is no consensus or agreement on the approach that should be taken to address the constrained nature of Bristol City Council area and the challenges it facing bringing enough housing development forward. Instead of working together, Bristol's neighbouring authorities seem to be actively seeking to minimise their own housing numbers, and certainty do not seem to be accepting of, or seeking to plan, for any additional housing to help met the wider needs of the Bristol City Region. This is an unsound approach to plan-making and does not reflect the Government ambitions to deliver 1.5 million new homes within this Parliament. HBF note that in other areas, such as Leicestershire, joint working on the issue of housing needs has resulted in agreed approaches, Statements of Common Ground and Memorandums of Understanding around the challenges Leicester City faces in seeking to meet its own need within its tightly drawn boundary. There is an agreement amongst the Leicestershire authorities that they should play their part in meeting this need, and discussions have been ongoing as to the re-distribution of this unmet need between the partners. Sizable efforts and a large amount of joint working has been undertaken by the Leicester and Leicestershire authorities to try and reach agreement. Efforts, which are sadly lacking from the Bristol city region authorities. HBF also notes, perhaps even more significantly that emerging Local Plans in Leicestershire are including an element of unmet housing need from Leicester within their housing requirement. HBF is disappointed that such joint working has proved impossible with the wider Bristol area, and this has served to undermine positive plan-making and meeting housing need. As well as creating unsound plan, the failure to address housing needs in the midst of a housing crisis is having, and will continue to have, social, economic and environmental consequences for the Bristol City region. Problems with the formatting of the policies and text HBF also offers a general observation around a problem that would affect the usability of the Plan. It its current format the Plan with create problems for plan users when seeking to refer to the policies and supporting text, particularly applicants and decision-takers. We note that all the policies are just written as a list of bullet points with no identifying numbering or lettering. The paragraphs of supporting text are also not numbered. This will make it very difficult for a developer, a planning officer, an elected member, or a member of the public to make specific reference to a particular part of the policy or text when preparing a planning application, writing a report, making a decision or making a representation on a planning application. The policies should be reformatted to improve the usability of the whole Plan. As currently written the Plan will be difficult to use and therefore ineffective, failing the tests of soundness. As we raised this issue at the previous Reg 19 stage it is disappointing to see it has not been addressed already.		

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						Plan Period The Plan identifies a Plan period to 2041. The NPPF states strategic policies should look ahead over a minimum 15-year period from adoption and that where larger scale developments form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery. HBF considers that the Council may want to be looking to prepare a new Local Plan that will look forward to 2042 as minimum to ensure that it covers the 15-year period. Whatever plan period is chosen there is a need for evidence to cover the whole plan period, it would therefore be sensible to ensure the evidence covers a longer time frame as well.		
Strategic Policies	No	• Justified • Effective • Consistent with national policy				HBF is concerned that the distinction that has been made between Strategic Policies and non-strategic policies is unclear. At the very least the term strategic policy, not the prefix SP should be used to identify each strategic policy. HBF is also concerned that the distinction between Strategic and non-strategic policies reflects a misunderstanding of the purpose of such a distinction and how this relates to planning applications and planning appeals. Some of the Strategic policies seem to be statements of intent or ambition and/or are merely foreshadowing detailed non-strategic policies later in the Plan. The wording of policy should set out what developers need to demonstrate in order should compliance with the policy. HBF request that Council revisits the wording of all the strategic policies. HBF suggest that any policy wording that does not assist a planning applicant or a decision-maker should be removed from policy and moved to the supporting text, or just deleted. The current approach to Strategic Policy identification is ineffective and therefore unsound. Vision, strategic priorities and sustainability objectives HBF suggest that the role of new housing in delivering sustainable development should be more explicitly recognised within the vision itself. HBF suggests that further consideration should be given to the role and benefits of new housing development within the Plan, and the Vision should be updated to reflect this. No reference is made within the Strategic Priorities to meeting the housing needs of the area in full. This should be a key objective of any Local Plan. There is a need for the Plan to better recognise the contribution is can and should be making to the ambitions to deliver 1.5 million new homes within this Parliament. The Plan should more explicitly recognise the role of open market housing in meeting the housing needs of the area.	The Plan does not include a Housing Trajectory as such is not considered to be sound as it is not justified or effective or in compliance with national policy. A Housing Trajectory needs to be provided which shows as a minimum the site-by-site breakdown of housing delivery over the plan period. This must also link into the Monitoring Framework.	North Somerset 2nd Reg 19 Dec 25.docx
SP1: Sustainable Development	No	• Effective					Policy SP1 is not considered to be sound as it is not effective. HBF suggest that it is difficult to see how a developer would show compliance with this policy. This policy appears in fact to be just an overarching statement that merely outlines issues already dealt with by other more specific policies located elsewhere in the Plan. It would be more usual for this	North Somerset 2nd Reg 19 Dec 25.docx

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							kind of overarching policy to include reference to how planning applications would be determined, including a reference to the policies in the Plan and other material considerations. As currently written this policy is not a policy and as such should be deleted, and it is unclear how a developer would show compliance with it. However, HBF recognise that an overarching policy on sustainable development could usefully set out that applications should accord with the policies in the plan, and that where applications do not comply with the plan applications could be refused unless other material considerations indicate otherwise. HBF would be supportive of such a policy.	
SP2: Climate Change		• Justified • Effective				Policy SP2 is not considered to be sound as it is not justified and not effective. This policy fails to provide any criteria against which a development proposal could be assessed. For example, the policy seeks a reduction in greenhouse gases but doesn't specify by how much, it seeks maximum water re-use and minimal energy use but no reference is made to any targets. As it is unclear what the Council means in terms of these maximum and minimums, and the Plan provides no policy, advice or guidance on what evidence would be required to show compliance, the policy is both unjustified and ineffective and should be deleted. HBF believe the issues flagged within this policy are already adequately addressed in other policies within the Plan, our comments on those particular matters such as energy efficiency and net zero can be found in our response to those particular policies, and as such are not repeated here. Although HBF recognise the role that house builders have to play in helping to address climate change significant work has been undertaken nationally, including through the Future Homes Hub, to establish a realistic timetable for achieving net zero. In seeking to go further and faster through Local Policies, Local Plan would create a patchwork of 360+ different policies which in fact risk undermining the delivery of this wider national policy objectives.		North Somerset 2nd Reg 19 Dec 25.docx
SP3: Spatial strategy	No	• Justified • Effective • Consistent with national policy					Policy SP3 is not considered to be sound as it is not effective, justified or consistent with national policy The wording of this policy is not a policy but rather a statement of intent, as such this policy is ineffective and unjustified. This policy fails to	North Somerset 2nd Reg 19 Dec 25.docx

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							provide any criteria against which a development proposal would be assessed. This policy is just some high level wording about the factors that have informed the spatial strategy the Council has chosen, it is not a policy and should be moved into supporting text. The actual Spatial strategy of the Plan is set out in Policies SP5: Towns and SP6: Villages and rural areas, and the site allocations. In relation to the substantive matter of whether the spatial strategy chosen is the correct one, the fact the Plan as a whole, and the spatial strategy policies (when taken together) are silent on the issue of Bristol's unmet need, means the Plan is failing comply with national policy requirements for neighbouring authorities to consider requests from neighbours who cannot meet their own housing needs in full. In both failing to recognise this issue, and in failing plan to meet some of Bristol's unmet housing need, the housing policies and spatial strategy in this Plan are not effective, justified or consistent with national policy, and therefore unsound. HBF believe that the need for the North Somerset Plan to increase its housing requirement to include some of Bristol's unmet need both necessitates the need for a comprehensive Green Belt review and also provides the exceptional circumstances necessary to justify the release Green Belt land for housing allocations. HBF would wish to see the plan amended to reflect this reality.	
SP4: Placemaking	No	• Justified • Effective • Consistent				Policy SP4 is not considered to be sound as it is not effective, justified or consistent with national policy Again, this policy fails to provide clear criteria against which a development proposal could be assessed. For example, the policy wording refers to the		North Somerset 2nd Reg 19 Dec 25.docx

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		with national policy				National Design Guide and other national advice, without specifying what this other national advice is. HBF suggest that it is difficult to see how a developer would show compliance with this policy. The wording of where appropriate needs further definition. Similarly, it is unclear when an application will need to go to a Design Panel.		
SP5: Towns	No	• Justified • Effective • Consistent with national policy				Policy SP5 is not considered to be sound as it is not effective, justified or consistent with national policy Although HBF does not comment individual housing allocations we would expect the housing land supply, including the sum of all the allocations, to meet the housings of North Somerset in full, including a contribution to meeting the unmet housing needs of Bristol. As this is not the situation in the case of this Plan, HBF argue additional allocations and enabling windfall policies are needed. The Plan should be amended to include additional housing allocations to fully meet the revised housing requirement HBF are requesting. Failure to do so means the Plan is not effective, justified or consistent with national policy, as national policy requires Local Plans to set an appropriate housing requirement and then to plan to meet that housing requirement, including considering the issue of any unmet need from neighbouring authorities.		North Somerset 2nd Reg 19 Dec 25.docx
SP6: Villages and rural areas		• Justified • Effective • Consistent with national policy				Policy SP3 is not considered to be sound as it is not effective, justified or consistent with national policy Although HBF does not comment individual housing allocations other than to say the Plan should provide for a wide range of deliverable and developable sites across the area in order to provide competition and choice to ensure that housing needs are met in full. HBF would wish to see the Plan set out a logical settlement hierarchy which meets all the housing needs and addresses all areas of the housing market, with a range of sites proposed for allocation. The soundness of strategic and non-strategic site allocations, whether brownfield or greenfield, will be tested in due course at the Local Plan Examination. We would expect the housing land supply, including the sum of all the allocations, to meet the housing requirement of North Somerset in full, including a contribution to meeting the unmet housing needs of Bristol. As this is not the situation in the case of this Plan HBF argue additional allocations and enabling windfall policies are needed. The spatial strategy of the Plan should also recognise that there may be clusters of villages that provide a range of services for that area within reasonable travelling distance of each other, so villages may need to be grouped together. These areas might be able to sustainably support a substantial level of development but may not have all the services within one particular village. Similarly, the Local Plan should recognise that settlements that currently do not have services could expand to include those services if new development is allocated in those areas. The current range of village services should not be used as a basis for only locating development close to existing services, it could in fact also identify where services could be improved through new development. Allocating housing sites in rural areas can also provide opportunities for small sites which are particularly helpful for SME builders. For the North Somerset Plan to be effective there is, we agree that there is a clear need for Green Belt release both within Bristol's boundary and beyond them in order to meet the housing needs of the Bristol HMA. Failure to do so with hinder the growth, development, recovery and renaissance of the Bristol		North Somerset 2nd Reg 19 Dec 25.docx

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						City Region, contrary to government policy. In relation to the villages and rural areas, HBF believe the current housing crisis and inability of Bristol to meet its own housing needs provides the exceptional justification necessary to review a comprehensive Green Belt review, including for the Green Belt in North Somerset. This should be in addition to meeting North Somerset's own needs. HBF supports the need for additional housing allocations including in villages and rural areas, including both greenfield and Green Belt sites. This must be in addition to the requirement for North Somerset Council also meets all if its own housing need in full. HBF request that the Plan is amended to include additional housing allocations to fully meet the housing requirement for North Somerset, a requirement which HBF believes itself should be increases for various reasons, set out more fully in our response to the Policy SP8 Housing. To be effective the policy should also include a list of villages, in the same way the four towns are listed in Policy SC4. Plan users should not have to consult the policy map to see which locations are villages.		
SP7: Green Belt	No	• Justified • Effective • Consistent with national policy				Policy SP7 is not considered to be sound as it is not effective, justified or consistent with national policy Although HBF do not comment on sites, we so agree with the Council, and that there is justification for the releases of Green Belt land for development. Although HBF support the allocation of land within the Green Belt for housing, we object to this policy as additional sites within the Green Belt are needed. HBF believe that in light of the housing requirement of North Somerset needing to be higher, a full green belt review is required along with the further Green Belt releases. HBF believe the exceptional circumstances of the housing crisis and the need to fully meet the housing needs of the area justify additional Green Belt releases and further housing allocations. HBF request that this policy is amended to include additional sites for housing.		North Somerset 2nd Reg 19 Dec 25.docx
SP8: Housing	No	• Justified • Effective • Consistent with national policy				Policy SP8 is not considered to be sound as it is not effective, justified or consistent with national policy The NPPF is quite clear that the standard method should be used a starting point unless there are exceptional circumstances that justify a different approach. HBF do not believe there are any such exceptional circumstances exist that would warrant a different approach than the standard method being used for North Somerset. HBF see no evidence or justification not to plan for the standard method housing number, indeed in HBF's view the Council should in fact be considering if there are any factors, which justify a higher figure. HBF believe the standard method should be used at the starting point setting the housing requirement, but that the unective in meeting housing need of wider Bristol area. For North Somerset this should include making a contribution to Bristol's unmet housing need. 49. The current approach proposed in the Plan is not justified or supported by the evidence and runs counter to the government's ambition to do more to address the housing crisis. As such the plan fails to comply with national policy in relation to housing. Incorrectly constraining housing numbers will impact on not just open market housing delivery but also impact the size, and type of housing that can be provided within North Somerset and undermine the delivery of affordable housing.		North Somerset 2nd Reg 19 Dec 25.docx

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						The Government has made it clear that it still supports the national target of 300,000 new homes per year. However, the standard method housing requirement has always been only the starting point for setting the housing requirement in a Plan. Indeed, HBF would support more housing than the standard method housing requirement in order to support economic growth, provide a range and type of sites and to support small and medium house builders. There is a need to provide a range and choice of sites, a need for flexibility and viability considerations to be taken into account and a need for the Council to consider whether higher levels of open-market housing are required in order to secure the delivery of affordable housing and/or support economic growth. HBF does not comment on individual sites, other than to say the Plan should provide for a wide range of deliverable and developable sites across the area in order to provide competition and choice to ensure that housing needs are met in full. HBF would wish to see the Plan set out a logical settlement hierarchy which meets all the housing needs and addresses all areas of the housing market, with a range of sites proposed for allocation. The soundness of strategic and non-strategic site allocations, whether brownfield or greenfield, will be tested in due course at the Local Plan Examination. Our detailed comments on the spatial strategy can be found in Chapter 4. However, in light of the need for a higher housing requirement the spatial strategy may need to be revisited in order to reflect and enable the additional housing allocations required to meet the full housing requirement of North Somerset. HBF remain concerned that neighbouring authorities are actively seeking to minimise their own housing numbers, and certainty not being accepting of, or seeking to plan for, any additional housing too help met the wider needs of the Region. This is an unsound approach to plan-making and a failure of North Somerset's Local requirements for effective plan-making. The failures of the previously envisaged joint working across the wider Bristol area must not create a context where planning to meet housing need ends up simply in the too difficult box. This can not be effective plan-making. The Need for an Annualised Housing Requirement The plan-led system requires Council to proactively plan to meet the needs of their community. This means that there is a need to provide a range and choice of sites, a need for flexibility and viability considerations to be taken into account, and a need for the Council to consider whether higher levels of open-market housing are required in order to secure the delivery of affordable housing and/or support economic growth. The plan should therefore be delivering more. The Need to address Bristol's unmet need HBF sympathise with the Council's challenge in preparing a Local Plan for North Somerset in the absence of a wider Bristol HMA Plan which HBF agree would represent a better way to ensure the housing needs of Bristol are addressed. The lack of a strategic plan for the wider HMA presents many challenges for plan-making in the area, but none of these are justification to fail to set the housing requirement at the right level, or to ensure that the Council is doing all it can to meet its own needs within its own boundaries, including through Green Belt release and ensuring maximum efforts are made to work collaboratively across the wider Bristol HMA so the needs of Bristol		

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						that cannot be met within the City boundary are adequately planned for as close to where they occur as possible. Without this range of actions the Plan is failing to meet the housing needs as required by the NPPF and therefore fails to be justified or effective, meaning the Plan is unsound. The NPPF requires that Local Planning Authorities to embrace the standard method as a starting point, then go through a process of setting the housing requirement including considering if it should be higher. LPAs must arrive at evidenced and justified view of what their housing requirement should be. In the case of North Somerset this much include recognition Bristol City's housing requirement and their work on development capacity. HBF agree that robust process must be undertaken to arrive at figure for much Bristol City housing requirement and to reach an understanding of how much of that housing need can be met within Bristol City. If all the housing need cannot be met within Bristol the Council, then the resulting 'unmet needs' should be cause for Bristol City Council and its neighbouring authorities working in partnership to see how this unmet need could be addressed elsewhere. North Somerset's housing requirement should therefore include a specific and explicit contribution towards meeting some of Bristol City's unmet need. The Council's failure to follow to this approach is unsound. The housing requirement calculations for all the neighbouring authorities around Bristol including the North Somerset Plan should include a component towards meeting Bristol's unmet need. Failure to grasp this issue results in ineffective plan making that holds back growth and prosperity of Bristol City Region. The Need for Small Sites The NPPF also requires Local Plans to identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare, unless there are strong reasons why this cannot be achieved. The HBF has undertaken extensive consultation with its small developer members. One of the chief obstacles for small developers is that funding is extremely difficult to secure without a full, detailed, and implementable planning permission. Securing an implementable planning permission is extremely difficult if small sites are not allocated. Without implementable consents lenders are uneasy about making finance available or the repayment fees and interest rates they set will be very high. Small developers, consequently, need to invest a lot of money and time up-front in the risky business of trying to secure an allocation and a planning permission, and this is money that many small developers do not have. In order to be effective and justified the Plan's policies and evidence base should set out how the plan will deliver 10% of homes on sites of less than one hectare, as required by the NPPF. Indeed, HBF would advocate that a higher percentage of small sites are allocated if possible. Such sites are important for encouraging the growth in SME housebuilders who will tend to develop these sites but rarely see the benefits that arise from the allocation of sites in a local plan. Up until the 1980s, small developers once accounted for the construction of half of all homes built in this country resulting in greater variety of product, more competition, and faster build-out rates. Since then, the number of small companies has fallen by 80%. Although small sites may come forward as windfall, HBF believe that in order for the Plan to be effective and justified the small sites requirements should be met through allocations. Windfall Allowance		

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						The NPPF (para 71) only permits an allowance for windfall sites if there is compelling evidence that such sites have consistently become available and will continue to be a reliable source of supply. By including windfalls within the Plan's housing requirement, the opportunity for windfalls to provide some additional housing numbers is removed. Windfalls do not provide the same choice and flexibility in the market as additional allocations. HBF are of the view that any allowance for windfall should not be included until the fourth year of a housing trajectory, given the likelihood that dwellings being completed within the next three years will already be known about (as they are likely to need to have already received planning permission to be completed within that timeframe). HBF are also of the view that any buffer provided by windfall sites should be in addition to the buffer added to the housing need figures derived from the Standard Method to provide choice and competition in the land market. HBF request the windfall allowance in the Plan is properly explained and evidenced in the Housing Trajectory.		
SP9: Employment	No					Policy SP9 is not considered to be sound as it is not effective, justified or consistent with national policy HBF believes the Plan needs to do more to recognise the links between housing and employment and the impacts that failing to provide to properly plan for housing will have on the economic performance and competitiveness of Bristol City Region. HBF believe that higher housing numbers are needed for a variety of reasons including addressing the current housing crisis, meeting housing need, providing affordable housing and supporting employment growth. There is therefore a need to more fully consider future housing in conjunction with the Plan's strategy for employment. HBF also suggests there is a need for a clearer link and explanation between the spatial strategy, housing and employment allocations and the topic specific policies later in the Plan. Such matters need to be considered on an area by area basis that fully recognises the links between housing policy and employment policy. Employment allocations and opportunities within a particular housing market area could give rise to an additional housing need that should be accommodated within that area. The failure to provide new housing close to where people work results in longer commuting times, less sustainable patterns of development and harms the economic performance of an area. What is needed is a plan that plans effectively for the housing and employment growth within the North Somerset. Otherwise the Plan is not consistent with national policy, is not positively prepared, not effective and not justified, and as such it is unsound.		North Somerset 2nd Reg 19 Dec 25.docx
SP11: Historic and natural environment	No	• Justified • Effective • Consistent with national policy				Policy SP11 is not considered to be sound as it is not effective, justified or consistent with national policy The simple reference to securing biodiversity net gain fails to reflect the national mandatory requirement for 10% Biodiversity Net Gain that is currently being introduced by the Government. The final Statutory Instruments to enable the mandatory BNG requirements in the Environment Act have now been laid before Parliament, and the policy went 'live' on Feb 12th 2024. A vague reference to BNG is therefore ineffective and the policy should instead make specific reference to the 10% mandatory Biodoversty Net Gain. Without such clarification the Plan will not be consistent with current		North Somerset 2nd Reg 19 Dec 25.docx

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						national policy. However, as we have already mentioned the BNG Guidance is currently under review so it will be important that the Plan reflects the most current DEFRA and MHCLG policy and guidance on this issue. This serves as a further example of the structural problem of the Plan in having vague and unspecific and unnecessary overarching policies when the detail is located elsewhere in subject specific policies. Again, HBF questions what this overview policy adds to the Local Plan and what developers could do to show compliance with it, when it is so vague and nonspecific. HBF suggests this policy could be deleted in its entirety as the Plan itself set out the matters around the historic and natural environment are already covered in twelve other main policies listed at the end of this section.		
Policy LP5: Housing, employment and mixed use allocations	No	‣ Justified ‣ Effective ‣ Consistent with national policy			Policy LP5 is not considered to be sound as it is not effective, justified or consistent with national policy.	Although HBF do not comment on specific site allocations, we find this policy is unsound because additional housing allocations are required. We are of the view, for the reasons details elsewhere in our representation, so not repeated here, there need to be more housing allocations. HBF are also surprised that the Council has chosen not to include a list of the housing and employment allocations within the wording of this policy. Doing so would greatly assist the usability of the Plan and assist with the housing monitoring. Monitoring of the Plan, particularly housing delivery, will be needed and it is important that this is as effective as possible, other the Plan will be unsound.		North Somerset 2nd Reg 19 Dec 25.docx
Policy LP9: Extent of the Green Belt	No	‣ Justified ‣ Effective ‣ Consistent with national policy				Policy LP9 is not considered to be sound as it is not effective, justified or consistent with national policy Although we support the release of Green Belt sites for housing in North Somerset, HBF are of the view, for the reasons detailed elsewhere in our representation, and so not repeated here, that the Council need to undertake a full Green Belt review and allocate more sites for housing, including possibly some more sites within the Green Belt.		North Somerset 2nd Reg 19 Dec 25.docx
Policy LP10: Strategic gaps	No	‣ Justified ‣ Effective ‣ Consistent with national policy				Policy LP10 is not considered to be sound as it is not effective, justified or consistent with national policy HBF are of the view, for the reasons detailed elsewhere in our representation, and so not repeated here, that the Council need to allocate more sites for housing, including possibly some within Strategic Gaps.		North Somerset 2nd Reg 19 Dec 25.docx
Policy DP1: High quality design	No	‣ Consistent with national policy				HBF reiterates its general observations around the problems created by the current format of the Plan. The failure to include paragraph numbers and/or identifying numbers and/or lettering within the policy, and the supporting text, will create problems for plan users when seeking to refer to Plan, particularly for applicants and decision-takers. We note that policies are just written as a list of bullet points with no identifying numbering or lettering. The paragraphs of supporting text are also not numbered. This will make it very difficult for a developer, a planning officer, an elected member, or a member of the public to make specific reference to a particular part of the policy and text when preparing a planning application, writing a report, making a decision or making a representation on a planning application. The policies should be reformatted to improve the usability of the whole Plan, as currently written the Plan will be difficult to use and therefore ineffective, failing the tests of soundness. Policy DP1 is not considered to be sound as it is not consistent with national policy		North Somerset 2nd Reg 19 Dec 25.docx

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						The wording of this policy is seeking to give Local Plan policy status to SPD which is contrary to national guidance. Planning policy must be made through the Local Plan process. This is subject to mandatory requirements for public consultation and independent scrutiny through the Examination process. Seeking to give Local Plan status to the existing SPDs is not appropriate. Any reference to the SPD should be moved to the supporting text.		
Policy DP6: Net zero construction	No	• Justified • Effective • Consistent with national policy				Policy LP6 is not considered to be sound as it is not effective, justified or consistent with national policy It would appear that the Council have sought to move away from the carbon reduction methods set out in Part L of the Building Regulations. HBF supports the Council in seeking to minimise carbon emissions and reduce heat and power demand through energy efficient design. However, the HBF does not consider that the Council setting its own standards is the appropriate method to achieve these outcomes. Whilst the ambitious and aspirational aim to achieve zero carbon is lauded, the HBF is concerned that the Council is adding to the complexity of policy, regulations and standards that housebuilders are already expected to comply with. The key to success is standardisation and avoidance of individual Councils specifying their own policy approach, which undermines economies of scale for product manufacturers, suppliers and developers. The impact of this requirement along with others in this Plan may have considerable viability implication and may lead to the non-delivery homes and needs to be fully considered within the Viability Assessment. HBF would caution against policies that seek to go further and faster than national legislation and policy changes, which would lead to the creation of a patchwork of differing local policies which could inadvertently undermine the delivery of the wider environmental objectives the Council is seeking and create unnecessary delays to much needed new housing. HBF would highlight the latest publication ‘Future Homes, One Plan Building a generation of high quality, affordable and sustainable homes and communities, together’ https://irp.cdn-website.com/bdbb2d99/files/uploaded/Future%20Homes%20One%20Plan_Future%20Homes%20Hub%20Prospectus-%20FINAL%20WEB.pdf. This was published in Nov 2023 and highlights what actions are needed to support the delivery of sustainable homes. In particular HBF, would highlight ‘Issue 9. The Partnership Imperative’ on page 15 which states in the Local Government section that “Local planning requirements must align with the overall plan for improving performance standards at national level. For example, avoiding divergence of local energy standards that make it harder to accelerate improvement in standards at national level, and avoiding conflict between local planning conditions and new requirements of building regulations.” This policy also states that proposals for major residential development will need to be supported by an Embodied Carbon Assessment that demonstrates a score of less than 750 CO2e/sqm. HBF considers that if the Council is to introduce a policy in relation to embodied carbon it will have to closely consider how it will be monitored and what the implications are for the preparation of any assessment, particularly in relation to how easily accessible any data is, and that it will have to take into consideration that much of the responsibility for emissions will lie in areas outside of the control of the homebuilding industry, including material extraction and transportation, occupation and maintenance, demolition and disposal. The Council will also		North Somerset 2nd Reg 19 Dec 25.docx

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						have to consider how the policy will interact with other policies for example in relation to energy efficiency or resilience to heat, as well as the viability and delivery of development. HBF considers that if this policy were to be introduced then the Council should provide a transitional period to give the industry time to adjust to the requirements and for the supply chain to be updated or amended as required. The Plan also seeks to require development to ensure an estimated water consumption of no more than 110 litres/person/day. HBF note that the level of customer experience starts to get affected at 100 litres per dwelling and below. Furthermore, there are examples of schemes around the country where once water usage begins to get too low there becomes a secondary issue of odour, air quality and human health as the piped systems aren't getting enough volume to run through and cleanse the system. Pipes need a certain volume of water to flush everything through, otherwise if the effluent is not getting cleared and if 'solids and matter' are just sitting dry in pipes this can cause air quality issues and nuisance to residents. HBF would strongly question the that as Building Regulations already address this issue, there is no need for further policy in the Local Plan on this matter.		
Policy DP8: Efficient use of land	No	• Justified • Effective • Consistent with national policy				Policy DP8 is not considered to be sound as it is not effective, justified or consistent with national policy The policy seeks a minimum target density of be 40 dwellings per ha. HBF are unclear if this requirement has been revisited taken into account, he requirements for on-site BNG and how this has links into viability. HBF note that the plan acknowledges that "in many locations there will be a range of factors such as ecological, green infrastructure or heritage considerations which will influence the proposed density." However, there will also be an impact on viability that needs to be considered.		North Somerset 2nd Reg 19 Dec 25.docx
Policy DP12: Development in the Green Belt	No	• Justified • Effective • Consistent with national policy				Policy DP10 is not considered to be sound as it is not effective, justified or consistent with national policy HBF reiterates comments we have made elsewhere in our representation that the boundaries of the green belt need revisiting to enable additional housing allocations. We note that if this is done there may also be a need to review the individual settlement boundaries.		North Somerset 2nd Reg 19 Dec 25.docx
Policy DP34: Green infrastructure	No	• Effective • Consistent with national policy			Policy DP8 is not considered to be sound as it is not effective, justified or consistent with national policy HBF are concerned that the Plan is ineffective because it is unclear how all the different environmental policies work together, making them ineffective.			North Somerset 2nd Reg 19 Dec 25.docx
Policy DP36: Biodiversity Net Gain						Policy DP36 is not considered to be sound as it is not consistent with national policy This policy will need reviewing and revising in light of the revised guidance on BNG that is expected to be published soon. The Council will need to review this policy to ensure it fully reflects all the new legislation, national policy and		North Somerset 2nd Reg 19 Dec 25.docx

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						guidance. It is the HBF's opinion that the Council should not deviate from the Government's requirement for 10% biodiversity net gain as set out in the Environment Act. There are significant additional costs associated with biodiversity gain, which will need to be fully accounted for in the Council's viability assessment. It is important that BNG does not prevent, delay or reduce housing delivery. Although the national policies requiring 10% BNG cannot be subject to site specific viability discussions, any policy requirements over 10% can be. Any policy seeking more than 10% BNG needs to reflect this position. It is also important to note that for large and complex sites where the development is phased, the guidance is clear that the 10% must be delivered at the end of the development, and this may not result in 10% BNG on each phase. Additional advice on phased development is still awaited. HBF also suggest particular care is needed in terminology to ensure the BNG policy reflects the national policy and guidance. For example, on-site and off-site biodiversity is referred to as units, and the statutory national credit system of last resort is referred to as credit. Similarly, it will be important to differentiate between the mitigation hierarchy, which seeks to avoid harm and then mitigate it in relation to protected habitats and the BNG hierarchy which prioritises on-site BNG delivery, then off-site units and finally allows for statutory credits. National BNG policy allows for all three of these options, and therefore the Plan should also reference statutory credits. The costs of BNG must also be considered as part of the whole plan viability assessment and should be specified as a single specific item, not combined into a generic s106 costs item. There are significant additional costs associated with biodiversity net gain, which should be fully accounted for in the Council's viability assessment, some of which are unknown at this time. It is important that BNG does not prevent, delay or reduce housing delivery. As this is still an emerging policy area and the market for off-site provision is still developing any figure used for BNG costs will need to be kept under review as BNG implementation progresses and a greater understanding of actual costs become available. The Whole Plan Viability Assessment should clearly set out how it considered the implications of mandatory BNG and how it was arrived at using the most up to date BNG costs information available. HBF suggest that there will also be a need for the North Somerset this policy and supporting text to say more about Local Nature Recovery Strategies. HBF would also encourage the Council to ensure the Local Plan fully considers the new BNG requirements in relation to site allocations. This is likely to require undertaking an assessment of the baseline to support the allocation to enable an understanding the BNG requirements for a site to be allocated and the impact this may have on viability and other policy requirements and considerations. It will be important to understand the BNG costs of mandatory BNG as this is non-negotiable and as such may impact on the viability of the site and its ability to deliver against other policy requirements such as affordable housing or other s106 asks. HBF also notes that there seems to be significant potential for confusion around environmental hierarchy, and suggest particular care is needed to avoid any confusion between the well-established mitigation hierarchy and the new BNG hierarchy. There is need for the policy wording and/or supporting text to be clearer about the differentiation between the mitigation hierarchy		

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						(which seeks to avoid harm in the first place, then mitigate and only then compensate it in relation to protected habitats) and the BNG hierarchy (which prioritises on-site BNG delivery, then off-site units and finally allows for statutory credits). There seems to be significant potential for confusion between the two difference hierarchies. HBF therefore suggest that the Reg 19 Plan should do all it can to explain how the two hierarchies work in different ways and that they seek to achieve different aims. We would suggest the use of the term “BNG spatial hierarchy” may help with this issue. At this point in time, reference should also be made within the Plan to the small sites metric. This is intended to be a less complex statutory metric that can be used to set out how 10% BNG will be secured on small sites. It can only be used for on-site BNG delivery. The DEFRA and MHCLG guidance is clear that going beyond the mandatory 10% requires evidence that this will not impact viability. HBF are aware of no such evidence exists to support a higher figure in North Somerset. As we have already mentioned, this policy will new reviewing if the national guidance changes, as it is expected to do imminently.		
Policy DP37: Trees, Woodlands and Hedges	No	• Effective			Policy DP37 is not considered to be sound as it is not effective The policy seeks the “equivalent of a minimum of one tree per dwelling is planted, to be located in gardens where practical or within a community garden”. HBF is concerned how this policy links into BNG delivery especially as requiring trees in gardens impacts on the working of the BNG Metric which recognises that the management, maintenance and retention of any trees in gardens would fall to householders once properties are sold and occupied.			North Somerset 2nd Reg 19 Dec 25.docx
Policy DP43: Affordable housing (including rural exception schemes)	No	• Justified • Effective • Consistent with national policy				Policy DP43 is not considered to be sound as it is not effective, justified or consistent with national policy Affordable Housing Policy Requirements HBF is concerned that the policy requirements for 50% on green Belt Land, 30% on Greenfield and 20% on PDL may not be viable. The Council’s viability study itself therefore provides evidence that the affordable housing requirements being proposed are already at, if not beyond, the margins of viability. As such HBF would request the policy is amended to allow flexibility and site specific viability assessments. It is important that the policies in the Plan allowing for flexibility on viability issues, and to fuller consider the wide range of challenges and additional costs facing developers at this time. Costs not included within the Viability Study HBF information suggests that complying with the current new part L is costing £3500 per plot. The Future Homes Standard Part L in 2025 is anticipated to cost up to £7500+ per plot. There will also be the addition of the Building Safety Levy that is coming in pay for cladding.		North Somerset 2nd Reg 19 Dec 25.docx

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						Other factors that need to be taken into account include increasing costs of materials and labour due to inflation and the costs of mandatory BNG, which are still emerging as the off-site market is yet to be established. HBF members are reporting costs of £20-30k per off-site BNG unit. Although the initial price of statutory credits is now known this national fallback option has been deliberately highly priced to discourage their use. Whilst this intention is understandable, at present the lack of functioning local markets for off-site credits causes viability problems because HBF members experience to date suggests that any scheme that needed to rely on statutory credits would become unviable. There is also a need to consider the costs of delivering the policy of all housing meeting M4(2) and the requirements for accessible and adaptable dwellings policy which references M4(3). A distinction needs to be made between M4(3)a wheelchair adaptable housing and M4(3)b wheelchair accessible housing. The whole plan viability assessment should be explicit in whether it was applying M4(3)a or M4(3)b but as the latter can only be sought on affordable housing where the Council has nominations and can be ten times more expensive than the former. Whole Plan viability testing is an important part of the plan-making process. However, as noted in PPG (ID: 10-003-20180724) assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable, and therefore flexibility in the amount of affordable housing sought may be needed to deal with site specific issues. As the Plan itself acknowledges “the Dixon Searle viability study (2023) illustrated how challenging affordable housing delivery is in North Somerset.” The failure to include the costs outlines above is evidence that viability will be more challenging that reflected in the current whole Plan viability study. At a very basic level viability can be improved by reducing costs or increasing values. Sometimes, therefore changing the type of affordable housing provided can help to improve viability of a specific site, and the plan should recognise this. In this situation there may be a “deviation” from the detail of the policy- in this example a change of the percentages of different types of affordable housing provided, but the headline figure of how much affordable housing is provided would remain the same. This is another reason why flexibility within the Affordable Housing policy is needed.		
Policy DP45: Residential space standards	No	• Justified • Effective • Consistent with national policy				Policy DP45 is not considered to be sound as it is not effective, justified or consistent with national policy The policy requires all new housing to meet Nationally Described Space Standard (NDSS). HBF does not support the introduction of the optional Nationally Described Space Standard though policies in individual Local Plans. If the Council wanted to do this they would need robust justifiable evidence to introduce the NDSS, as any policy which seeks to apply the optional nationally described space standards (NDSS) to all dwellings should only be done in accordance with the NPPF , which states that “policies may also make use of the NDSS where the need for an internal space standard can be justified”. The NPPF requires that all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned. The PPG identifies the type of evidence required to introduce such a policy. It states that ‘where a need for internal space standards is identified, local planning authorities		North Somerset 2nd Reg 19 Dec 25.docx

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						should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas: • Need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes. • Viability – the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted. • Timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions'. HBF also remind the Council that there is a direct relationship between unit size, cost per square metre (sqm), selling price per sqm and affordability. The Council's policy approach should recognise that customers have different budgets and aspirations. An inflexible policy approach to NDSS for all new dwellings will impact on affordability and effect customer choice. Well-designed dwellings below NDSS can provided a good, functional home. Smaller dwellings play a valuable role in meeting specific needs for both open market and affordable home ownership housing. An inflexible policy approach imposing NDSS on all housing removes the most affordable homes and denies lower income households from being able to afford homeownership. The introduction of the NDSS for all dwellings may mean customers purchasing larger homes in floorspace but with bedrooms less suited to their housing needs with the unintended consequences of potentially increasing overcrowding and reducing the quality of their living environment. The Council should focus on good design and usable space to ensure that dwellings are fit for purpose rather than focusing on NDSS. HBF considers that if the Government had expected all properties to be built to NDSS that they would have made these standards mandatory not optional. If the proposed requirement for NDSS is carried forward, then the Council should put forward proposals for transitional arrangements. The land deals underpinning residential sites may have been secured prior to any proposed introduction of the NDSS. These sites should be allowed to move through the planning system before any proposed policy requirements are enforced. The NDSS should not be applied to any reserved matters applications or any outline or detailed approval prior to a specified date.		
Policy DP46: Housing Type and Mix	No	• Justified • Effective • Consistent with national policy			Policy DP46 is not considered to be sound as it is not effective, justified or consistent with national policy In the section entitled 'Accessible and adaptable homes' policy requires a minimum of 5% of affordable dwellings will be required to meet Building Regulations M4(3) standard ('wheelchair user dwellings'), or			North Somerset 2nd Reg 19 Dec 25.docx

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					a higher proportion where there is evidence of local need." There is a need to differentiate between M(4)3a and M4(3) b. The policy also requires all new development to meet M4(2). HBF note that the requirements to meet Part M4(2) will be superseded by changes to residential Building Regulations. The Government response to 'Raising accessibility standards for new homes' states that the Government proposes to mandate the current M4(2) requirement in Building Regulations as a minimum for all new homes, with M4(1) applying in exceptional circumstances. This will be subject to a further consultation on the technical details and will be implemented in due course through the Building Regulations. There is therefore no need for this element of the proposed new policy. HBF also notes that the PPG states: "What accessibility standards can local planning authorities require from new development? Where a local planning authority adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to Requirement M4(2) and/or M4(3) of the optional requirements in the Building Regulations and should not impose any additional information requirements (for instance provision of furnished layouts) or seek to determine compliance with these requirements, which is the role of the Building Control Body. They should clearly state in their Local Plan what proportion of new dwellings should comply with the requirements. There may be rare instances where an individual's needs are not met by the wheelchair accessible optional requirement – see			

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					paragraph 011 below. Local Plan policies should also take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable. Where step-free access is not viable, neither of the Optional Requirements in Part M should be applied." The PPG sets out some of the circumstances where it would be unreasonable to require M4(2) and M4(3) compliant dwellings. Such factors include flooding, typography and other circumstances. HBF suggest that flexibility is needed in the application of these standards to reflect site specific characteristics, and the policy wording should reflect this. HBF do not believe this policy is sound without this flexibility, as it fails to comply with national policy and is not effective or justified. There is also a need to differentiate between Part a) and part b) of M4(3) technical standards. M43a sets out standards for wheelchair adaptable housing, where M43b relates to wheelchair accessible housing which can only be required on affordable housing where the Council has nomination rights. This part of the policy needs to be amended to recognise this distinction. This issue should also be factored into the whole plan viability assessment as both M4(3)a and M4(3)b impact on viability, with M4(3)b being considerably more expensive.		
Policy DP47: Older Persons Accommodation	No	• Justified • Effective			Policy DP47 is not considered to be sound as it is not effective, justified or consistent with national policy.			North Somerset 2nd Reg 19 Dec 25.docx

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		• Consistent with national policy			The economics of providing older persons housing are different from open-market and affordable housing, for example, due to the need to provide communal spaces. It is for this type housing to be considered separately in the whole plan viability appraisal.			
Policy DP63: Infrastructure delivery and development contributions	No	• Justified • Effective • Consistent with national policy				Policy DP63 is not considered to be sound as it is not effective, justified or consistent with national policy This policy should include reference to flexibility in the case of site specific viability issues		North Somerset 2nd Reg 19 Dec 25.docx

Name: Homes England **I.D:** 62943009

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SP9: Employment	Unsure		Unsure	Unsure	The wording of Policy SP9 on employment is supported. Homes England welcomes the move away from the previous Local Plan requirement of 1.5 jobs per home within Weston-super-Mare. The evidence to date from building out the Weston Villages development has demonstrated that this is a very challenging proposition and is likely to hinder the Council's ability to meet its housing requirement and maintain a five year housing land supply going forward. However, we do still note and support the reference to seeking to deliver the principle of housing and employment development in tandem within SP9 to strengthen and reinforce Weston-super-Mare as a principal economic centre "with employment opportunities provided in step with housing growth". We note this "includes the delivery of employment commitments as part of the ongoing build-out of the Weston Villages development," such as Locking Parklands with those commitments being as reflected in the revisions / proposals of this emerging plan.			
Policy LP5: Housing, employment and mixed use allocations	No	• Effective	Unsure	Unsure		Policy LP5 on housing, employment and mixed use allocations is generally supported. This policy however requires development to "take into account the site-specific requirements set out in the schedules", which needs to be reviewed. Schedule 1 provides the site requirements for Parklands Village and it notes that further details are contained in the Weston Villages Supplementary Planning Document (SPD). This SPD is now out of	We welcome the changes to the proposals map since the previous iteration to correct the development boundaries for the land by Lower Parade Ground and also north of Leedham Road at Locking Parklands previously shown as white land which is now included	

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						date and is no longer relevant to Parklands Villages as planning permissions are in place and the respective developments are being built out. Additionally, we note that the Weston Villages SPD requires the delivery of 1.5 jobs per dwelling. The SPD supplements Policy CS30 of the Core Strategy which will be replaced by the replacement Local Plan (2041) and there is no 1.5 job per home requirement within the emerging planning policy. Therefore, it is not justified for the site requirements of Parklands Village to align with the Weston Villages SPD. The site requirements in Schedule 1 should refer to the planning permissions for Parklands Village, with respect to Locking Parklands. We welcome the changes to the proposals map since the previous iteration to correct the development boundaries for the land by Lower Parade Ground and also north of Leedham Road at Locking Parklands previously shown as white land which is now included as residential development. We also welcome the inclusion of the former Leisure Dome / Parklands Site B (phase E) for the allocation of 420 dwellings. We propose the site requirements to be updated as follows for Locking Parklands at Parklands Village: “Planning permissions refs 13/P/0997/OT2, 09/P/1614/F,12/P/0760/F, 18/P/3175/FUL. Part full consent, part outline consent and subsequent reserved matters approvals.”	as residential development. We also welcome the inclusion of the former Leisure Dome / Parklands Site B (phase E) for the allocation of 420 dwellings.	
Policy LP7: Settlement boundaries	No	• Effective	Unsure	Unsure	Homes England supports Policy LP7 on settlement boundaries for Locking Parklands. However, the boundaries need to reflect the extant planning permissions and the proposed allocations on the Policies Map. The land south of Mannock Gardens and Farnborough Road (phase 12a) which is covered by the extant outline permission ref 13/P/0997/OT2 for Locking Parklands is shown to lie outside the settlement boundary. Whilst this land is proposed to be designated as a local green space under Policy LP15, this will need to be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services in line with the NPPF. The green space to the south of Farnborough Road will include informal and formal recreation set within the parkland setting so the designation must allow for active uses. Therefore, we propose for the settlement boundary to be reviewed to include the land south of Mannock Gardens and Farnborough Road.	No modification is proposed on the policy wording of Policy LP7. Homes England and St Modwen can provide a GeoJSON plan of the outline consent ref 13/P/0997/OT2 to the Council to transpose onto the Policies Map in relation to settlement boundaries to reflect the extant outline planning permission.		
Policy LP8: Town centre hierarchy	Unsure		Unsure	Unsure	Homes England supports Policy LP8 on town centre hierarchy and the identified proposed local/village centre for Locking Parklands within Schedule 6. However, we request that the final boundaries on the policies map are checked to reflect the extant planning permissions and pending RMs for phase	No modification is proposed on the policy wording of Policy LP8. Homes England and St Modwen can provide a GeoJSON plan of the outline consent ref 13/P/0997/OT2 and current reserved matters (once approved) for phases 8 and 10 to the Council to		

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					8/10.	transpose onto the Policies Map to reflect the proposed local centre.		
Policy LP15: Local Green Space	No	• Effective	Unsure	Unsure	Policy LP15 is generally accepted. However, the wording of the policy is very restrictive or is tightly defined. Policy LP15 states that “Planning permission will not be granted except in very special circumstances for development which adversely affects a designated Local Green Space as shown on the Policies Map and set out in Schedule 3 which forms part of this policy, particularly regarding the characteristics underpinning its designation such as beauty, historic importance, recreational value, tranquillity or richness of wildlife.” Schedule 3 identifies 3 local green spaces for Locking Parklands including South of Cruikshank Grove and McCrae Road, Parklands Village, South of Post Office Road Parklands Village and SE corner of Parklands Village (SE of Bowen Rd, S of Mannock Gardens and S of Farnborough Rd). This policy, however, does not recognise permissions that are in place at Locking Parklands (refs 13/P/0997/OT2, 09/P/1614/F and 12/P/0760/F, 18/P/3175/FUL and RMs) where development could be compatible with the reasons for designation such as NEAPs, LEAPs, earth bunds etc. Recognising the permissions that are in place meets the policy objective set out in Policy DP8 on efficient use of land, which requires “all parts of the site to have a positive purpose.” The green space to the south of Farnborough Road will include informal and formal recreation space for passive and active recreation brought forward under the outline permissions or subsequent detailed permissions. The designation should therefore reflect this. In addition, given that there is planning permission covering the land that is proposed to be designated as a local green space under Policy LP15, this will need to be ‘consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services’ in line with NPPF.	We request a modification to Schedule 3 to include a column for site specific requirements or to amend the justification details to “include development in accordance with the established planning permissions. For South of Cruikshank Grove and McCrae Road, Parklands Village, South of Post Office Road Parklands Village and SE corner of Parklands Village (SE of Bowen Rd, S of Mannock Gardens and S of Farnborough Rd) designations these are “refs 13/P/0997/OT2, 09/P/1614/F and 12/P/0760/F. Part full consent, part outline consent and subsequent reserved matters approvals.”		
Policy DP5: Climate change adaptation and resilience	No	• Effective	Unsure	Unsure		Whilst Homes England are broadly supportive of principle objectives set out within Policy DP5 on climate change adaptation and resilience they have concerns with the potential for unnecessary repetition within other subject focused policies covering elements such as biodiversity, sustainable design, energy and flood risk. They are also concerned that the majority of climate change provisions are also covered through adoption of Part O of building regulations so the policy needs to be worded in such a manner to avoid any areas of potential conflict. We also note a Supplementary Planning Document (SPD) will be prepared to set out the detail for how these policy requirements will be implemented. As currently worded the policy is overarching and		

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						vague. Given how this key policy relates to other policy requirements in the Local Plan and is vague, we are concerned that the SPD is likely to introduce requirements that are more stringent than those set out in Policy DP5. We also have a general concern with the number of references to future SPDs within the draft plan defining such future detail which has the potential for future confusion and is not a sound way of plan making. Therefore, Policy DP5 needs to be further refined with a view to reconsidering if the preparation of an SPD is actually required.		
Policy DP6: Net zero construction	No	• Effective	Unsure	Unsure	Homes England supports the transition to Future Homes and in the future potentially towards net zero over the lifetime of the plan. However that transition to net zero will likely be through further Legislation and Building Regulation changes. Accordingly as per Lee Rowley's Written Ministerial Statement, Written statements - Written questions, answers and statements - UK Parliament explains that Nationally applied standards the appropriate approach for the transition towards net-zero ready homes. Compared to varied local standards, these nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes The WMS provides that local standards can be prepared, but they should be rejected at examination if they are not well reasoned and robustly costed rational that - Development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework. - The additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP). Where plan policies go beyond current or planned building regulations, those polices should be applied flexibly to decisions on planning applications and appeals where the applicant can demonstrate that meeting the higher standards is not technically feasible, in relation to the availability of appropriate local energy infrastructure (for example adequate existing and planned grid connections) and access to adequate supply chains. The future plans of Government were recently clarified in response to a published question from Baroness Taylor of Stevenage (25 November 2025), the Government stated: The Government remains committed to meeting its target of net zero emissions by 2050 and recognises the important contribution that the energy efficiency of buildings has to make in meeting it. Through the Building Regulations, the Government sets minimum performance standards for new homes and	The policy should be deleted but if retained, it should simply require compliance with the latest building regs and provide clarification on the two issues we have raised re legacy sites. We also seek justification on how partially built strategic sites such as Locking Parklands could meet policy DP6. We also request for the word 'elsewhere' in the Renewable Energy Offsetting to be defined further to avoid uncertainty.		

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					buildings. In 2021, these standards were strengthened to ensure new homes and buildings are highly energy-efficient, with high-quality insulation and effective ventilation. These changes came into force in June 2022. We intend to introduce further changes to the Building Regulations through the Future Homes and Buildings Standards in the coming months. These standards will ensure new homes and buildings are extremely energy-efficient and use low-carbon heating. On Renewable Energy Offsetting, Policy DP6 states that, “residual energy demand should be met through the generation of onsite renewable energy, but if this is not technically feasible, the requirement may be met elsewhere by means of offsite renewable energy generation.” It is unclear in the policy wording whether meeting the requirement ‘elsewhere’ is a site that is directly linked with the site or ‘near-site’ or anywhere within North Somerset (or beyond) where there is existing or new or additional renewable energy generation provision that might be connected to. Additionally, there is no consideration for a strategic multi plot development like Locking Parklands, where off-setting elsewhere could be onerous if it is not technically feasible to generate renewable energy onsite. The Plan could also recognise the difficulty in meeting the carbon neutral objectives on strategic sites such as Locking Parklands which are partially constructed.			
Policy DP8: Efficient use of land	No		Unsure		Homes England welcomes the changes made to the policy wording and supporting text since our previous representations with regards to density targets. Whilst 40 dph is a reasonable target for density, there should be a recognition that across the Development Plan area and across different sites and indeed parts of sites, different site constraints/considerations may decrease this. Whilst the supporting text references ‘net’ density, we would suggest that this should also be reflected in the policy text itself.	We suggest a modification on the minimum target density to account for existing site constraints. We propose the insertion of the following in the policy wording (last para) “The minimum net target density will be 40 dwellings per hectare across developable areas, but this…”		Homes England - Representation form Part B. DP8 2025.docx
Policy DP9: Flood risk	No	• Effective	Unsure	Unsure	We welcome the changes made in this iteration of the Plan since our previous representations including the recognition within the supporting text to proposals consistent with the allocated use in the Local Plan not requiring the application of the sequential test (subject to changes in flood levels). We would however suggest that this should also be reflected in the policy wording itself.	We suggest moving the supporting text (penultimate para) within Policy DP9 as a new paragraph 7 (above Flood Risk Assessment subtitle): For proposals consistent with the allocated use in the local plan, the sequential test will not be required if there have been no significant changes to the known level of flood risk to the site, now or in the future, which would have affected the outcome of the test applied at the plan making stage.		Homes England - Representation form Part B. DP9 2025.docx
Policy DP15: Active and sustainable transport	No	• Effective	Unsure	Unsure	Homes England supports the objectives and aspirations of this policy (and any changes since the previous iteration) and have sought to bring forward the delivery of a pedestrian and cycle friendly development at Locking Parklands in line with the approved Design Code for the site.	We request references within the policy which seek to allow the practical implementation of Policy DP15 and to also state that where proposals comply with Manual for Streets and evidence through tracking and Road Safety Audits that they are safe, then roads will be adopted by the Council.		

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					However, this has been challenging at times by the approach of Council as Highway Authority in considering planning applications. Firstly, the Highways Design Guide (2020) imposes arbitrary 5.5m standard minimum carriageway widths for local access and minor access roads which further enhances the status of the car above sustainable modes. This is at odds with Manual for Streets 1 and 2. It undermines ability to design for active travel and lower vehicle speeds and prioritises design for bin lorries. Secondly, the Council's Parking Standards Supplementary Planning Document (November 2021) over provides for car parking and sometimes unnecessarily prioritises parking over sound design rationale which is seeking to create a sense of place and limit car parking provision. We do note that proposed policy DP19 Parking does recognise the opportunity for reduced parking provision but this is heavily caveated. The above-mentioned approach of the Highways Authority and the implementation of parking and highways design guidance is therefore at odds with the aspirations of Policy DP15, that of developers seeking to deliver these issues on the ground and Manual for Streets (1 and 2). We therefore continue to seek references within the policy which seek to allow the practical implementation of Policy DP15.			
Policy DP43: Affordable housing (including rural exception schemes)	No	• Effective	Unsure	Unsure	Policy DP43 states that, "30% affordable housing on greenfield sites and 20% on previously developed land, all at nil public subsidy. If these requirements cannot be met this will need to be fully justified with clear evidence set out in a viability assessment which must demonstrate that all grant funding sources have been fully explored." Homes England welcomes the recognition within this policy for a reduced affordable housing target on sites such as Locking Parklands, which is previously developed land (20%). However, we understand the Local Plan evidence base (2023 Dixon Searle Viability summarised on p212) suggests that on sites such as Locking Parklands (PDL in Outer Weston) that only 10% is viable. By way of context, due to viability considerations, the existing Locking Parklands Section 106 agreement requires a minimum of 13% affordable housing (and up to a maximum of 30% with public subsidy) thereby demonstrating the extent of potential shortfall with such a policy requirement on strategic sites with major Section 106 infrastructure costs (in addition to CIL). We therefore seek further justification for the 20% policy target without grant on the basis of being contrary to the evidence base. Homes England however, at Locking Parklands and elsewhere is the responsible funding body for Affordable Housing. We therefore have a role to play in the provision of grant funding to support viability and future delivery through a range of possible funding options across on this site and across the plan area.	No modification to the policy is proposed.		

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Policy DP46: Housing Type and Mix	No	• Justified	Unsure	Unsure	Whilst the principle of providing a range of house types and sizes is accepted, the policy as worded is not clear in terms of the expectations placed on developers with regards to the extent of provision of older persons accommodation and self/ custom build. The definition of 'local need' needs to be clarified. We note the policy wording is aligning with the Government's previously proposed changes to the Building Regulations Part M following their consultation document "Raising Accessibility Standards for New Homes". There is no evidence that all new dwellings need to be M4(2) compliant, nor that it would be viable to deliver all as such. We accept that some will and this percentage needs to be defined in the Local Plan and supported by appropriate evidence. Assuming the Government decides all new homes need to be M4(2) compliant, then this will be determined through updates to the building regs and these will ultimately supersede local policies. There is also a possibility that it could be delivered through the introduction of National Development Management policies. There is no need to pre-empt changes to the building regs or the introduction of National DM policies and enshrine/duplicate the requirement in local policy. The policy also needs to consider potential exceptional circumstances which can justify appropriately reduced requirements due to site topography e.g. if steep land and requires steps or long ramps or vulnerability due to flooding that could be hazardous to less mobile individuals. From Homes England experience within Parklands Villages further clarification is also sought with regards to the evidence for the intended split of M4(3) in terms of M4(3)a (wheelchair adaptable) and M4(3)b (wheelchair accessible).	The policy should specify an appropriate percentage of homes to be delivered as M4(2) compliant. This percentage should be justified with appropriate evidence and viability work. The requirement for all new homes to be M4(2) compliant should be deleted. Further clarification required on expectations with regards to older persons accommodation and self / custom build and what the term 'where appropriate' means in practice (i.e.does this include where viable).		
Policy DP47: Older Persons Accommodation	No	• Effective	Unsure	Unsure	Homes England are generally supportive of Policy DP47 regarding older persons accommodation, and sites such as Locking Parklands can assist in delivering a mix of accommodation including retirement, assisted living and care provision which will also foster a mixed and balanced community. Whilst we acknowledge that the Council will seek an element of affordable housing provision for older persons as part of appropriate market-led developments for older people; this needs to be defined and also subject to viability. We would also seek further clarification and justification on the intention to seek affordable housing from C2 use developments, especially care home facilities.	We propose an amendment of the policy wording from, "the council will seek an element of affordable housing provision for older persons as part of appropriate market-led developments for older people." To, "the council will seek an element of affordable housing provision for older persons as part of appropriate market-led developments for older people, subject to viability."		
Parklands Village	Unsure		Unsure	Unsure	Homes England does not comment on local plan housing targets. However, they support the recognition within the Plan that the Locking Parklands site can accommodate additional housing numbers especially as previously developed land benefitting from existing and proposed facilities including primary and secondary education, a GP			

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					surgery and Community Centre all on site. As such we support the identification of the former Employment Land and Former Leisure Dome land for housing. These former uses are not deliverable due to market conditions, but there is a significant need for housing. An intensification of housing at Locking Parklands provides an opportunity to help to address the housing requirements in a sustainable and deliverable manner, without adverse impacts on the green belt, local ecology and sensitive landscape designations. An intensification of housing here would also support the facilities and services being delivered as part of the wider village.			
Parklands Village	No	• Effective	Unsure	Unsure	Policy LP5 on housing, employment and mixed use allocations is generally supported. This policy however requires development to “take into account the site-specific requirements set out in the schedules”, which needs to be reviewed. Schedule 1 provides the site requirements for Parklands Village and it notes that further details are contained in the Weston Villages Supplementary Planning Document (SPD). This SPD is now out of date and is no longer relevant to Parklands Villages as planning permissions are in place and the respective developments are being built out. Additionally, we note that the Weston Villages SPD requires the delivery of 1.5 jobs per dwelling. The SPD supplements Policy CS30 of the Core Strategy which will be replaced by the replacement Local Plan (2041) and there is no 1.5 job per home requirement within the emerging planning policy. Therefore, it is not justified for the site requirements of Parklands Village to align with the Weston Villages SPD. The site requirements in Schedule 1 should refer to the planning permissions for Parklands Village, with respect to Locking Parklands. We welcome the changes to the proposals map since the previous iteration to correct the development boundaries for the land by Lower Parade Ground and also north of Leedham Road at Locking Parklands previously shown as white land which is now included as residential development. We also welcome the inclusion of the former Leisure Dome / Parklands Site B (phase E) for the allocation of 420 dwellings.	We propose the site requirements to be updated as follows for Locking Parklands at Parklands Village: “Planning permissions refs 13/P/0997/OT2, 09/P/1614/F,12/P/0760/F, 18/P/3175/FUL. Part full consent, part outline consent and subsequent reserved matters approvals.”		
Former Leisuredome allocation/ Parklands site B (phase E)	No		Unsure	Unsure	Policy LP5 on housing, employment and mixed use allocations is generally supported. This policy however requires development to “take into account the site-specific requirements set out in the schedules”, which needs to be reviewed. Schedule 1 provides the site requirements for Parklands Village and it notes that further details are contained in the Weston Villages Supplementary Planning Document (SPD). This SPD is now out of date and is no longer relevant to Parklands Villages as planning permissions are in place and the respective developments are being built out.	We propose the site requirements to be updated as follows for Locking Parklands at Parklands Village: “Planning permissions refs 13/P/0997/OT2, 09/P/1614/F,12/P/0760/F, 18/P/3175/FUL. Part full consent, part outline consent and subsequent reserved matters approvals.”		

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					Additionally, we note that the Weston Villages SPD requires the delivery of 1.5 jobs per dwelling. The SPD supplements Policy CS30 of the Core Strategy which will be replaced by the replacement Local Plan (2041) and there is no 1.5 job per home requirement within the emerging planning policy. Therefore, it is not justified for the site requirements of Parklands Village to align with the Weston Villages SPD. The site requirements in Schedule 1 should refer to the planning permissions for Parklands Village, with respect to Locking Parklands. We welcome the changes to the proposals map since the previous iteration to correct the development boundaries for the land by Lower Parade Ground and also north of Leedham Road at Locking Parklands previously shown as white land which is now included as residential development. We also welcome the inclusion of the former Leisure Dome / Parklands Site B (phase E) for the allocation of 420 dwellings.			
Parklands, land off Cruikshank Grove	No	• Effective	Unsure	Unsure	Homes England supports the allocation of these 2 sites for employment uses at Locking Parklands. This ensures that employment opportunities are provided in step with housing growth and to strengthen and reinforce Weston-super-Mare as a principal economic centre. In relation to the land of Cruikshank Road, we seek clarification on the request for additional tree planting in the surrounding landscape on the basis this falls outside of this allocation and will be picked up in the wider Locking Parklands landscape strategy. .	Remove reference to additional tree planting within the site specific requirements for land off Cruikshank Road.		

Name: Hugh Matthews **I.D:** 62372833

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Policy LP4: Strategic location: Pill and Easton-in-Gordano	No		No	No	Summary of Objection: I object to the North Somerset Local Plan 2041 because it is legally non-compliant and fundamentally unsound. I am writing as a lifelong resident of Pill who has watched this community grow and thrive over the decades. My wife moved here in 2005, and like so many who discover this village, she immediately fell in love with its character, its sense of community, and the beautiful green spaces that surround us. We are now raising our two children - a 14-year-old son and an 11-year-old daughter - who are growing up with the same freedoms and connections to nature that I enjoyed as a child. This plan violates multiple legal duties and fails all four tests of soundness. It prioritizes housing numbers over the wellbeing of existing residents, the protection of our environment, and the Council's own declared commitments to climate action and equality. I request that the Planning Inspector finds this Plan unsound and recommends the deletion of sites HE2015, HE206, HE20491, HE201097, and HE201065. PART 1: LEGAL COMPLIANCE FAILURES 1.1 Failure to Comply with the Equality Act 2010 The Council has a statutory duty under the Equality Act 2010 to have "due regard" to the need to eliminate discrimination and advance equality of opportunity for people with protected characteristics.			

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					I have serious concerns that the Council has failed to properly assess how this massive development will impact existing residents from protected characteristic groups. Has the Council Conducted an Equality Impact Assessment? I have reviewed the consultation documents and can find no evidence that the Council has adequately assessed how a 40% increase in village population will impact existing residents from protected characteristic groups, including: •LGBT+ residents and families who have chosen Pill for its inclusive, welcoming character - a quality that is not guaranteed in all rural communities and which could be threatened by rapid demographic change •Residents with mental health conditions (protected characteristic: disability) who depend on access to green spaces and stable community environments for their wellbeing •Residents with physical disabilities who rely on accessible local services that are already stretched to capacity •Existing elderly residents who depend on established social networks, familiar environments, and accessible healthcare services The Council must answer: 1.Has a comprehensive Equality Impact Assessment been conducted covering all protected characteristic groups? 2.Have minority communities within Pill been specifically consulted about the impact on community character and cohesion? 3.Has the Council assessed whether the existing inclusive character of the village will be maintained with such rapid demographic change? 4.How will the Council ensure that existing vulnerable residents are not harmed by the loss of accessible services and community support networks? Without this evidence, the Plan is not legally compliant. Community Cohesion and Vulnerable Groups Pill has developed a reputation as a genuinely inclusive community where diverse families are welcomed. This character has been built over generations through personal relationships and shared values. Research consistently shows that rapid demographic change can strain community cohesion, particularly affecting minority groups and vulnerable residents who rely on established social networks for support and acceptance. The existing social fabric of Pill - the networks of mutual support, the acceptance of difference, the sense of shared identity - cannot simply be scaled up by 40% and expected to remain intact. The Council has provided no evidence that it has considered these impacts or consulted with minority community members and vulnerable groups about their concerns. The Council is prioritizing housing numbers over the wellbeing of existing residents from protected characteristic groups. This is not positive preparation - it is reckless disregard for the communities that already exist. 1.2 Failure to Comply with Climate Emergency Declaration North Somerset Council declared a Climate Emergency in February 2020, committing to make the district carbon neutral by 2030. This plan directly contradicts that commitment and makes a mockery of the Council's climate pledges. Creating Massive Car Dependency The proposed development will add approximately 1,500 additional cars to our village, generating 3,000+ daily vehicle movements. Based on average UK car emissions of 0.8 tonnes CO_2 per year, this represents approximately 1,200 tonnes of CO_2 emissions per year from vehicle use alone - equivalent to the annual emissions of a small town. The Council claims that the proposed Portishead-Pill-Bristol railway line will reduce car dependency. This is demonstrably false: 1.The railway line does not yet exist. Basing a 20-year Local Plan on undelivered infrastructure is speculative and irresponsible. 2.The proposed station is not central to the village and is not easily accessible from the development sites, particularly HE2015 (Pill Green - 600 homes) and HE206 (East of Gordano Services - 200 homes). The Plan's promise of "safe, direct, high quality active travel routes" is unfunded and undelivered. 3.It will be a single-track branch line with limited service frequency - not a realistic alternative to car travel for the majority of journeys. 4.Most journeys are not to Bristol Temple Meads. Residents will still need cars for: •Commuting to employment areas not served by the line (Avonmouth, Portbury, South Bristol) •Shopping and services (supermarkets, retail parks) •School runs (particularly secondary school) •Healthcare appointments •Leisure and social activities The reality is that this development will create 1,500 new car-dependent households in a location with inadequate public transport. This is the exact opposite of sustainable development. Destroying Natural Carbon Sinks Pill Green is 45 hectares of grassland and hedgerows that currently act as a carbon sink, absorbing CO_2 from the			

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					atmosphere and supporting biodiversity. Covering this land with concrete and tarmac will: •Eliminate carbon sequestration capacity - the land will no longer absorb CO_2, it will emit it (through heating, cooling, and vehicle use) •Increase surface temperatures through the urban heat island effect, requiring more energy for cooling •Increase flood risk by replacing natural drainage with impermeable surfaces, leading to more flood events (which themselves have carbon costs) •Destroy wildlife habitat that forms part of the natural ecosystem supporting carbon cycling The Council cannot claim to be tackling climate change while destroying 45 hectares of natural carbon sink. Massive Embodied Carbon in Construction Building 1,060 homes will require approximately: •15,000-20,000 tonnes of concrete (one of the most carbon-intensive materials on earth) •Thousands of tonnes of steel, bricks, glass, and other materials •Hundreds of thousands of vehicle movements during construction The embodied carbon in this development (the carbon emitted during construction) could exceed 30,000 tonnes of CO_2 - equivalent to the annual emissions of 37,500 cars or the entire carbon budget of a small town for a year. Has the Council calculated this? How does it fit within the carbon budget for achieving carbon neutrality by 2030? Direct Conflict with Policy SP2: Climate Change The Plan's own Policy SP2 commits to: •"Reducing the need to travel" •"Promoting sustainable transport" •"Reducing carbon emissions" •"Adapting to climate change" This development does the exact opposite: •✗ Increases the need to travel (car-dependent location) •✗ Creates unsustainable transport patterns (1,500 new cars) •✗ Increases carbon emissions (1,200 tonnes/year + 30,000 tonnes embodied) •✗ Reduces climate resilience (destroys natural drainage and carbon sinks) The Plan contradicts itself. Policy SP2 is rendered meaningless if this development proceeds. The Council Must Answer These Questions: 1.Where is the carbon impact assessment for this development? Has one been conducted? If so, why has it not been published? If not, why not? 2.How does adding 1,200 tonnes of CO_2 per year from vehicle use align with the 2030 carbon neutral target? Show the calculations. 3.What is the embodied carbon of building 1,060 homes? Has this been calculated? How does it fit within the carbon budget? 4.How does destroying 45 hectares of carbon sink align with climate commitments? What is the carbon sequestration capacity being lost? 5.How can the Council claim this plan is "sustainable" when it creates massive car dependency in a location with inadequate public transport? This is greenwashing. Without credible answers to these questions, the Plan is not consistent with national policy (NPPF climate requirements) and directly contradicts the Council's own Climate Emergency declaration. This is climate hypocrisy of the highest order. 1.3 Failure to Protect Mental Health and Wellbeing The destruction of green spaces and the rapid transformation of our community will have serious mental health impacts on existing residents, including those with existing mental health conditions (a protected characteristic under the Equality Act 2010). Loss of Critical Green Space Access Research consistently shows that access to green space is critical for mental health and wellbeing, particularly post-COVID. The government's own "25 Year Environment Plan" recognizes that "spending time in green spaces can have a positive impact on mental health." Pill Green and the surrounding fields are used daily by residents for walking, exercise, and mental wellbeing. I personally use these spaces regularly with my family. My 11-year-old daughter walks our dog on the footpaths that cross Pill Green - it is her connection to nature, her refuge from the pressures of school and screens, and a critical part of her wellbeing. Destroying 45 hectares of accessible green space will: •Remove a vital mental health resource from the entire community •Particularly impact residents with anxiety, depression, or PTSD who rely on nature for recovery and management of their conditions •Disproportionately affect those who cannot afford to travel to alternative green spaces (lower-income families, elderly residents, those without cars)			

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					•Harm children's development and wellbeing (proven links between nature access and mental health outcomes, reduced ADHD symptoms, improved concentration) •Increase stress and reduce quality of life for all existing residents Has the Council assessed the mental health impact of removing this critical resource? If residents with mental health conditions (a protected characteristic) are harmed, is the Council prepared to defend this under the Equality Act? Community Cohesion and Social Isolation Rapid population growth (40% increase in a short timeframe) will destroy the close-knit community that provides social support and reduces isolation. Research shows that social isolation is as harmful to health as smoking 15 cigarettes a day (Holt-Lunstad et al., 2015). The Council is creating conditions for increased isolation, particularly affecting: •Existing elderly residents who rely on established social networks, familiar faces, and local support systems (note: new elderly housing does not help existing elderly residents who will see their community transformed) •People with mental health conditions who depend on familiar, supportive environments and established relationships •Families with young children who rely on informal childcare networks and playdate arrangements •Minority groups who have found acceptance and belonging in Pill's inclusive community As someone who has lived here all my life, I can attest to the strength of our community bonds. These bonds are not abstract - they are real, daily interactions that provide support, reduce loneliness, and improve wellbeing. A 40% population increase will dilute and potentially destroy this. You cannot simply add 2,650 new residents and expect the existing social fabric to remain intact. Chronic Stress from Infrastructure Failure The inevitable traffic gridlock, overwhelmed services, and years of construction disruption will create chronic stress for existing residents. Has the Council considered the mental health impact of: •Daily traffic jams adding 30+ minutes to commutes, creating chronic stress and reducing family time? •Inability to access GP appointments when needed, creating anxiety and worsening health outcomes? •Years of construction noise, dust, and disruption from building 1,060 homes? •Anxiety about the future - the loss of village character, the transformation of the community, the uncertainty about infrastructure delivery? •Feeling powerless - the sense that the Council is ignoring local democracy and imposing unwanted change? Chronic stress is a major risk factor for mental and physical health problems, including cardiovascular disease, depression, and anxiety disorders. The Council Must Answer: 1.Has a Health Impact Assessment been conducted, including mental health impacts? If so, where is it? If not, why not? 2.Has the Council consulted with mental health professionals about the impact of green space loss on residents with mental health conditions? 3.What is the Council's plan to mitigate mental health harms? Vague promises of "new green spaces" within the development do not replace 45 hectares of existing, accessible countryside. Without this evidence, the Plan is not legally compliant (Equality Act duties to disabled residents) and not positively prepared (fails to consider wellbeing of existing residents). PART 2: THE PLAN IS UNSOUND Even if the Council could demonstrate legal compliance (which it cannot), the Plan would still fail all four tests of soundness required by the National Planning Policy Framework. 2.1 The Plan is NOT JUSTIFIED: No Exceptional Circumstances The Council can only alter Green Belt boundaries in "exceptional circumstances" (NPPF Para 145). Before concluding such circumstances exist, it must demonstrate it has "examined fully all other reasonable options" (NPPF Para 147). The Council has comprehensively failed to provide this evidence. The Sites Are Not "Grey Belt" The Council is attempting to justify this Green Belt release by claiming the sites meet the "Golden Rules" for grey belt development introduced in the December 2024 NPPF. This is a misuse of the grey belt policy. The official guidance is crystal clear: land can only be classified as grey belt if it does not strongly contribute to Green Belt purposes (a), (b), or (d) (Green Belt Guidance Para 007, Reference ID: 64-007-20250225). Site HE2015 (Pill Green - 600 homes) is 45 hectares of undeveloped countryside that: •Strongly prevents urban sprawl from Bristol, a large built-up area (Purpose a). The site is completely free of existing development and lacks physical features that could restrict development. If developed, it would result in an incongruous "finger" of development extending into the Green Belt. •Strongly prevents the merger of Pill with the Bristol urban area and Royal Portbury Dock (Purpose b). The site forms a substantial part of the gap between these settlements, and development would result in significant loss of visual and physical separation. Under the government's own guidance criteria (Green Belt Guidance Para 005), assessment areas with these			

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					characteristics make a strong contribution to Green Belt purposes and therefore cannot be identified as grey belt. The government's grey belt policy is designed for derelict land, disused car parks, and wasteland within the Green Belt - not 45 hectares of pristine countryside. The Council is misusing this policy to circumvent the fundamental protections of the Green Belt. The Council must publish a robust Green Belt assessment proving these sites make only "weak or moderate" contributions to Green Belt purposes. If it cannot (and it cannot), the sites must be withdrawn from the Plan. Brownfield Sites Not Exhausted NPPF Para 147(a) requires the Council to make "as much use as possible of suitable brownfield sites and underutilised land" before releasing Green Belt. Where is the evidence that this has been done? •Where is the complete, up-to-date Brownfield Land Register for North Somerset? •Why are brownfield sites in Weston-super-Mare, Clevedon, and Portishead not being prioritized? •Has the Council identified and assessed all brownfield capacity across the district? •What specific brownfield sites have been rejected and why? The Council has not demonstrated it has exhausted brownfield options. Therefore, exceptional circumstances do not exist. Density Not Optimized in Urban Areas NPPF Para 147(b) requires the Council to optimize the density of development in existing urban areas, particularly "in town and city centres and other locations well served by public transport." There is no evidence that the Plan promotes significant density increases in: •Weston-super-Mare town centre (served by railway station) •Clevedon (larger town with services) •Portishead (larger town, future railway station) Why is the Council releasing Green Belt around a small village with limited public transport before maximizing density in sustainable urban locations? This is the opposite of sustainable planning. Duty to Cooperate Not Fulfilled NPPF Para 147(c) requires the Plan to be "informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development." Where is the evidence of meaningful cooperation? •Where are the complete Statements of Common Ground with Bristol City Council, South Gloucestershire Council, and Bath & North East Somerset Council? •Has the Council formally requested these urban authorities to take a share of the housing need? •Have these requests been formally refused with reasons? •What specific discussions have taken place about redistributing housing need to more sustainable urban locations? Without this evidence, exceptional circumstances do not exist. The Plan is NOT justified. 2.2 The Plan is NOT POSITIVELY PREPARED: Disproportionate and Undemocratic A sound plan must be based on a strategy that seeks to meet development needs in the most sustainable way. This plan does the exact opposite. Grossly Disproportionate Allocation Pill and Easton-in-Gordano has 2.3% of North Somerset's population but is being forced to take 4.6% of the housing allocation (1,060 out of 23,000 homes). This is double our fair share. Why should our small village community bear a disproportionate burden of development while larger, more sustainable towns with better infrastructure and public transport are not asked to take theirs? This is fundamentally unfair and will lead to a 40% increase in the size of our village, destroying its character and turning it into a suburb of Bristol. This is not sustainable development - it is the destruction of a community. Betrayal of Local Democracy The Abbots Leigh, Ham Green, Pill and Easton-in-Gordano Neighbourhood Plan 2020-2026 was adopted following a referendum in which 81% of residents voted in favour. It is part of the statutory development plan and carries significant weight. This Neighbourhood Plan explicitly states that growth should be limited to a maximum of 150-200 dwellings over the plan period. This was not an arbitrary number - it was based on careful assessment of the village's capacity to absorb growth while maintaining its character. The Local Plan's proposal for 1,060 dwellings - more than five times the Neighbourhood Plan limit - makes a mockery of this democratic process. A positively prepared plan would work with, not against, the expressed wishes of the community. The Council is betraying the democratic mandate given by residents and undermining the entire principle of localism and neighbourhood planning. If Neighbourhood Plans can be ignored this easily, what is the point of them?			

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					The Plan is NOT positively prepared. 2.3 The Plan is NOT EFFECTIVE: Infrastructure Cannot Cope This is where the plan completely and catastrophically fails. The infrastructure simply does not exist to support this development, and the Council has provided no credible, funded strategy to deliver it. The Roads Cannot Cope - This is Critical M5 Junction 19 is one of the busiest junctions in the South West, handling approximately 100,000 vehicle movements per day. Despite recent upgrades, it experiences significant daily congestion during peak hours. National Highways data confirms the junction is operating at or near capacity. The cumulative impact of planned development in the area is catastrophic: Development Area Homes Additional Vehicles (est.) Pill & Easton-in-Gordano 1,060 ~1,500 Long Ashton 3,009 ~4,200 South West Bristol 4,000 ~5,600 TOTAL 8,069 ~11,300 All of these vehicles will converge on M5 Junction 19 and the A369 corridor. The junction cannot absorb this level of additional traffic without major, funded upgrades that do not exist. Yet the Plan provides: •✗ No evidence of National Highways approval for this level of growth •✗ No funded scheme for junction improvements •✗ No delivery timescale •✗ No contingency if improvements cannot be delivered The A369 between Pill and Bristol is already severely congested during peak hours. I experience this personally every day - what should be a 5-minute journey to the motorway regularly takes 20-30 minutes during peak hours, with queues extending back through the village. Adding 1,500 cars from Pill alone (plus 11,300 from the wider area) will create complete gridlock. The result will be: •Traffic jams extending back into residential streets •Rat-running through narrow village lanes •Danger to pedestrians and cyclists •Increased air pollution (NO_2 and particulate matter) •Emergency vehicle access compromised •Economic cost (wasted time, fuel, productivity) My daughter will be learning to drive in the next couple of years. I genuinely fear for her safety on roads that are already dangerous and overcrowded. The Council is creating a traffic nightmare. Local roads within Pill are narrow, Victorian-era infrastructure never designed for current traffic levels, let alone a 40% increase in population. Key pinch points include: •Marsh Lane - narrow, single-track sections with no footways •Pill Road - already congested, serves St Katherine's School (child safety issue) •Ham Green - narrow lanes with no footways, used by walkers and cyclists •Lodway - unprotected raised footway mentioned in the Plan, but no funded scheme to improve it The Plan's promise of "appropriate highways mitigations" is meaningless without: •Detailed traffic impact assessments for each site •Specific, costed mitigation schemes •Confirmed funding sources (not just "developer contributions") •Delivery timescales •Contingency plans if mitigations fail None of this exists. The Plan is a wish list, not a deliverable strategy. The Council Must Answer: 1.Has National Highways confirmed in writing that the strategic road network can accommodate this cumulative development (8,069 homes, 11,300 vehicles)? 2.Where is the funded, deliverable scheme to upgrade M5 Junction 19 to accommodate this traffic? 3.Where are the detailed traffic impact assessments for each site showing current flows, predicted flows, and mitigation requirements? 4.Where are the specific, costed mitigation schemes for local roads (Marsh Lane, Pill Road, Ham Green, Lodway)? 5.What is the delivery timescale for all highway improvements, and what happens if they are not delivered before the homes are occupied? If the Council cannot answer these questions with hard evidence, the Plan is not effective. The Railway Line is Not a Solution The Council attempts to justify this car-dependent development by claiming Pill will have "direct rail links to Bristol			

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					Temple Meads by 2028" via the Portishead-Pill-Bristol railway line. This is misleading and does not make the development sustainable. Why the railway line does not solve the problem: 1.The line does not yet exist. While funding has been secured, construction has not been completed. Basing a 20-year Local Plan on infrastructure that does not yet exist is speculative and risky. What happens if the line is delayed or cancelled? 2.The station location is not central to the village. The proposed station on Monmouth Road is not easily accessible from the development sites, particularly HE2015 (Pill Green - 600 homes on the opposite side of the village) and HE206 (East of Gordano Services - next to the M5). The Plan's promise of "safe, direct, high quality active travel routes" connecting the sites to the station is unfunded and undelivered. 3.It will be a single-track branch line with limited service frequency. It will not provide a realistic alternative to car travel for the majority of residents, particularly those commuting outside peak hours or traveling to destinations other than Bristol Temple Meads. 4.Most journeys are not to Bristol Temple Meads. Residents will still need cars for: •Commuting to employment areas not served by the line (Avonmouth, Portbury, South Bristol, Weston-super-Mare) •Shopping (supermarkets, retail parks) •School runs (particularly secondary school) •Healthcare appointments •Leisure and social activities The railway line is a useful addition to the village, but it does not transform Pill into a sustainable location for 1,060 homes. The development will still be car-dependent. Healthcare Services Cannot Cope The local GP practice (Heywood Practice) currently serves approximately 6,700 patients. The practice is already under significant pressure, with appointment waiting times extending to several weeks. My wife already experiences this - she recently had to wait three weeks for a routine appointment. The proposed development will add approximately 2,650 additional residents (based on 2.5 persons per household), representing a 39% increase in the patient population. This is unsustainable. Policy LP4 states that "financial contributions towards... family centre services will be required." This is woefully inadequate. Financial contributions do not: •Guarantee that a GP practice will expand (practices are independent contractors, not controlled by the Council) •Guarantee that additional GPs will be recruited (there is a severe national GP shortage) •Provide a delivery timescale (when will capacity be increased?) •Address the immediate capacity crisis (existing residents already cannot get appointments) Where is the evidence that the NHS Integrated Care Board has been consulted and has confirmed it can deliver the necessary healthcare infrastructure? If this evidence does not exist, the Plan is not effective. Schools Cannot Cope The Plan proposes a new 420-place primary school (including early years provision) to serve the development. While this is welcome in principle, it raises critical questions that the Plan does not answer: 1.Where will the school be located? The Plan does not specify which site will deliver the school. This is a critical omission. If the school is located on the western edge of the village (e.g., on HE2015 or HE206), it will be inaccessible to families in the eastern part of the village, forcing more car journeys and undermining the Plan's sustainability claims. 2.When will the school be delivered? The Plan provides no phasing or delivery timescale. If the school is not delivered until after the first homes are occupied, where will the children go? The existing primary school is already at or near capacity. Will class sizes increase? Will children be bused to schools in other villages? 3.What about secondary school provision? St Katherine's School serves the village and surrounding areas. The Plan mentions "financial contributions towards post-16" provision but provides no evidence that the school can accommodate an additional 200-300 secondary-age pupils (based on 1,060 homes). Has the school been consulted? What is its current capacity? What expansion plans exist? Where is the funding? 4.What about special educational needs (SEN) provision? The Plan mentions "financial contributions towards special educational needs provision" but provides no detail. Where will children with SEN go? Are there places available? These questions are unanswered. Vague promises of "financial contributions" are not a delivery plan. The Plan is not effective. The "Co-ordinated Approach" is Meaningless Without Detail Policy LP4 repeatedly refers to a "strategic and co-ordinated approach" to infrastructure delivery. This sounds reassuring, but it is meaningless without: 1.A detailed Infrastructure Delivery Plan (IDP) showing: •Every piece of infrastructure required (roads, junctions, schools, GP surgeries, utilities, drainage, green spaces)			

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					•The cost of each item •The funding source (developer contributions, CIL, government grants, Council funding) •The delivery body responsible (who will actually build it?) •The delivery timescale (when will it be delivered?) •The phasing (what must be delivered before homes are occupied?) 2.A phasing plan that ensures infrastructure is delivered before or alongside housing, not years later when the damage is already done. 3.Enforceable mechanisms (planning conditions, Section 106 agreements) to prevent developers from building out the sites without delivering the promised infrastructure. Where is the Infrastructure Delivery Plan? If it does not exist, or if it is not robust and fully funded, the Plan fails the effectiveness test. The Council Must Answer: 1.Where is the detailed Infrastructure Delivery Plan? Has one been prepared? If so, why has it not been published for scrutiny? If not, why not? 2.What is the total cost of all infrastructure required to support this development (roads, schools, healthcare, utilities)? 3.Where is the funding coming from? Developer contributions alone will not cover strategic infrastructure like M5 junction upgrades and new schools. Where is the government funding? Where is the Council funding? 4.What is the delivery timescale? When will each piece of infrastructure be delivered, and what happens if it is delayed? 5.What enforcement mechanisms exist to ensure developers deliver the infrastructure and do not simply build the houses and walk away? Without credible answers to these questions, the Plan is NOT effective. It is an undeliverable fantasy. 2.4 The Plan is NOT CONSISTENT WITH NATIONAL POLICY The Plan's proposal to release vast swathes of Green Belt is in direct contravention of the National Planning Policy Framework. Harm to All Five Purposes of the Green Belt The development would cause demonstrable harm to all five purposes of the Green Belt (NPPF Para 143): (a) Checking the unrestricted sprawl of large built-up areas •The development would create urban sprawl from the Bristol conurbation into open countryside. Pill would become an extension of Bristol rather than a distinct village. (b) Preventing neighbouring towns merging into one another •The development would significantly reduce the gap between Pill and Royal Portbury Dock / Bristol urban area, risking eventual merger. (c) Assisting in safeguarding the countryside from encroachment •100+ hectares of open countryside would be lost to development - this is encroachment by definition. (d) Preserving the setting and special character of historic towns •Pill and Easton-in-Gordano are historic villages. The Plan acknowledges that sites near St George's Church (Grade II* listed) must "appropriately reflect their location within the historic setting." How can 200+ houses next to a historic church be appropriate? This is heritage harm. (e) Assisting in urban regeneration, by encouraging the recycling of derelict and other urban land •By releasing Green Belt before exhausting brownfield capacity, the Plan reduces the pressure to regenerate derelict urban land in Bristol, Weston-super-Mare, and elsewhere. The development harms all five Green Belt purposes. This is not exceptional circumstances - it is Green Belt destruction. Failure to Follow the Sequential Test NPPF Paragraph 148 requires that when Green Belt land is released, priority must be given to: 1.Previously developed land (brownfield) 2.Grey belt land 3.Other Green Belt locations The Council has provided no evidence that it has followed this hierarchy: •It has not proven that all brownfield sites have been exhausted •It has not proven that the proposed sites are grey belt (they are not) •It has not explained why these particular Green Belt sites have been chosen over others The Plan fails to follow the required sequential approach and is NOT consistent with national policy. Misapplication of Grey Belt Policy The government's grey belt policy, as clarified in the February 2025 guidance, is designed to unlock lower-quality Green Belt land such as disused car parks, wasteland, and previously developed sites within the Green Belt. It is not intended to justify the release of 45 hectares of pristine countryside at Pill Green. The Council is misusing this policy to circumvent the fundamental protections of the Green Belt. This is not what the policy is for.			

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					The Plan is NOT consistent with national policy. PART 3: CONCLUSION AND REQUESTED MODIFICATIONS This Plan is fundamentally flawed on every level. It is: Legally non-compliant: •Violates Equality Act 2010 duties (no adequate assessment of impacts on protected groups) •Contradicts Climate Emergency declaration (creates car dependency, destroys carbon sinks, massive embodied carbon) •Fails to protect mental health and wellbeing (destroys green spaces, creates chronic stress) Not Justified: •No exceptional circumstances for Green Belt release •Sites are not grey belt (strong contribution to Green Belt purposes) •Brownfield not exhausted •Density not optimized •Duty to Cooperate not fulfilled Not Positively Prepared: •Disproportionate allocation (double our fair share: 4.6% vs 2.3%) •Ignores democratic Neighbourhood Plan (81% voted for 150-200 homes, getting 1,060) Not Effective: •Roads cannot cope (11,300 vehicles converging on Junction 19, no funded solution) •Services cannot cope (39% increase in GP patients, no delivery plan) •Schools cannot cope (no location, no timescale, no secondary provision) •No Infrastructure Delivery Plan (vague promises, no funding, no timescales) Not Consistent with National Policy: •Harms all five Green Belt purposes •Fails sequential test (brownfield first, then grey belt) •Misuses grey belt policy •Contradicts climate policy The roads cannot cope. The services cannot cope. The infrastructure does not exist. The Council has violated multiple legal duties and ignored the wellbeing of existing residents. I have lived in Pill all my life. My wife moved here in 2005, and together we have raised our two children - a 14-year-old son and an 11-year-old daughter - in this community. We chose to raise our family here because of the village character, the green spaces, the sense of community, and the quality of life. This plan threatens to destroy all of that. It threatens: •The green spaces my daughter loves (Pill Green, where she walks our dog) •The safe roads young drivers need (already dangerous, will become lethal with 11,300 extra cars) •The community we have built (40% population increase will destroy social cohesion) •The climate-stable future our children deserve (1,200 tonnes CO_2/year + 30,000 tonnes embodied carbon) •The mental health and wellbeing of our entire community (loss of nature access, chronic stress) I am not against all development. I have seen sensitive, small-scale growth in this village over my lifetime that has brought new families and new life to Pill. But this is not that. This is a plan to increase the size of our community by 40% in one go, with no regard for the infrastructure, the environment, the existing residents, or the Council's own legal duties and declared commitments. This is not nimbyism. This is about: •Protecting our environment and meeting climate commitments •Protecting vulnerable residents and meeting equality duties •Protecting our mental health and wellbeing •Holding the Council accountable to its own policies and legal obligations •Ensuring development is sustainable, not destructive The Plan is unsound. It is unlawful. It must be rejected. I Respectfully Request That the Planning Inspector: 1.Finds the North Somerset Local Plan 2041 unsound due to failure of all four tests of soundness 2.Finds the Plan legally non-compliant due to: •Failure to conduct adequate Equality Impact Assessment under Equality Act 2010 •Contradiction of Climate Emergency declaration and national climate policy •Failure to assess mental health and wellbeing impacts on vulnerable residents 3.Recommends the deletion of sites HE2015, HE206, HE20491, HE201097, and HE201065 from the Plan 4.Requires the Council to publish before any Green Belt sites can be allocated: •A comprehensive Equality Impact Assessment covering all protected characteristic groups			

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					•A carbon impact assessment showing how the Plan aligns with the 2030 carbon neutral target and national net-zero commitments •A Health Impact Assessment including mental health impacts of green space loss •A robust Green Belt assessment proving sites are grey belt (which they cannot do) •A detailed, fully funded Infrastructure Delivery Plan with costs, funding sources, delivery bodies, and timescales •Evidence of genuine cooperation with neighbouring authorities through proper Statements of Common Ground showing formal requests and responses 5.Requires the Council to respect the democratically adopted Neighbourhood Plan and limit growth to 150-200 dwellings as supported by 81% of residents 6.Requires the Council to prioritize brownfield sites and urban density increases before releasing any Green Belt land I want my children to grow up in the same village I did - not in a sprawling suburb of Bristol with gridlocked roads and overwhelmed services. The plan is unsound. It must be rejected. I wish to participate in the oral examination hearings.			

Name: Hutton Parish Council **I.D:** 63066337

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP5: Housing, employment and mixed use allocations	Unsure		Unsure	Unsure	Regarding LP5 and Schedule 1: Large sites for residential development: Land to the west of Elborough and Land north of Banwell Road, Locking /Elborough (plan pages 292 and 293): As detailed in the attached HPC Parish of Hutton Survey Report Feb 2021 - see page 3, 5, 70 and 73 - there was a lack of support and strong opposition for any new housing within the Parish - which was a key Issue in the Survey Conclusion. • The majority - 86% did not support new housing being built outside or adjacent to the Settlement Boundary of Hutton. • The majority - 83% did not support any new housing being built in the vicinity of Elborough Village. As such it was agreed that: • The Parish Council will monitor all development and continue with it's strategy of protecting the green landscape and open spaces. • The Parish Council will continue to oppose housing and other developments where it believes it is right to do so. Therefore Hutton Parish Council oppose and object to the NSC Local Plan Additional Housing Consultation for the following reasons: • The additional housing would be against the majority of wishes, as detailed in the HPC Parish of Hutton Survey Report Feb 2021. • The additional housing would be against the Parish Council strategy of protecting the green landscape and open spaces, as detailed in the HPC Parish of Hutton Survey Report Feb 2021. • The strategic gap does not look to have been maintained. The new estates appear to effectively link Elborough and thus the Parish of Hutton to the Parish of Locking - thus removing any strategic gap with Locking.			Parish of Hutton NP Survey Report Feb 2021.pdf

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					• No safe walking or safe cycling routes for children or adults to and from the current Parish facilities situated in the village of Hutton - including School, Village Hall, Scout Hut, Children's Play Area, Adventure Play Area, Hutton Football Club and local businesses. • Lack of facilities and amenities such as shops and community facilities. • Loss of green landscape and open spaces. • Lack of sustainable infrastructure to support the new housing. • Increased road traffic in the vicinity of the new houses and Elborough in Banwell Road. • Increased road traffic through the village of Hutton 20 MPH Zone to get to the new houses and Elborough in Banwell Road. • Regarding the road between Hutton and Elborough, not only would it see increased traffic, but the road is very difficult and in places not wide enough for 2 cars to pass (yet alone buses and lorries) which will build congestion etc.. • The proposed developments around Elborough Village are very extensive • There will be some 400 additional properties added to the existing 180 properties in Elborough Village. These dwellings are in an isolated position there are no existing services within this area neither in Hutton. It seems difficult to see development being sustainable in this area unless there is an increase of facilities. • There are possible schools at Locking Parklands but there would need to be safe walking or cycle works and an increase in school places would be necessary to cater for the large increase in children • There are no community facilities at Elborough and if 400 houses are added it would be essential for some community facilities to be provided. There is also the proposal of some 360 houses immediately adjacent to Elborough in the Locking Parish. • There would need to be Highways upgrading to give suitable access to the A371 • There would need to be the introduction of public transport to support this development as at present there is none. • With the high demand on North Somerset for housing it seems that the Elborough Development although we dot consider them “Sustainable” they are more sustainable than many other areas proposed in these plans. • North Somerset is in an impossible situation in having to provide the level of development required by the Government. • If all this proposed development does take place where are the expected influx of people going to seek employment or will the transient population seek to travel yet even further than at present.			
Land to the west of Elborough	Unsure		Unsure	Unsure	Hutton Parish Council Objects for the following reasons: As detailed in the attached HPC Parish of Hutton Survey Report Feb 2021 - see page 3, 5, 70 and 73 - there was a lack of support and strong opposition for any new housing within the Parish - which was a key Issue in the Survey Conclusion. • The majority - 86% did not support new housing being built outside or adjacent to the Settlement Boundary of Hutton.			Parish of Hutton NP Survey Report Feb 2021.pdf

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					• The majority - 83% did not support any new housing being built in the vicinity of Elborough Village. As such it was agreed that: • The Parish Council will monitor all development and continue with it's strategy of protecting the green landscape and open spaces. • The Parish Council will continue to oppose housing and other developments where it believes it is right to do so. Therefore Hutton Parish Council oppose and object to the NSC Local Plan Additional Housing Consultation for the following reasons: • The additional housing would be against the majority of wishes, as detailed in the HPC Parish of Hutton Survey Report Feb 2021. • The additional housing would be against the Parish Council strategy of protecting the green landscape and open spaces, as detailed in the HPC Parish of Hutton Survey Report Feb 2021. • The strategic gap does not look to have been maintained. The new estates appear to effectively link Elborough and thus the Parish of Hutton to the Parish of Locking - thus removing any strategic gap with Locking. • No safe walking or safe cycling routes for children or adults to and from the current Parish facilities situated in the village of Hutton - including School, Village Hall, Scout Hut, Children's Play Area, Adventure Play Area, Hutton Football Club and local businesses. • Lack of facilities and amenities such as shops and community facilities. • Loss of green landscape and open spaces. • Lack of sustainable infrastructure to support the new housing. • Increased road traffic in the vicinity of the new houses and Elborough in Banwell Road. •Increased road traffic through the village of Hutton 20 MPH Zone to get to the new houses and Elborough in Banwell Road. • Regarding the road between Hutton and Elborough, not only would it see increased traffic, but the road is very difficult and in places not wide enough for 2 cars to pass (yet alone buses and lorries) which will build congestion etc. .• The proposed developments around Elborough Village are very extensive• There will be some 400 additional properties added to the existing 180 properties in Elborough Village. These dwellings are in an isolated position there are no existing services within this area neither in Hutton. It seems difficult to see development being sustainable in this area unless there is an increase of facilities. • There are possible schools at Locking Parklands but there would need to be safe walking or cycle works and an increase in school places would be necessary to cater for the large increase in children • There are no community facilities at Elborough and if 400 houses are added it would be essential for some community facilities to be provided. There is also the proposal of some 360 houses immediately adjacent to Elborough in the Locking Parish. • There would need to be Highways upgrading to give			

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					suitable access to the A371. • There would need to be the introduction of public transport to support this development as at present there is none. • With the high demand on North Somerset for housing it seems that the Elborough Development although we dot consider them “Sustainable” they are more sustainable than many other areas proposed in these plans. • North Somerset is in an impossible situation in having to provide the level of development required by the Government. • If all this proposed development does take place where are the expected influx of people going to seek employment or will the transient population seek to travel yet even further than at present.			
Land north of Banwell Road, Locking /Elborough	Unsure		Unsure	Unsure		Hutton Parish Council Objects for the following reasons:As detailed in the attached HPC Parish of Hutton Survey Report Feb 2021 - see page 3, 5, 70 and 73 - there was a lack of support and strong opposition for any new housing within the Parish - which was a key Issue in the Survey Conclusion. • The majority - 86% did not support new housing being built outside or adjacent to the Settlement Boundary of Hutton. • The majority - 83% did not support any new housing being built in the vicinity of Elborough Village. As such it was agreed that: •The Parish Council will monitor all development and continue with it's strategy of protecting the green landscape and open spaces. • The Parish Council will continue to oppose housing and other developments where it believes it is right to do so. Therefore Hutton Parish Council oppose and object to the NSC Local Plan Additional Housing Consultation for the following reasons: • The additional housing would be against the majority of wishes, as detailed in the HPC Parish of Hutton Survey Report Feb 2021. •The additional housing would be against the Parish Council strategy of protecting the green landscape and open spaces, as detailed in the HPC Parish of Hutton Survey Report Feb 2021. •The strategic gap does not look to have been maintained. The new estates appear to effectively link Elborough and thus the Parish of Hutton to the Parish of Locking - thus removing any strategic gap with Locking. • No safe walking or safe cycling routes for children or adults to and from the current Parish facilities situated in the village of Hutton - including School, Village Hall, Scout Hut, Children's Play Area, Adventure Play Area, Hutton Football Club and local businesses. •Lack of facilities and amenities such as shops and community facilities. • Loss of green landscape and open spaces. •Lack of sustainable infrastructure to support the new housing. •Increased road traffic in the vicinity of the new houses and Elborough in Banwell Road. •Increased road traffic through the village of Hutton 20 MPH Zone to get to the new houses and Elborough in Banwell Road. •Regarding the road between Hutton and Elborough, not only would it see increased traffic, but the road is very difficult and in places not wide enough for 2 cars to pass (yet alone buses and lorries) which will build congestion etc. •The proposed developments around Elborough Village are very extensive• There will be some 400 additional properties added to the existing 180 properties in Elborough Village. These dwellings are in an isolated position there are no existing services within this area neither in Hutton. It seems difficult to see development being sustainable in this area unless there is an increase of facilities. •There are possible schools at Locking Parklands but there would need to		Parish of Hutton NP Survey Report Feb 2021.pdf

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					be safe walking or cycle works and an increase in school places would be necessary to cater for the large increase in children •There are no community facilities at Elborough and if 400 houses are added it would be essential for some community facilities to be provided. There is also the proposal of some 360 houses immediately adjacent to Elborough in the Locking Parish.• There would need to be Highways upgrading to give suitable access to the A371. •There would \need to be the introduction of public transport to support this development as at present there is none. •With the high demand on North Somerset for housing it seems that the Elborough Development although we dot consider them “Sustainable” they are more sustainable than many other areas proposed in these plans. •North Somerset is in an impossible situation in having to provide the level of development required by the Government. •If all this proposed development does take place where are the expected influx of people going to seek employment or will the transient population seek to travel yet even further than at present.		

Name: I Barfield **I.D:** 39402305

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Backwell is not equipped to deal with such an immense proportion of growth: the infrastructure is not able to sustain it and nor is the environment. A proportionate increase in population of 80% on green land and on/close to flood plains will put existing (and currently being built) houses and residents at risk. There are already homes in Backwell at substantial risk of flooding. There is only 7% of Grade 1 Agricultural Land in the whole of North Somerset. Nature is being destroyed disproportionately to the ability for the infrastructure to support this speed of growth or regenerate the natural environment elsewhere. There is no needs or viability analysis for an extra 1,000 houses! This is TOO MUCH.			

Name: I Blenkinsop **I.D:** 58185793

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	There are many reasons that this plan is unsound. I consider the vast increase in housing around Backwell and Farleigh to be overdevelopment. Backwell is already growing by 40% with the approved housing. Additional developments most certainly represent overdevelopment. Given that this one small village is intended to take fully 7% of the county's new housing needs, this feels unbalanced and unsustainable. No social cohesion impact assessment has been provided. I would question whether the volume and scale of growth, investment and infrastructure change, in such a short period of time in one small area would be destabilising, unsustainable, and probably undeliverable. I question the overall sustainability of this location, which is much vaunted in the literature. Most people would find it a long walk to the station, and this likely will result in increased hyper-local traffic. The rail station, when you do arrive there, is unfit for purpose as a substantial transport hub. You have narrow, short platforms - with access to only half a train, and insufficient depth to be safe at busy periods. The lack of cover, lack of accessibility options, and the narrow road and pedestrian access underneath the station only compound the unsuitability of this station, unless it sees enormous investment. Bus access into Bristol or Weston is questionable. There are bus routes, but if you've ever tried to commute or use these for			

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					leisure you would know that they are absolutely not to be relied upon. Buses at peak times are often too busy and speed past bus stops without picking up passengers, especially when travelling out of the city in the afternoon. This makes the bus an unreliable mode of transport, and means lots of people in the area opt to drive. There is very little employment in Backwell directly, meaning most workers do need to commute in some way. The fact that the new road connecting Nailsea and Backwell is merely an aspiration and is not researched, funded, routed, or planned in advance likely means it would never happen. This is perhaps one of the only things that could help to alleviate some of the impacts of all this housing - and it seems highly unlikely it would ever be delivered. The sketched out routes are also questionable, as to whether they would truly solve the issues they are aiming to fix around Station Road and Backwell Common. These factors will combine to mean that most of this new housing will add substantially to traffic, parking and congestion issues for several miles around as most people will regularly opt to use their cars, even for short journeys. Saying people will walk or cycle regularly is simply wishful thinking in most cases. Services like doctors and dentists will not have capacity to take on thousands of new residents. School places seem likely to be an issue as well. The proposal would build on Grade 1 Agricultural land, of which there is only a small amount left in North Somerset. This goes against stated government policy to "protect our best and most versatile land" to safeguard food security. The proposals involve adding substantial development in the very lowest elevations of the Vale of Backwell. Somerset is low-lying, and medium-term climate change will lead to both rising sea levels, and (according to the IPCC Sixth Assessment Report (Working Group 1) very likely to much higher rainfall. We cannot be building at the bottom of valleys if we want this housing to be sustainable - and surely we want these houses to be in use, dry, desirable and comfortable for at least a hundred years to come. The area around Backwell lake is already flood prone. This will be exacerbated by this development and will certainly become worse. There are wildlife habitats that would be destroyed, harming biodiversity. This includes the Brockley Maternity Roost - Horseshoe bats are known to use the area.			

Name: I Brester Malykh **I.D:** 30920961

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Banwell Road, Locking /Elborough	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	Risk and Loss of Ecology and protected species including several bat species, hedgehogs and badgers; with bird species including Red Kites removing to the area. Flood risk to an already vulnerable area Increased traffic which will result in congestion and will danger vulnerable members of community I.e. children, elderly and disabled Volume of developments already in the area I.e. 3000 properties in Wolvershill, Locking Parklands developments. Breaking of North Somerset own policy to protect and maintain village identity	Risk and Loss of Ecology and protected species including several bat species, hedgehogs and badgers; with bird species including Red Kites removing to the area. Flood risk to an already vulnerable area Increased traffic which will result in congestion and will danger vulnerable members of community I.e. children, elderly and disabled Volume of developments already in the area I.e. 3000 properties in Wolvershill, Locking Parklands developments. Crime rates to increase due to increased population and traffic Breaking of North Somerset own policy to protect and maintain village identity		
Land north of Banwell Road, Locking /Elborough	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with	No	No	· With the high demand on North Somerset for housing it seems that the Elborough Development although we don’t consider them “Sustainable” they are more sustainable than many other areas proposed in these plans.	· With the high demand on North Somerset for housing it seems that the Elborough Development although we don’t consider them “Sustainable” they are more sustainable than many other areas proposed in these plans.	.	

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		national policy			· North Somerset is in an impossible situation in having to provide the level of development required by the Government. · If all this proposed development does take place where are the expected influx of people going to seek employment or will the transient population seek to travel yet even further than at present. In conclusion and for the reasons outlined: -- Breaking of North Somerset own policy of protecting village identity - Noise and traffic increase and pollution - Loss of green space -Impact on the biodiversity/ecology of the area -Amenity disturbance -Increasing flooding risk -Dangers to the vulnerable -Security and privacy concerns -Incompatibility with a residential environment. We will respectively request that the planning authority refuses this proposal and subsequent planning application submitted by SP Broadway are rejected. We whole heartedly reject the proposed and irrational development.	· North Somerset is in an impossible situation in having to provide the level of development required by the Government. · If all this proposed development does take place where are the expected influx of people going to seek employment or will the transient population seek to travel yet even further than at present. In conclusion and for the reasons outlined: -- Breaking of North Somerset own policy of protecting village identity - Noise and traffic increase and pollution - Loss of green space -Impact on the biodiversity/ecology of the area -Amenity disturbance -Increasing flooding risk -Dangers to the vulnerable -Security and privacy concerns -Incompatibility with a residential environment. We will respectively request that the planning authority refuses this proposal and subsequent planning application submitted by SP Broadway are rejected. We whole heartedly reject the proposed and irrational development.		

Name: I Brown **I.D:** 57940449

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective	Unsure	Unsure	I am writing to object to the proposed allocation of Land East of Backwell for around 1,000 homes. Based on both local evidence and my own direct observations, I consider this allocation unsound, unjustified, and harmful to Backwell and the surrounding environment. 1. Green Belt and Grade 1 Agricultural Land			

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		• Consistent with national policy			This land is part of the Green Belt and includes areas of Grade 1 agricultural soil, some of the most productive farmland in the district. Developing this site would permanently destroy high-quality agricultural land and undermine the Green Belt's purpose of preventing urban sprawl and safeguarding the countryside. 2. No Demonstrated Need, Viability, or Social Cohesion Assessment The Plan provides no needs assessment or viability analysis to justify placing an additional 1,000 homes in Backwell.There is also no social cohesion or community impact assessment, despite the fact that this development would be larger than Backwell's recent combined growth and would fundamentally alter the character and scale of the village. 3. Local Flooding on Backwell Common, Farleigh Road and Surrounding Areas From direct experience living in the area, I have observed regular flooding on: - Backwell Common – with standing water for extended periods after rainfall, especially when the ground is saturated. - Farleigh Road – where surface water often collects and overwhelms drains. - Adjacent fields and footpaths, where groundwater levels rise quickly and runoff flows toward low-lying areas. These problems occur already, without any development. The Local Plan has not presented any site-specific hydrological or flood-risk assessment for Land East of Backwell. Even with SuDS, large-scale development on sloping, naturally water-retaining farmland would significantly increase runoff, reduce natural infiltration, and exacerbate existing flood risk for both current and future residents. 4. Transport and Infrastructure Cannot Cope From daily use of local routes, I know that: - The A370 is frequently congested at peak times. - Emergency service vehicles struggle to use this route when congestion occurs. - Station Road struggles with traffic flows and safety issues even with traffic calming measures that have been implemented over the last few years. - Bus and rail services are already near capacity. - Local schools, GP practices, and utilities are under strain. No clear, funded, or deliverable infrastructure plan has been provided to support the scale of development proposed. 5. Landscape, Rural Character, and Environmental Harm The site forms part of Backwell's distinct rural setting. I regularly walk and use local viewpoints and footpaths, and it is clear that developing this area would: - Remove open countryside, - Sever wildlife corridors, - Erode the village's landscape identity, and - Damage biodiversity that relies on these fields, hedgerows, and habitats. Conclusion - The Allocation is Not Sound The proposal fails the NPPF tests of soundness: - Not justified a lacking need, viability, hydrological evidence, and social impact analysis. - Not effective – no deliverable transport or infrastructure strategy. - Not consistent with national policy – damages Green Belt, Grade 1 agricultural land, and environmental and flood-risk objectives. For these reasons, and based on my direct experience of the area, I strongly urge North Somerset Council to remove the allocation of Land East of Backwell from the Local Plan. Proceeding with this site will cause irreversible damage.			

Name: I Dawes **I.D:** 62865537

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The total increase in housing is forecast at 80%. Without infrastructure this is irreversibly damaging village character and the environment, whilst lowering the quality of life for all and prospective residents of Backwell. The suffering to Backwell is disproportionate. The proposed new road will increase traffic congestion. The building on green fields and arable land is criminally shortsighted given climate change and need for crucial sustainability. Build on brownfield sites.	Reflect on proportionality for Backwelland consider the residents if Backwelll.	N/a	

Name: I Forsyth **I.D:** 18483361

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	Unsure		Unsure	Unsure	Insufficient detail of the infrastructure needed to support such a large /excessive number of new houses-how can the development be phased?			
Policy LP3: Strategic location: Nailsea and Backwell	Unsure		Unsure	No	Nailsea and Backwell are two seperate communities with their own identities and characteristics-they have not been asked if they want or are willing to be merged-Are they to be combined as a new authority replacing the present parish council and town council			
Land east of Backwell	No		Unsure	Unsure	The present community of Backwell has grown to its present number over many years- approx 800 new houses have already been approved recently with some now in the course of being built notwithstanding the inadequate "village" road network and the strain on existing services/amenities. To consider allowing this additional housing being built within the next 15/16 years is wrong and unrealistic; this is high grade agricultural land and should be kept for farming. There is no proper disabled access to the station; this has been an ongoing issue for years and i question how well the Council will be able to sort out / provide the Cross Rail link.			

Name: I Palmer **I.D:** 30660641

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Legal Compliance The Plan is not legally compliant for the following reasons: Reasonable alternatives—including brownfield sites and Castlefield in Clevedon—were not properly assessed, contrary to national policy requirements for plan-making. The proposed Green Belt release has not met the exceptional circumstances test, nor has the Council demonstrated that non-Green Belt alternatives were exhausted. Biodiversity impacts, including the risk of the adjacent woodland losing its SSSI status, have not been adequately considered. The transport evidence is incomplete, does not demonstrate safe and suitable access, and therefore			

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					fails to meet statutory requirements. Soundness: Positively Prepared The Plan has not been positively prepared because: The Local Plan identifies 23 brownfield sites, and 22 of these have capacity for additional development, but this capacity has not been fully utilised. Castlefield in Clevedon could accommodate hundreds of homes and has far better public transport connections. The Council has not demonstrated that it is optimising brownfield land before proposing release of sensitive greenfield areas such as Tower Farm. Soundness: Justified The allocation of Tower Farm is not justified because: It is not the most appropriate site when compared with reasonable alternatives that are more sustainable and less constrained. The valley, woodland, and surrounding fields form an ecologically valuable landscape supporting a diverse range of species. A previous Planning Inspector supported retaining the woods and the protective buffer that Tower Farm would undermine. Soundness: Effective The allocation is not effective due to the following reasons: The site relies on one main vehicular access via The Downs, which is already congested, especially during school peak times. The emergency-only access via Tower Road is unreliable and does not provide the resilience required for a development of this scale. The steep gradient of Avon Way makes the developer’s walking-times and accessibility claims unrealistic. Surface water run-off from the site risks impacting existing homes on The Downs. The proposal will cause town-wide congestion, yet relies on unrealistic assumptions such as widespread e-bike commuting. The housing mix is inappropriate: Portishead does not need more 4-bedroom properties. The local need is for 1–3 bedroom homes, including affordable and downsizer accommodation. Soundness: Consistent with National Policy The allocation is not consistent with national policy because: The development poses a risk to the woodland’s SSSI status and would undermine biodiversity objectives in the NPPF. The Portishead Downs provide essential wellbeing and mental health benefits for the town’s 27,000 residents, consistent with national policy on healthy communities.			

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					The Plan does not follow brownfield-first principles, which national policy requires. The transport strategy fails to demonstrate safe, suitable and sustainable access as required by NPPF paragraphs 110–115. Site-Specific Objection to HE2068 In addition to the legal and soundness issues above, Tower Farm is an unsuitable allocation because: The valley and woodland form a functioning ecosystem essential to local biodiversity and landscape character. Allowing greenfield development would undermine brownfield regeneration across the district. The proposal will cause increased traffic throughout all of Portishead, worsening already severe congestion. Portishead is already under significant development pressure; Tower Farm would add further strain to infrastructure, transport, and community facilities. For the reasons set out above, allocation HE2068 is not legally compliant and not sound. The site is not deliverable, not sustainable, and conflicts with both local and national policy. I therefore request that Tower Farm be removed from the North Somerset Local Plan 2041. I formally request that: The allocation HE2068 (Tower Farm) be removed from the Local Plan. The Council should instead: Prioritise brownfield regeneration on the 22 sites already identified. Reassess Castlefield and other more sustainable alternatives. Protect SSSI woodland and key ecological networks. Reevaluate transport, access, and drainage constraints affecting the Tower Farm site.			

Name: Iain Johnston **I.D:** 62745217

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Justified	No	No	The proposed development of the land on Tower Farm for 500 new homes is not viable on many levels : Access - the development plans show no consideration for additional access roads in and out of the proposed site. The only road in and out of this area is The Downs which is adjacent to one of the largest Junior Schools in the region and also Down Road which a very busy main road and bus route. The junction is already under severe strain at school drop off / pick up times so with the addition of 500 new homes, this will then represent a serious hazard to locals / children with a hugely increased amount of traffic. Building - in the construction phase of this project there would be a large increase in the numbers of plant vehicles / machinery requiring access, again endangering lives and causing traffic chaos at peak times. Pollution - with 500 more homes, this will probably equate to 500 more vehicles using this one road in / out on a daily basis therefore causing an increase in pollutants in very close proximity to a primary school and affecting the health of both children			

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					and local residents. Environmental - the proposed development of the land on Tower Farm is extremely close to an area of outstanding natural beaty at Weston Big Wood - a wooded area that has existed for centuries and home to a multitude of species. This development will have massively detrimental effect on the natural habitats of the creatures who live in the woods. This is also a place that is regularly used by dogwalkers / runners and locals for recreational purposes. Well Being - The development will remove this land and social space will give extremely limited access to Weston Big Wood. Having these areas removed will have a very negative impact on people's wellbeing and mental health which will then put an increased strain on local doctor's surgeries. Without doubt there is a need for housing but surely there are numerous altrernatives in Portishead for brownfield development that won't have the same massively negative impacts as I have listed here. Therefore the development of Tower Farm land should definitely not go ahead.			

Name: Iain McDowell **I.D:** 62771137

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano			Unsure	Unsure	HE20491 Marsh Lane & Church Road already heavily congested 24 Church Road to Kings Arms pub. BS20 0PQ. Single track already due to parking. Unable to hold additional demand & flow from HE20491 HE206 no additional demand on this segment of road	HE20491 Marsh Lane & Church Road already heavily congested 24 Church Road to Kings Arms pub. BS20 0PQ. Single track already due to parking. Unable to hold additional demand & flow from HE20491 HE206 no additional demand on this segment of road		

Name: Iain McGregor **I.D:** 62564737

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	As a relatively new resident of Backwell, I am astounded at the amount of traffic through the village. Narrow roads, pavements that are damaged and difficult to walk on and motorists that drive too fast as they are trying to get around the traffic congestion as quickly as they can. I work from home and all day there is a constant flow of heavy traffic - it usually starts around 4am with the large construction vehicles rumbling through. The roads are in a poor state due to the damage caused by these heavy vehicles. I walk my dogs daily, and every morning I watch how kids walking to school have to step out into the road because vehicles are parked on the pavement, while cars race by to try get somewhere quicker and avoid other congested roads. I already feel there is bad planning that was done for the current state of Backwell - and to add in 1000 more homes will only decrease the safety for the residents and increase the amount of cars racing through the narrow roads. I honestly fear for my life when walking on some of these roads. There needs to be more investment in infrastructure, traffic calming solutions implemented, speed cameras, etc. There is even more development taking place in other areas where residents have to also travel through Backwell to get to Bristol. This will again cause more congestion and frustration as there is no alternative route and the Nailsea and Backwell station is not equipped to handle more travellers. There is already a shortage of places in schools, not enough Doctors, etc as well as roads that cannot handle the volume of people in Backwell currently. The village cannot handle additional houses being built. Soon there will be no more open land and no more agricultural land (loss of employment in that sector).			

Name: Ian Bloom **I.D:** 62813697

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at North West Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The proposed figure of 1817 new homes in Nailsea would lead to a total over development of the town. The proposed new road would not serve Nailsea's traffic or relieve congestion on Station Road, nor would it help traffic travelling from Backwell towards the M5. The new link road under-rail crossing is likely to be extremely expensive and the engineering problematic due to the proximity to the River Kenn. Although three new primary schools are proposed for Nailsea and Backwell, they will be funded through developer contributions and will be phased with no locations identified as yet. Additional development will place immense pressure on the town's existing health and leisure provision. There will be no direct investment to combat this pressure. Land to the north of Nailsea is proposed to be removed from the Green Belt and will be replaced to the south. Positively, the new section of Green Belt to the south is greater in size than the area being removed and will replace the Strategic Gap. Greenfield Crescent Playing Field is not protected under local Green Space Policy LP15. All proposed development sites in Nailsea have been assessed to be foraging locations for the rare Greater and Lesser Horseshoe Bats, which are Protected Species. Transport modelling shows there will be notable increases in vehicle movements on the network of rural lanes around Nailsea. There are no clear, workable plans to mitigate against this. The lanes will become congested and unsafe for pedestrians, cyclists and horse-riders. There are no plans in place to improve the accidents blackspots at Stone Edge Batch, Wraxall Hill or Portbury Lane all of which will see a marked increase in vehicle movements. Development is proposed west and south of Backwell Lake (Reservoir). The new roads and housing will be in the floodplain, which actually does flood regularly. The railway station is not fit for purpose as a transport hub; it remains inaccessible for people with mobility issues and presents serious challenges when travelling with young children.			
Land off Pound Lane, Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	1. The proposed figure of 1817 new homes in Nailsea would lead to a total over development of the town. 2. The proposed new road would not serve Nailsea's traffic or relieve congestion on Station Road, nor would it help traffic travelling from Backwell towards the M5. 3. The new link road under-rail crossing is likely to be extremely expensive and the engineering problematic due to the proximity to the River Kenn. 4. Although three new primary schools are proposed for Nailsea and Backwell, they will be funded through developer contributions and will be phased with no locations identified as yet. 5. Additional development will place immense pressure on the town's existing health and leisure provision. There will be no direct investment to combat this pressure. 6. Land to the north of Nailsea is proposed to be removed from the Green Belt and will be replaced to the south. Positively, the new section of Green Belt to the south is greater in size than the area being removed and will replace the Strategic Gap. 7. Greenfield Crescent Playing Field is not protected under local Green Space Policy LP15. 8. Grade 2 Agricultural Land, which is high yielding and of very good quality, will be lost permanently through housing development to the south of Nailsea. 9. All proposed development sites in Nailsea have been assessed to be foraging locations for the rare Greater and Lesser Horseshoe Bats, which are Protected Species. 10. One hundred homes are proposed adjacent to Moor End Spout Nature Reserve, a site hosting many protected species. Development would destroy valuable wildlife habitats and further harm biodiversity in our area. 11. Transport modelling shows there will be notable increases in vehicle movements on the network of rural lanes around Nailsea. There are no clear, workable plans to mitigate against this. The lanes will become congested and			

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					unsafe for pedestrians, cyclists and horse-riders. 12. There are no plans in place to improve the accidents blackspots at Stone Edge Batch, Wraxall Hill or Portbury Lane all of which will see a marked increase in vehicle movements. 13. Development is proposed west and south of Backwell Lake (Reservoir). The new roads and housing will be in the floodplain, which actually does flood regularly. 14. The railway station is not fit for purpose as a transport hub; it remains inaccessible for people with mobility issues and presents serious challenges when travelling with young children.			
Poplar Farm, Nailsea	No		Unsure	Unsure				
Poplar Farm, Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	1. The proposed figure of 1817 new homes in Nailsea would lead to a total over development of the town. 2. The proposed new road would not serve Nailsea's traffic or relieve congestion on Station Road, nor would it help traffic travelling from Backwell towards the M5. 3. The new link road under-rail crossing is likely to be extremely expensive and the engineering problematic due to the proximity to the River Kenn. 4. Although three new primary schools are proposed for Nailsea and Backwell, they will be funded through developer contributions and will be phased with no locations identified as yet. 5. Additional development will place immense pressure on the town's existing health and leisure provision. There will be no direct investment to combat this pressure. 6. Land to the north of Nailsea is proposed to be removed from the Green Belt and will be replaced to the south. Positively, the new section of Green Belt to the south is greater in size than the area being removed and will replace the Strategic Gap. 7. Greenfield Crescent Playing Field is not protected under local Green Space Policy LP15. 8. Grade 2 Agricultural Land, which is high yielding and of very good quality, will be lost permanently through housing development to the south of Nailsea. 9. All proposed development sites in Nailsea have been assessed to be foraging locations for the rare Greater and Lesser Horseshoe Bats, which are Protected Species. 10. Transport modelling shows there will be notable increases in vehicle movements on the network of rural lanes around Nailsea. There are no clear, workable plans to mitigate against this. The lanes will become congested and unsafe for pedestrians, cyclists and horse-riders. 11. There are no plans in place to improve the accidents blackspots at Stone Edge Batch, Wraxall Hill or Portbury Lane all of which will see a marked increase in vehicle movements. 12. Development is proposed west and south of Backwell Lake (Reservoir). The new roads and housing will be in the floodplain, which actually does flood regularly. 13. The railway station is not fit for purpose as a transport hub; it remains inaccessible for people with mobility issues and presents serious challenges when travelling with young children.			
Land south of Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	1. The proposed figure of 1817 new homes in Nailsea would lead to a total over development of the town. 2. The proposed new road would not serve Nailsea's traffic or relieve congestion on Station Road, nor would it help traffic travelling from Backwell towards the M5. 3. The new link road under-rail crossing is likely to be extremely expensive and the engineering problematic due to the proximity to the River Kenn. 4. Although three new primary schools are proposed for Nailsea and Backwell, they will be funded through developer contributions and will be phased with no locations identified as yet. 5. Additional development will place immense pressure on the town's existing health and leisure provision. There will be no direct investment to combat this pressure. 6. Greenfield Crescent Playing Field is not protected under local Green Space Policy LP15. 7. Grade 2 Agricultural Land, which is high yielding and of very good quality, will be lost permanently through housing development to the south of Nailsea. 8. All proposed development sites in Nailsea have been assessed to be foraging locations for the rare Greater and Lesser Horseshoe Bats, which are Protected Species. 9. One hundred homes are proposed adjacent to Moor End Spout Nature Reserve, a site hosting many protected species. Development would destroy valuable wildlife habitats and further harm biodiversity in our area. 10. Transport modelling shows there will be notable increases in vehicle movements on the network of rural lanes around Nailsea. There are no clear, workable plans to mitigate against this. The lanes will become congested and unsafe for pedestrians, cyclists and horse-riders. 11. There are no plans in place to improve the accidents blackspots at Stone Edge Batch, Wraxall Hill or Portbury Lane all of which will see a marked increase in vehicle movements.			

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					12. Development is proposed west and south of Backwell Lake (Reservoir). The new roads and housing will be in the floodplain, which actually does flood regularly. 13. The railway station is not fit for purpose as a transport hub; it remains inaccessible for people with mobility issues and presents serious challenges when travelling with young children.			

Name: Ian Bowen **I.D:** 62718401

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP1: Strategic location: Wolvershill (north of Banwell)	No	• Consistent with national policy	Yes	Yes	Policy LP1 is not consistent with national policy it omits, contrary to NPPF paras 58, 189 and 190(c) in particular (and relevant parts of the PPG) reference to the need for s106 planning obligations and/or CIL monies which may be necessary to address off-site recreational pressures within the Mendip Hills National Landscape, resulting from new development within or near the designated area	Policy LP1: Insert the following text at the end of Bullet Point 7: The development must respect the landscape setting, including minimising any adverse impact on the Mendip Hills National Landscape through sensitive design, landscaping and contributions to off-site nature recovery and improvements to key recreational routes and destinations		
Policy DP39: Mendip Hills Area of Outstanding Natural Beauty	No	• Consistent with national policy	Yes	Yes	The Plan is not consistent with national policy because Policy DP39:(1) does not adequately reflect the LPA's role in satisfying the statutory duty to 'seek to further' the purposes of the conservation and enhancement of the natural beauty of the Mendip Hills National Landscape; and (2) does not make clear, pursuant to NPPF paras 58, 189 and 190(c) in particular (and relevant parts of the PPG), that s106 planning obligations and/or CIL monies may be necessary to address off-site recreational pressures within the Mendip Hills National Landscape, resulting from new development within or near the designated area.	Suggested amendments to Policy DP39 and Justification as follows: DP39 – Mendip Hills National Landscape All Ddevelopment proposals affecting the Mendip Hills National Landscape must conserve and enhance its landscape and scenic beauty and enhance its wildlife and cultural heritage to which great weight will be attached., taking into account the economic and social well-being of the area. Major development within the Mendip Hills National Landscape will not be permitted other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Development which would have an adverse impact on the landscape, setting, tranquility and scenic beauty of the Mendip Hills National Landscape, including views into and out of the National Landscape, will not be permitted unless in exceptional circumstances and where it can be demonstrated that it is in the public interest. In seeking to further the purpose of conserving and enhancing the natural beauty of the area, the Local Planning Authority will require all applications for development to clearly demonstrate through suitable Landscape and Visual Impact Assessment and other relevant assessments how the proposal would conserve and enhance the natural beauty of the area with reference to its Special Qualities as set out in the most up-to-date Mendip Hills National Landscape Management Plan. Where any development would fail to conserve and enhance the natural beauty of the area, applicants must explain the reasons why, and identify and incorporate all reasonable mitigation measures before the Local Planning Authority will consider any countervailing benefits in the overall planning balance. Such measures may include: • Scheme amendments including to the proposed overall scale, size of buildings, layout, appearance/materials and landscaping; and • Appropriate compensatory measures secured through planning conditions or obligations. Development affecting this National Landscape should conserve and enhance its Special Qualities. All development will be controlled, through the use of planning conditions, to ensure it would minimise any detrimental effect to the		

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						natural beauty of the National Landscape. Proposals which meet the economic needs of local communities and meet demand for recreation will still need to be consistent with the conservation of that natural beauty. Particular attention will be given to the siting, scale, size, character, design, materials and landscaping of the proposed development, views to and from the National Landscape, as well as conservation of wildlife and cultural heritage. Outdoor lighting schemes, including those associated with new development, will not be permitted in the National Landscape or within its setting unless it has been demonstrated through evidence prepared by a suitably qualified lighting professional, that there will be no adverse impact from obtrusive light and cumulative skyglow. Particular care will be taken in those parts of the National Landscape where dark skies are an important feature of the area. The impact of indoor lighting such as roof lights and large windows will also be considered. Any planning development being considered within the National Landscape should also have regard for the public rights of way network. In appropriate cases, developer contributions will be required to mitigate harm to the existing recreational network as a result of increased pressures associated with new development. Wherever possible new roads and major infrastructure proposals should be kept away from the National Landscape and, where they would be likely to affect it, proposals should demonstrate the need for development and that the siting and design would do as little damage to the environment as practicable. The Local Planning Authority will assess whether proposals affecting the Mendip Hills National Landscape further the purpose of conserving and enhancing its natural beauty. Justification Justification National Landscapes are areas of fine landscape quality, of such great variety in character and extent that there is a national interest in protecting them. The primary objective of designation is conservation and enhancement of the natural beauty of the landscape, which Relevant Authorities (including the Local Planning Authority) have a statutory duty to ‘seek to further’ in carrying out their functions. The NPPF states that ‘great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes, which have the highest status of protection in relation to these issues’. The Mendip Hills National Landscape organisation has published 12 13 Special Qualities within its Management Plan 2025 – 2030 which create the Mendip Hills sense of place and identity and combined give rise to the area’s designation as a National Landscape. The Special Qualities include the ‘Sparsely populated and tranquil plateau’ and ‘Views towards and Views out’ of the Mendip Hills. The 12 13 Special Qualities can be viewed on the Mendip Hills National Landscape webpages. In promoting any development within the National Landscape or its setting, applicants will be expected to assess all likely effects with reference to the Special Qualities. Through measures including Landscape and Visual Impact Assessments (to Landscape Institute/IEMA GLVIA3 or successor standards), ecology and lighting assessments, applicants should identify all reasonable measures to conserve and enhance the area and mitigate any harm.		

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						The NPPF states that planning policies and decisions should aim to 'identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason'. Tranquility can be defined as areas relatively undisturbed by noise from human sources that undermine the intrinsic character of the area, for example an absence of noise and visual intrusion from major infrastructure such as motorways and A roads, urban areas and airports. The Mendip Hills National Landscape (formerly Area of Outstanding Natural Beauty (AONB)), designated in 1972, covers 198 square kilometres, and is divided between the administrative areas of North Somerset, Bath and North East Somerset and Somerset. National Landscape designation confers additional duties on local authorities. The application of this policy should help to protect and where possible enhance the landscape and natural beauty of the Mendip Hills National Landscape. In addition, off-site developer contributions may be sought, in line with Policy DP63, to address recreational pressures on nature, key routes and destinations within the designated area arising from new development. The council has had regard to the Mendip Hills National Landscape Management Plan 2025-2030, in preparing the policy. That is consistent with the Planning Practice Guidance (PPG) on Natural Environment.		
Policy DP63: Infrastructure delivery and development contributions	No	• Consistent with national policy	No	Yes	The Reasoned Justification to Policy DP63 is not consistent with national policy. It omits, contrary to NPPF paras 58, 189 and 190(c) in particular (and relevant parts of the PPG), reference to the need for s106 planning obligations and/or CIL monies which may be necessary to address off-site recreational pressures within the Mendip Hills National Landscape, resulting from new development within or near the designated area.	"Regardless of the provision of local community facilities, occupiers of new development within or near the designated Mendip Hills National Landscape are likely to resort to key routes and destinations within the area to enjoy outdoor recreation including by foot, cycling and horse riding. Where appropriate, s106 and/or Community Infrastructure Levy monies will be secured to mitigate off-site harm and/or enhance facilities commensurate with increased recreational pressures resulting from the development.".		

Name: Ian Chambers **I.D:** 39278241

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell already has 800 new houses approved any more would be severe overdevelopment. The proposed new roads have not been properly thought through and would not be effective. The new residents would have to commute for work so houses should be built closer to areas of employment.			

Name: Ian Edmondson **I.D:** 62751297

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of	No	• Positively	Unsure	Unsure	The planned developments will have a massive impact on Nailsea, in 2022 estimated dwellings 7039, the 1817 new houses would represent a 26% increase. The infrastructure even taking the possible new link road to the A370 into account, will be	Further consideration and research into the points raised above, resultant amendments and more detail of how the plan will mitigate		

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Nailsea		prepared • Justified • Effective • Consistent with national policy			inadequate and will not assist vehicle movements to the North of the town, and place added pressure on the B3130 to Clevedon and Wraxall which even now is not fit for purpose with many pinch points including sharp bends where buses and large lorries are unable to pass. Development on Green Belt land rather than Brownfield sites is not a good idea, as once the Green belt is developed it is lost forever and we as a nation need to be growing more of our own food rather than relying on imports Land with a flood risk should not be considered for housing, if local plans to mitigate the risk are successful usually this impacts on areas further down the watercourse, particularly where the water tables are near the surface. In addition occupants may have difficulty with insurance and obtaining mortgages, as flood risk would effect the property values. The biodiversity of the area will be disturbed and in some cases completely destroyed. Occupants of the new dwellings are unlikely to find local employment and will need to travel to Bristol, Weston Super mare or other larger centres either by car, or possibly public transport. Nailsea station has access issues particularly for the disabled, and if to be used by residents in the North of Nailsea will place additional strain on Station Road in Nailsea and also Backwell with new housing developments planned in both areas. Access to Doctors and Dentists will further be impacted unless additional resource placed in Nailsea. New primary schools are planned and part funded from developer contributions but where will the additional funds required be coming from? The current parlous state of local government finance would indicate that central government would need to provide the shortfall. Once established how would the schools be funded including maintenance and staff costs?	or remove the detrimental impact of these massive planned developments		

Name: Ian Hassall **I.D:** 62850017

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Our village already has an agreement for 800 new houses this is a 40% increase for the village which will not only change the demographics of this small village but change its character and identity. We believe that any additional numbers would lead to complete overdevelopment. Our road system is already not fit for the amount of traffic which we see through our village and he proposed road would not effectively serve Nailsea's traffic or relieve congestion on Station Road, Backwell Common, or Chapel Hill. Engineering the road under or over the railway would be highly expensive and possibly unfeasible. Despite the agreed increase, there is a deficit in school places across our area and no investment in health services or leisure facilities. The lack of infrastructure and services cannot support another 1,000 houses. Government policy requires 50% affordable housing on Greenbelt Land, but this reduces the funds developers contribute towards infrastructure. The sheer volume of growth with the required investment infrastructure and services over such a short period Backwell is allocated a higher number of houses than any other village in North Somerset, and even a higher growth percentage than towns. Backwell is expected to take 7% of the district's housing allocation, compared to Clevedon's 2%, this seems ill thought out and disproportionate for our village which has already agreed to 800 new homes. Backwell is not an employment hub, most residents commute which already makes the roads in Backwell slow and congested especially station road and the A370 which are main arteries in our	There is no needs or viability analysis for an extra 1,000 houses, we would expect this to be a standard process which needs to be done before agreement of any extra housing. The Infrastructure Delivery Plan lacks analysis and costings, and there are no funding guarantees for the new road or services.		

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					village, we also believe that this makes walking in our village even more dangerous. There is only 7% of this high quality land left in the whole of North Somerset. Grade 1 Agricultural Land currently used for food crops and grazing should be preserved to keep our heritage alive and improve our carbon footprint. This aligns with the Government policy which states that “we must protect our best and most versatile land” to safeguard food security. The proposals contradict this policy and undermine food security. Further development would destroy valuable wildlife habitats and further harm biodiversity in one of the world’s most nature-depleted countries. The proposals threaten the Brockley Maternity Roost and SSSI, with rare Lesser and Greater Horseshoe Bats relying on the land for food. Backwell Common and surrounding areas are prone to flooding, which would be aggravated by more housing, we already see increased levels of flooding over recent years especially on the A370. As stated earlier we have concerns regarding the strategic growth location designation include the impact on the area’s character, the loss of Greenbelt and high-quality agricultural land, the risk of flooding, and uncertainty over whether the road can be funded and delivered on time to support the proposed housing. Backwell Lake (Reservoir) and adjacent fields, where the new roads and housing is planned and are on a floodplain, which floods regularly. is destabilising, unsustainable and undeliverable. The railway station is not fit for purpose as a transport hub; it remains inaccessible for people with mobility issues and presents serious challenges when travelling with young children			

Name: Ian Hingley **I.D:** 62805249

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Significant traffic and transport issues: This part of the plan is unsound as it demonstrates insufficient evidence that full consideration of traffic and transport issues has been given. The villages of Pill and Easton-in-Gordano are served by one already busy road running through them with access to the A369. There is no provision for any additional access to the A369, a major commuter route between the city of Bristol and M5 Junction 19. The existing road through the villages of Pill and Easton-in-Gordano has several sharp bends, notably on St Georges Hill and Priory Road which create ‘pinch points’ when large vehicles such as buses pass through. There is a further pinch point on Lodway at the high pavement, making it single file for large vehicles. There is no recognition of the effect of the increased traffic through these pinch points in the plan. The A369 is an extremely busy commuter route. Previous planning applications for some of the very sites in this proposed plan have been rejected because of increased traffic and inadequate access to the A369. The A369 has a severe pinch point at The George in Abbots Leigh (within North Somerset) which limits its total capacity and ability to cope with the extra traffic generated by the proposed plan. There is an existing plan to replace the 2+ lane on the A369 between St Georges Hill and High Street Portbury with a bus lane. This will have the effect of limiting the volume of traffic able to join the A369 from the traffic light controlled St Georges Hill. There is no evidence the effect of extra traffic using this junction if this proposal is approved has been considered in this plan. The capacity of the A369 is also limited by the steep and winding Rownham Hill within Bristol City. There is no evidence the capacity of the A369 can cope with the extra traffic generated by this proposed plan. The M5 junction 19 roundabout causes many traffic issues as is well documented. The traffic jams are particularly bad on summer weekends. The addition of the proposed 1100 houses with 1518 vehicles (using the 1.38 multiplier from the 2021			aIMG_9767.jpg

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					Census) will increase traffic attempting to join the M5 from the A369. To leave the M5 southbound at J19 to join the A369 southbound towards the villages of Pill and Easton-in-Gordano the traffic is meant to share a single lane with traffic bound for the Gordano services. This causes significant and dangerous tailbacks onto the M5 at rush hour and summer weekends. A proportion of frustrated motorists often use the first of the 'Portishead' lanes to avoid this queue before cutting across in dangerous fashion to join the A369 southbound. The increase in traffic caused by this proposed development will exacerbate this situation. There is insufficient evidence of consultation with National Highways in this proposed plan to alleviate these risks. It is acknowledged that the approval of the proposed rail link between Portishead and Parsons Street station was a factor in elevating the villages of Pill and Easton-in-Gordano into the Strategic Development band. There is insufficient evidence the proposed plan adequately considers the parking requirement for the rebuilt Pill station. Whilst villagers 'may' walk or cycle from the proposed new developments, a successful rail link would draw people from neighbouring villages such as Failand and Portbury. This will further increase traffic entering the villages of Pill and Easton-in-Gordano . There is an acute lack of on-street parking in Pill around the station and insufficient evidence the proposed plan takes this into consideration. There is an over reliance on 'if' the trains run sufficiently frequently and 'if' they carry sufficient passengers without evidence this is actually an agreed concrete proposal. It must be realised the proposed rail route is only single track. It is impossible to increase the frequency of trains beyond that of the time taken to travel between Portishead and Parsons Street station as two trains cannot travel on the same line in opposite directions! As Portishead is the much larger town and is at the head of the line, there is no evidence of consideration of how many remaining passenger spaces there may be when the train arrives at Pill station and whether there will be sufficient capacity for the number of passengers this proposed plan expects to travel by train. Flooding risks: The policies in this proposed plan are unsound. There is a recognised flood risk in Pill at the area around Markham Brook as the valley bottom and parts of the surrounding land are within the Environment Agency's Flood Zone 3. This indicates a high probability of flooding from rivers (fluvial) and the sea (tidal). https://flood-map-for-planning.service.gov.uk/ . At particularly high tides there is flooding in Pill Creek several times per year as per the attached photo. The impermeable surfaces of the proposed plan for 1100 houses with access roads, roofs, driveways, patios, etc increase the speed of run-off into the surface water sewerage network compared with the natural green permeable land that will be built on. Each of the proposed development sites may plan to deal with its own surface water run-off but that will be by simply passing it downstream. There is insufficient evidence of modelling of all the developments passing all their surface water run-off into Markham Brook and hence Pill Creek simultaneously. The proximity of the proposed developments to Pill Creek and hence the tidal River Avon means there is little time for this increased surface water run-off to be attenuated. It seems likely North Somerset could and should have identified sites with much lower flood risks than these proposals to build 1100 homes directly adjacent to existing properties within the Environment Agency's Flood Zone 3.			

Name: Ian Hunter **I.D:** 62442209

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Strategic Policies	Unsure	• Justified	Yes	Yes	The proposal for more housing in Nailsea and Backwell adds more to an area that is already overdeveloped	Challenge central government edict that more housing is required in North Somerset and move plans away from Nailsea and Backwell to more brownfield sites		

Name: Ian John **I.D:** 62207809

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	Unsure		Unsure	Unsure	Answered "Unsure" above as not sure of the legal requirements or similar, but also for the following reason... It is difficult to determine whether this is a sound plan when there is insufficient data available to be able to properly assess the effects on the existing housing, infrastructure, and residents. For example, I Iive in Nailsea, where upwards of 3700 houses are proposed. But without detailed data on how many more road users, parking place users, footpath users, school users, play area users etc that this will impose on the existing infrastructure it is not possible to determine whether the plans (which themselves do not indicate the increased capacity of any upgrades) are sufficient.	In line with my comment above, please add detailed numeric data to demonstrate the actual effect.		

Name: Ian Manley **I.D:** 62913889

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm					I'm emailing to express my concerns over the possible development of the two sites of Black Rock and Tower Farm. My prime concern is on the ecological affects on Weston Big Big Wood ,ancient woodland, of which only 5% of UK woodland is classed as ancient.This woodland is a significant part of our ecological heritage and will be irreversibly damaged should the ajoining green belt fields currently acting as a buffer zone be used for housing purposes. Current land, is green belt, and should only be used in exceptional circumstances. Any development is not an exceptional circumstance and has not been demonstrated as such. Blocks in the 'green corridor' through the Gordano Valley and it's other SSI sites. Increased foot traffic through the woods.The damage of increased traffic has been demonstrated by the increased footfall during the covid 19 pandemic. My secondary concerns are yet more pressure on the existing infrastructure,services and amenities in Portishead e.g schools ,GP's, roads etc. Any proposed housing will almost certainly be the usual bland low quality thrown up in the usual identikit housing schemes as we have already seen in Portishead .They won't be affordable to many actual local residents. Impact of increased traffic ,presumably going past High Down School for access. Consideration should be given to alternate brownfield sites within North Somerset. Policy should be directed at property speculators both national and international treating the market as a game of monopoly and hoarding assets that prevent our children's generation from ever owning property and being forever paying sky high rents to the already wealthy .			
Black Rock, north of Clevedon Road					I'm emailing to express my concerns over the possible development of the two sites of Black Rock and Tower Farm. My prime concern is on the ecological affects on Weston Big Big Wood ,ancient woodland, of which only 5% of UK woodland is classed as ancient.This woodland is a significant part of our ecological heritage and will be irreversibly damaged should the ajoining green belt fields currently acting as a buffer zone be used for housing purposes. Current land, is green belt, and should only be used in exceptional circumstances. Any development is not an exceptional circumstance and has not been demonstrated as such. Blocks in the 'green corridor' through the Gordano Valley and it's other SSI sites. Increased foot traffic through the woods.The damage of increased traffic has been demonstrated by the increased footfall during the covid 19 pandemic.			

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					My secondary concerns are yet more pressure on the existing infrastructure,services and amenities in Portishead e.g schools ,GP's, roads etc. Any proposed housing will almost certainly be the usual bland low quality thrown up in the usual identikit housing schemes as we have already seen in Portishead .They won't be affordable to many actual local residents. Impact of increased traffic ,presumably going past High Down School for access. Consideration should be given to alternate brownfield sites within North Somerset. Policy should be directed at property speculators both national and international treating the market as a game of monopoly and hoarding assets that prevent our children's generation from ever owning property and being forever paying sky high rents to the already wealthy .			

Name: Ian Roebuck **I.D:** 62559521

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	Unsure		Unsure	Unsure				
Land at Tower Farm	No	• Justified	Unsure	Unsure	1. According to Portishead Town Council, there are brown field sites in lower Portishead with sufficient capacity to make this green belt development unnecessary. 2. The altitude difference between the site and the town centre will make walking or cycling to and from the town centre impractical for most residents. The bus service is already inadequate so the inevitable result would be yet more traffic on Down Road (which is already anarchic especially at school drop off and pick up) 2. The plan shows an unsuitable ecological buffer to Weston Big Wood to the south of the site. Avon Wildlife Trust should be consulted over this.			
Black Rock, north of Clevedon Road	No	• Justified	Unsure	Unsure	According to Portishead Town Council, there are brown field sites elsewhere in the town with sufficient capacity to make this green belt development unnecessary. There would be no space for a suitable ecological buffer to Weston Big Wood to the north of the site. Avon Wildlife Trust should be consulted over this.			

Name: Ian Slatter **I.D:** 20454017

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP10: Transport	No	• Effective • Consistent with national policy	No	No	The Stage 7 Transport Assessment document submitted in support of the NSC Plan contains inaccuracies, for example on page 40 it claims that the X5 bus service from Portishead to Weston-Super-Mare has been recently enhanced by the “Introduction of Sat & Sun service”. There has however been a Saturday service for many years (ie this was not added recently) and there is no Sunday service. The document itself notes “that minor changes to some quanta of development (including Wyndham Way residential allocation, and Wolvershill and Woodspring employment allocations) were made prior to publication, following agreement of the draft site allocations which were used to inform the strategic modelling.” The increase at Wyndham Way was significant, a 61% increase, and the modelling therefore cannot be seen to be accurate or representative.	A new Transport Assessment document is required, with public consultation on the proposed measures such as BSIP schemes and properly evidenced, realistic modelling based on accurate housing numbers. The impact on roads immediately next to developments such as Tower Farm should also be included.		

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					In addition, the following potential BSIP schemes were all consulted on previously with respondents overwhelmingly opposing the proposals: • A369 Bridge Road - Bus Lanes for priority on A369 • B3133 South Way Central Way (Clevedon) - Bus Priority at roundabout for EB and WB movements • Ettlingen Way Roundabout - EB and NB bus priority • Tickenham Road Northern Way - Larger Roundabout with EB and WB bus priority. "79% of respondents say ‘disagree’ with creating bus lanes at the Tesco roundabout while maintaining the same number of car lanes... 87% of respondents say ‘disagree’ with creating bus lanes on northbound and eastbound approaches... 90% say ‘disagree’ to changing a car lane into a bus lane on Central Way... 80% say ‘disagree’ to widening the carriageway on Moor Lane for a bus lane... 85% of respondents say ‘disagree’ to creating bus lanes on Tickenham Road on the east and west side of the roundabout)." Many members of the public voiced concerns that the proposals would make traffic worse, not only for car users but also for the buses that would be stuck in traffic jams before they could reach the bus lanes intended to help them. The following were also part of the BSIP plans but were removed from the consultation and the plans put on hold, presumably because of the strong evidence provided by Portishead Town Councillors that showed that the proposals would make traffic worse for all road users, again including buses that would again be stuck in traffic before reaching the bus lanes: • A369 Martcombe Road south of the M5 J19 - New 24-hour bus lane towards Junction 19, replacing High Occupancy Vehicle Lane • Portbury Hundred - Bus Lane on A369 towards Junction 19. Now, with no further consultation, these schemes appear to have been resurrected to justify the Plan, accompanied by claims that they will reduce journey times and make the use of public transport more attractive. Additional development in areas such as Portishead with “mitigation” that would actually make traffic worse would be disastrous, and destroys the report’s claims that the effects of such development can be mitigated. It should also be noted that there is no mention of the impact of proposed developments such as Tower Farm and Black Rock on the roads immediately around them and providing direct access to them, or on cross-town traffic generated as a result of the developments. How can it be claimed, therefore, that the impacts of these developments is being successfully mitigated? These plans are therefore contrary to NPPF S110 and S115.			
Castlewood	No	• Consistent with national policy	No	Unsure	This is a disused office site owned by North Somerset Council and has an allocation of just 120 homes. It is a sustainable location measuring 3.37 hectares with a flat, half a mile, 12 minute walk to the centre of town. It is served by the X5, X6, X7/X7a, X10 and X11 bus services, with bus stops immediately next to the site. It should be classified as either a suburban or urban site and national guidance recommends a dwelling density of 100-120 dph (dwellings per hectare) for suburban sites and 200+dph for urban sites. This brownfield site could therefore accommodate between 300 to 600 homes rather than the 120 currently planned, without causing any damage to the environment or to the local heritage. It is also truly baffling that NSC is not seeking to maximise its financial return from the site. Surely it has a statutory duty to obtain the maximum return from the sell-off of assets such as this, and if they sold a site that could accommodate more than 300 homes to a developer based on an allocation of 120 this would be a breach of their duty to council tax payers. It should also be noted that at present Clevedon currently only has an allocation of 258 compared with 6,084 in Weston, 1,347 in Portishead, 1,683 in Backwell, 1,817 in Nailsea and 1,100 in Pill. Increasing the density at Castlewood would provide more new homes for the residents of Clevedon to purchase and would also help to give a fairer distribution of development across North Somerset.			

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					This Plan therefore does not maximise the use of brownfield sites, which should be done before making changes to the Green Belt. A significant amount of Green Belt land could be protected whilst maintaining the total number of new homes within the Plan, if all brownfield sites were included and their density properly considered.			
Land at Tower Farm	No	• Consistent with national policy	No	Unsure	I believe that in respect of the Tower Farm development site proposal North Somerset Council's Plan is in breach of seven sections of the NPPF (S110, S115, S147, S156, S187, S192 & S193). I am going to focus on S147. NPPF S147 states that "Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph and whether the strategy: a) makes as much use as possible of suitable brownfield sites and underutilised land; b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport." North Somerset Council claims in its Green Belt Review Background Paper that there is insufficient capacity to meet their housing target using "Brownfield Sites and Underutilised Land." However, at least two brownfield sites in Portishead exist yet have not been included in NSC's Plan. Planning permission was granted in 2017 for 33 homes at a brownfield site in Portishead between Wyndham Way and Cheviot Meadow (17/P/1229/FUL), a short walk to the town centre and close to the location of the new railway station. These were not built, and permission was later granted for a care home there, but that has also not been built and the site is for sale again. Land is also for sale next to The Poacher public house, on the High Street, with an indicative 8 homes. That is 41 homes for starters, maybe more depending on the density of developments, that do not need to be built of the Green Belt. How many other brownfield sites are there in North Somerset that NSC has overlooked and that should be included before releasing Green Belt land? NSC also claims in its Green Belt Review Background Paper that "The North Somerset Local Plan 2041 has... ensured that opportunities to promote a significant uplift in minimum density standards in towns, strategic allocations and other appropriate locations well served by public transport have been incorporated into policies throughout the plan." This can also, however, be shown not to be the case. The density of the Wyndham Way site in Portishead was increased from 485 to 785 homes in the latest version of the Plan, but only after this was suggested by Portishead residents (as a way to reduce the requirement for Green Belt releases). NSC also mentions the Woodspring, and Wolvershill sites, but no others. Many other sites (at least 23) are clearly, from their descriptions, brownfield. If 300 homes can be added to Wyndham Way by increasing the density, this could surely be done elsewhere, removing the need to build on the Green Belt in Portishead and elsewhere. A prime example of a site that is not being made full use of is Castlewood in Clevedon. This is a disused office site owned by North Somerset Council and has an allocation of just 120 homes. It is a sustainable location measuring 3.37 hectares with a flat, half a mile, 12 minute walk to the centre of town. It is served by the X5, X6, X7/X7a, X10 and X11 bus services, with bus stops immediately next to the site. It should be classified as either a suburban or urban site and national guidance recommends a dwelling density of 100-120 dph (dwellings per hectare) for suburban sites and 200+dph for urban sites. This brownfield site could therefore accommodate between 300 to 600 homes rather than the 120 currently planned, without causing any damage to the environment or to the local heritage.			Response to North Somerset Local Plan 2041- Tower Farm.docx

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					It is also truly baffling that NSC is not seeking to maximise its financial return from the site. Surely it has a statutory duty to obtain the maximum return from the sell-off of assets such as this, and if they sold a site that could accommodate more than 300 homes to a developer based on an allocation of 120 this would be a breach of their duty to council tax payers. It should also be noted that at present Clevedon currently only has an allocation of 258 compared with 6,084 in Weston, 1,347 in Portishead, 1,683 in Backwell, 1,817 in Nailsea and 1,100 in Pill. Increasing the density at Castlewood would provide more new homes for the residents of Clevedon to purchase and would also help to give a fairer distribution of development across North Somerset. This Plan therefore does not maximise the use of brownfield sites, which should be done before making changes to the Green Belt. A significant amount of Green Belt land could be protected whilst maintaining the total number of new homes within the Plan, if all brownfield sites were included and their density properly considered. Even if some Green Belt allocations are still required, the Tower Farm site should be one of the sites removed from the Plan as it is an environmentally crucial site, adjoining Weston Big Wood SSSI and playing a key part in the Gordano Valley ecosystem, as evidenced by Gordano Valley - The Future of Wildlife and Gordano Valley Ecological & Development Strategy Report. It was surely not the intention of the changes to the NPPF that now allow Green Belt revisions to reclassify land such as this as Grey Belt, and to do so would be in breach of NPPF sections 187, 192 and 193. Tower Farm should therefore be removed from the Plan as NSC has not complied with NPPF 147, and could provide the target number of homes without its inclusion. Please also see the attached document - Response to North Somerset Local Plan 2041- Tower Farm.			
Black Rock, north of Clevedon Road	No	• Consistent with national policy	No	Unsure	I believe that in respect of the Black Rock development site proposal North Somerset Council's Plan is in breach of seven sections of the NPPF (S110, S115, S147, S156, S187, S192 & S193), and the site should therefore be removed. Focusing on three of those sections: S187 1. Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity… S192 2. To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation S193 "When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused; b) development on land within or outside a Site of Special Scientific Interest, and which is likely to	Remove the Black Rock site from the Plan.		Response to North Somerset Local Plan 2041 - Black Rock.docx

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					have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The Black Rock site is immediately adjacent to Weston Big Wood SSSI, an incredibly important site for flora and fauna and a crucial part of the wider ecosystem incorporating other SSSIs such as Gordano Valley and Walton Common. The land around it, including the Black Rock site, is vital as a nature corridor, and evidence provided by Avon Wildlife Trust and other environmental experts shows how allowing development close to Weston Big Wood would inevitably cause it significant harm. Development there will have an adverse impact on an SSSI, and therefore should not be permitted. Furthermore, S187 states that “Planning policies and decisions should contribute to and enhance the natural and local environment by… recognising… the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land.” NSC has listed the Black Rock site as Grade 3 agricultural land, but about 50% of the site (the southern part) is in fact Grade 1, according to the Natural England / DEFRA map. NPPF footnote 65 states “Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of higher quality.” “Best and most versatile agricultural land” is defined as “Land in grades 1, 2 and 3a of the Agricultural Land Classification.” Building on this higher quality, grade 1 land should therefore be avoided, as this is not the sort of land that should be redesignated grey belt. Portishead Neighbourhood Plan PEN5 states that “A minimum of 15m and preferably up to 50m buffer should be maintained between any development and the Ancient Woodland of the SSSI Weston Big Wood… in order to avoid adverse impacts on this irreplaceable habitat, unless the applicant can demonstrate very clearly how a smaller buffer would be acceptable.” 50 metres should be the very bare minimum required, as environmentalists will confirm that the distance should be greater than this. Therefore, a buffer of at least 50 metres and preferably more should be kept to the north of the site, and the southern part of the site should be protected as grade 1 agricultural land. This would leave, at the most, only a small portion of land in the middle, impossible to access and unsuitable for development. Please also see the attached document - Response to North Somerset Local Plan 2041 - Black Rock.			

Name: Ian Wills **I.D:** 62741569

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Over the last 15 years, Backwell has been a pleasant village with inadequate roads but adequate infrastructure that has coped with a gradually increasing number of houses. The 40% increase in house numbers already approved will stretch things to and beyond the limit. The current new proposals suggest a another massive increase in the size of our village without any increase in the services that national and local government supply and neither national nor local government seem to have the funds to address that situation. The proposal includes a road which, it is suggested, will relieve the congestion on Station Road. Who is going to produce the millions needed to build a bridge over the railway or convert one of the footpath bridges already there [that both flood every winter] to be fit for purpose? Why is the suggested percentage increase in the population of Backwell so much higher than in other communities in North Somerset? Why is it being scheduled for land that largely productive, used for growing food for us or grazing for animals, as I see when I regularly use the footpaths across them? North Somerset has too little grade 1 agricultural land already.			

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					Together with the developments already approved, the village population would be increased by about 80%. How are you going to cope with the corresponding increase in road traffic [most employment is in and around Bristol and the station already has significant shortcomings], in demand for school places, GP, leisure and other local facilities? It seems to me that this is a collection of builders schemes planned to suit them and their 'bit' of housing but ignoring the overall effect on the lives of those who will be living in those houses as well as those of us already here. It may well be easier for NSC and the builders to dump a lot of houses in one place instead of smaller sites more widely spread, but that is not serving the well-being of the people NSC are elected by nor giving the best care for the environment.			

Name: Imie Jones **I.D:** 62831681

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The plan is not sound. It fails to recognise the significant negative impact the development will have on the existing residents. The roads around this site are busy and expanding the school and adding more houses will only make this worse. The only way to access the area is by car as it is so far from the town centre and up a huge hill that cannot be walked or cycled. Weston Big Wood is an SSSI and various experts and organisations have spoken about how developing the land around it will have permanent negative impacts on the site. Understand people have to live somewhere and new houses are needed. Surely the brown field site in Portishead should be developed first before destroying this area. I dont believe it is sound or legally compliant	None, the site is not suitable		

Name: Ingeline Hart **I.D:** 62852417

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I am born in Backwell and thirty years later still live here and hope to bring up my children here. This plan will destroy the 'village' of Backwell and turn it into a Satellite town of Bristol with no facilities that match the size of the proposed town. As a young person concerned about the future of our country I think local authorities have a huge part to play in ensuring that they keep the land they are responsible for in a good environmental and biodiverse situation. This plan will destroy vital wildlife sanctuaries, the otter on the lake, the deer in the fields, the rare birds, the newts, the snakes, the stoats, the weasels , the hares, the bats and all the animals that make this land their home will have nowhere to go. Other developments in Backwell have torn down trees either nesting birds and I do not believe this one will be any better. This area is also prone to flooding, I have had to wade through floods on my way home from school a number of times. Any developments will make the flooding worse. Please reconsider North Somerset - you are responsible for our future.			

Name: Ingrid Slatter **I.D:** 29270401

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Consistent with national	No	Unsure	NPPF S147 makes it clear that brownfield sites should be used and their density maximised BEFORE revisions to the Green Belt are made. North Somerset Council has not done this, which is clear as numerous brownfield sites have been omitted from the Plan and others could have their density increased considerably. Enough homes can be provided using brownfield sites to make the 400 homes proposed at Tower Farm unnecessary.	Tower Farm should be removed from the development list and the 400 homes provided preferably on brownfield sites.		

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		policy			If Green Belt is still needed in order for NSC to hit its centrally imposed housing target then Tower Farm should not be one such site due to its ecological importance adjacent to Weston Big Wood NSSI. Tower Farm is also unsuitable as a development site due to its location. It is not a sustainable site as residents would need to drive to get everywhere, and as there is already considerable congestion on the roads that would be used to access it, eg Down Road and The Downs, traffic issues, carbon emissions and poor air quality problems would be considerably exacerbated by the addition of 400 new homes.			

Name: Innova Consulting Services **I.D:** 62883969

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Vision, Strategic Priorities and Sustainability Objectives	No	• Positively prepared • Effective • Consistent with national policy	Yes	No	pp9-10 of the Reg 19 Pre-Submission Plan states the plan period 2026 – 2041. NPPF paragraph 22 states that strategic policies should look ahead over a minimum 15 year period from adoption and that where large scale or significant extensions to existing towns and villages are part of the strategy for the area that policies should be “set within a vision that looks further ahead (at least 30 years), to take account the likely timescale for delivery”. There are two points to make. 1. Examination and adoption of the plan are proposed in 2026 by the Council. Most examined Local Plans require post hearing Main Modification consultation. The plan is therefore unlikely to be adopted in 2026 and the plan period should be extended accordingly. 2. The Reg 19 Pre-Submission Plan contains large strategic development allocations at Wolvershill (3,300 dwellings) and Woodspring (3,500 dwellings) as well as two urban extensions to Weston-super-Mare carried forward form the Site Allocations Plan (3,900 dwellings). Urban extensions are also proposed at Nailsea and Backwell. It is argued that the plan should have a 30-year plan period to allow for the delivery of the strategic infrastructure required to bring forward the strategic development locations and urban extensions. See policies LP1 p.51; LP2 p.58; LP3 p.65.	Revise the plan period to reflect a minimum of 15 years from a realistic adoption date given the need for Examination and Main Modification consultation with associated uplift in housing requirements for the extended plan period. Consider the NPPF requirement for a 30-year plan period given the size and scale of the larger growth locations and their needs for strategic infrastructure delivery.		NSC Reg 19 - Rep form Part B - Plan Period.pdf Appendix 4 - Contour Plan.pdf NSC Reg 19 - Rep form Part B - Duty to co-operate.pdf Appendix 2 - Site Plan.pdf Appendix 3 - View of site from Purn Hill.pdf Submission letter 11.12.25.pdf NSC Plan Pre-submission Plan - Reps form Housing Numbers.pdf
SP8: Housing	No	• Positively prepared • Effective	Yes	No	Policy SP8 states that land is identified to deliver a minimum of 23,700 dwellings for the period 2026-2041 equivalent to 1,580 dwellings per annum. The North Somerset Local Housing Needs Assessment Report of Findings (ORS Sept 2025) identifies at p. 5 an annualised requirement of 1,580 dwellings however others have identified the North Somerset annual housing requirement under the NPPF (2024) standard method to be 1,593 per annum. https://www.pegasusgroup.co.uk/the-new◈standard-method-what-does-it-mean-for-local◈housing-need/ This results in a shortfall of 195 dwellings over the plan period (13x15). The policy wording is also misleading as land is not ‘identified’ for 23,700 as there is a reliance identified in the Spatial Strategy evidence paper (Oct 2025) at paragraph 5.4 on ‘small site’ windfalls delivering 3,000 dwellings over the 15- year period. This is a rate of 200 dpa over 15 years, or 250dpa over 12 years. There is no certainty that these dwellings will be delivered. NPPF (2024) paragraph 75 states that there “should be compelling evidence” that windfalls “will provide a reliable source of supply” where an allowance is made for them to be part of anticipated supply. It is	The Council should increase their plan period housing requirement to accurately reflect thestandard method calculation in the NPPF (2024), not supress it. The Council should consider increasing their Plan Period to 2045 to account for delays in submission or Examination of the plan and the need for any additional and main modification consultations. The Council should allocate additional small to medium sites, in accordance with NPPF paragraph 73, in sustainable locations adjacent to main towns such as Weston-super-Mare that can deliver quickly and contribute to the Council’s five-year supply of deliverable housing sites on adoption of the Local Plan. One such site for consideration is our client’s site located to the south of Bleadon Lane (SHLAA ref: HE2035). The SHLAA spreadsheet table lists a single		NSC Reg 19 - Rep form Part B - Plan Period.pdf Appendix 4 - Contour Plan.pdf NSC Reg 19 - Rep form Part B - Duty to co-operate.pdf Appendix 2 - Site Plan.pdf Appendix 3 - View of site

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					also very unlikely that 23,700 dwellings will be delivered in the 15-year plan period owing to the reliance on past allocations being rolled forward plus large new development locations/strategic allocations that require the delivery of strategic infrastructure to facilitate their delivery. Table 5 (p.30) and Table 6 (p.31) of the SHLAA Main report (Oct 2025) set out anticipated build out rates and delivery from sources of supply for the plan period. This delivery is optimistic compared to evidencepresented in the Lichfield's Start to Finish Report Third Edition (Sept 2024). Based in empirical evidence this report finds that sites of 1000 dwellings plus take 5 years to obtain detailed planning permission and up to a further 1.6 years to deliver the first dwelling. Annual build out rates or schemes of 2,000+ dwellings are 100-188 dpa (compared to the Council's assumption of 180dpa) and schemes of 500-999 dwellings build out at 44-83dpa (compared to the Councils 100dpa). In summary, the Council do not identify sufficient dwellings to meet their standard method requirement. The housing requirement will increase should the plan period lengthen to take account of any extended Examination and Main Modification consultation; the Council rely heavily on small site windfalls (3,000 dwellings) rather than allocating sufficient land to meet their requirements; the Council make assumptions on delivery that are not founded in empirical national evidence. Also it is considered that the Council have not complied with the Duty to Co-operate in the preparation of their Reg 19 Pre-Submission Plan. While the Duty to Co-operate Paper (October 2025) lists in detail the supposed co-operation with adjacent authorities including Bristol City Council, the plan fails to make any contribution to meeting Bristol's unmet housing needs.	constraint against our client's site as Landscape, yet the site immediately to the north on higher sloping ground and more visible in the landscape from urn Hill (SHLAA ref:HE201030) also has landscape listed as a single constraint and yet it is allocated for 81 dwellings. The photo attached at Appendix 2 taken from Purn Hill shows how prominent the allocated site will be in the landscape once developed (the bright greenfield) and yet our client's site shown at Appendix 3 is hidden from view between mature hedgerows to the south of Bleadon Hill and will have less impact when viewed from this location. Appendix 4 a contour plan shows the allocated site situated on rising ground. Neither site is situated within the National Landscape. While the NPPF is clear at paragraph 189 that great weight is to be given to conserving and enhancing National Landscapes paragraph 189 also states that development within the setting of a National Landscape "should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas". Development at our client's site would be able to meet this test. The Council, for the reasons stated above are requested to give further consideration to the allocation of our clients site ref: HE2035 Land south of Bleadon Hill. Also consideration be given by North Somerset to meeting some of the unmet needs of Bristol City while allocating additional sites at sustainable locations adjacent to key towns such as Weston-super-Mare to provide for the housing requirements of North Somerset.		from Purn Hill.pdf Submission letter 11.12.25.pdf NSC Plan Pre-submission Plan - Reps form Housing Numbers.pdf
SP8: Housing	No	• Positively prepared • Consistent with national policy	Yes	No	It is considered that the Council have not complied with the Duty to Co-operate in the preparation of their Reg 19 Pre-Submission Plan. While the Duty to Co-operate Paper (October 2025) lists in detail the supposed co-operation with adjacent authorities including Bristol City Council, the plan fails to make any contribution to meeting Bristol's unmet housjng needs. The failure of the West of England Joint Strategic Plan (JSP) in 2019 (which would have contributed to a plan led approach to meeting Bristol's unmet housing needs), left a hiatus in plan making across the region with each authority instead pursuing preparation and submission of their own new Local Plan. The NPPF (2024) para 24 is clear that effective strategic planning across authority boundaries is vital in addressing key spatial issues including meeting housing needs. The ability of Bristol to meet its full housing requirements under the NPPF 2021 and lack of co-operation from adjacent authorities to assist is addressed in the Local Plan Inspector's letter of 21st November 2025 attached at Appendix 1 (para's 5- 10). Paragraph 6 states; "We acknowledge that there is insufficient capacity to meet the Council's objectively assessed housing need, as calculated by the standard method… Given the significant shortfall in meeting overall needs, and the current lack of agreement between Bristol and any neighbouring authorities to provide assistance, we consider it imperative that the Council seeks to maximise housing delivery." The Inspectors raise Bristol City's housing requirement by an additional 5,265 dwellings over the plan period to a total of 39,915 dwellings. While they accept a 5-year supply using the 'Liverpool' method they state at paragraph 9, "The Council must also set out what the level of unmet housing need is. While the objectively assessed housing need may change over time, we consider it necessary for this Plan to be clear about the situation at the time of adoption. This may, for example, be important in continuing work being done on other	That consideration be given by North Somerset to meeting some of the unmet needs of Bristol City while allocating additional sites at sustainable locations adjacent to key towns such as Weston-super-Mare to provide for the housing requirements of North Somerset.		NSC Reg 19 - Rep form Part B - Plan Period.pdf Appendix 4 - Contour Plan.pdf NSC Reg 19 - Rep form Part B - Duty to co-operate.pdf Appendix 2 - Site Plan.pdf Appendix 3 - View of site from Purn Hill.pdf Submission letter 11.12.25.pdf NSC Plan Pre-submission Plan - Reps form Housing Numbers.pdf

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					Plans." The Bristol City Inspector's state at paragraph 10 that an immediate review of the Bristol City Local Plan will be required. Given the level of growth proposed in the North Somerset Council Local Plan in close proximity to Bristol City, including Green Belt releases, it would have been entirely possible under the Duty to Cooperate for this growth to have been allocated to meet Bristol City's unmet housing needs with other sites allocated in sustainable locations elsewhere in North Somerset, for instance adjacent to the settlement boundary at Weston-super-Mare, to meet the Council's own needs.			
Policy LP5: Housing, employment and mixed use allocations	No	• Positively prepared • Effective	Yes	No	Policy SP8 states that land is identified to deliver a minimum of 23,700 dwellings for the period 2026-2041 equivalent to 1,580 dwellings per annum. The North Somerset Local Housing Needs Assessment Report of Findings (ORS Sept 2025) identifies at p. 5 an annualised requirement of 1,580 dwellings however others have identified the North Somerset annual housing requirement under the NPPF (2024) standard method to be 1,593 per annum. https://www.pegasusgroup.co.uk/the-new◈standard-method-what-does-it-mean-for-local◈housing-need/ This results in a shortfall of 195 dwellings over the plan period (13x15). The policy wording is also misleading as land is not 'identified' for 23,700 as there is a reliance identified in the Spatial Strategy evidence paper(Oct 2025) at paragraph 5.4 on 'small site' windfalls delivering 3,000 dwellings over the 15-year period. This is a rate of 200 dpa over 15 years, or 250dpa over 12 years. There is no certainty that these dwellings will be delivered. NPPF (2024) paragraph 75 states that there "should be compelling evidence" that windfalls "will provide a reliable source of supply" where an allowance is made for them to be part of anticipated supply. It is also very unlikely that 23,700 dwellings will be delivered in the 15-year plan period owing to the reliance on past allocations being rolled forward plus large new development locations/strategic allocations that require the delivery of strategic infrastructure to facilitate their delivery. Table 5 (p.30) and Table 6 (p.31) of the SHLAA Main report (Oct 2025) set out anticipated build out rates and delivery from sources of supply for the plan period. This delivery is optimistic compared to evidence presented in the Lichfield's Start to Finish Report Third Edition (Sept 2024). Based in empirical evidence this report finds that sites of 1000 dwellings plus take 5 years to obtain detailed planning permission and up to a further 1.6 years to deliver the first dwelling. Annual build out rates for schemes of 2,000+ dwellings are 100-188 dpa (compared to the Council's assumption of 180dpa) and schemes of 500-999 dwellings build out at 44-83dpa (compared to the Councils 100dpa). In summary, the Council do not identify sufficient dwellings to meet their standard method requirement. The housing requirement will increase should the plan period lengthen to take account of any extended Examination and Main Modification consultation; the Council rely heavily on small site windfalls (3,000 dwellings) rather than allocating sufficient land to meet their requirements; the Council make assumptions on delivery that are not founded in empirical national evidence. Also pp9-10 of the Reg 19 Pre-Submission Plan states the plan period 2026 – 2041. NPPF paragraph 22 states that strategic policies should look ahead over a minimum 15 year period from adoption and that where large scale or significant extensions to existing towns and villages are part of the strategy for the area that policies should be "set within a vision that looks further ahead (at least 30 years), to take	The Council should increase their plan period housing requirement to accurately reflect the standard method calculation in the NPPF (2024), not supress it. The Council should consider increasing their Plan Period to 2045 to account for delays in submission or Examination of the plan and the need for any additional and main modification consultations. The Council should allocate additional small to medium sites, in accordance with NPPF paragraph 73, in sustainable locations adjacent to main towns such as Weston-super-Mare that can deliver quickly and contribute to the Council's five-year supply of deliverable housing sites on adoption of the Local Plan. One such site for consideration is our client's site located to the south of Bleadon Lane (SHLAA ref: HE2035). The SHLAA spreadsheet table lists a single constraint against our client's site as Landscape, yet the site immediately to the north on higher sloping ground and more visible in the landscape from Purn Hill (SHLAA ref:HE201030) also has landscape listed as a single constraint and yet it is allocated for 81 dwellings. The photo attached at Appendix 2 taken from Purn Hill shows how prominent the allocated site will be in the landscape once developed (the bright greenfield) and yet our client's site shown at Appendix 3 is hidden from view between mature hedgerows to the south of Bleadon Hill and will have less impact when viewed from this location. Appendix 4 a contour plan shows the allocated site situated on rising ground. Neither site is situated within the National Landscape. While the NPPF is clear at paragraph 189 that great weight is to be given to conserving and enhancing National Landscapes paragraph 189 also states that development within the setting of a National Landscape "should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas". Development at our client's site would be able to meet this test. The Council, for the reasons stated above are requested to give further consideration to the allocation of our client's site ref: HE2035 Land south of Bleadon Hill. Also revise the plan period to reflect a minimum of 15 years from a realistic adoption date given the need for Examination and Main Modification consultation with associated uplift in housing requirements for the extended plan period. Consider the NPPF requirement for a 30-year plan period given the size and scale of the larger growth locations and their needs for strategic		NSC Reg 19 - Rep form Part B - Plan Period.pdf Appendix 4 - Contour Plan.pdf NSC Reg 19 - Rep form Part B - Duty to co-operate.pdf Appendix 2 - Site Plan.pdf Appendix 3 - View of site from Purn Hill.pdf Submission letter 11.12.25.pdf NSC Plan Pre-submission Plan - Reps form Housing Numbers.pdf

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					account the likely timescale for delivery". There are two points to make. 1. Examination and adoption of the plan are proposed in 2026 by the Council. Most examined Local Plans require post hearing Main Modification consultation. The plan is therefore unlikely to be adopted in 2026 and the plan period should be extended accordingly. 2. The Reg 19 Pre-Submission Plan contains large strategic development allocations at Wolvershill (3,300 dwellings) and Woodspring (3,500 dwellings) as well as two urban extensions to Weston-super-Mare carried forward form the Site Allocations Plan (3,900 dwellings). Urban extensions are also proposed at Nailsea and Backwell. It is argued that the plan should have a 30-year plan period to allow for the delivery of the strategic infrastructure required to bring forward the strategic development locations and urban extensions. See policies LP1 p.51; LP2 p.58; LP3p.65.	infrastructure delivery.		

Name: Iola Mary Solari **I.D:** 62855905

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Disproportionate share The increase in housing for Backwell is very disproportionately high with the percentage increase significantly higher than all other villages and towns in North Somerset, with actual numbers higher than other villages. New housing to date is already disproportionately high compared to Clevedon and Weston which are larger towns and employment hubs and better suited to increased housing. The further increases will result in complete overdevelopment of Backwell. It cannot support this level of increase. Infrastructure The proposals do not include investment in infrastructure, Education, Health services or Leisure facilities to support a further 1000 houses. Backwell is not an employment hub in the way bigger towns like Clevedon and Weston are and increased housing would then increase commuting on already very busy roads. The proposed new road will be inadequate to deal with all the extra traffic, especially around Station Road and there is no guarantee it would be built as there are no funding guarantees and likely difficulties with the route crossing the railway. The railway station is also inadequate to deal with the increased numbers and needs investment to make it accessible and safe for young children Agriculture and the environment The development will destroy even more Grade 1 Agricultural Land currently used for food crops and grazing. There is very little left in North Somerset - despite Government policy which states that "we must protect our best and most versatile land" to safeguard food security. Backwell common and the surrounding area is already prone to flooding. Backwell Lake and the adjacent fields are in a flood plain and often flood. Building large numbers of houses will make the situation even worse and totally unsuitable with the potential to cause further problems down the line. Wildlife would also be seriously affected. Eg the Brockley Maternity Roost and SSSI, Horseshoe Bats relying on the land for food, and more generally the destruction of valuable wildlife habitats' further affecting biodiversity in an already nature-depleted country.			

Name: Irina Garashchenko **I.D:** 62851393

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Save our precious land!!!! Save the village!!!! Backwell already has 40%increase. Stop overdevelopment. please!			

Name: Isabelle Lemoille **I.D:** 62717857

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land to the west of Elborough						Elborough I have seen the comments from Hutton Parish Council and Residents which I emphatically endorse. For clarification I repeat some of their observations :- They expressed strong opposition to development in the Elborough area. Their primary concerns include: o Loss of Green Space: The development would remove the strategic gap between Elborough and Locking parishes. o Infrastructure Deficiencies: There are major concerns about a lack of existing facilities (shops, schools, community centres), inadequate public transport, and roads not wide enough for increased traffic. o Public Opinion: An 83% majority of residents in a 2021 survey did not support new housing in the vicinity of Elborough. • Sustainability: The sustainability of the proposed development is a major point of contention. While developers and some council documents suggest the Elborough development is more sustainable than other potential sites, local objectors highlight the isolated nature of the location with no existing services. I would add the following relating to flooding in the area. Concerns have been raised that new developments in the area could increase the amount of impermeable surfaces (houses, roads) and exacerbate existing flooding problems. Runoff from farmland on the hill by Elborough Farm flows "like a river at times" across Banwell Road, flooding it several times a year. Surface water (flash flooding): This is a widespread risk across the region, which can even impact properties on hillsides. I trust that these very significant considerations opposing development in the area are fully taken into account when submitting the Pre-submission.		
Land to the west of Elborough					I have seen the comments from Hutton Parish Council and Residents which I emphatically endorse. For clarification I repeat some of their observations :- They expressed strong opposition to development in the Elborough area. Their primary concerns include: - Loss of Green Space: The development would remove the strategic gap between Elborough and Locking parishes. - Infrastructure Deficiencies: There are major concerns about a lack of existing facilities (shops, schools, community centres), inadequate			

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Land north of Banwell Road, Locking /Elborough						Elborough I have seen the comments from Hutton Parish Council and Residents which I emphatically endorse. For clarification I repeat some of their observations :- They expressed strong opposition to development in the Elborough area. Their primary concerns include: o Loss of Green Space: The development would remove the strategic gap between Elborough and Locking parishes. o Infrastructure Deficiencies: There are major concerns about a lack of existing facilities (shops, schools, community centres), inadequate public transport, and roads not wide enough for increased traffic. o Public Opinion: An 83% majority of residents in a 2021 survey did not support new housing in the vicinity of Elborough. • Sustainability: The sustainability of the proposed development is a major point of contention. While developers and some council documents suggest the Elborough development is more sustainable than other potential sites, local objectors highlight the isolated nature of the location with no existing services. I would add the following relating to flooding in the area. Concerns have been raised that new developments in the area could increase the amount of impermeable surfaces (houses, roads) and exacerbate existing flooding problems. Runoff from farmland on the hill by Elborough Farm flows "like a river at times" across Banwell Road, flooding it several times a year. Surface water (flash flooding): This is a widespread risk across the region, which can even impact properties on hillsides. I trust that these very significant considerations opposing		

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Land north of Banwell Road, Locking /Elborough					I have seen the comments from Hutton Parish Council and Residents which I emphatically endorse. For clarification I repeat some of their observations :- They expressed strong opposition to development in the Elborough area. Their primary concerns include: - Loss of Green Space: The development would remove the strategic gap between Elborough and Locking parishes. - Infrastructure Deficiencies: There are major concerns about a lack of existing facilities (shops, schools, community centres), inadequate public transport, and roads not wide enough for increased traffic. - Public Opinion: An 83% majority of residents in a 2021 survey did not support new housing in the vicinity of Elborough. - Sustainability: The sustainability of the proposed development is a major point of contention. While developers and some council documents suggest the Elborough development is more sustainable than other potential sites, local objectors highlight the isolated nature of the location with no existing services. I would add the following relating to flooding in the area. Concerns have been raised that new developments in the area could increase the amount of impermeable surfaces (houses, roads) and exacerbate existing flooding problems. Runoff from farmland on the hill by Elborough Farm flows "like a river at times" across Banwell Road, flooding it several times a year.Surface water (flash flooding): This is a widespread risk across the region, which can even impact properties on hillsides. Another point which I am sure you are well aware is the ongoing construction of houses in Locking Parkland, Haywood Village and Banwell. The whole area is being saturated with houses reducing alarmingly the green space needed to reduce pollution. Once the green space is gone it is too late and gone forever. I trust that these very significant considerations opposing development in the area are fully taken into account when submitting the Pre-submission.			

Name: Isobel Jones **I.D:** 62776033

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Land at Tower Farm	No	• Consistent with national policy	Unsure	Unsure		The current proposals ignore the cumulative effects of development in key areas, and the significant net loss of Green Belt, and are in direct contravention of the National Planning Policy Framework. Critically important buffer zones were put in place to protect Weston Big Wood and the land at Tower House farm would badly damage the buffer zone. The SSSI is currently in unfavourable declining condition, due to the pressure from the existing level of footfall, with biodiversity in the woodland and surrounding area already having been significantly reduced. Weston Big Wood is an integral part of the Gordano Valley nature reserve stretching from the Severn estuary, through Portbury Wharf Nature reserve, along the Gordano Valley to the Somerset Levels and Mendips and is of		

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						national strategic environmental importance. Degrading it further by additional development will result in the loss of a key part of the Gordano Valley environment and impact negatively on the wildlife, flora and ecology of the whole Gordano Valley. Section 40 of Natural Environment and Rural Communities Act 2006 places a duty on public bodies to contribute to the coherence and resilience of ecological networks. Some of the proposals undermine the principles of the North Somerset Local Nature Recovery Strategy (LNRS), which establishes priorities and specific actions to drive nature's recovery and provide wider environmental benefits within the region - requirements set out by Government in the Environment Act 2021. As it stands, the Plan presents a significant threat to the essential connections between international, national, and locally designated sites, and will bring about the irreversible loss of wildlife corridors and stepping stones that connect these sites.		

Name: Isobelle Notley **I.D:** 62761249

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	There is no robust published alternatives assessment demonstrating that this sensitive site is the only or most appropriate option for growth. The loss of best and most versatile (BMV) farmland (Grade 2/3a by reference to the ALC dataset) and the risk of irreversible damage to the ancient woodland make this allocation unsuitable. The allocation conflicts with the National Planning Policy Framework (NPPF) paragraphs 180–182, which require that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland) should be refused unless wholly exceptional reasons exist. The Council's reference to an "ecological buffer" is vague, unenforceable and insufficient to address indirect impacts such as root-zone damage, hydrological change or wildlife disturbance. The Woodland Trust and Avon Wildlife Trust state that ancient woodland is irrecoverable once damaged. Moreover the Framework requires delivering biodiversity net gain, yet the allocation offers no clear mechanism for ensuring that outcome. Construction and built development would alter surface-water run-off and soil compaction on the former farmland, potentially affecting the hydrological regime that sustains the adjacent ancient woodland. The risk of nutrient runoff, altered infiltration and woodland root zone damage is material. Additionally changes in surface water run off could affect the existing houses below the planned development through flooding. This has been the case with even small developments of <20 houses and affected the surrounding green space equally, irrespective of "measures" implemented. When considered alongside other allocations in the Portishead area (such as Black Rock north of Clevedon Road), the combined pressure on ecology, infrastructure and transport is significant and undermines the Council's commitments to nature recovery and sustainable growth. Research has also been undertaken following the pandemic with regards to the use of green space, and its effects on wellbeing. Creating a town that no longer has sufficient green space will have negative long term effects not just on the wildlife and ecology of the woodland but of the residents of Portishead. No modification short of removing the allocation entirely would make this site appropriate. Given its direct adjacency to ancient woodland, its loss would be irreversible and cannot be mitigated sufficiently. The land should instead be retained as undeveloped green space, managed to enhance biodiversity and provide sustainable public access, in line with the Avon Wildlife Trust's 2030 Strategy and national "30 by 30" nature-recovery goals. I do not consider this submission to be sound.			

Name: J Axam **I.D:** 51425025

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell already has 800 new houses approved, a 40% (1000) increase for the village. These additional numbers would lead to complete overdevelopment which would be very destabilising for the village as a whole given how quickly the houses will be built. The proposed road would not be adequate to cope with the extra traffic and would be far too expensive to build. The railway station needs to be significantly upgraded if it is to become the transport hub envisaged by North Somerset Council. Despite many attempts over the years it still remains inaccessible for people with mobility issues and very difficult for mums with young children. No funded increase in capacity for the required extra school places or doctors/dentist facilities or leisure facilities. I cannot understand why a new road, railway crossing and/or services haven't been costed and funding agreed in advance. I am very worried the houses will be built without the necessary infrastructure. I feel flooding would be a major issue with the extra houses suggested. The high number of houses allocated to Backwell seems out of proportion to other local towns/villages North Somerset has not properly assessed the needs associated with the building of an extra 1000 houses. Most of the residents of the new houses would need to commute as there is very limited local employment. It is unlikely that they will all be working in central Bristol and will need to use a car. I object strongly to Grade 1 Agricultural Land to be used for housing. The loss of green space with its loss of wildlife habitats would be detrimental to the village.			

Name: J Bensted **I.D:** 21230849

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified	Unsure	No	I object to the pre-submission plan on the basis that it will double the size of Backwell and no longer would be considered a village which then changes the way people regard Backwell . No consideration seems to be given to the infrastructure required to service an increase of this size . I object to the new road as it will cut off Backwell Common (where I live) from The village of Backwell and I consider the plan of making part of Backwell Common pedestrian completely unworkable as there are houses within that area that need through traffic . It would cut our part of the common off from station road and the village . Also who is paying for the new road I do not believe that North Somerset council has funds for this . The ground around Backwell Common is so low lying that a build of almost a thousand houses and the building of a road will have increase the possibility of flooding in the area . I object strongly to this plan .	N/A	N/A	

Name: J Berry **I.D:** 62793889

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with	Unsure	Unsure	The lack of infrastructure cannot support this huge development. Backwell already has recently incorporated a huge development of new houses and their construction has caused massive upheaval for the community in regard to transport and delays in travel requirements, when most residents are required to commute. The development proposed is far too big, and would compromise wildlife habitats and biodiversity, at the same time as reducing high quality agricultural land.			

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		national policy			New roads and housing proposed are on a floodplain, with risk of future further flooding complications.			

Name: J Bradley **I.D:** 57956257

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP5: Housing, employment and mixed use allocations	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Objection to the Allocation of Tower Farm 1. Ecological Harm and Failure to Demonstrate Mitigation The site plays an essential role in maintaining the ecological integrity of Weston Big Wood (SSSI) and the wider Gordano Valley ecological corridor. It supports local biodiversity, provides critical habitat connectivity, and contributes significantly to North Somerset's landscape character. The Local Plan does not demonstrate that these ecological constraints can be effectively mitigated. Weston Big Wood is ancient and irreplaceable, such habitats cannot be recreated or compensated for through development. Any development in this location would result in unavoidable and unacceptable ecological harm. 2. Green Belt Designation and Lack of Exceptional Circumstances Tower Farm was added to the Green Belt in the late 1980s due to the landscape, ecological and strategic importance. National planning policy requires that changes to Green Belt boundaries occur only in exceptional circumstances and must be supported by clear evidence. No such circumstances have been demonstrated. Housing need alone does not justify releasing Green Belt land, particularly where alternative, less constrained sites exist. This location does not meet any credible definition of “grey belt”. It sits immediately next to two SSSIs which are the highest level of nature conservation designation in England reinforcing its strategic importance and the inappropriateness of allocating it for development. 3. Unsuitable, Unsafe and Undeliverable Access The sites cannot provide safe or suitable access, as required by the National Planning Policy Framework (NPPF). The steep topography, constrained local road network and existing junction limitations create significant safety issues. These cannot be resolved through normal mitigation measures. Channelling traffic from hundreds of new homes past a primary school and through an already constrained T-Junction would result in additional congestion and heightened safety risks for pedestrians, cyclists and children. 4. Severe Transport Impacts and Unsound Transport Evidence	To make the Plan legally compliant and sound, the following modifications are necessary 1. Remove Tower Farm from the proposed allocations This site should be deleted from the Local Plan because their allocation is not justified, not effective, not deliverable, and is inconsistent with national policy relating to Green Belt protection, ancient and irreplaceable habitats, and safe access requirements. Their removal is required for the Plan to meet the NPPF soundness tests. 2. Reassess the spatial strategy to ensure compliance with Green Belt legislation and national policy The Plan must demonstrate genuine exceptional circumstances for any Green Belt release. No such evidence has been provided for Tower Farm. The Green Belt appraisal and site selection process should be revised to ensure transparent, evidence-led assessment that complies with national policy and case law. The current assessments fail to address the impacts on Weston Big Wood SSSI, adjacent SSSIs, and the Gordano Valley ecological corridor. The Plan must include detailed, site-specific ecological evidence demonstrating how harm to irreplaceable ancient woodland habitats would be avoided, not just slightly mitigated. If this cannot be demonstrated, these sites cannot be allocated. 3. Update the transport evidence base to address inaccuracies and omissions The submitted transport assessments exclude key data, including actual school-peak traffic conditions and local junction constraints. A revised, comprehensive transport assessment is required. It must demonstrate that safe and suitable access can be achieved for all users and that severe residual cumulative impacts will not occur. If such evidence cannot be produced, the sites must not be included in the Plan. Re-evaluate deliverability in line with national planning policy Access constraints, topography, ecological protections and infrastructure limitations raise serious questions about deliverability. The Plan must ensure that all allocated sites can realistically be delivered within the Plan period. Sites that cannot meet access, ecology, or infrastructure requirements should be removed. 4. Strengthen the Plan’s methodology for the selection and rejection of sites The current approach lacks transparency and does not adequately		

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					Development in this location would generate substantial additional traffic on already constrained routes, including the Portbury Hundred and the narrow local road network, particularly at the Avon Way junction and the High Street mini-roundabout. The transport evidence submitted by the developers is incomplete and does not account for existing peak time congestion, including significant volumes of school traffic. The impacts are foreseeable, severe and cannot be mitigated to acceptable levels. As a result, the proposed allocation fails the NPPF tests of soundness, especially in relation to justification, effectiveness and deliverability. Due to the lack of exceptional circumstances for Green Belt release, the significant and unavoidable ecological harm, unresolved access constraints and severe transport impacts, the allocation of Tower Farm is unsound and should be removed from the Local Plan.	evidence why environmentally constrained Green Belt sites have been preferred over less sensitive or more sustainable alternatives. The site selection methodology should be revised to ensure it is clear, consistent, and aligned with the tests of justification and effectiveness.		
Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	1. Ecological Harm and Failure to Demonstrate Mitigation The site plays an essential role in maintaining the ecological integrity of Weston Big Wood (SSSI) and the wider Gordano Valley ecological corridor. It supports local biodiversity, provides critical habitat connectivity, and contributes significantly to North Somerset's landscape character. The Local Plan does not demonstrate that these ecological constraints can be effectively mitigated. Weston Big Wood is ancient and irreplaceable, such habitats cannot be recreated or compensated for through development. Any development in this location would result in unavoidable and unacceptable ecological harm. 2. Green Belt Designation and Lack of Exceptional Circumstances Tower Farm were added to the Green Belt in the late 1980s due to the landscape, ecological and strategic importance. National planning policy requires that changes to Green Belt boundaries occur only in exceptional circumstances and must be supported by clear evidence. No such circumstances have been demonstrated. Housing need alone does not justify releasing Green Belt land, particularly where alternative, less constrained sites exist. This location does not meet any credible definition of “grey belt”. It sits immediately next to two SSSIs which are the highest level of nature conservation designation in England reinforcing its strategic importance and the inappropriateness of allocating it for development. 3. Unsuitable, Unsafe and Undeliverable Access The sites cannot provide safe or suitable access, as required by the National Planning Policy Framework (NPPF). The steep topography, constrained local road network and existing junction limitations create significant safety issues. These cannot be resolved through normal mitigation measures.	1. Remove Tower Farm from the proposed allocations This site should be deleted from the Local Plan because their allocation is not justified, not effective, not deliverable, and is inconsistent with national policy relating to Green Belt protection, ancient and irreplaceable habitats, and safe access requirements. Their removal is required for the Plan to meet the NPPF soundness tests. 2. Reassess the spatial strategy to ensure compliance with Green Belt legislation and national policy The Plan must demonstrate genuine exceptional circumstances for any Green Belt release. No such evidence has been provided for Tower Farm. The Green Belt appraisal and site selection process should be revised to ensure transparent, evidence-led assessment that complies with national policy and case law. The current assessments fail to address the impacts on Weston Big Wood SSSI, adjacent SSSIs, and the Gordano Valley ecological corridor. The Plan must include detailed, site-specific ecological evidence demonstrating how harm to irreplaceable ancient woodland habitats would be avoided, not just slightly mitigated. If this cannot be demonstrated, these sites cannot be allocated. 3. Update the transport evidence base to address inaccuracies and omissions The submitted transport assessments exclude key data, including actual school-peak traffic conditions and local junction constraints. A revised, comprehensive transport assessment is required. It must demonstrate that safe and suitable access can be achieved for all users and that severe residual cumulative impacts will not occur. If such evidence cannot be produced, the sites must not be included in the Plan. Re-evaluate deliverability in line with national planning policy Access constraints, topography, ecological protections and infrastructure limitations raise serious questions about deliverability.		

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					Channelling traffic from hundreds of new homes past a primary school and through an already constrained T-Junction would result in additional congestion and heightened safety risks for pedestrians, cyclists and children. 4. Severe Transport Impacts and Unsound Transport Evidence Development in this location would generate substantial additional traffic on already constrained routes, including the Portbury Hundred and the narrow local road network, particularly at the Avon Way junction and the High Street mini-roundabout. The transport evidence submitted by the developers is incomplete and does not account for existing peak time congestion, including significant volumes of school traffic. The impacts are foreseeable, severe and cannot be mitigated to acceptable levels. As a result, the proposed allocation fails the NPPF tests of soundness, especially in relation to justification, effectiveness and deliverability. Due to the lack of exceptional circumstances for Green Belt release, the significant and unavoidable ecological harm, unresolved access constraints and severe transport impacts, the allocation of Tower Farm is unsound and should be removed from the Local Plan.	The Plan must ensure that all allocated sites can realistically be delivered within the Plan period. Sites that cannot meet access, ecology, or infrastructure requirements should be removed. 4. Strengthen the Plan’s methodology for the selection and rejection of sites The current approach lacks transparency and does not adequately evidence why environmentally constrained Green Belt sites have been preferred over less sensitive or more sustainable alternatives. The site selection methodology should be revised to ensure it is clear, consistent, and aligned with the tests of justification and effectiveness.		

Name: J Brooks **I.D:** 62855777

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Backwell already has approval for 800 new houses, a 40% increase in the village’s size. This level of growth is disproportionate, especially when compared to other villages and towns in North Somerset. Backwell is planned to accommodate 7% of the district’s total housing allocation, while larger towns like Clevedon are only expected to take 2%. Such an excessive concentration of new housing in a small village is unsustainable and threatens to overwhelm the community’s character and services. The proposed development would also result in the loss of valuable greenbelt and grade 1 agricultural land. This land is currently used for food and grazing, and its loss would undermine both local food security and national government policy on food security (“we must protect our best and most versatile land”). The destruction of these green spaces would have a lasting negative impact on local wildlife habitats and biodiversity, further destroying one of the most nature-depleted countries. There is a significant deficit in local infrastructure, including school places, health services, leisure facilities, plus maintenance and performance of local roads. The Infrastructure Delivery Plan lacks proper analysis, costings, and funding guarantees for essential services and new roads. The area is already prone to flooding, and additional development would likely worsen this, especially around Backwell Common and Backwell Lake, which are already on a floodplain. The sheer volume and pace of growth required, without adequate investment in infrastructure and services, is destabilising and undeliverable. The loss of greenbelt land and high-quality agricultural land, combined with the risk of flooding and uncertainty over infrastructure delivery, makes this proposal fundamentally unsound.			

Name: J Charlewood **I.D:** 62849569

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	‣ Positively prepared ‣ Justified ‣ Effective	No	No	Prior's field in Easton-in-Gordano has village green status, as it has great value to us as a recreational space in Easton-in-Gordano. If this area is built on, dog walkers will have to drive to walk their dogs locally, thus increasing traffic in the area. Village green status indicates that this land has move value to us as a community than as an area to be developed, and we would like its status respected as a community. This plan does not demonstrate to me that the Duty to cooperate has been entered into fully. SP6 says that this plan will ensure that infrastructure will be considered to ensure that the population is adequately served. There is no evidence that this has occurred so far, or that it would occur in the future. The local school in the village is already full, and increasing the population by nearly double will mean that the schooling provision would also need to be increased, otherwise that will also increase traffic in the area as children are ferried to other schools. The health care infrastructue in the village is also currently stressed with the current population, and failure to properly plan for this will lead to greater health inequalities in the area. The GP surgery is already difficult to get an appointment at, so more patients will need more health care professionals, and the GP surgery will require more space to see the increase in patient population. The plan has centred a large proportion of the new housing on one location, overwhelming the currently small population and the infrastructure it has.	The protection of Prior's field as a village green and it being maintained as a recreational space for our children, animals and the whole community. Demonstration of a fully worked up infrastructure plan including education and healthcare, with fully-funded explicit detail on increasing the size of the local primary school and GP surgery premises. As the plans state 50% affordable housing, this suggests the population increase in this community will include a larger number of families and younger people. Or spreading the increases in housing across north somerset, so no one community is overwhelmed by the population increase.		

Name: J DeBude **I.D:** 58388225

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Churchill Avenue	No	‣ Justified	Unsure	Unsure	Penny Field should be protected as a Local Green Space. It’s one of Clevedon’s last true greenspaces, a Nature Recovery priority site, and vital for wildlife, community wellbeing, and access to nature. Better brownfield and greyfield sites across the town exist for development.	Penny Field should be protected as a Local Green Space. It’s one of Clevedon’s last true greenspaces, a Nature Recovery priority site, and vital for wildlife, community wellbeing, and access to nature. Better brownfield and greyfield sites across the town exist for development.	Penny Field should be protected as a Local Green Space. It’s one of Clevedon’s last true greenspaces, a Nature Recovery priority site, and vital for wildlife, community wellbeing, and access to nature. Better brownfield and greyfield sites across the town exist for development.	

Name: J Dowdeswell **I.D:** 50922241

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	We already have about 800 new houses in Backwell, representing a 40% increase in village size. More would lead to total overdevelopment. The propsoed road would not effectively deal with the traffic problems we already have, let alone with any further housing. Given the already huge growth of Backwell, this has not be accompanied by investment in schools and healthcare. Why is Backwell asked to take so much more housing as a percentage (7%) whereas Clevedon, for example, is only 2%. There is no justification for this. The whole volume of growth that has both taken place recently and is now proposed for Backwell is unsustainable and destabilising and lacks justification.			

Name: J Drew **I.D:** 58600193

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	There are more suitable areas around Wyndom way. The roads around West Hill cannot cope with the hundreds of cars that the development would generate. We live in the Deans and it is impossible getting in or out at school drop-off and pick-up, we try to avoid those times but we had an appointment and came back at afternoon pick-up, it took us 20 minutes to travel 200 yards, it was total gridlock, people were getting frustrated because no-one could move and shouting abuse at other drivers. Using the Wyndom side of Portishead the traffic would be in a better position for the M5, A359 and the new railway station. The impact on wildlife would be enormous there are deer and a large variety of birds that habitat these fields, the food source, light and noise pollution would have a devastating effect on them, beside the fact that the number of cats would increase significantly which have a huge effect on the bird and mammal population they are the biggest threat to the bird population and small mammals that birds of prey rely on. It will also have a huge impact on people's mental and physical health. Lots of people young and old enjoy walking in the fields it is a way of socialising for a lot of older people and to see the deer and hear the birds song lifts anyone's spirit. Footfall in the woods would be inevitable and that would have a huge effect on the rare plants and trees of which are of SSSI. This area was made a green belt area in the 1980's for that reason and it should remain as it is.			

Name: J Dudley **I.D:** 14977665

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Pill Green	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	1: The Sustainability Appraisal fails SEA Directive, ie No assessment of Brownfield Alternatives to Pill Green. Reg12/2024 Brownfield Register 2,800+ units ignored. 2: North Somerset Council has no duty to cooperate on Bristol’s 8,000 unit unmet need. There is no statement of common ground, this is a unilateral 1100 home dump in Pill and Easton-in-Gordano. 3: Green Belt exceptional circumstances not evidenced (NPPF 147) This land has been identified as ‘high-performing agricultural land’. Was there any sequential test? 4: 44% population increase in Pill and Easton-in-Gordano is disproportionate, unjustified and unjustifiable! The 600 homes at Pill Green represents a 24% increase on this one site alone. 5: No deliverability plan for A369, M5 J19, Schools or drainage by 2041 making plans for Pill Green typically bonkers and unworkable. 6: The Brownfield First policy has been ignored; there are above 2500 viable urban units available on the fringes of Bristol, Weston and Portishead. 7: Pill Green breaches NPPF 159. 8: I expect there to be independent verification of “Exceptional Circumstances” before any Pill Green consent is given.	Preferably delete the Pill Green site (600 homes) from the LP8 Schedule of Sites but at the very least amend Policy LP8 as follows: “ No development on Pill Green until exceptional circumstances are independently verified (NPPF para 147) and sequential testing confirms no viable non-Green Belt alternatives are available, prioritising brownfield sites in Weston-Super-Mare, Portishead and the Bristol fringe. Cap total total LP8 allocation across all sites; require full funding (via S106/CIL agreements) for flood defences to 1-in-1000 year standard +45% climate change allowance, A369 and M5 J19 capacity upgrades and critical communal infrastructure upgrades before granting outline permission. Insert new para 6.79: “ Allocations must demonstrate no disproportionate impact on village populations, defined as <5% increase per site without evidenced need. Allocations in villages with a population under 10,000 must not result in a population increase of more than 5% from any single site unless exceptional circumstances are independently verified and full infrastructure is secured upfront via s106/CI. Cumulative impacts across all sites within a settlement must not exceed 20% without a master planned, funded delivery strategy.”	N/A	

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					9: Village growth should be capped at 5% per site; note: a) 2017 JSP and previous local plan allocations; b) NPPF 11 and 130(f) “Plans must be ‘deliverable’ and ‘avoid adverse impacts’ on local character and services; c) Local Plan examinations have found that developments that cause more than a 10% population increase are unsound unless supported by exceptional infrastructure evidence, which is not seen here at Pill Green. 10: The fields that would be obliterated by the Pill Green development are Green Belt, that should be enough but clearly not! They are a massive asset to the village for outdoor space, for dog walkers, horse riders and for experiencing all kinds of wildlife, from at least two species of deer, foxes, badgers, hedgehogs, buzzards, sky-larks, jays, redwings, sparrow hawks, numerous species of owl, as well as the more common bird species, and amphibians: frogs, toads and newts. How soon we forget the desperate need for such places that we all experienced during the Covid Pandemic. 11: Traffic congestion on the A369 is already extremely bad at rush-hour, and is compromised throughout the day at the Abbots Leigh choke-point, get two large vehicles trying to pass at this point can cause major traffic issues that are sometimes not easily resolved. Anyone who thinks adding 600 homes to this issue is not going to wreak havoc on this route into Bristol is either a bloody idiot or a dishonest rogue. 12: The Bristol experience: Bristol is different from all other large metropolitan areas (think Birmingham, Manchester, Leeds etc), non of them can match the wonderful entrance into the city via the A369 and the suspension bridge, it needs to be cherished as unique, not obliterated under a sea of urban sprawl, it’s precious and should be appreciated for being different and better than anywhere else, or are you all just money obsessed Philistines?			

Name: J Dyson **I.D:** 28928545

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Strategic Policies	No	• Consistent with national policy	Unsure	Unsure	North Somerset council 2041 Local Plan has a responsibility from the UK government to deliver the strategic national recommendations of the UK Food Security 2024 report & the regional North Somerset Strategic Flood Risk Assessment Level 1 - 2025 report. I don't believe it delivers these mandatory objectives. Examples below are as follows: 1) UK Food Security report highlights: 'Extreme weather events continue to have a significant effect on domestic production'. By North Somerset Council (NSC) allowing agricultural land to the used for non-farming purposes in the 2041 plan (e.g. new housing, solar farms), this increases the risk of local flooding and hence reduces local food production. This is the complete opposite to the objective of the British food security measure, which has the Executive warning: 'The UK continues to be highly dependent on imports to meet consumer demand for fruit, vegetables and seafood'. As a country, the UK needs to produce more of its own food, something the 2041 plan does not deliver & contribute towards. Especially, when the growing UK & NSC population is taken into account; 2) UK Food Security report notes: 'The impacts of climate change, biodiversity loss and water insecurity both at home and abroad remain pressing risks to food security'. By NSC reducing the amount of agricultural land, this is the reverse of the required UK aims. The 2041 plan does not deliver the required national objective; 3) The current NSC Flood Risk analysis report, already highlights much of Weston-super-Mare, Clevedon & Banwell are all at flood level 3 (the highest flood risk category from a variety of sources e.g. rainfall, groundwater, river/ rhyne flooding & most likely tidal overflow destruction). It states 'Much of North Somerset's land lies below existing spring high tide levels'. By NSC planning to reduce the agricultural land & dramatically increase the amount of regional housing on green fields, this will dramatically impact the flood risk to the existing local population, emergency services demand & reduced food production; 4) The current NSC Flood Risk Breach Model map, includes hundreds if not thousands of square miles of NS flooded land, particularly in Weston-super-Mare. Much of which is over the planned new housing developments. The 2041 plan mitigation measures are not of sufficient detail to ensure compliance.	The document must comply to the UK Food Security 2024 report & the regional North Somerset Strategic Flood Risk Assessment Level 1 - 2025 report.		

Name: J Eade **I.D:** 31049857

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Youngwood Lane	No	• Justified	Unsure	Unsure	In laypersons' terms the proposed Gleesons plan for building off remaining fields above Youngwood Lane would have a detrimental effect on the wildlife that uses the triangle of ponds in the area - Nailsea Railway Ponds, Youngwood Farm ponds, and Backwell Lake. There is also no road access towards Nailsea, and it is a long way from the town centre facilities, and uphill, for walking or cycling. Access to the lake and railway station has recently been closed, and the bridleway is not safe, for exit on to Bucklands Batch - a piece of road which is between Nailsea Station road and Backwell Station road, which is on a hill, with a bend, with 4 residential roads and other houses trying to exit/enter on to it. A new road, possibly built across the newly formed Green belt, which is to replace the existing green belt close to the A370 in Backwell, and going close to the railway side of the lake, coming out on Backwell Station Road, close to, and between the lake car park and the station car park, and the route where many pedestrians and cyclists access the station and to Backwell school, would be very dangerous. There are also 2 footpaths that exit Moorfield Farm fields, close to each other, and in the same vicinity. They provide access to walk either to Backwell Common, and across to the A370, or towards Nailsea, without the need to walk along the 'main' road, with its narrow pavement.	Don't build more houses below Morgan's Hill or Sedgemoor Close, or at the lake end of Youngwood Lane.		
Youngwood Lane					In addition to my previous comments - i can't even understand what your map coloured orange is showing. Apart from Netherton Wood Lane labelled, and a road shown through the balancing pond (Backwell Lake!), Youngwood Lane is not shown, it is not at all obvious where The Grove, Sedgemoor Close, The Perrings, or anything even is - or is it just showing the houses that are already under construction (with the footpath closed from the top of Morgan's hill to the bottom corner of Youngwood Lane), and the houses that are already occupied/built?? It does not appear to be possible to comment, in general, about the lack of infrastructure and facilities that are planned. Backwell has nothing (except a swimming pool), a few small shops and a small health centre. Ye,s it has the a370 running through it, but not everybody needs to go to Bristol (or locally) to work. Many p[eople need to access the M5 north, which means going down Chapel Hill, then along Backwlel bow and Lodge Lane, on to the Wraxall Road, up Wraxall Hill, along, and down Portbury Lane. All of these roads are at best B roads - and most are unclassified, narrow,			

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					and with bends, and are totally unsuitable for more traffic. The same is true for roads out of Nailsea in all other directions. Stone Edge Batch, on the Clevedon Road, is dangerous - especially when a bus, and/or a lorry are coming along there, and the road through Tickenham gets clogged up if there are any temporary traffic lights, the queue goes back nearly to the rabbit place on the bends towards Nailsea. Queues to get out of Portbury Lane, on to the Failand Road, in the evenings are long. The exit from the Failand Road at Stone Edge Batch, where it joins the Clevedon Road, has long queues - all of these made worse if there is a problem on the M5. Other unclassified roads out of Nailsea are dangerous - The Causeway, which passes Tickenham church has potholes along the edge, and sat. nav.s take vehicles along there. If you pass a van then you may tip into the rhyne. The alternative road to the M5 at Clevedon, through West End, is narrow, has potholes, and is dangerous, with bends, dwellings, the rhyne along Nailsea Wall... The roads through Chelvey and Brockley, to to join the A370, to go in the direction of the airport, and to Weston, to that M5 junction, are also narrow and dangerous, with bends. As already mentioned, the road along Lodge Lane/Backwlel Bow and Chapel hill, which is used as a rat run, to avoid Backwell speed bumps and traffic lights, is dangerous, floods under the railway bridge, and is dangerous when you are trying to use the footpaths that come out on to it, and continue on the other side of the road - or not. The road through Wraxall is dangerous, especially when two buses are trying to pass, and they, or a lorry, have to mount the pavement. again footpaths come out on to it and you need to cross to carry on, up towards Tyntesfield, Truckle wood, etc. There was a swan in the road at the bottom of Bucklands Batch, near Backwell Lake, yesterday, stopping traffic.There have been other accidents on Bucklands Batch, including a jack-knifed horsebox, and a bike going down the cycle path that is for cycling up, and colliding with a pedestrian who was coming out of Bucklands Lane, and injuring her. There is no pedestrian crossing to go from one pavement to the other side, either near the station, or its car park, or the lake, or the footpaths that exit the fields of Moorfield farm along there. The pavement under the railway bridge is very narrow. There is only a slope access on the Nailsea side of the railway 'station' (halt). There are 3 other pedestrian footpath access points under the railway, that connect Nailsea to Backwell, as well as the footpath along Station Close, up to The Grove area. The health centres will not cope with the extra population. Neither will the dentists, leisure centres etc.			
Land south of Nailsea	No	Justified			Same comments as for other land off Youngwood lane. New proposed road too close to Backwell lake, and will come out between the lake, and the station car park, and on a busy piece of pavement, where people walk, and cycle, and drive, to the station, Backwell School, the new Co-op and Backwell motors..... Other footpaths go from almost opposite the lake entrance, towards Nailsea, and towards Backwell, across Backwell Common and on, to come out next to the swimming pool, or the allotments, and Chapel Hill.....as well as the footpaths down Station Close that go up and across Youngwood Lane and up to The Grove and beyond. Then there is the bridlepath that goes from the top of Engine Lane, right across Morgan's Hill and down behind the houses in Sedgemoor close, coming out at the top of Youngwood Lane. Then continuing from further down the hill in Youngwood Lane, to the bottom of the The Perrings grass - and did, until recently, go down to the lake, and out on to Station Road, to acces the station and Backwell School. Also you can continue on to Backwell Common, and then the A370. Now the only option is the dangerous exit on to Bucklands Batch, since the path down from The Perrings grass to the lake has been closed.	Don't build these extra houses then there will be no need for this road. It has been 'in the pipeline' for nearly 40 years, if not more. The exit/roundabout, is dangerous for all of those on foot or bike, trying to access the station, and Backwell, school, let alone the lake etc.		

Name: J Estcourt **I.D:** 62850593

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Comments on “North Somerset Councils reg119 Local Plan 2041” from a Backwell residents point of view. Page 29. The first paragraph speaks that the "green belt of North Somerset checks the urban sprawl of Bristol" etc. How can this be when prime farming land (which grows the countries food) in the green belt of North Somerset has been chosen for an extensive urban sprawl in Backwell to house people far away from Bristol and their workplace thus encouraging longer commuting distances. The whole of the development of Nailsea and Backwell area depends on the proposed New Road Bridge under the railway East of Backwell railway station. It would seem that the North Somerset planners have been taken in by the builders saying that they will build a road through the estate to bypass the busy Station Road (from the traffic lights in Backwell down to the Nailsea side of the Station at Backwell Lake) with a new bridge to be built under the railway line and an extensive/expensive road to meet the existing road at Backwell Lake. The proposed builder has stated that they will build the road who's progress will match the estate building works down to the Railway line. Being as there are no proposed houses beyond the railway line on the Nailsea side of the railway track a lengthy road will need to be built from the new proposed bridge to the bottom of Bucklands Batch. It must be noted that the construction of this road must be of a higher spec than what a builder would construct for a housing estate as it needs to take heavy goods vehicles and will the bridge be high enough to take double decker buses and high sided HGV’s. Will it be single lane with traffic lights or more! I would be quite right to say that the Bridge and the extended road on the Nailsea side of the Railway, due to it's eye-watering expense, will not be paid for in any way by the Builder, the Council or the Government. The Local Council and the Government are broke, it will only be the Builder having built the houses who will walk away from the project with the profits from the houses for their shareholders. Are we to expect that the road and bridge will be built by British Rail? We will be left with a massive estate of 900 houses (50 % affordable) with no bridge/bypass for Station Road but with nearly 900 houses/families who need to get to a supermarket in Nailsea to do their shopping via the existing Station Road. Backwell has had more than it's fare share of private house building work granted over the last few months/years without any Council or Government money spent on any of it's infrastructure. Backwell only has convenience shops, a post office/ convenience store, a school at full capacity, a small leisure centre and a small surgery. Backwell is expected to increase it’s population by 80% with Nailsea population increase of a further 55%. Is this realistic? Is the funding in place from the Council and Government to do the necessary upgrades to Backwell and Nailsea services? As Bristol is the main area of work nearly everyone who has had to purchase a house in the green belt of Backwell in North Somerset will have to use the existing road system (A370) to commute to Bristol through Flax Bourton via the Long Aston Bypass which has been reduced to a single lane.. Any sensible person would allow the boundary's of Bristol to be extended as the road infrastructure extensions would be less and the people would be nearer to their place of work and recreation, less greenhouse gas’s etc. It would only mean a short extension of the Bristol Metro line from the Park and Ride in Long Ashton which would encourage people to use public transport, rather than to live outside of Bristol and have to use their cars. It's about time that the road/transport infrastructure is brought up to date with North Somerset’s expansion. Back in the 1970’s a road from the end of the Long Ashton bypass to the M5 junction at Clevedon was planned but regretfully forgotten about and I can see this happening with the proposed bridge under the railway. In conclusion to add the estate East of Backwell (889 houses making a 80% increase to the village) in addition to the building already passed for planning (794 houses representing a 40% increase on the village) all using the only supermarkets which are in Nailsea together with the proposed additional housing for Nailsea, all using the A370 to commute to work in Bristol will be chaotic on the existing road structure. We are all aware that the sticking plaster of a rail underpass/bypass road for Station road in Backwell will just never happen and even if it did we are still talking of the existing roads needing to carry all the additional traffic.			

Name: J F Button **I.D:** 62775297

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Policy LP3: Strategic location: Nailsea and Backwell	No	• Effective	Unsure	No	The volume of houses planned to be built for Nailsea and Backwell, which share infrastructure is disproportionate to transport links capabilities, doctors / dentist capacity etc. Much is planned on prime agricultural land which is needed for food and good for wildlife. And the development is distant from employment centres which has environmental implications.	I think the volume of development should be reduced in this area, taking into account what has already been agreed and the size of the existing settlement. The excess houses should be built near an employment centre or near motorways / areas with better travel links to Bristol, Weston, Avonmouth and similar. Ideally not on prime agricultural land.		

Name: J Farr **I.D:** 51450369

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Grove Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	backwell already has 800 houses approved . these additional development will change the nature of a village into a small town and lead to overdevelopment. the A370 already is heavy with traffic and congestion which this will only add to. Nature will be lost and good growing land also. backwell infrastructure has not been considered.			
Land at Farleigh Farm	No		Unsure	Unsure	again the development will impact adversely on the nature of the village. field will be lost, population will increase, traffic will increase swell as air pollution. safety for pedestrians will be compromised. Agricultural land will also be lost. school provision, medical services , shops, will not support the increased demand.			
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	why is it that Backwell is taking the brunt of housing development compared to other small towns and villages? we live on the very busy A370 which is frequently congested when the M5 is shut or blocked with traffic. further development here will add to traffic, congestion and road safety hazards in a place already blighted as a short cut to the motorway. Medical services in a place lived in by many senior citizens which generally is very good will no longer be so. The village will become a small town and quality of life will be damaged. I consider that these housing plans will not address the national housing shortage . only social, affordable housing aimed at young people can fulfil that challenge.			

Name: J Haskins **I.D:** 62775585

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared • Justified • Effective • Consistent with	Unsure	Unsure	This ‘plan’ is once again unbalanced and lacking in the key information that would allow people to consider it objectively. With the level of information provided at this moment then the only rational conclusion is that it is an unworkable and inappropriate plan and that it can only be objected too. The critical areas that this plan does not address are: 1. Road access to/from Nailsea - the roads are still in the main as they were before the development of Nailsea started in the 1970’s, that is only ‘B’ class roads or narrow twisty country lanes. The lack of employment opportunities in the			

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		national policy			Nailsea area dictate people will be travelling further afield for their employment and the road network and links to the motorway and Bristol are inadequate to provide swift and safe travel. How will the plan address this? 2. The plan does not stipulate the types of houses to be built. Nailsea needs 2 & 3 bed properties priced for first time buyers, not more 4-5 bed larger properties. 3. The plan says ‘3 additional primary schools’ but does not identify any location for these or give a timescale for them to be built. The inclusion of schools infers the intention to attract younger families, if this is the intention then why doesn’t the plan stipulate the type of houses to be built? 4. There is no mention whatsoever of increasing the other critical services (doctors surgeries, dentists & leisure facilities). A well thought out plan and comprehensive plan would address this and include these additional facilities and how they are to br funded. 5. Flood plains - many of the areas identified are low lying and regularly subject to flooding. 6. A number of the areas are presently used for farming building of this land further reduces the local food production and employment.			

Name: J Hickling **I.D:** 62699105

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Land east of Backwell	No	• Justified	Unsure	Unsure		Government policy states we must protect our best and most versatile land to safeguard food security. Development would destroy valuable wildlife habitats and further harm biodiversity. Grade1 agricultural land is currently used for food crops and grazing. There is only 7% of this high quality land left in N Somerset.		

Name: J James **I.D:** 62774369

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Our family has lived on the B3128 Tickenham Hill for the last 14 years the proposed increase in housing and associated traffic concerns me on several points. 1) Increased flooding due to houses being built South of Nailsea above the Land Yeo River. We have had significant rain over the last few weeks. The café at Jacklands Trout Farm has already been flooded resulting in cost of clean-up and loss of business to this local business. Two fields are already flooded and have remained flooded. The cows usually graze these fields. My understanding is that local planning is not meant to increase the risk of flooding, and I cannot see that this is true in this case. 2) Tower House Woods is an ancient woodland that should be protected as it the home of dormice, bats and other wildlife that should be looked after. Again. Building in this area may impact this very special environment. 3) During the warmer months and whenever there are problems on the M5 there is a queue of traffic that forms on the hill. When it reaches our house it means traffic is queueing for over 30 minutes to turn out towards Tickenham at the bottom of the hill. When the M5 was closed the traffic was queueing both ways on the hill making it impossible to leave our house. More traffic means the queues will be worse. The junction at the bottom of the hill is not controlled so it can be very hard to turn out. 4) The Clevedon Road from Folly Farm to Jacklands has a multitude of issues. It is reduced to single lane for HGVs by the Ryves Vale development because of the corners. There has also been an accident where 2 buses collided on the corner by			

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					The Star Inn because it is hard for 2 larger buses of HGVs to pass each other. The turn out at the bottom of Tickenham Hill can once again be an accident risk a car went into the hedge of the bottom house there but luckily no injuries. There have also been many accidents with lorries not stopping at the bottom of the hill and knocking down the wall opposite. Then we move onto the stretch from Stone Edge batch to Nailsea it has a single lane section at the start so traffic must wait for HGVs to come through then if the HGVs meet at the bends, it can be very difficult for them to negotiate a way through. A wait of 20 minutes has regularly resulted when this happens. The time someone tried to take a large motorboat down caused the traffic to back up for 45 minutes there are no signs warning of the issues, so HGV drivers are not prepared. 5) There is a lack of public transport to this area and it is a long walk (30 minutes) to the railway station and although the X6 is meant to run every 30 minutes if it gets held up in the congestion the buses get delayed. There is no safe route to walk along this section of road as there is no pavement. I take my life in my hands when I need to walk my dog along this section to get home. 6) If you put more houses in Nailsea you need to improve Doctor Surgeries as they are at capacity and struggling to cope already. It is very hard to get an appointment with a GP when needed. 7) The route out to the M5 needs improving as it is struggling to cope already any increases in housing will make things worse. 8) It feels that the local plan has been put together without the local input that is needed to understand the problems we have in our area.			

Name: J Lamborn **I.D:** 29214593

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	The ‘village’ of Backwell already has over 800 houses approved which is a 40% increase for the village. We are presently already overdeveloped, to consider adding to this further is complete and utter madness. The proposed new road would not effectively serve to relieve congestion on Station Rd, Backwell Common or the surrounding areas and its plan to go under or over the existing railway lines is completely unfeasible and absurd. Neither existing residents nor new residents are likely to drive to the far end of the village to access a new road so that they can shop in Nailsea, Rather Station Rd would be their first choice. The village of Backwell has one small doctors’ surgery, one dentist, a veterinary surgery, a post office and a couple of shops. None of these has room to expand or increase capacity and no further employment opportunities in the area exist. Other than those working from home these are the only employment opportunities in the area ergo we are simply unable to sustain an additional thousand households. Also the Infrastructure Delivery Plan lacks any analysis or costings and with no funding guarantees for new roads or services! It should be noted that Backwell Common and surrounding areas are very prone to flooding which would be made worse by more housing! Far from being an employment hub most residents of Backwell commute to work on a daily basis. The ‘village’ of Backwell ‘boasts’ Grade 1 Agricultural Land upon you wish to build, of which there remains just 7% in the whole of North Somerset. Government policy states that we must protect our best and most versatile land to safeguard food security and we believe that these proposals contradict this. Furthermore, the areas in question would destroy valuable wildlife habitats and further harm the biodiversity! This attack on our Greenbelt would directly threaten the Broccoli Maternity Roost and SSSI, with the London question supporting rare Lesser and Greater Horseshoe Bats feeding grounds. The impact on this area’s character its population, and services on offer make it wholly unsuitable for an additional development which we note will add a considerable increase in households, residents, vehicles and the need for additional need for services that do not and are unlikely to exist due to Backwell being a ‘village’!! The proposed new road and further housing are situated at Backwell Lake and adjacent fields which are a floodplain and indeed flood regularly!?? She railway station is not fit for purpose as a transport hub as it is inaccessible with many steps for both platforms and remains little more than a bus route!			

Name: J Liddle **I.D:** 39126721

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Comments on NSC Reg 19 Local Plan 2041 • Backwell has been targeted by developers for some time and approval already exists for 800 new houses. This alone represents a 40% increase without any certainty of provision of the necessary infrastructure (schools, medical & leisure facilities etc.). The proposed additional houses in the plan would lead to the village being swamped and left without the necessary support services. • As far as I am aware, there is no needs or viability analysis for the additional 1000 houses proposed, nor is there any social cohesion impact assessment. • I know from personal experience that Backwell Common and the adjacent land suffers from flooding. The additional housing proposed would exacerbate this problem. • Backwell has little or no employment opportunities and most existing residents commute to work. The existing approvals will lead to considerable increases in commuting traffic and the additional 1000 houses proposed in the plan will worsen this even further. The railway station cannot be regarded as a viable solution to this problem – it is inaccessible for those who are less mobile and the relatively small platform area (which cannot be increased except at considerable expense) will present problems at busy times of the day and especially for those travelling with young children. • The plan contains a proposal for a new “relief” road. It is not at all clear what this is supposed to relieve. It will not make any difference to the traffic using the Chapel Hill rat-run and it is doubtful that it will improve Station Road traffic. The new road will have to pass either over or under the railway. Although the railway runs on an embankment past Backwell Common, the height of an underbridge needed to allow the passage of modern high lorries (because no-one, surely, would advocate building a bridge with the sort of height limitation we currently have) would dictate that the road be sunk below ground level. In view of the flooding problems in the area (and note the problems at the existing Chapel Hill bridge) this is not a feasible option. The alternative (passing over the railway) would result in a substantial structure which would bring its own problems. There would be a considerable visual intrusion running through the proposed housing and a very significant noise pollution problem. Neither of these options is addressed in any detail in the plan and the considerable funding required remains shrouded in mystery. Any such road construction should be funded in large part by the developers of the proposed housing – it is they after all who are laughing all the way to the bank if approval is given. Such funding should be required before building can commence and should be hypothecated for the road construction alone, but I have to recognise that such a pragmatic approach is foreign to local Councils and frankly the proposed road is pie in the sky. • The plan proposes building on Grade 1 agricultural land. This is madness. There is very little land of this quality left in North Somerset and there is an increasing need for its retention. The current geo-political climate presents extreme uncertainty and the UK should be working to increase its resilience and food self-sufficiency, not concreting over the means of production. • The proposed development would severely adversely affect the local wildlife habitat, including the local bat populations which rely on the land for food. • The scale of housing proposed for Backwell is completely out of proportion to its current size and the village has been singled out for radically more housing than neighbouring areas. We are expected to take 7% of the district’s allocation in comparison to Clevedon (a much larger community) which is targeted for 2%. The resultant increase in population for Backwell is 80% - a totally unreasonable imposition. • Overall, the proposed increase in housing over what is a relatively short period is undeliverable. The construction industry in the UK has not covered itself in glory in respect of housing delivery in the past and there is no reason, given the paucity of skilled labour supply, to expect any improvement in that situation. • Attempting to make such wholesale changes to a small village environment will lead to complete overdevelopment and utterly destroy the character of the area. When coupled with the loss of Greenbelt, the loss Grade 1 agricultural land, the risk of flooding, the uncertainty surrounding funding for the proposed road and the lack of firm proposals for the necessary support infrastructure (schools, medical etc), the whole plan is ill-conceived.			

Name: J Logan **I.D:** 39232257

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell has recently had 800 new homes approved. These new homes increase the size of the village by over 40%. Additional houses will lead to complete over development of a small village with very limited existing infrastructure. There are no plans for additional school places and no investment in health services. The existing leisure centre is over used, filthy and not fit for purpose and yet there are no plans for additional leisure facilities. Many areas in the village including the land around Backwell Lake and Backwell common flood regularly. (Some houses on Backwell common flood frequently with water coming up through the floor). Chapel Hill floods almost every time there is heavy rain and car consistently get stuck in the water under the bridge. More houses will only make flooding worse. Our village has some of North Somerset's very limited grade one agricultural land. It is currently used for growing food crops and for grazing. This land is an essential part of our food security strategy and should not be eroded. We have seen how the UK has struggled because we have not ensured energy security, are we going to make the same mistake over food? Surely we owe it to future generations to provide enough agricultural land to produce crops to sustain the population. Government policy states we must protect our best and most fertile land. This proposed development completely contradicts this instruction. This plan includes a new road which would have to go under the railway or over the track. This would be extremely costly and would do little ease the congestion around the train station, Backwell Hill or the Common. Our village has been allocated a higher number of new houses than any other village in North Somerset; a growth percentage that is higher than local towns who have much better existing infrastructure. Backwell is not an employment hub so most villagers commute. Additionally residents will place additional pressure on already clogged roads and public transport. There seems to be no regard given to social cohesion. Where is the impact analysis? Development will destroy local wildlife and biodiversity, however North Somerset seem to be going against their own policy on providing wildlife habitats; for bats in particular. No of the plans have been costed properly, the road has been costed and there is a lack of evidence of sources of funds for the new road or for any infrastructure.			

Name: J North **I.D:** 21231425

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell is currently a village, until recently, with around 1700 houses. An additional 800 houses have already been approved and now you are proposing to add an extra 1000 houses without any guarantee of support for the infrastructure. I cannot believe that such a massive increase in one small area can be justified. We have two main roads, one, the A370 runs from Bristol to Weston-Super-Mare and the M5 and the other, Station Road, runs under the railway towards Nailsea. Neither road can support an increase in the traffic generated by an additional 800 houses, let alone 1800 houses, likely to be an extra 3500 cars! The railway station is a village station, a little platform, inaccessible to wheelchairs and with parking facilities appropriate to the current size of the village, not the proposed version. The road under the railway is narrow, with a narrow pavement, again, not designed for the volume of traffic resulting from the increase in development. The proposal does include the possibility of a new road alleviating the traffic on Station Road, but this also needs to cross over or under the railway line and so is unlikely to be feasible in the final version. The site of the proposed development is farm land, currently used for grazing and arable crops. Once it has gone, there is no way back and the ability to be self-sufficient is depleted further, not to mention the habitats that are lost along the way. I have lived here for 25 years and am very much saddened to see the wasteful destruction of our countryside for no apparent reason.			

Name: J Palmer **I.D:** 30624833

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP10: Transport	No	• Effective	Unsure	Unsure	Reasons for saying that the North Somerset Local Plan 2041 is not effective: - LAND NORTH OF NAILSEA (Wraxall land) for development by LVA THE EXISTING UNSATISFACTORY INFRASTRUCTURE has not been considered; ROADS The road provision has not changed or been improved for many decades. While a connecting road has been proposed for the new site, that alone will not alleviate the current problems with traffic in the whole area. On the contrary, any new roundabouts will add to them. The B3130 Clevedon Road leading to the 'pinch point' at Stone Edge Batch is already causing problems for drivers due to it being no wider than a country lane. Not only are the roads inadequate, there is yet to be a proposal to redesign the road network in general in this and other areas. POUND LANE/EMERGENCY VEHICLES Increased construction traffic, possible temporary traffic lights, and a new roundabout built near Pound Lane will impede not only the residents of Nailsea going to work and school but also emergency vehicles that are required. Police, fire crews and ambulances are all centrally stationed at Nailsea Ambulance Station in the Pound Lane area. The B3130 road is crucial, for accessing the M5 in an emergency; the traffic density would be considerably increased after the development.	Not possible to comment	Not possible to comment	
Land north of Nailsea	No	• Positively prepared	Unsure	Unsure	WRAXALL LAND, NORTH OF NAILSEA The North Somerset Local Plan 2041: Pre-submission Plan has not been positively prepared because it does not fully consider the implications of flooding due to climate change. ENVIRONMENT AND FLOODING The site is not a huge expanse of green land. The fields are known to be subject to flooding; see photos below. There are also natural springs that affect the foundations of houses at the edge of Southfield estate. Photos were taken in January 2023 Grid Reference: ST 47686 71741 Grid Reference (6 figure): ST476717 X (Easting) , Y (Northing): 347686 , 171741 Address (near) : Tower House Lane, Wraxall, North Somerset, England, BS48 1JR	Not possible to comment	Not possible to comment	January 2023 View of Nailsea from land South of Tower House Wood.JPG January 2023 Flooding North of Nailsea A.JPG January 2023 Flooding North of Nailsea B.JPG

Name: J Panes **I.D:** 21426689

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Green Belt Status – North Nailsea. The Green Belt North of Nailsea has been designated as green belt land and for good reason, it thoroughly satisfies at least 4 of the 5 purposes as set out in the National Planning Policy Framework "[the] Fundamental aim of Green Belt Policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence". This land meets the criteria for the definition and inclusion of green belt status. This was true for this land when green belt areas were first introduced and were considered an important asset and the purpose & criteria that this land offers, are still valid today. The stated 5 purposes of Green Belt; 1) To check the unrestricted sprawl of large built up areas by keeping land permanently open. [To act as a buffer between towns, towns and countryside.] If this development is allowed to proceed, it will be built on land in the parish of Wraxall but visually it will appear as though Nailsea has just spilled out (or sprawled) into the only remaining narrow strip of countryside that is still in place before the			Wraxall Road 3.jpg Wraxall Road 7.jpg Wraxall Road blockage 1.jpg Wraxall Road 5.jpg Wraxall Road Buses 4.jpg Wraxall Road 8.jpg Wraxall Road blockage 2.jpg

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					wooded hill rises up. There will be nothing separating the town of Nailsea from Wraxall, there will be no buffer other than in places, a simple 4 foot hedge, in other places the plans show the gardens of the 'new' proposed Wraxall residents adjoining the existing gardens of the Nailsea houses. The development will also facilitate the joining of Tickenham/Nailsea & Wraxall. In this regard, the green belt status is still valid and required to stop the urban sprawl and act as a buffer between towns, towns and countryside. I believe attempting to change the parish boundary lines to accommodate the developers wishes and the local Councils coffers, is morally reprehensible. 2) Prevent neighbouring towns from merging into one another. Please see my comments under 1) 3) Assist in safeguarding the countryside from encroachment. This planning proposal could not demonstrate or have a more flagrant disregard for this aspect of green belt purpose. Building and encroaching on the countryside that is designated green belt - is not safeguarding. Allowing the green belt area to stay as it is - will be self fulfilling point 3. 4) To preserve the setting & special character of historic towns. With Nailsea's unique history of Glass making and the colleries that supported this trade and generally the coal industry at that time, I would consider that Nailsea certainly qualified as a historic town. I interpret the comments made on this planning portal from the National Trust, to be that the view within the natural setting that the Roman Fort at Cadbury Camp has always had, would be to the detriment if the surrounding green fields were to be lost. 5) To assist in urban regeneration by encouraging the recycling of derelict and other urban land. There has recently been fairly large scale development to the west of Nailsea and development in other pockets of infill in Nailsea. There is scope and opportunity to concentrate further development in these green field areas, which are not so openly viewed or utilised as is this area of land by the inhabitants of Nailsea. Proportionately North Somerset has such a small percentage of Green Belt when compared to the percentage of green field possibilities. Why would we as a community be willing to sacrifice our already established Green Belt? Simply swapping the already designated Green Belt area from the North of Nailsea to the South, is not acceptable. The two very different areas and the attributes that each possess - are not comparable. Having in depth and first hand knowledge of both North Nailsea Green Belt area and it's associated wildlife and South Nailsea proposed Green Belt area, I can honestly say that the variety and abundance of birds, mammals and insects are far greater in the North Nailsea established Green Belt, possibly attributed to the adjacent woods and all year round flooded ground - than that of the proposed South Green Belt area. Even with the Government's rather vague definition of the newly invented "Grey Land" there is still no justification or exceptional circumstances for removing the green belt status or development on this land. A Labour press release states that Grey land is "a new class of land to ensure grey and poor quality parts of the Green Belt are prioritised" – Labour refer to prioritising "poor quality and ugly areas" that have not previously been developed. There is no argument for considering this beautiful valley as ugly or poor quality given the high regard that local people have for it, or its use for enjoyment and interaction with wildlife. Open Countryside & Wildlife – North Nailsea. Large stretches of unaltered natural land are crucial in order for biodiversity to be maintained. This section of the valley forms part of the of the continuous Nailsea & Tickenham moors leading into the Wraxall valley and plays an important part in not only supporting wildlife but absorbing and holding the run off rainwater, spring water and assisting in the land drainage in this area.			Wraxall Road 6.jpg

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					Other comments have highlighted the abundance of wildlife that this diverse landscape supports such as wild fowl, wading birds, Egrets, 2 types of Wood Peckers, Swallows, House Martins, Hedge Hogs, Damsel & Dragon Fly's and various types of Bats that all forage & feed on the insects, Water Voles, Otters, Field Mice & Slow Worms to name but a few. It is well documented that all of the UK's insect and wild life population is under threat & in decline. Removing their habitat is not something that in good conscience should be permitted. Extreme Road congestion & Blockage – North Nailsea. I note that the proposed development is to be serviced with a bye pass and roundabouts at the points where the proposed new road joins the Wraxall end of the B3130 & Tickenham end of the B3130. Simply creating two new roundabouts where the road is already wider will not ease the problems already in existence where the roads are extremely narrow. As other people have attested it is often impossible to pass through the pinch points both on the brow of Tickenham Hill road and indeed in many places throughout the village of Wraxall. In both cases the road simply isn't wide enough for opposing traffic flow, or in places wide enough for one large vehicle without it requiring the use of the entire road width. Two cars can pass without incidence but a car and for example, small home food delivery van such as Tesco, then successful navigation has to be with extreme caution. A bus and small delivery van, most likely passing will not be accomplished without tricky reversing for all vehicles on the road, sometimes back down the hill and around the blind corner and as a result delays are inevitable. If this is scaled up to two passing buses or worse still, two HGV's or a bus & a HGV then I personally have waited for up to 20 minutes or longer, whilst the vehicle manoeuvres in or out of the hedge or occasionally someone's stone wall. I have seen drivers leave their large vehicles to fold in/out the wing mirrors and try to unhitch parts of their vehicles from another's. A resident in Wraxall has had the overhanging gable end/fascia of his house smashed off on more than one occasion. I have much documented, photographic evidence of the jams and tailbacks if anyone would care to view. I have witnessed ambulances caught up in the long tailbacks but thankfully never one with its blues and two's on. However, I am fearful that this is just a question of time as the main Ambulance Station & Fire Station for several of the surrounding towns, is situated adjacent to the proposed new roundabout on the B3130 at the Tickenham end of the Development. I would imagine that should the new development be allowed in this area, that there would be somewhere in the region of 700+ extra cars on these already grid locked prone roads. The town does not need the headache of more HGV's accessing the proposed new light industrial area. Flooding – North Nailsea. Much has already been said about the flooding, swampy, bog like conditions of the fields. This is not something new, I have been a resident in Nailsea for 60 years & it's always been this way. What is probably less well known, is how all the natural springs and spring water that flow from higher up in Nailsea & that naturally filter down towards the Land Yeo River, & how they contribute to this problem. For many months of the year which often include the summer months if a spell of wet weather has occurred, a lot of the ground is not capable of supporting human or bovine weight without sinking considerably. The cattle spent a long time this winter/spring literally up to their arm pits in squelchy mud – even on the highest parts of the field on the Nailsea/Wraxall parish boundary. This may be in part because of the well documented local springs & clay nature of the ground. A Mr T Smith wrote a very interesting article on 'The Hydrology of Nailsea' he talks about the pockets of impervious clay and the various natural water supply to Nailsea, of particular interest are the springs that many years ago supplied & facilitated the "Heath Mineral Water" business, which I believe was situated around the Heathfield Road/ Southfield Road area and still to this day drain down towards the proposed new development. Of course there are many local springs in this area that possibly all contribute to the saturation of the land. A few years ago we had problems with flooding in our garages and driveways – it took a couple of years for the North Somerset Environmental Department to try to discover the source of the water (which they couldn't) and to re-dig underground drains that lead out into the field. Our gardens are still squelchy and do not drain at all well. How will the associated burden of extra run off water from any new development be dealt with sufficiently? How will this affect the residents of Riverway, Yeomeade, Woodland Road & Greenfield Crescent when the land that lies below and beyond is developed therefore creating more run off water onto already saturated land that does not drain at all well. There will be large areas covered with impervious concrete and Tarmac that will not absorb water, I cannot imagine that there is a drainage system that will cope with the issue we already have let alone predicted higher rainfall that accompanies climate change.			

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					Proposed Community Centre – North Nailsea. We already have numerous similar facilities in Nailsea. Scotch Horn Community/Leisure Centre, Nailsea Town Council Tythe Barn, Grove Sports Centre and many large & small Church Halls readily available for hire. I appreciate that this looks good on paper but is there any actual demand for another community centre that is further removed from the centre of Nailsea than the existing facilities already underused? Residents Wellbeing & Pure Enjoyment – North Nailsea. The Department of Health & Social Care identify that sedentary behaviour is a major contributor to many associated health conditions including stokes, coronary heart disease and type 2 diabetes, amongst many other health conditions, the NHS advise regular exercise such as walking. It also advises that regular [outside] exercise such as walking will not only extend one's life span but will help with depression and mental health wellbeing. My family and I regularly enjoy evening and weekend walks along the footpaths, fields and riverbanks, nothing is better for the soul after a day at work often spent sitting and focusing on a screen. We truly appreciate the feeling of green, natural, open space and scenery which will disappear or be blocked by bricks, mortar and tarmac if this development is allowed. It is not purely dog walkers that use this space, many local people walk daily in this open, beautiful environment whilst taking in the varied wildlife that is currently abundant. This has an extremely positive effect on people's wellbeing both physically and mentally and this valuable aspect of this Green Belt land should not be underestimated or played down.			

Name: J Partridge **I.D:** 62814273

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Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Please bear in mind that the UK is considered one of the most nature depleted countries globally and has some of the lowest biodiversity in Europe. with significant declines in species abundance and habitat loss, ranking bottom of 14 European nations, due to intensive land use, pollution and climate change. Studies show the UK has less than half its original biodiversity left, with species populations declining significantly since 1970, making it a stark example of environmental degradation. The proposed allocation of Land at Tower Farm for 400 homes lies immediately beside Weston Big Wood, which is an an ancient woodland and site of Nature Conservation Interest SNCI managed by the Woodland Trust and supported by Avon Wildlife Trust. The woodland forms part of the Gordano Valley ecological network and a nationally important habitat mosaic of ancient woodland, grassland, wetland and woodland. 1 Not justified There is no robust published alternative assessment demonstrating that this sensitive site is the only or most appropriate option for growth. The loss of best and most versatile BMV farmland Grade 2/3a by reference to the ALC dataset and the risk of irreversible damage to the ancient woodland make this allocation unsuitable. Not Consistent with National Policy The allocation conflicts with National Planning Policy Framework NPPF paragraphs 180-182 which require that the development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland) should be refused unless wholly exceptional reasons exist. The councils reference to an ecological buffer is vague, unenforceable and insufficient to address indirect impacts such as root-zone damage. hydrological change or wildlife disturbance. The Woodland Trust and Avon Wildlife Trust state that ancient woodland is irrecoverable once damaged. Moreover the Framework requires delivering biodiversity net gain, yet the allocation offers no clear mechanism for ensuring that outcome. Not Positively Prepared.			FB_IMG_1765318153049.jpg

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					The allocation intensifies existing pressures in Portishead schools, healthcare and transport infrastructure are already under strain for example the A369 corridor. This peripheral site would likely increase private vehicle usage and pollution rather than support sustainable travel patterns, contrary to NPPF paragraphs 104-106. Not Effective Landscape and Connectivity The farmland, woodland edge acts as a critical ecological and landscape transition zone.Development here would fragment habitat, diminish the Gordano wildlife corridor and erode the rural fringe character. Even with a buffer the visual and ecological intrusion into the woodland and surrounding landscape would be significant. Drainage & Hydrology Construction and build development would alter surface water run off and soil compaction on the former farmland, potentially affecting the hydrological regime that sustains the adjacent woodland. The risk of nutrient runoff, altered infiltration and woodland root zone damage is material. Cumulative Impact When considered alongside other allocations in the Portishead area, such as Black Rock, north of Clevedon Road, the combined pressure on ecology, infrastructure and transport is significant and undermines the Councils commitments to nature recovery and sustainable growth. No modification short of removing the allocation entirely would make this site appropriate. Given its direct adjacency of ancient woodland, its loss would be irreversible and cannot be mitigated sufficiently. The land should instead be retained as underdeveloped green space, managed to enhance biodiversity and provide sustainable public access, in line with the Avon Wildlife Trusts 2030 Strategy and national 30 by 30 nature recovery goals. Please save our wood and wildlife I do not support the North Somerset Local Plan 2041 for the Tower Hill Farm Location			
Black Rock, north of Clevedon Road	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Not Positively Prepared The site lies on the western approach to Portishead along the Clevedon Road, where public transport is limited and local services are minimal. Residents would be heavily reliant on private vehicles to access schools, health care and employment. The fact that footways and new bus stop contributions are required underlines existing infrastructure inadequacy. This car dependent pattern of development conflicts with the sustainable transport objectives of NPPF paragraphs 104-106. Not Justified - Unsuitable location requiring off site ecological mitigation The allocation of approximately 100 dwellings sat Black Rock is not justified because the Council itself acknowledged that key environmental and ecological requirements cannot be met on site, and must instead be located off site on land to the south west. This approach directly conflicts with NPPF paragraph 180a, which requires avoidance of impact before remediation or off site compensation is considered. The need for offset land demonstrates the inherent unsuitability of the site for development. There is no published evidence of less sensitive alternative sites being considered and discounted. Not Effective -Unclear delivery and infrastructure dependencies The site depends on multiple off site and third party mitigations, including ecological offset land, new footway construction, bus service contributions and delivery of a section of the Gordano Greenway. No clear funding mechanism, responsible delivery body, or phasing plan is identified in the Plan. Consequently the			

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					allocation lacks deliverability and fails the effectiveness test under NPPF paragraph 35c. Not Consistent with National Policy-failure to protect and enhance biodiversity. The approach of relying on off site mitigation and a suitable ecological buffer illustrates a reactive rather than preventative approach to biodiversity protection. NPPF paragraphs 180-182 require Local Plans to conserve habitats, prevent deterioration of irreplaceable habitats and deliver net gains for biodiversity. The allocation fails this by offloading its ecological burden onto unspecified land, without securing long term management or legal protection for compensatory habitats. it also conflicts with the Avon Wildlife Trusts 2030 Strategy, which emphasises restoration of 30% of land for nature and enhancing connectivity in the Gordano Valley. Landscape & Setting The site lies within open countryside forming part of the rural setting of Portishead and the Gordano Valley. The expansion westwards into this part of the countryside would diminish the settlement edge, reduce landscape openness, and risk urbanising what should remain a transitional zone between town and countryside. Agriculture and Soils The farmland in question is likely to be of best and most versatile quality Grade2/3a and its loss for housing is not justified when less sensitive land could be used. The Plan does not robustly demonstrate why this agricultural land must be released. Hydrology& Ecology Development on this edge of farmland may affect surface water drainage, soil compaction and wildlife connectivity into the adjoining woodlands and wetland systems associated with the Gordano Valley. The cumulative effect of development pressure in the area further stresses the ecological network. Cumulative Impact Combined with the Tower Farm allocation and other nearby proposals, the Black Rock site would add to cumulative ecological, transport and infrastructure burdens around Portishead - contrary to the Councils stated nature recovery and sustainable growth objectives. No modifications would make this allocation acceptable. The need for offsite mitigation and multiple infrastructure dependencies shows this site is environmentally and logistically unsuitable for housing. The allocation should be removed entirely from Schedule 1 Instead the land should remain open countryside, contributing to biodiversity and landscape value. In line with the Avon Wildlife Trusts 2030 Strategy, Woodland Trust guidance and national biodiversity objectives. The uk has the accolade of having the least wildlife and biodiversity of 14 countries in Europe			

Name: J Ratcliffe **I.D:** 58638241

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Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective	Unsure	Unsure	Response to draft local plan Backwell has already had approval for 800 new houses, an increase of 40% in the village. The numbers proposed would double this, well overdeveloped! There is no viability analysis for an extra 1000 houses. Most working residents commute, as Backwell does not have employment facilities, just a few shops. The proposed new road is totally unfeasible and would not relieve the current traffic problem. The lack of infrastructure and services in Backwell would not support such an increase in houses. Backwell has been allocated more houses than any			

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		• Consistent with national policy			other North Somerset village, and a higher growth percentage than towns! Backwell has grade 1 agricultural land, and there is now only 7% of this high q uality land in all of North Somerset!! The proposals contradict the Government's policy that 'we must protect our best and most versatile land'. This development would destroy our valuable wildlife habitats. It threatens the Brockley Maternity Roost and SSSI, with rare Lesser and Greater Horseshoe Bats, that rely on this land for food. The plan for infrastructure lacks costing, with no funding guaranteed for new road or services. Low ground in Backwell Common area is prone to flooding, much aggravated by more housing. There is concern over the strategic growth location designation, including the impact on this village's character, the loss of Greenbelt and agricultural land, flooding and whether the road can be funded to support proposed housing. Our beautiful Backwell Lake and local fields where roads and houses, are planned, is on a floodplain! As the Government asks for 50% affordable housing on Greenbelt, developers will not have much funds to put towards infrastructure. Nailsea & Backwell Station is still not fit for purpose as a transport hub, being inaccessible for those with mobility issues, and problems when travelling with young children. To conclude, the sheer volume of growth, with the required investment infrastructure and services over such a short period, is destabilizing, unsustainable and undeliverable!!!			

Name: J Roxby **I.D:** 62656577

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Black Rock, north of Clevedon Road	No		Unsure	Unsure	The plan identifies an area Black Rock as suitable for housing because it is adjacent to the town of Portishead and its amenities. However it fails to take into account the effect of rainfall on the site which is currently agricultural . Very little rainfall is needed before the field becomes waterlogged with run off from Black Rock and the Clevedon road is often flooded during 9 months of the year. This would presumably be exacerbated by the hardcore and impervious nature of a housing development .	Withdraw the proposed site.		

Name: J Skelton **I.D:** 58629345

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Land at North West Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I object very strongly to the proposals. It is extremely important that the green belt is saved for public health and wildlife and the environment in general. Houses and other buildings must not be built in the floodplain. Grade 2 agricultural land must not be lost through building new housing. The Horseshoe bats must keep their foraging areas. The More End Spout Nature reserve must be protected. Nailsea is already overflowing and cannot cope with more residents. The roads cannot cope with more traffic. It is already extremely dangerous. The proposed new road will not help with traffic heading for the M5 or around the town and such a road would take a very long time to be constructed. There is no certainty that there will be enough schools, or when they might appear. There are insufficient doctors and pharmacies already.	I do not have any proposals		

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					The health and leisure provisions are already insufficient. There is STILL no swimming pool. The railway station is not accessible for those who cannot [for whatever reason] climb the steps. There is no ramp on the Backwell side. For any who could use that.			

Name: J Slade **I.D:** 49505505

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP7: Green Belt	No	‣ Justified ‣ Effective	Unsure	No	Green belt and high grade agricultural land should be protected for future generations and to maintain food security which si estimated to only stand at about 65%. This has been achieved and protected throughout recent history so why are we allowing this draconian and chaotic government to tear up these sound custodial protections rather than standing up to these unreasonable demands? Food security is one the government's own 13 Critical Infrastructure Sectors and therefore must be protected at all costs. Housing and building solar farms is not. Ring-fence and protect any farmland that can support a yield relating to food supply and construct plans to support this activity as a matter of urgency.			
SP8: Housing	No	‣ Justified ‣ Consistent with national policy	Unsure	No	The UK government through the NPPF has "imposed" these massively increased housing targets on NSC but do not have the jurisdiction to do so as they have already stated they would need a court order. NSC need to stand up to the government and these draconian measures that are being imposed on it. Courts only become involved if a council challenges the legality of government action but this has not been tested and needs to be. Revert back to the housing targets in the initial Local Plan that was based on sound analysis rather than this chaotic governments whim. This plan will turn our town into a city, given the number of people who would occupy them. The current infrastructure wouldn't support the increase in population. If this plan went ahead, who would the new homes be for? How can you predict what the increase in population would be? Is this consultation with the residents actually worth completing, as by the time this plan is put into practice, the goal posts will have been moved again? I strongly believe that whatever proposals are put to us, at a local level, the government at that given time will overturn them and they will force North Somerset Council to proceed with their agenda, and residents will have to take it, without being heard.	A face to face consultation is needed.		
Policy DP53: Best and most versatile land	No	‣ Justified ‣ Effective	Unsure	No	Green belt and high grade agricultural land should be protected for future generations and to maintain food security which si estimated to only stand at about 65%. This has been achieved and protected throughout recent history so why are we allowing this draconian and chaotic government to tear up these sound custodial protections rather than standing up to these unreasonable demands? Food security is one the government's own 13 Critical Infrastructure Sectors and therefore must be protected at all costs. Housing and building solar farms is not. Ring-fence and protect any farmland that can support a yield relating to food supply and construct plans to support this activity as a matter of urgency.			

Name: J Sleigh **I.D:** 58535713

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I believe the plan is not sound as Backwell has already been selected for a 40% increase in housing. This would lead to over development. Excessive pressure on transport links, medical and educational facilities. The offer of a link road, post completion, would have excessive costs due to crossing a railway line. This increasing costs are likely to exceed any developers and council budgets' offer to build. Clevedon is currently expected to take 2% of the housing and has far better facilities, shops, medical and more than one primary school. Plus quick links to the motorway. Backwell would be taking 7% this a higher growth percentage. Where is tge evidence for the need of more housing especially away from employment thus requiring excessive pressure on an already overloaded road and rail system. Further encroachment on green space, in particular grade 1 agricultural land is unnecessary and counter productive to us being more food secure. Flooding is already an issue in this area so with increased hard surfaces from current developments runoff will increase and the designated area is low lying. Insurance companies are already running shy of houses likely to flood. Houses on green belt should include 50% affordable housing thus reducing the developers ability to provide appropriate schools, medical centres and link roads. The current situation at the railway station for westward travel Is totally inadequate with no opportunity for prams, wheelchairs or other mobility aids, to access the platform. We are already one of the most depleted countries with regards to wildlife and this would exacerbate that particularly with regards to the greater horse shoe bat. NS has one of the largest such colonies and their feeding ground includes this as well as areas already earmarked for development.			

Name: J Smallbone **I.D:** 31071425

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Land at North West Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I do not think the Pre-submission Plan is sound for the following reasons. This parcel of land is Green Belt within the Parish of Wraxall and Failand. As such it fulfills the function of separating the town of Nailsea from the villages of Wraxall and Failand, and from the village of Tickenham. It is open space, accessible by public footpaths and is agricultural in nature, being grazed by cattle, sometimes sheep, and has been used for growing crops within the previous decade. It is bordered to the north by the Land Yeo River and otherwise encircled by the B3130, Clevedon Road. It slopes down to the Land Yeo River and acts as a natural sponge to attenuate rainfall running into the river. At its lower levels it is marshy and within the Flood Plain. High winter rainfall causes the river to rise and spread outwards, this is now exacerbated as the Environment Agency no longer remove summer growth of vegetation from the river, which now impedes flow, nor do they maintain and adjust the spillage gate next to the B3130 at Jacklands Bridge. The river now stays at high level for much longer after a spell of heavy rain due to the lack of flow. At the west and the east end of this parcel of land, the ground is low and bridged by the B3130 road, so when there is flooding water encroaches the road at these places, posing a hazard and disruption to traffic. Development of this area of land would increase the volume of run off, the river would be higher and the risk of road flooding more likely. The B3130 Clevedon Road has pinch points at Stone Edge Batch and at the Battle Axes in Wraxall, being too narrow for vehicles to pass in opposite directions without stopping. Increased number of vehicle journeys resulting from development on this site would further add to the general volume of traffic and slow down traffic movement at these points. The emergency services have Fire, Police and Ambulance facilities next to the B3130 as it exits Nailsea towards Tickenham, their journey times would be negatively impacted by larger volumes of road use. To the northeast Tower House Wood is adjacent, a site of Ancient Woodland and to the west is Tickenham Moor, a SSSI, thus this land links these two areas and is a corridor for wildlife and for people to utilize the natural space. A strategic high-pressure aviation fuel pipeline runs right across the site. This would need a wide avoidance channel by any development works. It is not mentioned in the plan. The Local Plan 2041, pg. 29, "Justification" states twelve sites have been identified for Release from Green Belt, the land north of Nailsea being one of them. The plan was developed from the October 2025 Arup Strategic Green Belt Assessment Interim Report (SGBA), which was prepared to support North Somerset Council's Draft Local Plan	I suggest that the proposed Local plan 2024 is unsound and should be reconsidered and a new report prepared with the proposed release of Land Yeo Valley land rejected. This land should remain within Green Belt. Releasing any current Green Belt land undermines NPPF 2024 para.145 and sets a precedent for further erosion of the Green Belt.		JS 11 December final.pdf JS North Somerset Local Plan 2041_ 09 December 2025V1ps.pdf

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					Consultation (Regulation 19). The SGBA acknowledges that “this report takes into account the particular instructions and requirements of our client,” which undermines the independence of the evidence base, the methodology being shaped by the clients brief of needing to find land for potential release rather than preserving the Green Belt. The Arup Report applied five Green Belt purposes from (NPPF-143) these being preventing sprawl, preventing towns merging, safeguarding countryside, preserving historic towns, encouraging regeneration. Each area of land under consideration was assessed and scored in contribution to Green Belt as ‘strong,” “moderate,” “weak,” or “no contribution.” Theses labels are not based on measurable data but on professional opinion and interpretation, they are subjective, without benchmark evidence and so cannot meet the (NPPF-145/146) requirement for exceptional circumstances to justify Green Belt Release. The NPPF, paragraph 44 states that “the right information is crucial to good decision-making particularly where formal assessments are required”. The SGBA presents itself as balanced but relies on professional judgment in certain areas, meaning it can be challenged as flawed, incomplete or unsubstantiated. North Somerset Council is under government pressure to deliver housing but the evidence supporting Green Belt Release must be robust and independent, a process of objectivity rather than one shaped by housing targets or any other form of bias. Reliance on consultant reports risks privileging development pressures over the statutory purposes of Green Belt Policy, NPPF 2024 (Section 13). A sound Local Plan must rest on impartial evidence, not being constrained or influenced by client objectives. I suggest that the proposed Local plan 2024 is unsound and request the proposed release of Land Yeo Valley land be rejected, it should remain within Green Belt. Releasing any current Green Belt land undermines NPPF 2024 para.145 and sets a precedent for further erosion of the Green Belt. The Wraxall and Failand Neighbourhood Plan (2022-2038), already adopted by North Somerset Council forms part of the legal Development Plan, that plan strongly protects the Green Belt, rural character and road safety. The Council’s own Nature Emergency Toolkit says that development should protect and strengthen wildlife corridors and natural drainage, developing this Wraxall and Failand Green Belt site would achieve the exact opposite. We are all facing increasing risk of climate change, extreme weather events, food insecurity, physical and mental health challenges. At this point it would be remiss of any council to choose to permanently remove an area of land that currently provides agricultural and recreational use to the community.			

Name: J Smith **I.D:** 62741377

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Vision, Strategic Priorities and Sustainability Objectives	Yes		Yes	Yes				
Strategic Priorities	Yes		Yes	Yes				
Policy LP4: Strategic location: Pill and Easton-in-Gordano	Yes		Yes	Yes				
Land at Lodway Farm	Yes		Yes	Yes		The no through road should be enforced with cameras		

Name: J Spicer **I.D:** 32493057

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Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	‣ Positively prepared ‣ Justified ‣ Effective	No	No	Brownfield sites not considered (Quote regs 12/2024 Brownfield Register 2,800 +units ignored). Green Belt Exceptional Circumstances not evidenced (NPPF 147) 44% Population Bomb disproportionate and	Green Field sites to remain protected and not built on and alternative brown field sites to be used instead for which there are plenty as mentioned above.	Soundness not surported as per comments noted above.	

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		• Consistent with national policy			unjustified. Adverse impact on character of Pill and EIG and services. Adverse impact on wildlife and natural springs. Level of housing not needed.			
Pill Green	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	No assessment of Brownfield Alternative sites. (Quote regs 12/2024 Brownfield register 2,800 +units ignored.) Green Belt Exceptional circumstances not evidenced. Population growth of 44% disproportionate and unjustified. Cap village growth less than 5%. Adverse impact on local character of Pill. Adverse impact on wildlife and water springs on site.	The green belt not to be built on and alternative brown field sites to be identified and/or used instead. There is no need for additional houses as plenty for sale and some have been on the market for more than a year.	The plans are not sound as mentioned in comments above.	

Name: J Standen **I.D:** 62833537

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Land east of Backwell	No	• Justified	Unsure	Unsure	The plan proposes more residential development than any other surrounding villages and the existing services such as Doctors, schools and roads will not support them. This will turn Backwell into an undesirable place to live.	Scrap the plan and build on brown field sites.		

Name: J Stanley **I.D:** 62783745

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Yew Tree Gardens, Easton-in-Gordano/ Pill		• Positively prepared	No	No	Full consultation within the village has not been held since Pill became a strategic centre following the agreement of the new railway coming through to Portishead. Information to residents has been sparse and time constrained. There has been two exhibitions but none since Pill was made a strategic centre.	As per comment above, no it is not legally compliant as residents have not had sufficient opportunity to express their views and opinions. The Council has enabled this plan to become Developer led and therefore not giving the people of Pill and District the chance to comment.		

Name: J Stone **I.D:** 62659137

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	House building proposals would almost double the size of Backwell - an unreasonable increase leading to complete overdevelopment Current road systems would be unable to cope with the increase in traffic especially station road which is already congested . This would further endanger the students using the narrow pavements. A complete new road system would be required at great expense as the road would have to go over or under the railway line. An increase in housing of this magnitude would necessitate provision of school places both for nursery ,			

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					primary and secondary students. Current health service and leisure provision would be inadequate Most residents commute - not find employment in the village Grade 1 agricultural land currently used for food production - development contradicts government policy to protect land used in food production Damage wild life habitats, including the important bat colonies Not financially viable and lack of costings			

Name: J Sully **I.D:** 39310401

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Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	A) The additional number of houses proposed by NSC is much too high for the existing infrastructure (roads, health, school places and leisure facilities). Although the existing infrastructure is poor, it almost copes. However, with sites currently under construction and other sites already approved by NSC it will not cope. The additional proposed site on Backwell Common for 889 houses would make things much much worse than they are going to be anyway. If NSC has any plans to improve the infrastructure in Backwell, are there any funding guarantees and where would the money come from? The existing roads are barely adequate for the current amount of traffic. There is little (if any) scope for widening them, and even more development will inevitably result in gridlock. B) Your proposal to have a new road built between the A370 and Backwell Lake looks doomed from the start. Does NSC plan for it to go under the railway line or over, or to have crossing gates with a high ramp on both sides to reach the top of the embankment? Is any of this feasible? If so, tell us which one and who would fund it? C) There is already limited scope for employment within Backwell so even more people will have to commute. D) I think it wrong to build on grade 1 agricultural land currently used for food crops and grazing. Also wrong to build near land or roads that might become flooded. The subsoil in Backwell is a heavy clay so water is very slow to soak away. E) I do not understand why ‘Greenbelt’ land is now considered irrelevant. As of 2012 the Government National Planning Policy Framework for Greenbelt land includes: to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from encroachment. I believe that these aims are still valid today, although governments have since ‘updated’ (ie eroded) these aims in order to suit their political objectives. F) If Nailsea and Backwell railway station is to become part of a transport hub it needs to be significantly modified for people with walking problems and for young children. This has been a problem since it was first built and there is no willingness for anyone to spend the money, probably because it is on a high embankment and would be a difficult expensive project.			

Name: J Taylor **I.D:** 62850561

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Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Backwell has already seen significant housing development in the last couple of years, with some already agreed. It is such a sad sight seeing fields where the children play after school being eaten up by machinery - it is ruining the feel of the village and changing the opportunity for the community to access green space; essential for mental health and wellbeing. Backwell is not where the jobs are, people commute and the road system simply can't cope - and no amount of bus lane changes have helped in any way. When there are any issues on surrounding roads then it grinds to a halt in backwell a clear indication of what will happen if so many more residents are housed here. The infrastructure simply can't cope and with the railway there are no options to do this safely and effectively. The railway is sweet but not a major hub to cope with increased numbers. It is a narrow platform and has no provision for mobility limitations or push chairs etc. It is a single lane through the tunnel and there is already far too much traffic on this road. The poor secondary students are at risk of cars knocking them enough as it is with such narrow pavements and so much traffic - to add more is so dangerous! The fields suggested are regularly waterlogged and are valuable flood defence for surrounding houses. Please have common sense around this - we need these soakaway fields. The fields are not only valuable agricultural land, and phenomenal for wildlife, but are also regularly enjoyed by the community. Just head there at the weekend and see people greeting each other whilst dog walking and children enjoying the freedom of not walking next to a road. My own children love going for walks through here and it does them so much good. My children attend both the infant and junior school - the junior school is at capacity and have a waiting list. The infant school has smaller numbers only becuase of the low birth rate this year - it would only take a handful of children to be at capacity. What happens when those spaces are taken? More traffic on the road at peak times when children are on the pavements that already have trucks and cars mounting them to get around all the traffic - it is an accident waiting to happen and as a mum it is terrifying!	The increase in population for Backwell is purely unsustainable.		

Name: J Turnbull **I.D:** 29553729

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Land to the west of Elborough							Reg 19 Objection – Sites HE20637, HE20237 & HE201040 (South of Banwell Road, Elborough) I am submitting this representation to object to the proposed allocation HE20637, HE20237 & HE201040 in the Publication Local Plan 2039. The site lies south of Banwell Road and adjoins Elborough. My objection is based on material planning grounds relevant to the tests of soundness. 1. Brownfield Context – When the previous Elborough Village development was approved, Elborough’s recent growth occurred solely on the former Aerojet’s industrial site, a derelict and redundant brownfield plot. Redevelopment was justified because it regenerated previously developed land, removed obsolete structures, and did not extend the previously developed land into open countryside. The above allocations are entirely undeveloped agricultural land forming part of Elborough’s rural setting, making its proposed allocation fundamentally different and unjustified. 2. Unsustainable location and car dependency. Elborough lacks the additional essential services including a school, GP surgery, shop, limited public transport, with additional housing. Residents would be dependent on private cars for daily needs. Safe pedestrian or cycling routes to services would result in a trip greater than 15		

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							mins. The nearest shops are either Asda filling station or the Co-op in Banwell, both over 1.5 miles from the centre of the proposed development. 3. Highway Constraints. Banwell Road already experiences severe congestion and limited pedestrian safety. Additional vehicle movements from this site would worsen traffic pressures and increase safety risks. No evidence has been provided to show that safe access or active travel improvements are deliverable. In providing footpaths, bus stops, cycle paths and visibility spays, will increase the width of the highway known as Banwell Road. In turn, forcing the proposed development further towards the Flood Zone. Development to the north will put a strain on the Old Banwell Road, with further congestion on the A371. 4. Landscape and Settlement Impact. The site forms part of the open rural landscape that defines the setting of Elborough. Development would introduce a prominent urban edge, erode village character and contribute towards a merger with Locking Village. 5. Ecology Objection. Sites HE20637, HE20237 & HE201040 lies within a sensitive countryside corridor that supports a range of native species and contributes to the ecological network around Elborough. The site contains established native hedgerows, which are priority habitats and important movement routes for wildlife. Development would fragment these corridors and permanently remove high-value habitat. The area for development is a designated area known as Density Band C; this is an area for consultation in protecting Lesser Horseshoe Bats. The fields and surrounding ditches support birds, owls, amphibians, small mammals and deer. Without robust ecological evidence, the allocation cannot be considered justified or deliverable. 6. Drainage and Flooding Risks. Sites HE20637, HE20237 & HE201040 sits within a low-lying landscape where water naturally collects from all directions. The fields regularly display standing water after rainfall, indicating poor infiltration and a high-water table. The area relies on a historic network of rhynes and drainage ditches already close to capacity. Increasing impermeable surfaces would intensify runoff, raising flood risk to existing homes. This would ultimately place residents' buildings insurance at high policy value, or uninsurable. There is clear and outstanding evidence of regular flooding in this area of Banwell Road above and beyond the indication of the flood Zone	

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							map. 7. Hutton Parish Council Response. Hutton Parish Council has also objected to the inclusion of approx. 400 houses and related growth around Elborough, drawing on extensive evidence from the Hutton Parish Survey Report (Feb 2021). The survey showed overwhelming community opposition to development beyond the settlement boundary (86%) and specifically near Elborough (83%). • The Parish Council highlights several material planning issues that directly support this objection. • The loss of green landscape and strategic gaps between Hutton, Elborough and Locking. • The absence of safe pedestrian or cycling routes to essential village facilities. • Lack of local amenities and community infrastructure. • Severe limitations on the local road network, including narrow rural lanes and increases in traffic through the Hutton 20mph zone. • The unsustainable scale of growth proposed relative to available services, schools, and public transport. Their findings reinforce that HE20637, HE20237 & HE201040 is neither appropriate nor sustainable, and that its allocation conflicts with both community evidence and the Parish Council's long-standing strategy to protect open countryside and maintain distinct settlement identities. 8. Other near and or Future Developments. There are also several nearby sites that already have planning permission, and allocated, or are earmarked for future development that sit in far more sustainable and strategic locations than HE20637, HE20237 & HE201040, under the "Call for Land" scheme. The new Banwell bypass will unlock development clusters with the space and capacity to deliver the supporting infrastructure that new housing requires, including shops, healthcare provision, schools and safe transport links. In contrast, Weston-super-Mare, Locking, Locking Parklands, Banwell and West Wick all contain areas specifically identified for growth, where services, road capacity, public transport and active-travel connections already exist or can be viably expanded. These locations are demonstrably more capable of contributing to North Somerset's housing need without dispersing development into isolated rural land such as HE20637, HE20237 & HE201040. Conclusion For the reasons above, HE20637, HE20237 & HE201040 should be removed from the Local Plan. I request that this objection is formally	

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							recorded and considered at examination.	
Land to the west of Elborough					Reg 19 Objection – Sites HE20637, HE20237 & HE201040 (South of Banwell Road, Elborough) I am submitting this representation to object to the proposed allocation HE20637, HE20237 & HE201040 in the Publication Local Plan 2039. The site lies south of Banwell Road and adjoins Elborough. My objection is based on material planning grounds relevant to the tests of soundness. 1. Brownfield Context – When the previous Elborough Village development was approved, Elborough's recent growth occurred solely on the former Aerojet's industrial site, a derelict and redundant brownfield plot. Redevelopment was justified because it regenerated previously developed land, removed obsolete structures, and did not extend the previously developed land into open countryside. The above allocations are entirely undeveloped agricultural land forming part of Elborough's rural setting, making its proposed allocation fundamentally different and unjustified. 2. Unsustainable location and car dependency. Elborough lacks the additional essential services including a school, GP surgery, shop, limited public transport, with additional housing. Residents would be dependent on private cars for daily needs. Safe pedestrian or cycling routes to services would result in a trip greater than 15 mins. The nearest shops are either Asda filling station or the Co-op in Banwell, both over 1.5 miles from the centre of the proposed development. 3. Highway Constraints. Banwell Road already experiences severe congestion and limited pedestrian safety. Additional vehicle movements from this site would worsen traffic pressures and increase safety risks. No evidence has been provided to show that safe access or active travel improvements are deliverable. In providing footpaths, bus stops, cycle paths and visibility spays, will increase the width of the highway known as Banwell Road. In turn, forcing the proposed development further towards the Flood Zone. Development to the north will put a strain on the Old Banwell Road, with further congestion on the A371. 4. Landscape and Settlement Impact. The site forms part of the open rural landscape that defines the setting of Elborough. Development would introduce a prominent urban edge, erode village character and contribute towards a merger with Locking Village. 5. Ecology Objection.	Conclusion For the reasons above, HE20637, HE20237 & HE201040 should be removed from the Local Plan. I request that this objection is formally recorded and considered at examination.		

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					Sites HE20637, HE20237 & HE201040 lies within a sensitive countryside corridor that supports a range of native species and contributes to the ecological network around Elborough. The site contains established native hedgerows, which are priority habitats and important movement routes for wildlife. Development would fragment these corridors and permanently remove high-value habitat. The area for development is a designated area known as Density Band C; this is an area for consultation in protecting Lesser Horseshoe Bats. The fields and surrounding ditches support birds, owls, amphibians, small mammals and deer. Without robust ecological evidence, the allocation cannot be considered justified or deliverable. 6. Drainage and Flooding Risks. Sites HE20637, HE20237 & HE201040 sits within a low-lying landscape where water naturally collects from all directions. The fields regularly display standing water after rainfall, indicating poor infiltration and a high-water table. The area relies on a historic network of rhynes and drainage ditches already close to capacity. Increasing impermeable surfaces would intensify runoff, raising flood risk to existing homes. This would ultimately place residents' buildings insurance at high policy value, or uninsurable. There is clear and outstanding evidence of regular flooding in this area of Banwell Road above and beyond the indication of the flood Zone map. 7. Hutton Parish Council Response. Hutton Parish Council has also objected to the inclusion of approx. 400 houses and related growth around Elborough, drawing on extensive evidence from the Hutton Parish Survey Report (Feb 2021). The survey showed overwhelming community opposition to development beyond the settlement boundary (86%) and specifically near Elborough (83%). • The Parish Council highlights several material planning issues that directly support this objection. • The loss of green landscape and strategic gaps between Hutton, Elborough and Locking. • The absence of safe pedestrian or cycling routes to essential village facilities. • Lack of local amenities and community infrastructure. • Severe limitations on the local road network, including narrow rural lanes and increases in traffic through the Hutton 20mph zone. • The unsustainable scale of growth proposed relative to available services, schools, and public transport. Their findings reinforce that HE20637, HE20237 & HE201040 is neither appropriate nor			

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					sustainable, and that its allocation conflicts with both community evidence and the Parish Council's long-standing strategy to protect open countryside and maintain distinct settlement identities. 8. Other near and or Future Developments. There are also several nearby sites that already have planning permission, and allocated, or are earmarked for future development that sit in far more sustainable and strategic locations than HE20637, HE20237 & HE201040, under the "Call for Land" scheme. The new Banwell bypass will unlock development clusters with the space and capacity to deliver the supporting infrastructure that new housing requires, including shops, healthcare provision, schools and safe transport links. In contrast, Weston-super-Mare, Locking, Locking Parklands, Banwell and West Wick all contain areas specifically identified for growth, where services, road capacity, public transport and active-travel connections already exist or can be viably expanded. These locations are demonstrably more capable of contributing to North Somerset's housing need without dispersing development into isolated rural land such as HE20637, HE20237 & HE201040.			
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						7. Hutton Parish Council Response. Hutton Parish Council has also objected to the inclusion of approx. 400 houses and related growth around Elborough, drawing on extensive evidence from the Hutton Parish Survey Report (Feb 2021). The survey showed overwhelming community opposition to development beyond the settlement boundary (86%) and specifically near Elborough (83%). • The Parish Council highlights several material planning issues that directly support this objection. • The loss of green landscape and strategic gaps between Hutton, Elborough and Locking. • The absence of safe pedestrian or cycling routes to essential village facilities. • Lack of local amenities and community infrastructure. • Severe limitations on the local road network, including narrow rural lanes and increases in traffic through the Hutton 20mph zone. • The unsustainable scale of growth proposed relative to available services, schools, and public transport. Their findings reinforce that HE20637, HE20237 & HE201040 is neither appropriate nor sustainable, and that its allocation conflicts with both community evidence and the Parish Council's long-standing strategy to protect open countryside and maintain distinct settlement identities. 8. Other near and or Future Developments. There are also several nearby sites that already have planning permission, and allocated, or are earmarked for future development that sit in far more sustainable and strategic locations than HE20637, HE20237 & HE201040, under the "Call for Land" scheme. The new Banwell bypass will unlock development clusters with the space and capacity to deliver the supporting infrastructure that new housing requires, including shops, healthcare provision, schools and safe transport links. In contrast, Weston-super-Mare, Locking, Locking Parklands, Banwell and West Wick all contain areas specifically identified for growth, where services, road capacity, public transport and active-travel connections already exist or can be viably expanded. These locations are demonstrably more capable of contributing to North Somerset's housing need without dispersing development into isolated rural land such as HE20637, HE20237 & HE201040. Conclusion For the reasons above, HE20637, HE20237 & HE201040 should be removed from the Local Plan. I request that this objection is formally recorded and considered at examination.		

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Land north of Banwell Road, Locking /Elborough						Reg 19 Objection – Sites HE20637, HE20237 & HE201040 (South of Banwell Road, Elborough) I am submitting this representation to object to the proposed allocation HE20637, HE20237 & HE201040 in the Publication Local Plan 2039. The site lies south of Banwell Road and adjoins Elborough. My objection is based on material planning grounds relevant to the tests of soundness. 1. Brownfield Context – When the previous Elborough Village development was approved, Elborough's recent growth occurred solely on the former Aerojet's industrial site, a derelict and redundant brownfield plot. Redevelopment was justified because it regenerated previously developed land, removed obsolete structures, and did not extend the previously developed land into open countryside. The above allocations are entirely undeveloped agricultural land forming part of Elborough's rural setting, making its proposed allocation fundamentally different and unjustified. 2. Unsustainable location and car dependency. Elborough lacks the additional essential services including a school, GP surgery, shop, limited public transport, with additional housing. Residents would be dependent on private cars for daily needs. Safe pedestrian or cycling routes to services would result in a trip greater than 15 mins. The nearest shops are either Asda filling station or the Co-op in Banwell, both over 1.5 miles from the centre of the proposed development. 3. Highway Constraints. Banwell Road already experiences severe congestion and limited pedestrian safety. Additional vehicle movements from this site would worsen traffic pressures and increase safety risks. No evidence has been provided to show that safe access or active travel improvements are deliverable. In providing footpaths, bus stops, cycle paths and visibility spays, will increase the width of the highway known as Banwell Road. In turn, forcing the proposed development further towards the Flood Zone. Development to the north will put a strain on the Old Banwell Road, with further congestion on the A371. 4. Landscape and Settlement Impact. The site forms part of the open rural landscape that defines the setting of Elborough. Development would introduce a prominent urban edge, erode village character and contribute towards a merger with Locking Village. 5. Ecology Objection. Sites HE20637, HE20237 & HE201040 lies within a sensitive countryside corridor that supports a		

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						range of native species and contributes to the ecological network around Elborough. The site contains established native hedgerows, which are priority habitats and important movement routes for wildlife. Development would fragment these corridors and permanently remove high-value habitat. The area for development is a designated area known as Density Band C; this is an area for consultation in protecting Lesser Horseshoe Bats. The fields and surrounding ditches support birds, owls, amphibians, small mammals and deer. Without robust ecological evidence, the allocation cannot be considered justified or deliverable. 6. Drainage and Flooding Risks. Sites HE20637, HE20237 & HE201040 sits within a low-lying landscape where water naturally collects from all directions. The fields regularly display standing water after rainfall, indicating poor infiltration and a high-water table. The area relies on a historic network of rhynes and drainage ditches already close to capacity. Increasing impermeable surfaces would intensify runoff, raising flood risk to existing homes. This would ultimately place residents' buildings insurance at high policy value, or uninsurable. There is clear and outstanding evidence of regular flooding in this area of Banwell Road above and beyond the indication of the flood Zone map. 7. Hutton Parish Council Response. Hutton Parish Council has also objected to the inclusion of approx. 400 houses and related growth around Elborough, drawing on extensive evidence from the Hutton Parish Survey Report (Feb 2021). The survey showed overwhelming community opposition to development beyond the settlement boundary (86%) and specifically near Elborough (83%). • The Parish Council highlights several material planning issues that directly support this objection. • The loss of green landscape and strategic gaps between Hutton, Elborough and Locking. • The absence of safe pedestrian or cycling routes to essential village facilities. • Lack of local amenities and community infrastructure. • Severe limitations on the local road network, including narrow rural lanes and increases in traffic through the Hutton 20mph zone. • The unsustainable scale of growth proposed relative to available services, schools, and public transport. Their findings reinforce that HE20637, HE20237 & HE201040 is neither appropriate nor sustainable, and that its allocation conflicts with both community evidence and the Parish Council's		

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						long-standing strategy to protect open countryside and maintain distinct settlement identities. 8. Other near and or Future Developments. There are also several nearby sites that already have planning permission, and allocated, or are earmarked for future development that sit in far more sustainable and strategic locations than HE20637, HE20237 & HE201040, under the “Call for Land” scheme. The new Banwell bypass will unlock development clusters with the space and capacity to deliver the supporting infrastructure that new housing requires, including shops, healthcare provision, schools and safe transport links. In contrast, Weston-super-Mare, Locking, Locking Parklands, Banwell and West Wick all contain areas specifically identified for growth, where services, road capacity, public transport and active-travel connections already exist or can be viably expanded. These locations are demonstrably more capable of contributing to North Somerset’s housing need without dispersing development into isolated rural land such as HE20637, HE20237 & HE201040. Conclusion For the reasons above, HE20637, HE20237 & HE201040 should be removed from the Local Plan. I request that this objection is formally recorded and considered at examination.		

Name: J Williams **I.D:** 51443649

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Backwell has grown since we came to live here 7 years ago, and will soon be 40% bigger when the current house building is finished. Backwell is expected to take 7% of the allocation meaning a higher growth percentage than nearby towns - it would grow 80% bigger but have no more facilities. I understand there is a need to create more housing but the decision to put so much of it in one small village with no additional infrastructure is ill founded for the following reasons; The village has very little employment, it is a residential area and no social cohesion impact assessment has been carried out. The A370 is already congested and any incident backs traffic up on the side roads causing dangerous rat runs. The suggested new road is just that - a suggestion - no promises to provide it, no funding guarantees for new roads, no study to show how it would ease congestion and no timescale for creating it. Environmental impact - we live in one of the most nature depleted counties in the world, we shouldn’t be adding housing in areas with valuable wildlife habitats and biodiversity. Grade 1 agricultural land would be dug up for the first time, releasing unmeasured amounts of carbon into the atmosphere. We have only 7% Grade 1 land available in the county - this should not be lost and the government itself states ‘we must protect our best and most versatile land’ The proposed land is a flood plain, where is all the water meant to go? Global warming means more flood alleviation is required, not less. There is no plan or costing regarding this. Infrastructure and services are already stretched, there is no funding or plan for schooling, doctors or other amenities -			

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					just houses - the station is antiquated and inaccessible for prams or people with mobility issues. I don’t object to new housing in the area, I do object to an ill thought out, ill conceived and illogical Local Plan that would ruin the lives of the villagers already here in the short term and longer term. Please rethink where this housing is to go.			

Name: J Wills **I.D:** 58493633

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP11: Historic and natural environment	No	• Justified	No	No	NSC has not properly considered: Alternative brownfield or greenfield sites with far lower ecological impact, both in Portishead and across North Somerset. Opportunities to increase housing density on proposed brownfield sites, which could remove the need to develop Tower Farm and Black Rock. The strategic ecological importance of these sites in protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor. The fact that both areas were added to the Green Belt in the late 1980s due to their high ecological value.	Do not build these houses		
Land at Tower Farm	No	• Effective	Unsure	Unsure	The site at Tower road and Black rock would have substantial impact on local transport routes. The proposed road comes out on to a fast and dangerous road which could cause accidents. The other road will increase traffic on an already busy junction.	Do not build these houses.		
Black Rock, north of Clevedon Road	No	• Effective	Unsure	Unsure	The site at Tower road and Black rock would have substantial impact on local transport routes. The proposed road comes out on to a fast and dangerous road which could cause accidents. The other road will increase traffic on an already busy junction.	Do not build these houses.		

Name: J.Plant **I.D:** 59565633

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	With the already agreed additional 800 houses a further 1000 would represent complete overdevelopment. The need for the additional proposed road is not needed or feasible going across a flood plain and having to cross a railway line at no doubt great expense. With the proposed increase agreed no additional infrastructure to support education and health areas. No other village has been allocated such a percentage increase. The Grade 1 agricultural land is vital to be kept as part of the National Plan for food security. The whole area proposed for housing is in a floodplain. The sheer size of this proposal is totally out of proportion for the whole of the North Somerset Area. There is on,y 7% of Grade 1 agricultural land left in North Somerset and should therefore not be touched.			

Name: JFullick **I.D:** 62725377

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Justified • Consistent with national policy			I OBJECT to the North Somerset Local Plan 2041: Pre-submission Plan on the grounds that it is neither sound nor legally compliant, and that the Council has not demonstrated compliance with the Duty to Cooperate. My objections are set out precisely below. 1. Not sound (fails the four tests of soundness) The Plan is unsound because it is not positively prepared, justified, effective, or consistent with national policy for the following reasons: a) Unjustified Green Belt releases (Black Rock — HE20124). The Plan allocates land at Black Rock (site ref HE20124, north of Clevedon Road) without demonstrating the “very special circumstances” required to justify permanent removal of land from the Green Belt. There is insufficient, published evidence that alternative, sustainable brownfield options have been fully tested and discounted, and no clear demonstration that the allocation is the least harmful way to meet housing needs. This undermines the Plan’s justification and consistency with national Green Belt policy. b) Insufficient deliverability evidence (Tower Farm, Portishead). The allocation of Tower Farm (Portishead) for ~400 homes (or similar capacity) is not supported by robust, up-to-date evidence showing deliverability. The Plan lacks clear, site-specific confirmation that critical infrastructure — highways capacity, foul water/sewerage capacity, primary school places, GP/healthcare capacity and utilities — is available or will be provided in step with development. Without firm evidence of delivery mechanisms, the allocation is not effective. c) Inadequate assessment of cumulative impacts. The Plan does not supply a satisfactory cumulative assessment of the combined impacts of new allocations around Portishead (including Tower Farm and Black Rock) on transport networks, education, health services, sewage and surface water drainage. The absence of cumulative modelling and mitigation plans means the Plan cannot be considered effective or positively prepared. d) Flood risk & drainage evidence absent or inadequate. For sites where flood risk or drainage constraints are material (including fields near Portishead), the Plan does not present the necessary sequential/exception testing, up-to-date flood modelling or Environment Agency sign-off on proposed mitigation. This fails the tests in national planning policy and renders allocations unsafe and unjustified. e) Biodiversity and landscape harm not properly demonstrated as mitigable. The Plan does not set out sufficient site-level ecological surveys or clear, funded mitigation/ compensation measures for likely impacts on local habitats and landscape character. Without this, allocations risk causing irreversible ecological harm and the Plan is not justified or consistent with national policy on biodiversity net gain. 2. Not legally compliant / failure to provide necessary evidence a) Lack of necessary technical evidence on the public record. At Regulation 19 the Council must publish the background evidence that demonstrates soundness and legal compliance. There is insufficient published evidence demonstrating that statutory providers (Environment Agency, health providers, sewerage undertaker, highways authority/ National Highways) have confirmed delivery arrangements and necessary mitigation for the proposed allocations. This absence means the Plan cannot be shown to be legally compliant or sound.	I consider that the following modifications are necessary and essential for the North Somerset Local Plan 2041 to be legally compliant, sound, and capable of adoption. Without these changes the Plan should not proceed. 1. Removal of Black Rock (HE20124) from the Plan unless Green Belt tests are lawfully satisfied Required Modification: Delete the allocation of site HE20124 (Black Rock, north of Clevedon Road) from the Plan, unless and until the Council can demonstrate: - That all reasonable non-Green Belt and brownfield alternatives have been fully assessed and exhausted through a transparent site selection process; - That “very special circumstances” objectively exist to justify permanent Green Belt release; -That exceptional circumstances required by national policy for Green Belt boundary changes have been clearly evidenced. Reason: The Plan currently fails to satisfy national Green Belt policy and is therefore not justified, not consistent with national policy, and not legally compliant. 2. Removal of Tower Farm pending firm infrastructure commitments Required Modification: Remove the Tower Farm allocation unless the following are published and secured through the Plan: - Written confirmation from the sewerage undertaker that foul and surface water infrastructure has sufficient capacity or that upgrades are fully funded and programmed; - Written confirmation from the NHS/ health authority that GP and primary healthcare capacity will be expanded in step with development; - Written confirmation from the local education authority that sufficient primary and secondary school places will be delivered; - A fully published independent transport		

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					b) No robust viability and delivery programme. The Plan does not contain a transparent, site-specific viability assessment and a clear delivery/ timescale programme (including trigger points for infrastructure). Absent this, the Plan fails the effectiveness test. 3. Failure (or insufficient demonstration) of the Duty to Cooperate a) Insufficient evidence of strategic engagement. There is no adequate, published evidence demonstrating that North Somerset has proactively engaged and agreed strategic matters with neighbouring authorities and prescribed bodies where cross-boundary impacts arise (for example, highways / strategic transport, education and health capacity). The Council must publish Statements of Common Ground (SoCGs) or equivalent evidence showing how objections from statutory bodies have been resolved — this is not apparent on the public record. b) Consequences of the failure. Without demonstrable, constructive engagement and agreement on strategic issues, the Plan may not have addressed cross-boundary needs or infrastructure responsibilities, and therefore may be legally non-compliant with the Duty to Cooperate.	assessment demonstrating that cumulative traffic impacts in Portishead can be safely mitigated. Reason: Without firm infrastructure commitments the allocation fails the effectiveness and positively prepared tests and is therefore unsound. 3. Mandatory cumulative impact modelling for Portishead and surrounding sites Required Modification: Insert a new policy requirement that no planning permission shall be granted for any major housing site in or around Portishead until: - Cumulative transport modelling (not site-by-site) has been completed and approved; - Cumulative impacts on healthcare, schools, drainage and utilities have been fully assessed and funded. Reason: The current Plan relies on piecemeal site-level assessments, which is inadequate and renders the strategy ineffective and unjustified. 4. Binding infrastructure delivery and phasing schedules Required Modification: Add site-specific infrastructure delivery schedules for every major allocation, including: - Trigger points for roads, schools, healthcare and drainage upgrades; - Identification of funding sources (CIL, S106, public funding); - Clear phasing controls preventing occupation before infrastructure is in place. Reason: Without binding delivery mechanisms, the Plan lacks certainty of implementation and fails the effectiveness test of soundness. 5. Updated flood risk, drainage and		

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						Environment Agency approval Required Modification: Require updated site-specific flood risk assessments, sequential testing and drainage strategies for all greenfield sites near Portishead; - Require written confirmation from the Environment Agency that each site is acceptable in flood risk and drainage terms before allocation is retained. Reason: Allocating land without confirmed flood safety is a direct failure of national policy and renders the Plan unsound and potentially unlawful. 6. Legally robust biodiversity evidence and net gain delivery Required Modification: Insert a policy requiring: - Full ecological surveys at allocation stage (not deferred to application stage); - Legally secured biodiversity net gain, with off-site compensation sites identified and funded upfront. Reason: Deferring ecological certainty undermines the Plan’s justification and exposes it to legal risk. 7. Full publication of Statements of Common Ground (Duty to Cooperate) Required Modification: The Council must publish full Statements of Common Ground with all prescribed bodies and neighbouring authorities, including: - Highways and strategic transport providers; - Health authorities; - Education authorities; - Sewerage and water infrastructure providers. These must demonstrate how objections have been resolved, not merely recorded. Reason: Without published and evidenced agreement on strategic matters, the Plan		

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						fails the Duty to Cooperate and is legally non-compliant. 8. Revised housing trajectory based on proven deliverability Required Modification: - Recalculate the housing trajectory using only sites with proven infrastructure capacity and confirmed delivery timescales; - Remove reliance on speculative or infrastructure-constrained sites to meet the five-year supply. Reason: An unrealistic trajectory undermines positive preparation and effectiveness. 9. Stronger protection for settlement boundaries and countryside Required Modification: Insert a reinforced policy protecting: - The open setting of Portishead; - Settlement separation; - The intrinsic character of countryside land. Reason: The current strategy risks coalescence, urban sprawl and irreversible landscape harm, contrary to national policy. Conclusion: Unless the above modifications are made in full, the North Somerset Local Plan 2041: - Fails the tests of soundness (positively prepared, justified, effective and consistent with national policy), - Fails legal compliance, and - Fails to adequately demonstrate fulfilment of the Duty to Cooperate by North Somerset Council. These are main modifications, not minor edits. If they are not implemented, the Plan should be found unsound and incapable of adoption.		

Name: JL **I.D:** 58543553

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Justified • Effective	Unsure	Yes	Development should not be permitted if it results in an adverse effect on local Nature Reserves or local wildlife sites. The proposed building at Tower Farm area in Portishead encroaches the Nature Reserve and would squeeze the habitat of a vast number of wildlife to their detriment. There is no way to compensate the wildlife for their loss of habitat as they will simply reduce in numbers. Once the habitat and the wildlife are destroyed they are gone. Green Belt was created for a reason!! What is the point in having Green Belt Land which is supposed to be protected if politicians can simply justify its irreversible destruction by using the 'exceptional circumstances' clause when those 'exceptional circumstances' are quite literally that they have built everywhere else and have no other land left to build on. Additionally the impact of the concreted developments in the selected areas in Portishead will pose a flood risk - Clevedon Road already floods regularly with heavy rain and this will only worsens when the 'natural' soakways are concreted over. Increases into infrastructure need to be in place BEFORE any further housing is built. The strains on primary schools may be easing but there is only one comprehensive school. GP facilities are at breaking point with difficulties getting access to face to face appointments, pharmacy facilities are poor - currently one pharmacy to serve the whole of portishead. Multiple roads are in a poor and dangerous state and several areas are traffic hotspots and need improvement. Bus services are often unreliable and only provide minimum routes. All of these things need to be in place BEFORE any building of houses starts because if it isn't it won't happen and the infrastructure we have now will not cope. Sort out and, where appropriate build, all infrastructure BEFORE any houses are built or it won't get done. Do not build on Green Belt Land - using up all the land that you are allowed to build on SHOULD NOT be an excuse and really shouldn't be 'Exceptional Circumstances'. Green Belts are there for a reason! Once you start squeezing the habitat that wildlife needs to survive you will destroy them. Once the habitat and the wildlife are gone there is no getting it back. Wildlife play a massive part in our climate - councils and governments are supposed to consider this too. I do not. They are trying to justify building on Green belt land simply because they have run out of other land. That is not right and is not an 'exceptional circumstance'			

Name: JP Tickenham **I.D:** 30789441

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Land off Pound Lane, Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I do not think that NSC have properly considered the traffic impacts to Tickenham roads and lanes which are currently seriously congested and unsafe for cyclists and pedestrians. These roads/lanes cannot support the increase in new homes proposed by the Local Plan. Before any housing is commenced the infrastructure of a fully thought-out and implemented road network must be put in place. The road through Tickenham is too narrow, without footpaths in some areas, to be considered a main link from the M5 to Nailsea which is what NSC are proposing. I live on one of the many “pinch points” on Clevedon road and often see buses and HGV lorries screeching to a halt as they try to pass one another. We already have to push out into the road to force other traffic to give way before we can exit our property so what will it be like if we have a 40% increase in traffic. I have already given up cycling as I consider it is too dangerous now with the current level of traffic on both Clevedon Road and the surrounding lanes so I dread to think what it will be like in the future. The road network must be put in place before the houses are built as the increase in HGV lorries during and after construction will lead to congestion and accidents on an unacceptable scale.			

Name: JV Kay **I.D:** 58244993

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Land at Tower Farm	No	• Effective	No	No	Neither site can provide safe or suitable access. They would create unacceptable transport impacts, failing national soundness tests. The top of The Downs is by High Down schools and this access is not available all day. There are always cars parked at the top of the hill. These houses would create strategic ecological importance relating to Weston Big Wood (SSSI) and the Gordano Valley green corridor. National planning policy allows Green Belt changes only in exceptional circumstances- and these have not been met.	Traffic lights would need to be set up at the top of the Downs and this would not work well. Protecting Weston Big Wood and the Gordano Valley green corridor have NOT been met.		
Black Rock, north of Clevedon Road	No	• Effective	No	No	Neither site can provide safe or suitable access. They would create unacceptable transport impacts, failing national soundness tests. The top of The Downs is by High Down schools and this access is not available all day. There are always cars parked at the top of the hill. These houses would create strategic ecological importance relating to Weston Big Wood (SSSI) and the Gordano Valley green corridor. National planning policy allows Green Belt changes only in exceptional circumstances- and these have not been met.	Traffic lights would need to be set up at the top of the Downs and this would not work well. Protecting Weston Big Wood and the Gordano Valley green corridor have NOT been met.		

Name: Jacinta Magee **I.D:** 58398945

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SP1: Sustainable Development	Yes		Unsure	Unsure			I believe this plan is sound because it has removed Wrington sites from potential development. No sites in Wrington are appropriate for development as (per DP8) housing should be where it is needed i.e. close to public transport, services and jobs - not in a small village with no services and extremely limited public transport. In addition Wrington regularly floods and the flooding has got worse since additional houses were built on Coxs Green - Tumbling Weir, which is next to this development, flooded three times last winter, making the road impassable for days and damaging the road and bridge, when I have never known it to flood in the previous 10 years. Beam Bridge - slightly downstream from the development - also flooded more than 5 times and double the amount it is has flooded in previous years, making that route out of the village unusable for days at a time.	

Name: Jack Nicholls **I.D:** 62850081

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Policy LP3: Strategic location: Nailsea and Backwell	No	• Justified • Effective • Consistent with national policy	Unsure	No	This allocation is not sound because it is neither justified nor consistent with national policy. The Plan conflicts with the NPPF requirements to protect valued open spaces, resist loss of land capable of recreational use unless strict criteria are satisfied, and to give great weight to the need for sufficient school infrastructure in areas of housing growth. No evidence has been provided that the field is surplus, nor that alternative provision of equal quality can be secured, nor that the educational and well-being impacts on West Leigh Primary have been assessed. The allocation is also not legally compliant in failing to demonstrate how statutory duties relating to adequate school outdoor space and the Council's own emerging policies on green infrastructure and school playing fields have been met. For these reasons, the inclusion of this site is unsound and should be removed from the housing allocation.	In order to make the Plan legally compliant and sound, the Council must modify the allocation by recognising that development of this field is inconsistent with national policy on the protection of open space, the promotion of healthy communities, and the requirement to give great weight to the need for sufficient school infrastructure. The modification should therefore remove the site from the housing allocation and re-designate it as protected open space, either through Local Green Space status or through a dedicated green infrastructure/education		Protecting the field adjacent to West Leigh Primary School - Planning policy case JN.docx

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					[Please see the attached document for the full case] The allocation of the field adjoining West Leigh Primary School is not sound or legally compliant when assessed against national planning law and the Council's own emerging policies. As set out in the National Planning Policy Framework (NPPF), plans must positively support healthy communities, protect valued green spaces, and resist development on open space or land capable of recreational use unless strict tests are met (NPPF paras 98, 103–104). The Plan also has a statutory duty to give "great weight" to the need to expand or enhance school facilities alongside housing growth, ensuring adequate educational infrastructure is secured (NPPF para 100). The proposal to build on this field is therefore inconsistent with the NPPF's requirements to safeguard green space, support existing school provision, and plan for health and well-being. Locally, the emerging North Somerset policies on open space and school playing fields (e.g., draft DP52) allow development on land associated with schools only in exceptional circumstances, specifically where land is proven surplus or is required for educational purposes, neither of which is demonstrated here. The Council's own precedent of safeguarding land elsewhere in Backwell for primary school playing fields also reinforces that protecting such spaces is integral to a legally compliant strategy. Furthermore, statutory regulations governing school premises require that schools are provided with "suitable outdoor space" for PE and play, meaning that removing the only realistic opportunity for West Leigh to expand its constrained grounds risks undermining legal duties around educational provision. Taken together, these national and local policy requirements show that allocating this field for housing fails the tests of soundness particularly justified and consistent with national policy and does not comply with the legal and policy framework governing open space, school infrastructure, and community well-being.	safeguarding policy. This modification should also ensure that the Plan meets its own open space and school playing-field policies by securing the land for recreational, educational, and community purposes, rather than for residential development; and that it supports statutory duties requiring adequate outdoor space for schools. Incorporating these changes would bring the Plan into alignment with NPPF paragraphs on open space protection, school provision, and community wellbeing, as well as North Somerset's emerging policies on green infrastructure and school land, thereby meeting the tests of soundness - justified, effective and consistent with national policy.		
Policy LP3: Strategic location: Nailsea and Backwell	No	• Justified • Effective • Consistent with national policy	Unsure	Unsure	I consider the North Somerset Local Plan 2041: Pre-submission Plan not sound, failing the tests of justification and consistency with national policy (NPPF para 35), due to its failure to clearly define and protect the southern settlement boundary of Backwell in the vicinity of the Recycling Centre. The draft Plan allows development to extend southwards towards the Recycling Centre without a clear, defensible boundary or permanent open-land buffer. This risks incremental sprawl beyond the established village edge, undermining the physical and perceptual separation between the village and adjacent infrastructure uses. National planning policy places clear importance on preventing the unnecessary outward expansion of settlements, maintaining settlement identity, and safeguarding the countryside from encroachment. The fields to the south of Backwell, between existing housing and the Recycling Centre, perform a critical spatial and planning function: they define a clear and legible village edge; they act as a buffer between residential uses and industrial/waste infrastructure; and they help prevent the erosion of Green Belt openness and countryside character. The Plan does not provide a robust justification for weakening or removing this boundary, nor does it demonstrate that alternative, less harmful configurations have been adequately considered. This lack of clarity risks setting a precedent for future southward expansion beyond the plan period, contrary to the NPPF objective of plan-led, boundary-based development rather than incremental erosion. As such, the Plan is not justified by proportionate evidence and is inconsistent with	To make the Plan sound and legally compliant, the following modifications are necessary: Explicit designation of a fixed southern settlement boundary for Backwell, running along the existing village edge north of the Recycling Centre. Retention of the open fields between existing housing and the Recycling Centre as undeveloped land, either through: continued Green Belt designation; and/or a policy designation that safeguards these fields as a permanent buffer or open countryside. Clear policy wording confirming that no residential development will take place south of this boundary during the plan period, in order to provide certainty to residents, landowners, and future decision-making. Recognition within the spatial strategy that the Recycling Centre represents a hard infrastructure edge, beyond which residential expansion would be inappropriate due to land-use incompatibility, landscape impact, and settlement character. These modifications would help ensure that	I support the Plan's general objective of focusing development within defined settlement boundaries, but do not consider the Plan sound or legally compliant unless the southern boundary of Backwell is clearly fixed and protected. With the modifications outlined above, the Plan would better reflect national policy objectives to: prevent settlement sprawl, protect	

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					national policy on settlement containment and Green Belt purpose.	development remains plan-led, contained, and proportionate, and that Backwell's village identity is maintained.	countryside and Green Belt function, and provide long-term certainty over the limits of development. Without such clarity, the Plan risks undermining confidence in the spatial strategy and enabling incremental expansion beyond what has been properly tested or justified.	
Land west of Rodney Road	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	No	This is the same comment I made in relation to LP3 as it looks like it would be best made here: This allocation is not sound because it is neither justified nor consistent with national policy. The Plan conflicts with the NPPF requirements to protect valued open spaces, resist loss of land capable of recreational use unless strict criteria are satisfied, and to give great weight to the need for sufficient school infrastructure in areas of housing growth. No evidence has been provided that the field is surplus, nor that alternative provision of equal quality can be secured, nor that the educational and well-being impacts on West Leigh Primary have been assessed. The allocation is also not legally compliant in failing to demonstrate how statutory duties relating to adequate school outdoor space and the Council's own emerging policies on green infrastructure and school playing fields have been met. For these reasons, the inclusion of this site is unsound and should be removed from the housing allocation. Please see the attached document for the full case. The allocation of the field adjoining West Leigh Primary School is not sound or legally compliant when assessed against national planning law and the Council's own emerging policies. As set out in the National Planning Policy Framework (NPPF), plans must positively support healthy communities, protect valued green spaces, and resist development on open space or land capable of recreational use unless strict tests are met (NPPF paras 98, 103–104). The Plan also has a statutory duty to give "great weight" to the need to expand or enhance school facilities alongside housing growth, ensuring adequate educational infrastructure is secured (NPPF para 100). The proposal to build on this field is therefore inconsistent with the NPPF's requirements to safeguard green space, support existing school provision, and plan for health and well-being. Locally, the emerging North Somerset policies on open space and school playing fields (e.g., draft DP52) allow development on land associated with schools only in exceptional circumstances, specifically where land is proven surplus or is required for educational purposes, neither of which is demonstrated here. The Council's own precedent of safeguarding land elsewhere in Backwell for primary school playing fields also reinforces that protecting such spaces is integral to a legally compliant strategy. Furthermore, statutory regulations governing school premises require that schools are provided with "suitable outdoor space" for PE and play, meaning that removing the only realistic opportunity for West Leigh to expand its	In order to make the Plan legally compliant and sound, the Council must modify the allocation by recognising that development of this field is inconsistent with national policy on the protection of open space, the promotion of healthy communities, and the requirement to give great weight to the need for sufficient school infrastructure. The modification should therefore remove the site from the housing allocation and re-designate it as protected open space, either through Local Green Space status or through a dedicated green infrastructure/education safeguarding policy. This modification should also ensure that the Plan meets its own open space and school playing-field policies by securing the land for recreational, educational, and community purposes, rather than for residential development; and that it supports statutory duties requiring adequate outdoor space for schools. Incorporating these changes would bring the Plan into alignment with NPPF paragraphs on open space protection, school provision, and community wellbeing, as well as North Somerset's emerging policies on green infrastructure and school land, thereby meeting the tests of soundness - justified, effective and consistent with national policy.		Protecting the field adjacent to West Leigh Primary School - Planning policy case JN (1).docx

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					constrained grounds risks undermining legal duties around educational provision. Taken together, these national and local policy requirements show that allocating this field for housing fails the tests of soundness particularly justified and consistent with national policy and does not comply with the legal and policy framework governing open space, school infrastructure, and community well-being.			
Land east of Backwell	No	‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	No	I consider the North Somerset Local Plan 2041: Pre-submission Plan not sound, specifically failing the tests of justification, effectiveness, and consistency with national policy (NPPF para 35), in relation to the proposed East Backwell Strategic Growth Location. First, the scale of development at East Backwell is unjustified and disproportionate. Backwell has already consented approximately 800 new dwellings, representing around a 40% increase in the size of the village. The addition of a further c.1,000 dwellings would result in growth of a scale and speed that is wholly out of proportion to the settlement's role, character and capacity, particularly when compared with other villages and even towns within North Somerset. Backwell is expected to accommodate a significantly higher proportion of district-wide housing growth than larger, more sustainable settlements, without a robust evidential justification. No clear local housing needs assessment or market demand analysis has been provided to justify this concentration of growth. Second, the allocation is ineffective and undeliverable due to unresolved infrastructure constraints. The proposal relies on a new strategic road crossing or passing under the railway. This infrastructure is un-costed, unfunded, and of uncertain technical feasibility, yet is fundamental to the delivery of the housing numbers proposed. The Infrastructure Delivery Plan lacks detailed analysis, costings, funding sources, or delivery certainty for this road and associated services. There is therefore a serious risk that housing would be delivered in advance of infrastructure, contrary to sound planning principles, or that the scale of development proves undeliverable within the plan period. Third, the Plan is inconsistent with national policy on Green Belt and agricultural land. The East Backwell site includes Grade 1 "best and most versatile" agricultural land, of which only a very small proportion remains in North Somerset. National policy is clear that such land should be protected and that significant development on it should be avoided unless clearly justified. The Plan fails to demonstrate the exceptional circumstances required to justify Green Belt release in this location, particularly given the availability of alternative, less harmful development options elsewhere in the district. Fourth, the allocation conflicts with national policy on sustainable development and climate objectives. Backwell is not an employment center and is predominantly a commuter settlement. The vast majority of residents rely on private car travel, and the local rail station is not currently fit for purpose as a high-capacity, accessible transport hub. Locating growth of this magnitude in Backwell risks entrenching unsustainable travel patterns, contrary to the NPPF requirement to focus development in locations that reduce the need to travel. Taken together, these issues mean the East Backwell allocation is not justified by evidence, not effective, and not consistent with national policy, rendering the Plan unsound.	To make the Plan sound and legally compliant, I consider the following modifications necessary in relation to East Backwell: A substantial reduction in the housing numbers allocated to East Backwell, reflecting the village's existing consented growth, infrastructure capacity, and role within the settlement hierarchy. Any development should be incremental and proportionate, not strategic in scale. Removal or reclassification of East Backwell as a Strategic Growth Location, unless and until exceptional circumstances for Green Belt release are robustly evidenced and alternatives fully assessed. A requirement that no housing delivery is permitted until critical infrastructure is fully funded, approved, and deliverable, including: A costed and technically feasible railway crossing solution; Guaranteed funding sources and delivery timescales; Clear mechanisms to ensure infrastructure is delivered in advance of or alongside housing. Explicit protection of Grade 1 agricultural land, with development steered away from best and most versatile land in accordance with national policy and the Plan's own stated objectives on food security and environmental protection. A revised spatial strategy that redistributes housing growth more equitably across the district, prioritising locations with existing infrastructure, employment opportunities, and genuine sustainable transport options. Without these modifications, the risks of overdevelopment, infrastructure failure, environmental harm, and unsustainable commuting remain unresolved.	I do not support the soundness or legal compliance of the Plan in its current form in relation to East Backwell. While I support the principle of meeting housing needs and recognise the challenges facing North Somerset, this must be achieved through a balanced, evidence-led and proportionate strategy. The current East Backwell proposal places an excessive and unjustified burden on a single village, relies on uncertain infrastructure delivery, and conflicts with national policy on Green Belt protection, agricultural land, and sustainable development. With the modifications outlined above, a much more limited and carefully phased level of development in the Backwell	

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							area may be capable of contributing to housing supply without undermining the Plan's overall soundness. As drafted, however, the proposal does not meet the required planning tests.	

Name: Jackie Kemmish **I.D:** 58638081

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The land to the North of Nailsea should not be included in the north somerset plan as a potential area for development as it is part of the flood plain as it regularly flooded.This land is at the same level of flood risk as those areas in Clevedon that have not been identified as appropriate due to the flood risk.I would like to see the legal reasoning for why this section of land is suggested as suitable for development with such significant flood risk in comparison to the areas in Clevedon that are deemed as unsuitable. The land North of Nailsea is frequently flooding and the properties neighbouring this land are also at increased risk of flooding if this land is developed. The land to the North of Nailsea is part of the Tickenham ridge and is not geologically sound for development.NSC have previously commissioned a report seeking advice regarding the suitability of this area that runs alongside the ridge in relation to its suitability for development.The conclusion of this report was that the land that includes the area to the North of Nailsea not to be suitable for development due to its Geology.I would like NSC to demonstrate more in-depth understanding around the Geological significance of this site in reference to suitability of the land structure. The land North of Nailsea is designated as green belt land and fulfils the purpose of preventing sprawl from Nailsea and preserving the openness of the countryside and enables people to be able to access nature and historic woodlands in a natural setting.There is significant importance to the wildlife of having the ancient woodland that runs along the ridge to the north of this land.There is a significant bio diversity of the type of land/land structure/type of geology/type of water flow/ areas of marsh land/flood plain and full wildlife corridor. This section of land forms a corridor from the SSI along the Tickenham ridge to Tyntsfield and is flanked by ancient woodland with ancient hedgerows that are essential for wildlife and for survival of endangered birds/bats of which there are several listed in this area.The formation of the habitat in this area with the Yeo river enables full biodiversity and eco systems to be maintained. The area is natural floodplain and this differs to the flat areas in North Somerset that are brownfield sites.NSC has not proved that they have exhausted all these other options which I understand there is a legal requirement to do so? Release of the greenbelt requires legal changes that must be justified and the evidence has not been provided from NSC.NSC has a legal obligation to work within its own Nature emergency tool kit that states development should protect and strengthen wildlife corridors and natural drainage-this area meets all these significant wildlife credentials and therefore should not be included as an area for development within this plan. The land to the North of Nailsea lies within the boundary of Wraxall and Failand parish council.NSC proposal to include this land area for possible development is in conflict/contradicts the adopted local plan which was recently passed. Traffic infrastructure/access: The area to the North of Nailsea is significantly impacted by the pinch point at the B3130.This section /junction becomes impassible when there is a van/lorry trying to pass a car.This road is not safe to be carrying more			

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					HGV traffic and this becomes a significant concern with emergency services. This is the main access road from Clevedon/access to the top road to Bristol and already a significant pinch point and safety concern and is is not a safe or sustainable option for the proposed plan. Gas Pipeline:I would like to see justification from NSC regarding the safety and efficacy of building on this area that has a significant pipeline along this route.I would like NSC to clearly document the risk assessment that has been carried out in regards to this. General infrastructure concerns: NSC plan has disproportionate number of homes planned for these areas that do not have the highway or road networks structure.I am unclear why the plan is not considering growth in areas that already have road infrastructures in place and easy access to motorways etc.Clevedon has a tiny amount of development included in this plan yet has the road and highway infrastructure in place.I would like NSC to be able to clearly and legally justify why these other areas are not being considered for development and why these other areas of low grade or brownfield sites are not being included.If the reasoning is due to the flood plain/flood risk then I this NSC local plan is NOT SOUND. The area to the North of Nailsea has so many justifiable reasons not to be suitable for development and the reasoning of the NSC local plan is not sound. I oppose the development of the area to the land to the North of Nailsea and I do not think that NSC have fully considered the appropriateness of this area of land for development.			

Name: Jacky Hawley **I.D:** 62688385

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The plan does not take into account the large number of homes already under construction in and around Nailsea. The infrastructure is already deficient for the new developments that have already increased the population using the town's facilities, so that roads, schools and medical and sports facilities are already inadequate. The essential qualities of the region, such as health-giving open spaces would be diminished or lost and air, sound and light pollution would increase enormously. Much of the proposed development would be on areas that often flood . Indeed the purpose of a flood plain is to protect the surrounding area by providing a run-off area for heavy rain. Climate change forecasts more and increasingly dangerous rain. It would be irresponsible to build in areas of high risk. Greenbelt areas have already been sacrificed to residential construction. Once covered in cement etc., these areas of natural beauty (needed for mental and physical health) and environmental resources such as protected species (eg bats) can never be recovered. The loss of natural flora and fauna would be catastrophic. The proposed new road will add to an already overcrowded road network in Nailsea, and do nothing to mitigate the dangers of busy, crowded roads. These roads carry traffic ranging from cyclists to heavy lorries and already represent a danger to children, elderly people and the disabled, as well as road users. The Nailsea & Backwell railway station does not meet required standards for accessibility, and should be upgraded before more passenger numbers are indicated.			

Name: Jacqueline Reardon **I.D:** 62776257

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified	Unsure	Unsure	Backwell already has 800 new houses approved—an increase of 40%, the highest imposed on any village in North Somerset. Adding yet more homes on top of this is not “growth,” it is overdevelopment. No other village is being pushed this far. In fact, Backwell is expected to take 7% of the entire district’s housing allocation. What makes this even more alarming is the land being targeted. This is *Grade 1 agricultural land*, the highest quality in			

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		• Effective • Consistent with national policy			the country, currently used for crops and grazing. Only 7% of such land remains in the whole of North Somerset. The Government is clear: ''we must protect our best and most versatile land'' to safeguard the nation's food security. Yet this proposal does the exact opposite. Once this land is built over, it is lost forever. You cannot replace Grade 1 farmland. Despite the enormous scale of what is being proposed, the infrastructure delivery plan is shockingly incomplete. It lacks proper analysis, it lacks costings, and—most importantly—it lacks any funding guarantees. There is no certainty that the new road, schools, healthcare, drainage, or essential services will be delivered at all, let alone in time to support thousands of new residents. The village simply cannot absorb this without serious long-term consequences. Backwell is not prepared for—nor suited to—development on this scale. We are not an employment hub. Most people would still need to drive elsewhere for work, adding pressure to roads that already struggle and posing safety risks for everyone, but particularly for children walking to and from school and those using the leisure centre. And although the railway station has been cited as justification for expansion, it is not fit for purpose. It remains inaccessible for people with mobility issues and, as a parent of young children, I know first-hand how challenging and unsafe it can be to navigate the station with them. It is not a realistic transport solution for a development of this size. The designation of Backwell as a "strategic growth location'' comes with significant risks. It threatens the character of the area, involves the loss of greenbelt and the best-quality agricultural land, increases the risk of flooding, and relies on a road that may not even be financially viable. There is no evidence that this road can be funded or delivered on time—yet the housing is being pushed forward regardless. This level of growth, delivered this quickly, without guaranteed infrastructure, is destabilising, unsustainable, and undeliverable. It threatens our farmland, our environment, our roads, our safety, and the identity of Backwell itself. Once this begins, we cannot reverse it. For the sake of our community and it's access to already-stretched services, our food security, and the future of our village, I deem this pre-submission plan to not be sound.			

Name: James Cridland **I.D:** 62865793

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Churchill Avenue	Yes	• Effective	Yes	Yes	Penny Field must be protected and made a Local Green Space. Under local planning policy, Penny Field is the perfect candidate for Local Green Space designation because it'd be in the top 24% of sites based on policy alignment. Clevedon Town Council, two petitions (2022 and 2025) of 600+ signatures and the consultation for Clevedon's placemaking strategy all called to protect Penny Field. Penny Field is a prime candidate for Local Nature Recovery, as identified by WECA, due to the presence of three priority species. Penny Field is also located on a Green Infrastructure Corridor under NSC's own policy. Under any Equalities Impact Assessment the reduction of green space would adversely affect lower income households.			

Name: James Doulton **I.D:** 58510337

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Leighton Crescent	No	• Justified	No	Unsure	The plan is not sound. It includes a site that does not meet the plan's criteria of having "access to	Remove the Land at Leighton Crescent, Weston-super-Mare as it clearly does not meet the criteria. The provision of 81 houses in this unsuitable location will consolidate the environmental destruction caused by the extension of Wentworth Drive in 2020. The occupants will not commute by walking, cycling or using		

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					jobs and services" through "walking, cycling and use of public transport" and "enhancing biodiversity" and "protecting the Mendip Hills National Landscape".	public transport because the site is located at a dangerous bottleneck on on Bleadon Hill where there is no footpath, it is up a 1 in 8 hill (Totterdown Lane) and is approximately 2 miles from any services and 4 miles from the centre of WSM where the majority of services are focused. There is no credible public transport. Clearly, all commuting and shopping will be by car (or delivery van). The inclusion of this site brings the whole plan into disrepute.		

Name: James Durie **I.D:** 62857633

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP2: Strategic location: Woodspring (south west of Bristol)	Unsure		Unsure	Unsure	We are unsure - please see representation below and attached which sets out what changes we consider are needed to the policy. Duries represent the James family who own Castle Farm – edged red on the attached plan forming part of the proposed strategic allocation covered by Policy LP2. The James Family welcome the proposed allocation in the latest Local Plan consultation and have made representations into the Call for Sites and Additional Sites consultation undertaken by North Somerset Council in February and March 2025. We are aware that the vast majority, if not the entirety, of the rest of the proposed allocation is owned and/or controlled by Taylor Wimpey, and North Somerset Council are aware that as part of their promotion of the land the James family and their representatives have participated constructively and collaboratively with the Council and with Taylor Wimpey in a number of master planning workshops through the autumn of 2025. We have also made some previous brief suggestions relating to a draft of the LP2 policy on 22 August 2025. Whilst to date these very early stages of master planning workshops have only looked at very high level broad concepts, all parties have satisfied themselves that the land controlled by Taylor Wimpey is not in any way contingent upon the Castle Farm site coming forward for development or infrastructure nor is the reverse the case i.e. no Taylor Wimpey land is required in advance of the Castle Farm site coming forward. This does not mean that both parcels would not continue to be properly considered through the proper identification of constraints and opportunities and development of the masterplan as is demanded by the draft policy, but it is clearly important that the ability to separately deliver the two parcels remains the case, otherwise in the absence of any agreement between the owners and/or developers of each site there is a risk of failure. The policy therefore needs amendment to reflect and enable this. The comments below therefore we hope will be read in this context where there remains a willingness/desire on behalf of the James Family to continue to engage in this process and to work with Taylor Wimpey and North Somerset Council. Depending on the further findings particularly in relation to some of the constraints identified in he policy, and some of the infrastructure requirements, disagreement at some point is ossible however undesirable. In the 4th line of draft policy LP2 therefore we are not sure how the policy can compel developers to work together in this way. The ultimate arbiter must be North Somerset Council as to the configuration of the Master Plan. We have previously suggested, and as referred to in Policy LP1 relating to the strategic location at Wolvershill, an SPD would seem a good way to ensure the Master Plan (and the Policy) is tested and is deliverable. We are not sure why LP2 does not have similar supporting text as a fall back in the event the parties have failed to agree a Master Plan for the whole allocation. And we would suggest wording is included in LP2 to this effect. Clearly it is essential that a Master Plan framework exists before applications are determined to ensure all the necessary infrastructure and uses etc are delivered across the whole site. Together with provision at the same time allowing individual parcels to come forward separately.	We are unsure - please see representation attached which sets out what changes we consider are needed to the policy.	We are unsure - please see representation attached which sets out what changes we consider are needed to the policy.	2025-12-11 Reps Reg 9 _JRD.pdf NSC CfS CastleFarm Plan.pdf

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					Comprehensive Development 2nd bullet point requires a comprehensive masterplan to be submitted with “the” planning application. There will inevitably be more than one planning application and this would seem to conflict slightly with latter section under Design which refers to Sub Area Masterplans. Transport The Master Planning workshops had already identified some difficulties in creating “accessible high quality walking and cycling connections” to and from Dundry, Yanley and Long Ashton. Furthermore the requirement not to prejudice the future delivery of a mass transport route must surely be identified at this stage. The impacts of this together with the other requirements for transport related infrastructure set out in the IDP needs to be costed to confirm both the capacity of the site and the viability of different parcels. Local Centre Services Facilities and employment The 5th bullet point refers to the provision of around 10 hectares of new employment land. The location of this within the overall master plan as well as the secondary school and primary schools must all be identified and agreed to ensure the Policy is sound, with such agreement forming part of the SPD and/or at the very least evidence base supporting the policy. Given the location and scale of the Castle Farm site whilst there may be some scope to provide part of the employment allocation (as part of a high quality local centre) the vast majority of this and of the education provisions will need to be provided elsewhere within the master plan. Flood Risk and Land Conditions The James family have to date not been party to much of the conversations with the water company, their engineers and other parties so we do not have much of an understanding as to what the full implications of the reservoir overspill modelling nor hat the solutions might be. But we intend to engage in the future with the water company, the council and Taylor Wimpey, etc to understand the technical constraints. These are fundamental to the capacity of the allocation and potentially to deliverability of the parts of the site. Reference is made to the upgrade of the culvert from Yanley Lane to Hanging Hill Wood. This culvert runs beneath an old landfill site and we would imagine would be prohibitively expensive to upgrade. Such works are not likely o be a pre-condition to the development of the Castle Farm land. Phasing It was acknowledged during the various earlier master planning workshops that Castle Farm would properly form one of a small number of Phase 1 areas to be released. This would come forward by way of a separate planning application and therefore the policy we would suggest should reflect this.			

Name: James Hobbs **I.D:** 50595137

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The population of Nailsea would appear to be increasing by a considerable number as a result of this plan. The plan does not appear to be taking into account the increase in traffic this will stimulate along Nailsea’s many single lane tracks that don’t have pavements. No firm plans for new schools appear to be included. The proposed road underneath the railway line near Backwell and Nailsea Station will prove difficult to construct due to it being in a low lying area, with high risk of flooding.	I would prefer Nailsea to remain unaffected but if the plan is to proceed it will need: better roads (all single track, rural lanes, to be widened), firm funding for new schools, firm funding for increased leisure facilities.		

Name: James Knowles **I.D:** 51430785

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The plan is not sound for the following reasons: 1. Contrary to Food Security. UK Government policy states that “we must protect our best and most versatile land” for reasons of food security. Building on this land would be contrary to this policy because this land is Grade 1 agricultural land currently used for growing crops and grazing. Only 7% of such high quality agricultural land is left in North Somerset. If this land were to be used for housing, it will be lost forever to agriculture and growing food. 2. Nature – there will be seriously adverse impact on the local bat population. 3. Flooding. Building on this land will increase run-off, leading to more flooding in the land itself and in the surrounding fields. This area is prone to flooding (as I write this in mid- December 2025 there are many flooded areas in the fields) and building more housing would make this far worse. The land is on a flood plain (that is why Backwell lake was built) and it would not be sound to build here. 4. Road Problems. The proposed road would increase traffic congestion on Station Road, Backwell Common and Chapel Hill. 5. Rail Problems. The proposal is to build a road under or over the railway. This would be very expensive and lead to serious disruption on a well-used railway line for an indeterminate time. It would require closing a mainline railway line between Bristol and the South West used by GWR and Cross Country. A disabled access ramp to the railway station Weston bound platform has been declared unfeasible/ too costly and so it is simply not believable that a road bridge or tunnel would be built. A road bridge would be enormous and completely out of keeping with the area. A tunnel would require extensive flood protection. 6. Nailsea and Backwell Station as a barrier to inclusion. The current train station on the Weston platform is inaccessible for people with mobility issues. This is serious barrier to inclusion for disabled people. It is also difficult to use with young children and bikes due to the step access. To regard this as a transport hub and increase the numbers using it will only make these barriers worse. 7. Not local homes. These developments will not create any extra jobs and will be occupied by commuters. This will put further strain on local roads, especially if the proposed link road is declared unfeasible. 8. No proper analysis - The Infrastructure Delivery Plan lacks analysis and costings and there are no funding guarantees for the new roads or services. As at point 5 above the crossing of a mainline railway line is likely to be extremely expensive and may not be feasible and the Infrastructure Plan should deal with this issue. I understand that 50% of the housing on Greenbelt land must be affordable and this reinforces the need for proper funding analysis. There is no needs or viability analysis for an extra 900 homes. 9. No social cohesion impact assessment has been provided. 10. Sustainability of Backwell . An increase in the size of Backwell of 80 % cannot be sustainable. Backwell already has 800 new houses approved, a 40% increase for the village. A further 900 homes would lead to complete overdevelopment of what was a small village. 11. Too high an allocation - Backwell is being allocated a higher number of houses than any other village in North Somerset and an even higher allocation than any towns. Backwell is expected to take 7% of the district’s housing allocation despite being only a village. This is grossly disproportionate and unfair. 12. Overall the plan is completely unsound for the reasons set out above.			

Name: James Lucas **I.D:** 57848577

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Pill Green	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	No deliverability plan for M5 j19, there are not enough schools, GP access, dentists etc. and the village will be overwhelmed with this many new homes. There are no extenuating circumstances that justify building on green belt land.	Delete the Pill Green site for the above mentioned reasons, it is not a good idea to build this many homes on green belt land next to a small village	N/a	

Name: James Oram **I.D:** 58628705

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	I am concerned about the proposed developments on Tower Farm. Both sites form an essential part of the Gordano Valley green corridor, which includes Weston Big Wood. They were added to the green belt because of their ecological value, containing ancient woodland and a wide variety of plant and animal species. I can see no exceptional circumstances that would justify reversing this designation. As a resident of North Weston, one of the proposed sites would be directly across from my home. It is already extremely difficult to exit Clifton Street during commuting hours, and additional housing opposite would worsen this, with the increased number of cars creating a bottleneck on Clevedon Road. In my opinion, this access would be unsafe, and I believe the resulting traffic could fail national sound-level tests. There are far more suitable locations across North Somerset to meet the need for new housing. One such area is the ‘Old Mill’ site near Sainsbury’s. Its central position and future access to the new train line make it ideal for development, particularly for flats aimed at first-time buyers. In addition, many other brownfield sites are available across the region. I feel that the interest in these sites is driven more by financial potential than by their suitability for housing. No modification short of removing the allocation entirely would make this site appropriate. Given its direct adjacency to ancient woodland, its loss would be irreversible and cannot be mitigated sufficiently. The land should instead be retained as undeveloped green space, managed to enhance biodiversity and provide sustainable public access, in line with the Avon Wildlife Trust’s 2030 Strategy and national “30 by 30” nature recovery goals. I do not support the the North Somerset Local Plan 2041 for the Tower Hill Farm location.			
Black Rock, north of Clevedon Road	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	I am concerned about the proposed developments on Black Rock. Both sites form an essential part of the Gordano Valley green corridor, which includes Weston Big Wood. They were added to the green belt because of their ecological value, containing ancient woodland and a wide variety of plant and animal species. I can see no exceptional circumstances that would justify reversing this designation. As a resident of North Weston, one of the proposed sites would be directly across from my home. It is already extremely difficult to exit Clifton Street during commuting hours, and additional housing opposite would worsen this, with the increased number of cars creating a bottleneck on Clevedon Road. In my opinion, this access would be unsafe, and I believe the resulting traffic could fail national sound-level tests. There are far more suitable locations across North Somerset to meet the need for new housing. One such area is the ‘Old Mill’ site near Sainsbury’s. Its central position and future access to the new train line make it ideal for development, particularly for flats aimed at first-time buyers. In addition, many other brownfield sites are available across the region. I feel that the interest in these sites is driven more by financial potential than by their suitability for housing. No modification would make this allocation acceptable. The need for off-site mitigation and multiple infrastructure dependencies shows the site is environmentally and logistically unsuitable for housing. The allocation should be removed entirely from Schedule 1. Instead, the land should remain open countryside, contributing to biodiversity and landscape value, in line with the Avon Wildlife Trust’s 2030 Strategy, Woodland Trust guidance and national biodiversity objectives. I do not support the the North Somerset Local Plan 2041 for the Black Rock location.			

Name: James Parsonage **I.D:** 62858369

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of	No	‣ Positively	No	No	I am writing to register my strong objection to the above planning application. The proposal represents an unjustifiable and unsustainable level of development in Backwell and is contrary to the	Fairer distribution amongst the villages and towns in North		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Backwell		prepared • Justified • Effective • Consistent with national policy			principles of sound planning, sustainable growth, environmental protection, and infrastructure capacity. My specific concerns are outlined below. 1. Overdevelopment and Disproportionate Housing Targets Backwell already has 800 new homes approved, representing a 40% increase in the size of the village. The addition of a further 1,000 dwellings would constitute complete overdevelopment and fundamentally alter the character of Backwell. Backwell is being asked to accommodate an unprecedented 7% of North Somerset's entire housing allocation, a higher proportion than any other village and even surpassing some towns such as Clevedon (2%). This scale of growth is disproportionate, unjustified, and inconsistent with the principle of balanced distribution. 2. Transport Failures and Impracticality of Proposed Road The proposed relief road would not alleviate existing congestion on Station Road, Backwell Common, or Chapel Hill nor serve Nailsea's traffic effectively. Serious concerns remain over the feasibility of taking the road either under or over the railway line—an engineering challenge that would be extremely costly, complex, and possibly unachievable. Without a guaranteed and deliverable solution, the transport case is fundamentally flawed. 3. Severe Infrastructure Deficit Backwell already faces insufficient school places, and there is no investment planned for health services or leisure facilities. The current infrastructure cannot support the already-approved growth, let alone the addition of another 1,000 households. There are no guarantees, funding commitments, or realistic timescales for the supporting infrastructure required. 4. Lack of Needs and Viability Assessments No genuine assessment has been provided to demonstrate the need, market demand, or economic viability of an additional 1,000 homes in Backwell. The absence of evidence-based justification undermines the credibility of the proposal. 5. Unsustainable Commuter Village Expansion Backwell is not an employment centre. Most residents commute to Bristol or further afield, meaning additional housing would increase car dependency and congestion, contrary to sustainable transport policy. 6. No Social Cohesion Impact Assessment No assessment has been provided on the social impacts or how such rapid and large-scale growth would affect the existing community, cohesion, and service demand. This breaches fundamental planning principles requiring an understanding of community impact. 7. Loss of Grade 1 Agricultural Land The site includes Grade 1 Agricultural Land, currently used for food crops and grazing. Only 7% of North Somerset's land falls into this highest-quality classification. Government policy expressly states that the UK must "protect our best and most versatile land" to ensure food security. Building on this land is contrary to national policy and is not justified. 8. Biodiversity Harm and Threat to Protected Species The proposals threaten valuable habitats in one of the world's most nature-depleted countries.	Somerset - ie Clevedon is only assigned 2% of the total allocation.		

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					The site is essential feeding ground for Lesser and Greater Horseshoe Bats, linked to the Brockley Maternity Roost and SSSI, both of which are highly sensitive and protected. The ecological harm would be profound and irreversible. 9. Flood Risk and Unsuitable Location Backwell Common and surrounding areas are already highly prone to flooding, including land around Backwell Lake (Reservoir) and adjacent fields earmarked for development. Increasing hard surfacing and housing on a floodplain would significantly worsen local flood risk and contradict national guidance directing development away from areas susceptible to flooding. 10. Lack of Infrastructure Delivery Plan Credibility The Infrastructure Delivery Plan (IDP) lacks detailed analysis, realistic costings, and—critically—any guarantee of funding for the new road or essential services. A development of this magnitude cannot proceed without clear, secured, and deliverable infrastructure. 11. Green Belt and Character Impacts The proposal contributes to the erosion of the Green Belt and would irreversibly damage the rural character of Backwell. Government policy requires 50% affordable housing on Green Belt sites, which would in turn reduce developer contributions, further undermining the funding of critical infrastructure. 12. Unsustainable Timeline and Undeliverable Growth The sheer volume of housing, combined with the massive infrastructure required, over such a short period is destabilising, unsustainable, and unrealistic. There is no evidence that the proposed road or supporting services can be funded or built in time to accommodate this growth. 13. Inadequate Transport Hub Backwell railway station is not fit for purpose as a transport hub. It remains inaccessible to people with mobility needs, and no funded, deliverable plan exists to upgrade it. Relying on it to justify major growth is flawed. ◈ Conclusion For the reasons above—overdevelopment, lack of infrastructure, environmental harm, severe flooding risk, loss of Grade 1 agricultural land, and the absence of viable transport or funding plans—the proposal is unsound, unsustainable, and contrary to national and local planning policy. I therefore urge North Somerset Council to reject the application in full.			

Name: James Ryan **I.D:** 32388609

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP8: Housing	No	• Positively prepared • Justified	No	No	It is not sound because other avenues have not been exhausted ideally towns derelict areas or empty properties. Roads etc are not big enough to take this strain. Village will disappear and become a town.	There are no modifications that would make any justifyable reasons why you would entertain building on green belt when other options are	Legally you do not build on green belt for houses that alone is not enough. It us there for a reason.	

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
		‣ Effective ‣ Consistent with national policy				available. Why build houses here when there are better locations that can take these houses. ? The roads are already busy .		
SP8: Housing	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	I want the village to stay as a village not a mini town. Portbury roundabout traffic and the A369 will be horrendous. We want clean air and be able to walk across fields seeing wildlife in open spaces. It is green belt for a reason. Why do we need all these houses when we have houses for sale already. The places to build are in towns edge of towns .these should be built on first and in line with regulations. Not tare up green fields and ruin our green and pleasant land. I am an elderly resident and can remember the village having a lovely character. It should stay as it is .There is no need to build anywhere in this district to create more problems when infrastructure exists already in towns.	To throw out the plans. It is not needed. It will not help the village but destroy it. Where are all these people coming from?	It is unsound because breaching the agreements associated with the green belt	
SP8: Housing	No	‣ Justified ‣ Effective	No	No	No because I believe the green belt does not appear to follow national policy. The infrastructure does not support the proposals. Also trying to create a concrete jungle yet will live in a village that suits us. Traffic is bad at the best of times. You cannot rely on the train as it us not up and running yet. Even when it is will it be sustainable? Waiting an hour and trains sharing one track is hardly sustainable.	Remove the allocation at Pilland Easton in Gordano .Do not release green belt land. Reassess the green belt properly. There are old buildings in the city that could be knocked down and rebuilt. You could build tower blocks to take high numbers in towns where the infrastructure already is there.	No i do not support the soundness or legal compliance of the plan.	
SP8: Housing	No	‣ Positively prepared ‣ Justified ‣ Effective	No	Unsure	I am young and don't want houses to ruin the fields. You cannot just build on green belt without a good reason. You have to build on brown belt and places that can take all these people. We are a village and are fine as we are we do not need more houses. You should be trying to make the place better not worse.At the moment you have to wait weeks to see a G.P. As I go to the hospital often the traffic can get jammed on the A369.More houses mean more cars.The train will not make a difference . It just is all excuses to build when we do not need them around here	There is nothing you can do at the moment which makes it ok to build on green belt. You have not built on towns or cities where there are many run down places that can house mire people. Next should come brown belt after that. That is how you should do it	I do not agree with any of it.	
SP8: Housing	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	Unsure	Too much. It will overload the village with roads doctors etc. The sewage it is a lot of marsh land. Taking up the land that should not be used without looking at the other proper locations. A village is a village it should not be made into a town.	All locations are green belt meaning they can only release under exceptional circumstances. As other areas have not been explored towns that makes this unsound.	No i do not wish to support this	
SP8: Housing	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent	No	No	Not thought of the traffic. Not thought of who lives here. Legally you should be building in run down areas derelict areas like bedminster/ ashton/ weston super mare. Where they cope . Pill is only a village only 3 exits out of pill. All of them are busy at crucial times of the day. We don't need more houses when we already have houses for sale. We don't want it to become a town and lose its character.	No because it is green belt.	No because it is unsound..not thought outside the box just a way to make money.akso not thinking of the consequences. I have lived in the village for 40 years. .20 years not in the village .my late parents would also agree with my comments	

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		with national policy						
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	The plan is not legally compliant because North Somerset Council has failed to demonstrate exceptional circumstances for releasing Green Belt land around Pill. The National Planning Policy Framework requires that all reasonable alternatives be fully considered before Green Belt release. There is no clear evidence that towns with existing infrastructure, regeneration sites, or previously developed (brownfield/grey belt) land have been properly assessed before designating Pill as a strategic location. Consultation has also been inadequate. Pill and Easton-in-Gordano residents were not meaningfully engaged in the February/March consultation, and there is insufficient evidence that local feedback influenced the plan. The proposal is not effective, as Pill lacks the infrastructure to support 600 houses, a primary school, and associated facilities. There are already homes for sale locally, and large-scale development here would result in unsustainable concrete sprawl over rolling countryside and natural springs. In short, the plan is unjustified, inconsistent with national policy, and legally unsound. Pill and Easton-in-Gordano are not the places for large-scale housing, as the exceptional circumstances test has not been met and towns with existing infrastructure have been ignored.	To make the North Somerset Local Plan 2041 legally sound, the following modifications are required: Re-prioritise housing locations: Direct large-scale housing to towns with existing infrastructure, regeneration sites, and previously developed (brownfield/grey belt) land. These alternatives must be fully assessed and evidenced before any Green Belt release. Strengthen exceptional circumstances evidence: Provide robust justification for Green Belt release in line with the National Planning Policy Framework. General housing need or community facilities such as a primary school, doctors' surgery, or skatepark do not meet the legal threshold of "exceptional circumstances." Improve consultation: Conduct meaningful, targeted consultation in Pill and Easton-in-Gordano, with clear evidence of how local feedback has influenced the plan. Ensure deliverability: Align housing allocations with locations that already have schools, doctors, transport links, and shops. Avoid allocating large-scale housing in villages without capacity, as this makes the plan ineffective. Protect character and heritage: Include policies to safeguard the rural character, heritage assets, and environmental features (such as natural springs and rolling countryside) of Pill and Easton-in-Gordano.	I support the principle of meeting housing need and providing affordable homes, but I do not support building on this site because it is Green Belt land over natural springs. National guidelines can be met elsewhere — in towns, regeneration areas, and through higher-density developments where infrastructure already exists — without causing detrimental damage to the countryside or changing the character of Pill and Easton-in-Gordano.	

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
						Closing line: Without these modifications, the plan remains unjustified, ineffective, inconsistent with national policy, and legally unsound. Pill and Easton-in-Gordano are not appropriate strategic locations for large-scale housing, as the exceptional circumstances test has not been met and towns with infrastructure have been overlooked.		
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Justified • Effective • Consistent with national policy	No	No	The plan is not legally compliant because North Somerset Council has failed to demonstrate exceptional circumstances for releasing Green Belt land around Pill. The National Planning Policy Framework requires that all reasonable alternatives be fully considered before Green Belt release. There is no clear evidence that towns with existing infrastructure, regeneration sites, or previously developed (brownfield/grey belt) land have been properly assessed before designating Pill as a strategic location. Consultation has also been inadequate. Pill and Easton-in-Gordano residents were not meaningfully engaged in the February/March consultation, and there is insufficient evidence that local feedback influenced the plan. The proposal is not effective, as Pill lacks the infrastructure to support 600 houses, a primary school, and associated facilities. There are already homes for sale locally, and large-scale development here would result in unsustainable concrete sprawl over rolling countryside and natural springs. In short, the plan is unjustified, inconsistent with national policy, and legally unsound. Pill and Easton-in-Gordano are not the places for large-scale housing, as the exceptional circumstances test has not been met and towns with existing infrastructure have been ignored.	To make the North Somerset Local Plan 2041 legally sound, the following modifications are required: Re-prioritise housing locations: Direct large-scale housing to towns with existing infrastructure, regeneration sites, and previously developed (brownfield/grey belt) land. These alternatives must be fully assessed and evidenced before any Green Belt release. Strengthen exceptional circumstances evidence: Provide robust justification for Green Belt release in line with the National Planning Policy Framework. General housing need or community facilities such as a primary school, doctors' surgery, or skatepark do not meet the legal threshold of "exceptional circumstances." Improve consultation: Conduct meaningful, targeted consultation in Pill and Easton-in-Gordano, with clear evidence of how local feedback has influenced the plan. Ensure deliverability: Align housing allocations with locations that already have schools, doctors, transport links, and shops. Avoid allocating large-scale housing in villages without capacity, as this makes the plan ineffective. Protect character and heritage: Include policies to safeguard	I support the principle of meeting housing need and providing affordable homes, but I do not support building on this site because it is Green Belt land over natural springs. National guidelines can be met elsewhere — in towns, regeneration areas, and through higher-density developments where infrastructure already exists — without causing detrimental damage to the countryside or changing the character of Pill and Easton-in-Gordano.	

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
						the rural character, heritage assets, and environmental features (such as natural springs and rolling countryside) of Pill and Easton-in-Gordano. Closing line: Without these modifications, the plan remains unjustified, ineffective, inconsistent with national policy, and legally unsound. Pill and Easton-in-Gordano are not appropriate strategic locations for large-scale housing, as the exceptional circumstances test has not been met and towns with infrastructure have been overlooked.		
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	The plan is not legally compliant because consultation has been inadequate, exceptional circumstances for Green Belt release have not been evidenced, and the evidence base is weak. Residents of Pill and Easton-in-Gordano were not meaningfully engaged, and there is no clear demonstration that feedback influenced the plan. The proposal fails to show why towns, regeneration sites, and previously developed land were insufficient before designating Green Belt countryside over natural springs for 600 houses. The plan also fails the duty to cooperate. North Somerset Council has not demonstrated constructive engagement with neighbouring authorities such as Bristol, Bath & North East Somerset, and South Gloucestershire. Housing need could be met more sustainably through regeneration and higher-density developments in towns with existing infrastructure, rather than allocating large-scale housing in Pill. Transport alternatives such as bus improvements have been overlooked, despite heavy investment in the railway line, which does not adequately serve wider communities.	To make the North Somerset Local Plan 2041 legally compliant and sound, the following modifications are needed: Redirect housing to towns, regeneration sites, and brownfield land with existing infrastructure. Provide robust evidence of exceptional circumstances before any Green Belt release. Improve consultation in Pill/ Easton-in-Gordano and show how local feedback shapes the plan. Align housing with areas that already have schools, doctors, shops, and transport capacity. Use the Pill site positively for renewable energy or environmental projects that benefit the community. Strengthen transport strategy by cooperating with neighbouring authorities and investing in bus networks, not relying solely on the railway. Without these changes, the plan remains unjustified, ineffective, inconsistent with national policy, and legally	I support the principle of meeting housing need and providing affordable homes, which shows positive preparation. I also welcome commitments to green spaces and community facilities in principle. However, I do not support building on Green Belt land at Pill/Easton-in-Gordano, especially over natural springs. National guidelines can be met elsewhere — in towns, regeneration areas, and through higher-density developments where infrastructure already exists — without causing detrimental damage to the countryside or undermining local character.	

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
						unsound.		

Name: James Sutherland **I.D:** 51276801

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I object to this proposed housing in this Local Plan and consider it to be undeliverable and unsustainable for the following reasons: In the past few years Backwell Village has already had 800 new houses approved. This is a 40% increase for the village. Approving any more housing would lead to total over development. The road proposed would not serve Backwell or the nearby town of Nailsea. It would not alleviate the traffic issues on Station Road (a narrow road with pavement on only one side and the only road for school children to walk to Backwell School). The proposed road would have to go over or under the existing railway line which would be very expensive and possibly unfeasible. There will be no investment in local health or education services as part of this proposed development. The current infrastructure in the village cannot support another 1000 houses. Backwell has already been allocated a higher number of houses than any other village in North Somerset and a higher growth percentage than some towns. Clevedon (which has better infrastructure) is taking 2% whereas Backwell (a village with a lack of amenities and services) is taking 7%. There has been no viability analysis for an extra 1000 houses in Backwell. The proposed development is on Grade 1 Agricultural Land which is currently used for grazing and crops. There is only 7% of this land left in the whole of North Somerset and should not be used for housing. The Government has said “we must protect our best and most versatile land” to safeguard food security and this proposal directly contradicts and undermines the Governments own policy on food security. There would be a massive threat to local valuable wildlife and habitats including the Brockley Maternity Roost affecting the rare Lesser and Greater Horseshoe Bats. The Infrastructure Delivery Plan lacks any analysis and costings and there is no guarantees for funding for the new road and other services. Backwell Common and the surrounding area are already prone to flooding and this would increase with more housing. Chapel Hill regularly floods, cutting off access. The planned houses are on a flood plain which also regularly floods. There has been a lack of regard to strategic growth location designation, including the impact on the area’s character, loss of Greenbelt and high quality agricultural and risk of flooding. Whilst Backwell has a train station it is not fit for purpose as a transport hub as it remains inaccessible for people with mobility issues and a challenge for those travelling with young children. The platform is short and only a certain number of carriages can stop at the platform.			

Name: James Wring **I.D:** 62863905

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective	Unsure	Unsure	Too many houses being allocated to a small village, far greater than other larger settlements in North Somerset - circa 40% increase in village size. Road infrastructure is already poor and would be difficult to improve due to railway and existing settlement. It is on low land subject to flooding. There does not appear to be suggested adequate infrastructure development - schools, Doctors etc. The land is high quality farm land which should be preserved.	I believe it should be rejected in view of other developments that are planned for the village.	No	

Name: Jamie Chinner-Evans **I.D:** 62849889

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Gordano Services	No	• Justified • Consistent with national policy	No	Unsure	The proposed development on Land East of Gordano Services is not sound primarily because of the lack of a plan to deliver improvements to junction 19 of the M5. This junction is already dangerous, with cars exiting the southbound carriageway frequently queuing back up onto the M5 during peak hours. There is also the broader problem at this junction of significant traffic on the main roundabout of the M5, leading to long queues both in the direction of Portishead and Bristol. Furthermore, despite assessment of the impact of noise pollution, there is still a significant risk to the health of potential residents as a result of proximity to the M5 - in terms of noise pollution, vehicle emissions and microplastics from vehicle tyres. This risks widening health inequalities, going against the Plan's central vision to reduce inequality. See, for example: https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0174882	Delete this site from the Plan. Or require substantial changes to M5 Junction 19 and a full independent assessment of the health impacts of living in a development in such proximity to the motorway.		
Pill Green	No		No	No	The proposed development of Pill Green is not sound as there has been no independent verification that 'exceptional circumstances' have been met to grant such an extreme development on green belt land. The land is currently high-performing agricultural land, with significant benefits to the local ecosystem and biodiversity - offering a habitat for a range of wildlife, including the local bat population. The proposed development is disproportionate, both in its size relative to the current population of Pill, Ham Green and Easton-in-Gordano and also in terms of its negative environmental impact. The addition of 600 homes is inconsistent with the agreed-upon Local Plan and will lead to adverse impacts upon the character of the local area, contrary to the the NPPF. Moreover, we have significant concerns about the fragmented nature of the proposed development; it appears to have limited means to be connected to the rest of the village, save for a possible single access point through to Brookside - which is not a suitable road for such traffic. Residents in the proposed development would also be segregated from the rest of the village by the topography, which would place them on one side of a hill and the rest of the village on the other. Residents at the top of the hill already have a significant walk to access the Co-op and Post Office, so potential residents of Pill Green would find themselves even further away the services they require. This means the site is not sustainably located. Despite good intentions behind the proposal to provide active travel links to the rest of the village, the topography means that these will not be well used, resulting in poor return on investment, and ultimately more traffic on the A369 and Pill Road. Despite investment in the train station at Pill, we are also concerned that such a large development will only add to the already congested traffic issues at junction 19 of the M5 and along the A369 into Bristol. Finally, on a specific point, we are concerned that there has been a lack of clarity given by the council in relation to the land at the south-east end of Cross Lanes, to the rear west/south-west of Davin Crescent which currently has a large house and stables. Different maps produced by the council appear to have shown different boundaries, some of which include this patch of land and some which don't. This has made it difficult for local residents to engage fully with the consultation and I would argue therefore calls into question the legality of what has been proposed / consulted upon, as we simply do not know with any great certainty what it is we are being consulted on.	Delete the Pill Green site from the Plan. Require independent verification that the 'exceptional circumstances' condition has been met for building on the green belt. Require examination of the lack of clarity given about the inconsistent maps produced by the council related to boundaries of the proposed site at Pill Green - in particular, whether or not the land to the south-west of Davin Crescent (currently a stables) is included within the proposed site or not. If it is found that local residents have been left uncertain about what is actually being proposed, then this may amount to a serious procedural defect in the consultation. Require more formal crossing for active travel on the A369 just above Blackmoor Road, as the current crossing point is unsafe given the speed and volume of traffic on that road; the central island barely accommodates a bike, the crossing is poorly lit, and there is nothing to encourage drivers to give way to those attempting to cross. While improvements to the River Avon Trail are welcome, improvements to the cycleway along the A369 through Abbots Leigh are necessary to accommodate an increased volume of cycle traffic. This would include the addition of lighting at key points along the cycle way, such as the elevated cycle path to the west of Abbots Leigh Cricket Club. The		

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						cycle route along Bridge Road leading up to the Clifton Suspension Bridge is also not fit for purpose, as the cycle lane is intermittent, causing bikes to weave in and out of traffic during rush hour. A segregated cycle lane - or poles, at the very least - are necessary to avoid accidents and encourage greater uptake of active travel modes.		

Name: Jamie Sparey **I.D:** 31076769

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell					I oppose the build on the east of Backwell for the following reasons. 1) the infrastructure is inadequate for that many houses. Backwell has already had planning and building of many houses. The new road proposed to go either under or over the railway is not feasible and would cost millions to build. 2) the railway station isn't big enough and there is no access for disabled people. Only three carriages can stop for passengers to a light and leave the trains. Train companies do not have enough rolling stock. 3) the area designated for building floods all the time. 4) the land is grade one agricultural land there is only less than 7% of this type of land left in North Somerset. The land has always been used for grazing and crop growing. 5) many people use the land for recreational purposes for example walking and running. The land is full of wildlife. 6) the houses that the developers build isn't really for people requiring affordable homes. The houses are for the more affluent people. The developers prefer to build on Greenbelt because it's easier. Once the green belt has gone, it can never come back. You can't turn back time please try and think of the future. We need our green spaces for our mental health and fitness. We have had enough building in Backwell more than any other villages around us.			

Name: Jan Lydon **I.D:** 62760065

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective	No	No	Grade 1 Green Belt Land is already down to 7% in North Somerset. Using this land to build upon would be irresponsible, environmentally disastrous and show a complete lack of judgement and care for our countryside. The village of Backwell is already overdeveloped, with roads that are unsuitable for the amount of traffic that flow along them, and without the infrastructure to support the amount of new arrivals. Congestion levels are already unbearable and this will only exacerbate the issue. There are few jobs in Backwell, therefore the traffic will be further worsened by people commuting to work at peak times. There are more new homes in Backwell than anywhere else in North Somerset, and flooding is common around Backwell common, Backwell lake etc. This area is completely unsuitable to build upon. The station in the village is a tiny affair, meant only to handle the needs of a small local community, and cannot feasibly be extended.No costing has been explained to the people of Backwell. The environmental damage, the inevitable increase of crime and the devaluation of	Scrap the policy. Put a stop to the mindless ideas of turning Backwell into a town. Use a modicum of common sense		

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					property will be ludicrous. Backwell has become a hot spot for mindless, shameless builders to build large, unaffordable homes upon, capitalizing on the countryside and pleasant community. This should be clamped down upon immediately.	and go and build elsewhere!!		

Name: Jane Elliot **I.D:** 51431073

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Over development, 40% increase has already been approved. The proposed new road will not ease the daily congestion of the A370 and station road, Backwell. With more houses, all infrastructure like the doctors, dentist, leisure facilitates are not being increased. Backwell has been allocated more new houses than other villages in North Somerset. Backwell has little employment opportunities as most people commute to Bristol. The proposed development will be built on Grade 1 Agricultural land which is a great loss for food crops in this area. Government policy says we must protect our best land to safeguard food security. The development would destroy wildlife habitats in trees and hedges and threaten the rare Lesser and Greater Horseshoe Bats which need fields for food. Funding for the new road structure is uncertain. Areas of Backwell Common flood regularly. The development will change the village's character too much making it a small town with no shopping opportunities. Affordable housing on Greenbelt land is a Government policy. Too much growth on one village causes destabilising of the local community. As a railway hub, the train station is not accessible for wheelchairs or prams.			

Name: Jane Evans **I.D:** 20905985

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at North West Nailsea	No		No		1. I do not consider the North Somerset Local Plan 2041 to be sound, and in particular I focus responses in relation to the proposed allocation of land north of Nailsea for inclusion in the Local Plan for development. The plan fails to meet the four tests of soundness in paragraph 36 of the National Planning Policy Framework (NPPF): • Not Positively Prepared – The plan does not demonstrate that Nailsea's constrained B-road network to the north of the town, with long-standing bottlenecks and places where two vehicles cannot safely pass, can safely or sustainably support the proposed level of development. There is no credible infrastructure or funding strategy to address these constraints. • Not Justified – The evidence base does not show that the north Nailsea allocation is the most appropriate strategy compared with reasonable alternatives. I cannot find evidence of sufficient engagement with neighbouring authorities and infrastructure to justify inclusion, and the site's extensive drainage, flood and access issues indicate that it was not objectively chosen. As an aside, the June Cabinet Meeting waived this land through with vague references to the need for housing; the mobile library debate was given more air time. • Not Effective – The allocation depends on mitigation measures that are vague or uncosted, including a 20 mph internal route and contributions to unspecified transport schemes. These do not address the fundamental capacity and safety problems identified in the Nailsea and Backwell Transport Strategy or the site requirements schedule. • Not Consistent with National Policy – The proposal conflicts with several NPPF requirements, including: • safe and suitable access and sustainable transport; • Green Belt protection (no exceptional circumstances have been demonstrated for its release);			IMG_1408.jpeg IMG_9384.jpg IMG_1078.jpeg

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					• flood risk (the site lies on sloping land draining toward a river that floods regularly - see attached photos) and • on protecting biodiversity and natural networks (the site forms part of a green wildlife corridor identified in the Council's Nature Emergency Toolkit). Please see attached aerial photo which illustrates clearly the corridor and how it feeds into the SSSI. The plan also fails to reference the North Somerset Nature Toolkit at all, despite it being adopted by the Council to guide development under its declared Nature Emergency. This omission further undermines justification and consistency. The site requirements themselves acknowledge major engineering and drainage constraints, while making no reference to the Exoleum underground fuel pipeline that crosses the site — a serious safety and deliverability omission. Its presence may render mortgages and insurance difficult. I would not want to live anywhere near a pipeline carrying high pressure aviation fuel. Finally, the allocation conflicts with the Wraxall & Failand Neighbourhood Plan (2022–2038), which forms part of the statutory Development Plan and emphasises protection of the Green Belt, rural character, and transport safety. For these reasons, the plan is not positively prepared, not justified, not effective, and not consistent with national policy. It cannot therefore be considered sound in its current form. 2. I do not consider the North Somerset Local Plan 2041 to be legally compliant, particularly in relation to the proposed allocation of land north of Nailsea. The Council's own Duty to Co-operate Statement of Compliance (October 2025, pp. 11, 16–17, 20 and 32) confirms that engagement with key partners—including National Highways, the Environment Agency, and neighbouring authorities—remains "ongoing." This indicates that effective cooperation had not been completed before the Plan's publication. There is no evidence of targeted engagement concerning the severe access constraints and flood risks affecting the land north of Nailsea. The Plan also fails to integrate or even reference the Council's adopted North Somerset Nature Toolkit, despite the Council having declared a Nature Emergency and promoting this Toolkit as a framework for biodiversity, drainage and landscape protection. Its omission calls into question whether the Plan has been prepared in full accordance with the Council's own environmental. Furthermore, the Plan makes no reference to the Exolum underground fuel pipeline that runs through the north Nailsea site. This is a nationally significant item of infrastructure, and the operator should be a non-statutory consultee. The absence of consultation evidence or safety assessment suggests that the Plan has not been prepared in consultation with all relevant bodies, contrary to legal requirements. In addition, the allocation conflicts with the Wraxall & Failand Neighbourhood Plan (2022–2038), and undermines the latter's policies on Green Belt protection, settlement character, and transport safety. For these reasons, I do not consider the Plan legally compliant. 3. I do not consider the North Somerset Local Plan 2041 to comply with the statutory Duty to Co-operate, particularly in relation to the proposed allocation of land north of Nailsea. The Duty to Co-operate Statement of Compliance (October 2025) itself (pages 11, 16–17, 20 and 32) admits that discussions with key partners were still "ongoing" at the time of publication. This demonstrates that the Council has not completed effective cooperation with all relevant authorities and infrastructure bodies before submitting the Plan. There is no clear evidence of substantive joint working with Bristol City Council, National Highways, the Environment Agency, or Exolum UK Ltd (the operator of the strategic underground fuel pipeline crossing the site) on the specific issues of access, flood risk, or infrastructure capacity for north Nailsea. The absence of consultation with these statutory bodies means the Plan cannot be regarded as having been prepared "constructively, actively and on an ongoing basis." There is no evidence that the Council has engaged meaningfully with the principles of its own North Somerset Nature Toolkit or with neighbouring authorities on biodiversity connectivity, contrary to current requirements. For these reasons, the Plan does not comply with the legal Duty to Co-operate and should not be submitted for examination until evidence of full engagement and signed Statements of Common Ground with the relevant bodies are provided. I would suggest from studying the documents that the Land North of Nailsea be removed in full from the Local Plan.			

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					Reason: The allocation is not positively prepared, not justified, not effective and not consistent with national policy due to unresolved access on constrained B-roads, Green Belt harm (no demonstrated exceptional circumstances), flood-risk and drainage issues (including an overland flood route and strict SuDS limits), biodiversity and corridor fragmentation, omission of the Exolum pipeline constraint.			

Name: Jane Hawker **I.D:** 63092897

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm					We are writing re the threat of development at the above. There would be major impact on local schools plus all other infrastructure, eg the already stretched GP services, also parking issues in and around the ‘village’ and the inevitable increase in traffic. Access to and from these areas noted above from Down Road would become chaotic. Anyone (local residents in particular) in the vicinity of Highdown Schools at the start and end of the school day will be well aware of the existing chaos.			
Black Rock, north of Clevedon Road						We are writing re the threat of development at the above. There would be major impact on local schools plus all other infrastructure, eg the already stretched GP services, also parking issues in and around the ‘village’ and the inevitable increase in traffic. Access to and from these areas noted above from Down Road would become chaotic. Anyone (local residents in particular) in the vicinity of Highdown Schools at the start and end of the school day will be well aware of the existing chaos.		

Name: Jane Kearney **I.D:** 51397665

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	In the Short Guide to the Local Plan, North Somerset Council state that “their strategy is focused on directing housing and other development to areas with better access to jobs and services. This means targeting brownfield sites within Weston-super-Mare, Clevedon, Nailsea and Portishead first, then new development close to towns and large built-up areas such as Bristol, then the larger more sustainable villages.” Backwell is a small village, which already has 800 new houses approved, a 40% increase for the village. In this draft plan it has been allocated a further 1,000 houses which is a higher number of houses than any other village in North Somerset and even a higher growth percentage than towns. It is expected to take 7% of the district’s housing allocation, compared to Clevedon’s 2%. This represents a total contradiction of the Council’s stated strategy. In addition, Backwell is not an employment hub and most residents commute. The significant development proposed will cause a large increase in traffic in the area, contributing to congestion and pollution. The proposed road would not effectively serve Nailsea’s traffic or relieve congestion on Station Road, Backwell Common or Chapel Hill – all small country roads that cannot accommodate such an increase in traffic. It would also need to cross the railway, and whether it goes over or under, this will be expensive at best and unfeasible at worst. The buses are unreliable and infrequent, and the railway station is inaccessible for people with mobility issues and presents serious challenges when travelling with young children. Further on in the Short Guide to the Local Plan the council refer to their policies to respond to climate change and their pledge to be carbon neutral by 2030. Within that section, they pledge to enhance biodiversity and protect high-quality land, and yet they propose building 1,000 houses on grade 1 agricultural land currently used for food crops and grazing. There is			

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					only 7% of this high quality land left in the whole of North Somerset, so not only does the proposed development in Backwell contradict their stated policy, it is also in contravention of the government's policy which states that “we must protect our best and most versatile land” to safeguard food security. The proposals would also destroy valuable wildlife habitats and further harm biodiversity in an area which currently provides foraging areas for a wide variety of wildlife including rare Lesser and Greater Horseshoe bats. Finally, Backwell Common and surrounding areas are already prone to flooding, which would be aggravated by more housing. I believe the proposed development around Backwell is ill-conceived, unsustainable and undeliverable.			

Name: Jane Mather **I.D:** 57964929

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP7: Green Belt	No	• Effective	Unsure	Unsure	NSC has not considered the ecological impact of the Tower Farm site in protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor. Both areas were added to the Green Belt in the late 1980’s due to their high ecological value. National planning policy allows Green Belt only in exceptional circumstances - and these have not been demonstrated.	Find alternative brownfield or greenfield sites with far lower ecological impact in both Portishead across North Somerset.	None	
SP10: Transport	No	• Effective	Unsure	Unsure	Tower Farm site cannot provide safe or suitable access Development would create unacceptable transport impacts, especially at school drop off and pick up times. No quick link to town centre amenities, eg medical centre, on public transport. Only one bus route which goes one way round the town, and takes 20 minutes.	Add extra access route, coming from North Weston, in order that all vehicles do not have to travel through an already contested Portishead town centre.	None	
Land at Tower Farm	No	• Effective	Unsure	Unsure	NSC has not considered the ecological impact of the Tower Farm site in protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor. Both areas were added to the Green Belt in the late 1980’s due to their high ecological value. National planning policy allows Green Belt only in exceptional circumstances - and these have not been demonstrated.	Find alternative brownfield or greenfield sites with far lower ecological impact in both Portishead across North Somerset.	None	
Black Rock, north of Clevedon Road	No	• Effective	Unsure	Unsure	NSC has not considered the ecological impact of the Tower Farm site in protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor. Both areas were added to the Green Belt in the late 1980’s due to their high ecological value. National planning policy allows Green Belt only in exceptional circumstances - and these have not been demonstrated.	Find alternative brownfield or greenfield sites with far lower ecological impact in both Portishead across North Somerset.	None	

Name: Jane Middleton **I.D:** 21267169

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I object to the proposed scale of development in Backwell within the North Somerset Local Plan 2041 on the grounds that it is unsound, unjustified, and not consistent with national policy. 1. Disproportionate and Unsustainable Housing Allocation Backwell has already absorbed around 800 new homes, yet the Plan proposes a further 1,000, more than any other village. This is not a proportionate or evidence-based strategy and would permanently damage the village’s character. 2. Transport Network at Breaking Point The A370 and local road network are already over capacity, with no funded mitigation. Development at this scale would create severe residual impacts and unsafe conditions. 3. Railway Station Not Accessible or Fit for Purpose Nailsea & Backwell Station has no step-free access and poor interchange facilities. It cannot serve as a sustainable transport hub for major growth. No upgrade is funded or confirmed. 4. Loss of Greenfield Land Large greenfield releases around Backwell would destroy landscapes and habitats. Alternatives have not been properly assessed.			

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					5. Flood Risk Backwell Lake and surrounding fields form an active floodplain essential for natural water storage. Development here would increase flood risk and reduce natural drainage. 6. Threats to Protected Wildlife – Brockley Maternity Roost & SSSI The area supports Lesser and Greater Horseshoe bats, among the rarest UK species. Development threatens their roost, foraging grounds, and dark corridors. Impacts are likely irreversible. 7. Conflict with Backwell Neighbourhood Plan The scale of development disregards community-led planning and fails to respect local input. 8. Lack of Evidence for Housing Numbers The Plan does not justify why Backwell should take such a high share of district-wide housing. This is neither balanced nor sustainable. 9. Climate and Environmental Harm Car-dependent development in Backwell increases emissions and reduces natural habitats, harming the environment and reducing climate resilience. Conclusion The Backwell allocation in the Local Plan is unsound because it is: • Not justified • Not effective • Not consistent with national policy			

Name: Jane Miller **I.D:** 30918593

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP9: Employment	No	• Effective	Yes	No	Once again, this has ignored the cinstant calls from residents of no more building homes until well paid jobs are created. Ie not minimum wage retail jobs.	More employment space in Portishead. NHS hospital /clincs instead of having to go 10 niles to Bristol or over 20 miles to Weston s Mare. No more homes - esp apartments. Improved bus service not just into Bristol city cente.		

Name: Jane Shearer **I.D:** 58638209

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell is allocated a disproportionate number of houses compared to all other villages in North Somerset and towns such as Clevedon. Backwell has been allocated 7% of the 24,495 housing target, yet Clevedon only 2%. We already have 800 new houses approved in Backwell which represents a 40% increase for the village. There has been no investment in health services or leisure facilities to support this increase. An additional 1000 houses over such a short period is completely unsustainable and destabilising. There is no needs or viability analysis for this development. There is already a deficit in school places. There is daily traffic congestion on and around the A370 through Backwell, and the proposed new road would not relieve the congestion on Station Road, Backwell Common, or Chapel Hill. These are narrow roads and lanes, and Chapel Hill is frequently subject to flooding and impassable after heavy rain. The proposed development is on Grade 1 Agricultural Land currently used for food crops and grazing. It is vital that we protect this land to safeguard food security. There is only 7% of this high quality land left in North Somerset which should be protected for future generations. There are also rare lesser and greater horseshoe bats that rely on the land for food. There are concerns that the proposed road to support the new housing development will not be funded or delivered on time. The railway station does not serve those with mobility issues and is very difficult to navigate when travelling with a small child in a buggy. The sheer volume of growth is just not acceptable for a village with such limited services and facilities and will completely alter its existing rural character.			

Name: Jane Wills **I.D:** 51043841

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell, with its narrow winding lanes has developed gradually over more than a thousand years. With plans already approved for 800 new houses, including 500 to the west, the suggestion of a sudden massive deposit of 889 further new houses to the east, bringing sudden urbanisation, is total planning vandalism. To double the size of our thousand year old village in a decade will have a devastating, destabilising and unsustainable effect on our community. Obviously, almost all of thousands of proposed new residents will work in Bristol. So, the plan is to expect tens of thousands of new car journeys into Bristol. Expecting any large proportion of these new commuters to travel by public transport is proven nonsense. Why do the planners not plan new mass housing close to employment and other facilities rather than swamping villages outside the green belt. Sacrificing the only green gap between Backwell and Nailsea for road-building would be a blow to previous planning promises. This potentially highly expensive ‘fantasy’ project would purely serve the expansion in Nailsea, and will do nothing to alleviate the increase traffic confusion caused by a massive housing development to the east of Backwell. This could well just add to the problem, as fresh traffic from Nailsea joins the A370 at the entrance to the proposed extra development of the 889 new houses east Backwell. e will have a devastating effect on the community.			

Name: Janet Bainbridge **I.D:** 62858465

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	It is not sound for the following reasons There are enough houses being built already to overwhelm the following Schooling provision Medical provision Lane safety for horses and pedestrians in the nearby lanes . The road planned would totally overwhelm the neighbouring town of Nailsea . We have only 7% of prime agricultural land left in North Somerset which surely should be retained at all costs for our unsure future There is a limit to jobs available in this neighbourhood and in Bristol Perhaps consider a new town with planned built in infrastructure elsewhere where there is more room to provide suitable services in another county . This is NOT a case of not in my backyard but being able to plan social infrastructure properly eg in Herefordshire. One doesn’t want to take land in another place but if houses have to built , then why not in an area where there is space to plan appropriately.			

Name: Janet Court **I.D:** 51431393

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at North West Nailsea	No		Unsure	Unsure	Nailsea cannot cope with further housing development. 1817 new homes would be an un-needed over development of the town, which in essence is a small village with facilities struggling to support the existing population. The proposed new road will not aid this situation as it would not serve Nailsea's traffic. Further to the lack of facilities/infrastructure there are no locations identified for the three new primary schools proposed for Nailsea/Backwell. It would appear that these are something of an afterthought to the rush to build new housing. Further to this the Nailsea will surely struggle to cope with pressure on the town's health and leisure provision. (I suggest very strongly from numerous examples of anecdotal evidence that these are already under a great deal of pressure.) With this in mind it would appear that Greenfield Crescent Playing Field is not protected under the local green space Policy LP15. What a disappointing thought that Nailsea is due to lose high quality agricultural land if the development to the south of Nailsea goes ahead. Further to the ecological concerns it would be foolhardy to develop on sites that are foraging locations for the rare Greater and Lesser Horseshoe Bats. The thought that so much development is due to take place adjacent to Moor End Spout Nature reserve which hosts protected species is depressing. Please think about the possibilities (or not!) for children in nearby schools to continue observing nature in such a venue. Overall there appears to be little serious, in-depth thought given to the realistic impact on the residents (human or otherwise) of Nailsea, a small town which is, it could be argued, already over developed. There is clearly a lack of in depth forward planning to cope with increased traffic demands on the lanes in and around Nailsea and Backwell. The lanes are			

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					inevitably going to become congested and unsafe for pedestrians, cyclists and, yes, horse riders. It would appear that some development is in a flood plain (land to the west and south of Backwell Lake) which does actually flood regularly. Finally, in addition to road transport concerns expressed above, the railway station is not fit for purpose. I respectfully ask that the proposed develop is not actioned.			

Name: Janet Davey **I.D:** 20318049

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Consistent with national policy	No	No	National policy allows green belt to be used for development only after all brown field sites have been properly investigated and used. Castlewood in Clevedon could have a higher density of housing, for example, as it is within the town and close to amenities, and other sites could be used in Portishead so that it would not be necessary to build near Weston Big Wood, which is a triple SI and extremely important within the Gordano Valley. Tower Farm developers state that their development is sustainable; in order to get to Bristol, Weston or the new train station residents would need to use their cars. It is a 45min walk to the new station, and longer returning because of Avon Way, a mile long steep hill. This hill also precludes the use of bicycles, unless one is young and fit. Current public transport is unreliable and poor in this area. To reach Weston College students have to go into the town and catch a bus that takes 1.5 hours to get to college. The Black Rock development is on a steep hill near Weston Big Wood. Any run off would cause flooding across Clevedon Road and into the homes opposite. The land there is very low lying and subject to frequent flooding. I do not believe there is a sufficient buffer either side of the Big Wood to safeguard its ecological value. There is evidence of a hill fort on Portishead Down, which would have been within one hours walking distance of the Iron age fort at Eastwood and close to the main earthworks at Cadbury Camp.	There is building land elsewhere in Portishead. Wyndham Way is still in the Local plan and is a brown field site. There is land on the Vale intended for a care home which has not been used - we have too many care home spaces currently in the town and no need for more. More building could be done near the new station; high rise would give enough homes to stop the need for development near the Big Wood. The Portishead Local Plan states that we do not need more 4 bed homes, but more smaller starter homes and one person flats. Weston Big Wood is too precious both nationally and locally to be harmed by building so close. In the 1980s examiners made the area around the wood into green belt as they said the wood needed that protection.		
Black Rock, north of Clevedon Road	No	• Consistent with national policy	No	No	National policy allows green belt to be used for development only after all brown field sites have been properly investigated and used. Castlewood in Clevedon could have a higher density of housing, for example, as it is within the town and close to amenities, and other sites could be used in Portishead so that it would not be necessary to build near Weston Big Wood, which is a triple SI and extremely important within the Gordano Valley. Tower Farm developers state that their development is sustainable; in order to get to Bristol, Weston or the new train station residents would need to use their cars. It is a 45min walk to the new station, and longer returning because of Avon Way, a mile long steep hill. This hill also precludes the use of bicycles, unless one is young and fit. Current public transport is unreliable and poor in this area. To reach Weston College students have to go into the town and catch a bus that takes 1.5 hours to get to college. The Black Rock development is on a steep hill near Weston Big Wood. Any run off would cause flooding across Clevedon Road and into the homes opposite. The land there is very low lying and subject to frequent flooding. I do not believe there is a sufficient buffer either side of the Big Wood to safeguard its ecological value. There is evidence of a hill fort on Portishead Down, which would have been within one hours walking distance of the Iron age fort at Eastwood and close to the main earthworks at Cadbury Camp.	There is building land elsewhere in Portishead. Wyndham Way is still in the Local plan and is a brown field site. There is land on the Vale intended for a care home which has not been used - we have too many care home spaces currently in the town and no need for more. More building could be done near the new station; high rise would give enough homes to stop the need for development near the Big Wood. The Portishead Local Plan states that we do not need more 4 bed homes, but more smaller starter homes and one person flats. Weston Big Wood is too precious both nationally and locally to be harmed by building so close. In the 1980s examiners made the area around the wood into green belt as they said the wood needed that protection.		

Name: Janette Baker **I.D:** 62735553

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land to the west of Elborough					Elborough Village, I would like to express my strong opposition to the development in the Elborough area following the comments from the Hutton Parish Council and Residents which I fully endorse against this development. My concerns names below have already been expressed by my fellow residents, but I couldn't word my concerns any better than they have, so I repeat their points as follows; 1) Loss of Green Space which would be lost forever. The development would remove the strategic gap between Elborough and Locking parishes. 2) Infrastructure Deficiencies: There are major concerns about a lack of existing facilities (shops, schools, community centres), inadequate public transport, and roads not wide enough for the increased traffic. 3) Public Opinion: 83% majority of residents in a 2021 survey DID NOT SUPPORT new housing in the vicinity of Elborough. 4) Sustainability: The sustainability of the proposed development is a major point of contention. While developers and some council documents suggest the Elborough development is more sustainable than other potential sites, local objectors highlight the isolated nature of the location with no existing services. I would like to emphasize the risk of flooding in the area. Concerns have been raised that new development in the area would increase the amount of impermeable surfaces (houses, roads) and exacerbate the existing flooding problems especially with the climate change. Run off from farmland on the hill by Elborough flows abundantlly across Banwell road, flooding it several times a year. Flash flooding is a widespread risk across the region and this area, which can impact properties. I trust that these very significant considerations opposing development in the area are fully taken into account when submitting the Pre-submission.			
Land north of Banwell Road, Locking /Elborough						Elborough Village, I would like to express my strong opposition to the development in the Elborough area following the comments from the Hutton Parish Council and Residents which I fully endorse against this development. My concerns names below have already been expressed by my fellow residents, but I couldn't word my concerns any better than they have, so I repeat their points as follows; 1) Loss of Green Space which would be lost forever. The development would remove the strategic gap between Elborough and Locking parishes.		

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					2) Infrastructure Deficiencies: There are major concerns about a lack of existing facilities (shops, schools, community centres), inadequate public transport, and roads not wide enough for the increased traffic. 3) Public Opinion: 83% majority of residents in a 2021 survey DID NOT SUPPORT new housing in the vicinity of Elborough. 4) Sustainability: The sustainability of the proposed development is a major point of contention. While developers and some council documents suggest the Elborough development is more sustainable than other potential sites, local objectors highlight the isolated nature of the location with no existing services. I would like to emphasize the risk of flooding in the area. Concerns have been raised that new development in the area would increase the amount of impermeable surfaces (houses, roads) and exacerbate the existing flooding problems especially with the climate change. Run off from farmland on the hill by Elborough flows abundantlly across Banwell road, flooding it several times a year. Flash flooding is a widespread risk across the region and this area, which can impact properties. I trust that these very significant considerations opposing development in the area are fully taken into account when submitting the Pre-submission.			

Name: Janice Jennings **I.D:** 62844929

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP15: Local Green Space	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The proposed development of 1,817 new homes in Nailsea would lead to a total over development of our town. New primary schools would be required, and with no locations and firm funding provisions in place, this would not facilitate the proposed population increases to the town. The new link road, under the rail crossing is likely to be very expensive with problematic engineering given the proximity to the River Kenn. The plans will lead to the permanent loss of Grade 2 Agricultural land which is of good quality and high yielding, as a result of the housing development to the south of Nailsea. The town's existing health and leisure provisions are already under considerable pressure and would become unacceptably pressured without firm investment committed to developing these facilities further. Proposed sites for development in Nailsea are recognised foraging sites for Greater and Lesser Horseshoe bats. Proposed homes adjacent to the Moor End Spout Nature Reserve, would destroy wild life habitats and biodiversity in our town, since the site hosts many protected species. The proposed development to the west and south of Backwell Lake (reservoir) mean that new roads and housing will be in the floodplain which does flood regularly. Plans are not currently in place for accident blackspots at Wraxhall Hill, Stone Edge Batch and Portbury Lane, which will see a marked increase in vehicle movements. The railway station is already not fit for purpose as a transport hub, since it remains inaccessible for people			

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					with mobility issues and presents considerable challenges for adults travelling with small children. Greenfield Cresent playing field is not protected under Local Green Space Policy LP15. Land to the north of Nailsea is proposed to be removed from the green belt and will be replaced to the south. Positively, the new section of green belt to the south is a greater size than the area being removed and will replace the strategic gap. The proposed new road would not serve Nailsea's traffic or relieve congestion on Station Road, nor would it help traffic moving from Backwell to the M5.			

Name: Jason Pitchers **I.D:** 31078145

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP6: Educational, sporting, leisure and community use allocations						An allocation of swimming pools that enables sufficient water space and time for every child to learn and participate in the most valued of all exercises because everyone can participate and everyone has the right to learn to swim to keep safe. I have run my own swim school for 30 plus years. Pools are never opened only closed and parents desperately travel 'miles' taking time and blocking our road systems to get to a pool. Nailsea needs it's own pool sufficient in size to the match the needs of the ever growing population as does every community in North Somerset. In turn you will get a happier and healthy nation and new technologies do not mean they have to be expensive to run, but 'accessable to all.		
Land north of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The allocation of land north of Nailsea conflicts with the Wraxall & Failand Neighbourhood Plan (2022-2038) which has already been adopted by the Council and forms part of the legal Development Plan. The roads at both ends of the proposed allocation are already pinch points that often get log jammed with traffic. Further development will result in frequent traffic gridlock. The proposed site lies in the Green Belt and the Council has not demonstrated that all other reasonable options have been exhausted. In particular, the local need is for more social housing, genuinely affordable starter homes and smaller homes for older people to downsize. This means that other proposed developments in the area should only be for higher density, lower cost homes obviating the need to take away more greenbelt. Development North of Nailsea will result in increased surface water run-off into an area that is already prone to flooding. The proposed site will negatively impact wildlife corridors and increase noise and light pollution.	Remove the land north of Nailsea as a proposed residential development area and leave it as greenbelt.		

Name: Jasper Hart **I.D:** 62865089

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	Unsure	Not Justified The Local Plan is not justified as required by NPPF paragraph 35(b), as it is not based on proportionate or robust evidence demonstrating that Backwell is a reasonable or optimal location for the scale of growth proposed. Key data: • UK household growth projections have slowed materially since pre-pandemic assumptions • Office for National Statistics (ONS) data shows: • UK fertility rate fell to 1.49 births per woman (2022) — well below replacement • Net household formation growth is increasingly concentrated in urban centres, not villages The Plan relies on outdated growth assumptions and does not adequately test reasonable alternatives, including higher-density urban development or brownfield regeneration. NPPF paragraph 174(a) requires planning policies to contribute to and enhance the natural and local environment by protecting valued landscapes. Relevant facts: • Backwell lies within a visually sensitive rural setting • The surrounding land performs a clear landscape buffer function • The countryside around Backwell: • Preserves openness • Prevents urban sprawl • Contributes to local character and identity The proposed allocation would result in the irreversible loss of open countryside, contrary to the intrinsic character and beauty of the rural area recognised by NPPF paragraph 176. The land around Backwell performs a strategic role in maintaining physical and perceptual separation between settlements. Development at the scale proposed would materially reduce this separation, risking coalescence and permanently undermining Backwell’s identity as a distinct village. NPPF paragraph 35(c) requires plans to be effective, including being deliverable over the plan period. Evidence-based concerns: • A370 corridor already experiences peak-time congestion • Backwell rail station operates near practical commuter capacity • GP practices nationally are under pressure: • UK GP numbers per capita have fallen since 2015 • NHS England reports rising patient-to-GP ratios The Plan relies on aspirational infrastructure improvements without secured funding, delivery certainty, or enforceable phasing, rendering it ineffective. Development in Backwell will increase car-based commuting into Bristol and surrounding employment centres, directly conflicting with the Plan’s climate objectives and the Council’s declared climate emergency. NPPF paragraph 174(b) requires recognition of the economic and other benefits of Best and Most Versatile (BMV) agricultural land. Key data: • Only ~21% of land in England is classified as BMV (Grades 1, 2, and 3a) • Loss of such land is permanent and cumulative The Plan fails to demonstrate that lower-quality or previously developed land alternatives have been fully exhausted before proposing greenfield release.	Look at other sites not near Backwell. All reasons stated above.		

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					Backwell is being asked to accommodate growth disproportionate to its scale, infrastructure capacity, and rural character. This suggests site selection driven by convenience rather than suitability, undermining the principle of equitable spatial distribution. For the reasons set out above, the North Somerset Local Plan 2041 is unsound in respect of the proposed development at Backwell, failing the tests of being justified, effective, and consistent with national policy as set out in NPPF paragraph 35. The Plan should be modified to remove or significantly reduce the proposed allocation at Backwell and redirect growth to more sustainable and less environmentally harmful locations.			

Name: Jayne Keightley **I.D:** 51424481

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	There are already 800 new houses approved, a 40% increase in the size of the village. The additional numbers proposed indicate total over development. The plans include a new road linking Station Road near Backwell Lake with the A370 still in Backwell. This has to cross the railway, the feasibility for which has not been demonstrated. It is unlikely that this would relieve congestion on neighbouring roads which with the increase in housing in Backwell and Nailsea will become horrendous. The bulk of the proposed development is on Grade 1 Agricultural Land currently used for food crops and grazing. There is only 7% of this high quality land left in North Somerset. This is despite Government policy stating that “we must protect our best and most versatile land” to safeguard food security. The proposals contradict this policy and undermine food security. There is nothing in the plan about necessary improvements to infrastructure, particularly school places and health services. The sheer volume of growth with the required investment infrastructure and services over such a short period is destabilising, unsustainable and undeliverable. Development would destroy valuable wildlife habitats and further harm biodiversity in one of the world’s most nature-depleted countries. Areas around the proposed development are regularly subject to flooding which will only be made worse by the excessive number of houses proposed. Backwell is allocated a higher number of houses than any other village in North Somerset. It is not an employment hub – most residents commute, mainly into Bristol. The railway station is already not fit for purpose as a transport hub; it remains inaccessible for people with mobility issues and presents serious challenges when travelling with young children.			

Name: Jayne Kirkbride **I.D:** 39326817

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	This would lead to overdevelopment of the village. 800 houses i.e a 40% increase already. The proposed new road would not really benefit Backwell. School traffic and local traffic would still use Station Road, so the only benefit might be for the new houses only. Backwell schools and amenities e.g doctors surgery will not be able to absorb this extra capacity for people. Nothing extra in terms of theses vital amenities is planned. Why is a small village being burdened with 7% of the county’s housing compared to a large town like Clevedon which will only get 2%. Backwell doesn’t need all these houses. There is no employment within the village to support these new households. For myself I am most outraged that it is considered in any way acceptable to build houses on grade 1 agricultural land. Government policy itself dictates that such land must be safeguarded for food security.	Do not subject Backwell to this ridiculous target, building on grade 1 agricultural land. Find other sires which are not as valuable agriculturally and share out the housing allocations more fairly across the district.		

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					Where are the analysis of fundings and costings? New roads and houses are planned on the flood plain by the Backwell reservoir. The surrounding area are prone to flooding. Where is all the flood water going to go. Already as I understand as a concerned resident excess rain water from Farleigh Fields development is being funnelled into the ditch running along the side of the field next to the Leisure centre. This is where houses are proposed and then where is all this extra water going to end up? The railway station which is put forward as a great transport link, is inaccessible for people with mobility issues and those travelling with young children. It goes without saying that the wildlife will be dilsplaced, but to where? I walk in theses fields everyday and regularly see deer who live here. When it rains the public footpaths flood and are inaccessible especially near the railway line. Backwell should not be forced to suffer a population growth of 80%. The very features of our village which make it an attractive area to build in will be completely ruined for everyone, both existing residents and new ones- not enough village school places, extreme difficulty in accessing health services which have already indicated they have no capacity. Finally the buses. We are a bus commuting family. We regularly have to commute by car because either the buses all get cancelled at no notice or if they are running, by the time they get to Farleigh Road they are full and don’t stop.			

Name: Jean Howard **I.D:** 58542145

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Leighton Crescent	Unsure		Unsure	Unsure	MISLEADING DESCRIPTION LOCATION My first comment is that the site position description is very misleading as Leighton Crescent is on the South side of the road (Bleadon Hill) with the junction joining the very narrow section of the road. A more accurate positioning description would be “North of the road Bleadon Hill, to join Olmixon - Weston-super-Mare with Hillcote - Bleadon”. UNSUITABLE DEVELOPMENT LOCATION As with the field opposite, that has had many planning applications refused over many years, any building development of this site should not be considered for the very same reasons. The site is unsustainable, it will offer no amenities to residents. Due to the steep gradient of the hill in every direction to the site, only the very fittest residents would be able to cycle or walk to the nearest shops schools etc. Parents with pushchairs and young children or wheelchair users would not be able to access amenities and so would be car reliant. The proposed development would erode the boundary between Olmixon and Bleadon. DANGEROUS SITE FOR ANY DEVELOPMENT Around the proposed site, from the blind bend West of Hillcote and through the very narrow pinch point where Leighton Crescent joins Bleadon Hill, is very dangerous for pedestrians and all other recreational users that enjoy the AONB (cyclist, walkers, horse riders etc.) When travelling West from Hillcote to walk our dogs, we now use our car to Leighton Crescent, much safer. Since living here we have seen many incidents in the area including, a green single decker bus (when we had a bus service - none of which have been sustainable) with one wheel down the bank at the blind bend. Only 3 days ago we witnessed two transit vans meet head on at the same blind bend, with one struggling			

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					to reverse and the other nearly in the hedge towards the same bank edge. The road edges are continually breaking away around that area and before one of the edges was partially filled, a flat bed lorry almost lost control when its steering/suspension came into contact with the road when it dropped into the hole. A car crashed into a wall just at the entrance to Leighton Crescent (looks like the driver tried pulling in to the entrance to allow oncoming traffic to pass and miss judged it). Another destroyed its near side front suspension having run into a wooden sleeper edging a front garden (probably miss judging the road width when positioning for an oncoming vehicle). Walking from Hillcote East towards the AONB is safer, being a straight road, although a while ago the road was blocked from Hillcote, to allow an Air Ambulance to attend a pony and trap driver. Should this site be developed, massive disruption would occur during any construction period, on roads that are already too narrow for current usage, let alone construction/delivery vehicles and ultimately a hundred or more extra vehicle movements from the site. Bleadon Hill is too narrow and too dangerous for pedestrians to use safely and even worse when there is an incident on the A370 when traffic is rerouted over Bleadon Hill. This site would most probably be totally car reliant which contravenes national planning policy frameworks that demand sustainable developments.There can be no requirement for such an unsustainable development in this rural setting. WILDLIFE Any disturbance around the hedgerows during and following any build will cause considerable disturbance and probably destruction of any historic natural food source for feeding bats, other small mammals, plus deer, hedgehogs, slow worms, badgers and wild birds, thus affecting the future sustainability of the existing wildlife population living, feeding and nesting around the proposed site.			
Bleadon	No	• Justified	Unsure	Unsure	I can only comment on our local area of Bleadon, and Hillcote (that has been part of Bleadon for many years). The housing map shows Hillcote not in Bleadon, but in Weston-super-Mare and the proposed housing development bridging the gap between Bleadon (Hillcote) and Weston-super-Mare. As previously submitted, this area is totally unsuitable for any housing development.	I am not qualified to comment on legality of any part of the plan, but would suggest boundaries should not be randomly changed to suit this particular unsuitable housing infill, merging Bleadon with Weston-super-Mare. Original village/town boundaries should be maintained and the maps to reflect that. Again I can only comment on this area known to me. The whole Plan, put together as one, is too overwhelming and not easy to negotiate.		

Name: Jean Murdoch **I.D:** 62559137

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national	Unsure	Unsure	The proposal to build 889 houses on Land East of Backwell, which is Grade 1 Agricultural Greenbelt Land, is contrary to Government policy which states that “ we must protect our best and most versatile land” to safeguard food security. I believe there is very limited Grade 1 agricultural land left in North Somerset and I am horrified that with all the threats to food security – climate change, world conflict and other causes of world trade disruption - that there is a proposal that Grade 1 Agricultural Greenbelt Land could be effectively lost for ever to provide food for future generations.			

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		policy						

Name: Jeanne Craske **I.D:** 31072289

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP2: Climate Change	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	No	Active travel will never be achieved in Nailsea and Backwell if large housing allocations go ahead as they will result in more journeys to centres of employment, which will do nothing to counteract climate change.			
SP3: Spatial strategy	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	It is illogical to group Nailsea & Backwell together into one location as they are completely different in character. Nailsea, a town with some facilities but no A roads in and out. Backwell, a village with a congested A road and few facilities. Your justification indicates that development 'must not be of a disproportionate scale which adversely impacts on the character of the settlement or leads to a significant increase in the number of car journeys', yet this objective is clearly not being met.	Reduce the allocation to Nailsea and especially Backwell and identify brownfield sites in more sustainable locations nearer to centres of employment.		
SP5: Towns	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The aims of revitalising towns are undermined by excessive new housing without putting in matching services and infrastructure in advance.	Ensure adequate infrastructure is in place prior to building.		
SP6: Villages and rural areas	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The plan accepts that development in rural areas is less sustainable, yet Nailsea & Backwell are being targeted for large scale development in spite of the fact that they have both already grown larger than is sustained by their facilities and infrastructure. Grouping all villages together in one policy ignores their differences.			
SP7: Green Belt	No	• Positively prepared • Justified • Effective	Unsure	Unsure	Large housing allocations in Nailsea & Backwell amount to unjustified Green Belt release, contrary to SP7 and national policy.	Identify brownfield sites in more sustainable locations.		

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		• Consistent with national policy						
SP8: Housing	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I think it's unlikely that the numbers are deliverable and supported by infrastructure.			
SP9: Employment	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The small amount of employment land in Backwell conflicts with the goal of creating balanced communities.			
SP10: Transport	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	In respect of Nailsea and Backwell improvements to the transport system are very uncertain. There is poor access to the train station which is on a narrow road and is impossible for disabled travellers to use on the southward side (campaigners have tried and failed to get improvements.) Together with a poor onward bus service this does not make for a good transport hub. The same applies to a large extent to Yatton. Infrastructure needs to be improved massively in advance of building work starting or, together with the Congresbury junction, the area will become a car park.			
SP11: Historic and natural environment	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Allocations around Nailsea and Backwell will harm conservation areas, bat habitats and floodplains.	Utilise suitable brownfield sites.		
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The policy is based on unsound assumptions – the transport 'set up' is unfunded, the release of Green Belt is not justified by exceptional circumstances and the scale of the development does not reflect local constraints. The character of Nailsea and particularly Backwell would be changed forever, to the detriment of existing residents, new residents and anyone passing through. The policy is too vague about any infrastructure being in place before homes are built. There is no guarantee that improvements will be carried out in advance and without any improvements to the narrow routes into Nailsea (Station Road, Wraxall Hill and Wraxall) will be on overload. The plan will not achieve any reduction in car dependency as thousands of residents would be added to a town	Reduce the number of houses allocated to Nailsea and Backwell to reflect environmental and infrastructure constraints. Prioritise finding alternative locations		

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					and village with little employment. In proposing to release Green Belt it should be proven that there are no other options. There is no proof that there are no suitable brownfield sites elsewhere. In addition, some of the land which is proposed to be released is prone to flooding – eg Backwell Common, Jacklands Lake. Golden Rules requirements may be unviable yet once the land is gone, 'it's gone'.	with brownfield capacity and transform disused buildings and those adjacent to town centres (of which there are plenty in Nailsea – eg the old Weston College which is an eyesore.) Avoid development on flood plains. Ensure that the effects of previously permitted developments are assessed before giving permission for more. Ensure that improvements to infrastructure are carried out prior to new developments. Ensure that housing types meet the requirements of potential purchasers. Ensure that sites are schools and community facilities in a timely manner.		
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared • Effective • Consistent with national policy	Unsure	Unsure	The policy is based on unsound assumptions – the transport 'set up' is unfunded, the release of Green Belt is not justified by exceptional circumstances and the scale of the development does not reflect local constraints. The character of Nailsea and particularly Backwell would be changed forever, to the detriment of existing residents, new residents and anyone passing through. The policy is too vague about any infrastructure being in place before homes are built. There is no guarantee that improvements will be carried out in advance and without any improvements to the narrow routes into Nailsea (Station Road, Wraxall Hill and Wraxall) will be on overload. The plan will not achieve any reduction in car dependency as thousands of residents would be added to a town and village with little employment. In proposing to release Green Belt it should be proven that there are no other options. There is no proof that there are no suitable brownfield sites elsewhere. In addition, some of the land which is proposed to be released is prone to flooding – eg Backwell Common, Jacklands Lake. Golden Rules requirements may be unviable yet once the land is gone, 'it's gone'.	Reduce the number of houses allocated to Nailsea and Backwell to reflect environmental and infrastructure constraints. Prioritise finding alternative locations with brownfield capacity and transform disused buildings and those adjacent to town centres (of which there are plenty in Nailsea – eg the old Weston College which is an eyesore.) Avoid development on flood plains.		

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						Ensure that the effects of previously permitted developments are assessed before giving permission for more. Ensure that improvements to infrastructure are carried out prior to new developments. Ensure that housing types meet the requirements of potential purchasers. Ensure that sites are schools and community facilities in a timely manner. Reallocate housing so that Nailsea and Backwell take only their fair share of the North Somerset allocation.		
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The policy is based on unsound assumptions – the transport ‘set up’ is unfunded, the release of Green Belt is not justified by exceptional circumstances and the scale of the development does not reflect local constraints. The character of Nailsea and particularly Backwell would be changed forever, to the detriment of existing residents, new residents and anyone passing through. The policy is too vague about any infrastructure being in place before homes are built. There is no guarantee that improvements will be carried out in advance and without any improvements to the narrow routes into Nailsea (Station Road, Wraxall Hill and Wraxall) will be on overload. The plan will not achieve any reduction in car dependency as thousands of residents would be added to a town and village with little employment. In proposing to release Green Belt it should be proven that there are no other options. There is no proof that there are no suitable brownfield sites elsewhere. In addition, some of the land which is proposed to be released is prone to flooding – eg Backwell Common, Jacklands Lake. Golden Rules requirements may be unviable yet once the land is gone, ‘it’s gone’.	Reduce the number of houses allocated to Nailsea and Backwell to reflect environmental and infrastructure constraints. Prioritise finding alternative locations with brownfield capacity and transform disused buildings and those adjacent to town centres (of which there are plenty in Nailsea – eg the old Weston College which is an eyesore.) Avoid development on flood plains. Ensure that the effects of previously permitted developments are		

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						assessed before giving permission for more. Ensure that improvements to infrastructure are carried out prior to new developments. Ensure that housing types meet the requirements of potential purchasers. Ensure that sites for schools and community facilities are provided in a timely manner. Reallocate proposed housing developments so that Nailsea and Backwell take only their fair share of the North Somerset allocation.		
Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Although this site is just within the Nailsea boundary it is very close to Backwell which is potentially taking a disproportionate share of the North Somerset housing allocation. Several housing developments in Backwell are already in progress and the effects of these have yet to be assessed. Most Backwell residents use Station Road on a regular basis to access the better facilities in Nailsea. The health and well-being of existing and new residents will inevitably suffer if permission is granted for a site as large as this, on top of those which already have permission in the area. Residents of the wider area will also suffer from the congestion on narrow routes through Nailsea or towards the M5 and those travelling along the A370 are likely to be held up in standing traffic. This plan does nothing to mitigate the effects of climate change. There is no clear indication as to whether a new road is viable. It is not known whether this number of houses is actually needed in this location. There is insufficient evidence that the infrastructure will support a development of this size. The area is also at risk of flooding. Our already depleted wildlife will be further adversely affected if this goes ahead. Whilst Nailsea and Backwell are being targeted for large scale development on the strength of having a railway station, the station cannot be regarded as suitable for a transport hub as the road layout around it is so poor. Added to which it is unsuitable for use by the disabled, having a ramp on only one side.	Reduce the number of houses allocated to Nailsea and Backwell to reflect environmental and infrastructure constraints. Prioritise finding alternative locations with brownfield capacity and transform disused buildings and those adjacent to town centres (of which there are plenty in Nailsea – eg the old Weston College which is an eyesore.) Avoid development on flood plains. Ensure that the effects of previously permitted developments are assessed before giving permission for more.		

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						Ensure that improvements to infrastructure are carried out prior to new developments. Ensure that sites for schools and community facilities are provided in a timely manner. Reallocate housing so that Nailsea and Backwell take only their fair share of the North Somerset allocation.		
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell is potentially taking a disproportionate share of the North Somerset housing allocation, in spite of the fact that it has few facilities and is overcongested already. Several housing developments are already in progress and the effects of these have yet to be assessed. The health and well-being of existing and new residents will inevitably suffer if permission is granted for a site as large as this, on top of those which already have permission. Residents of the wider area will also suffer from the congestion on narrow routes through Nailsea or towards the M5 and those travelling along the A370 are likely to be held up in standing traffic. Thjs plan does nothing to mitigate the effects of climate change. There is no clear indication as to whether a new road is viable. It is not known whether this number of houses is actually needed in this location. There is insufficient evidence that the infrastructure will support a development of this size. Backwell is not a centre of employment so residents will always have to commute elsewhere. It makes no sense to build on such good quality agricultural land when there are more suitable brownfield sites elsewhere. Losing land such as this is against Government policy of protecting food security. The area is also at risk of flooding. Our already depleted wildlife will be further adversely affected if this goes ahead. Whilst Nailsea and Backwell are being targeted for large scale development on the strength of having a railway station, the station cannot be regarded as suitable for a transport hub as the road layout around it is so poor. Added to which it is unsuitable for use by the disabled, having a ramp on only one side. There is also no guarantee of an improved bus service for travel to and from the station.	Reduce the number of houses allocated to Nailsea and Backwell to reflect environmental and infrastructure constraints. Prioritise finding alternative locations with brownfield capacity and transform disused buildings and those adjacent to town centres (of which there are plenty in Nailsea – eg the old Weston College which is an eyesore.) Avoid development on flood plains. Ensure that the effects of previously permitted developments are assessed before giving permission for more. Ensure that improvements to infrastructure are carried out prior to new developments. Ensure that housing types meet the		

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						requirements of potential purchasers. Ensure that sites for schools and community facilities are provided in a timely manner. Reallocate housing so that Nailsea and Backwell take only their fair share of the North Somerset allocation.		

Name: Jemima RM **I.D:** 62814241

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I do not understand why there is a suggestion to build here on Grade 1 agricultural land. We need to be able to feed ourselves now and in the future. We have all seen the impact of the modern geopolitical world on food imports and exports (war in Ukraine and Covid pandemic) and we need to safeguard our farmland to prevent scarcity. I am also concerned for the wildlife that inhabits these fields and hedgerows and the bats that also use these fields to forage over. The knock-on effects for local biodiversity will be awful. Not to mention the degradation of the green spaces we realised were so important for mental health during the pandemic. Have we already forgotten that? Backwell is already allocated 800 new houses and Nailsea many hundreds more which will have a huge impact on the local community on a massive scale and there has been no agreement to improve services or money put forward by the developers to create a useful bypass (which would actually need to run from this end of the Long Ashton By Pass to the North of Nailsea to benefit the area). I walk along Station Road every day to school and it is already dangerous. I have seen lots of friends have near misses with cars and lorries. Please do not approve any more houses for Backwell. We have got more than our fair share of new houses.			

Name: Jen Ashman **I.D:** 21309025

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	• Justified	Unsure	No	Concerns for the following: Noise pollution Air pollution Traffic increase given some of the roads in Backwell do not have sufficient pavements and poorly if at all lit at night Potentially more flooding than is already the case in particular check Chapel Hill area Inevitable increase in antisocial behaviour of which we are seeing now and crime of which we are seeing now.	Less housing on flood and agricultural land	n/a	

Name: Jenny Holmes **I.D:** 21334465

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The Local Plan is not sound The scale of development proposed for Backwell represents an unsustainable 40% increase in the size of the village. Backwell already has 800 new homes approved. Adding a further 1,000 houses would overwhelm local services and infrastructure. As a parent of three children who attend local schools, I am already aware that the secondary school is oversubscribed and the limited investment in health and community services. These plans do not demonstrate how essential services will cope with such rapid and concentrated growth. We live on the A370 and frequently see the flooding on the road outside our house, we fear of the impact of the 125 houses already planned on Farleigh Fields on this flooding problem on the road. Our flooding concerns show that the plan is not justified or deliverable. Much of the proposed development land sits on or adjacent to known floodplain areas including Backwell Common and the fields around Backwell Lake. These locations already flood regularly. Adding major housing and roads here increases risk to existing and future residents. There is no adequate evidence that mitigation is feasible or can be funded. Traffic impacts on the A370 have not been properly assessed. The A370 is already heavily congested at peak times. It is essential that the proposed road from Backwell Lake to the A370 is property assessed and funded if all this houses is to go ahead. Without a properly engineered bypass around the village, Backwell's main roads will become gridlocked. If development is imposed, a full bypass (such as the Long Ashton bypass) must be included from the outset so that existing residents are not left carrying the consequences of poor planning. The Local Plan is not legally compliant Key evidence is missing. No detailed viability testing has been provided for the major road infrastructure required to make this level of development safe or practical. The Infrastructure Delivery Plan lacks analysis, costings and secured funding. Without this, the plan does not meet legal requirements for infrastructure planning. The environmental assessments are incomplete. High quality Grade 1 agricultural land would be permanently lost. The area is home to protected species including Lesser and Greater Horseshoe Bats. Flooding risks have not been sufficiently evidenced or addressed. These issues indicate that the plan does not comply with statutory environmental duties. The Local Plan does not meet the duty to co-operate Backwell is being asked to absorb a higher proportional increase than nearby towns. No explanation is provided for placing a disproportionate burden on a village that is not an employment centre and lacks the transport capacity to support this level of growth. There is no clear demonstration that North Somerset Council has effectively engaged with the community or neighbouring authorities regarding traffic impacts on the A370, the rail station's accessibility limitations, or wider infrastructure strain. Residents have consistently raised concerns about flooding and roads. These issues have not been meaningfully addressed or resolved.			

Name: Jenny Ingram **I.D:** 62784897

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Vision, Strategic Priorities and Sustainability Objectives	No	• Justified • Effective • Consistent with national policy	Unsure	Unsure	Lack of community involvement and consultation methods. NSC has not engaged properly with local community of Pill and Easton in Gordano about the plan. An increase of 44% in population requires extensive consultation with local residents in the villages. Deviation from Settlement Boundaries (SP6). Land outside established settlement boundaries should not be included in proposed development allocation in Pill and EIG. Extending beyond the settlement boundaries will undermine the planning rules for SP6 and SP11. This will	1. A well publicised public meeting with the local community 2. Review of sites to ensure compliance with NSC proposed policies. 3. Acknowledgement of existing settlement boundaries and no extension to them.		

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					increase pressure on infrastructure, set precedent for further expansion, and affect cohesion of the villages. Spatial strategy and transport. Pill and EIG have limited facilities, services and jobs.They will become dormitory areas for Bristol. The proposed new railway will not encourage people to use this to get to Bristol as there will be few trains per hour and 3 carriages, likely to be full from Portishead. Car traffic will be increased considerably on A369 and bottle necks into Bristol causing adverse impacts on this route. Placemaking. The proposed sites suggest a high density of houses not appropriate to the locations, not producing sustainable communities. Too many houses are proposed for the land. Green belt land. No reasonable alternatives to using Green Belt have been considered. These include maximising brownfield sites and optimising sites in the city with higher- density capacity.	4. Review of the transport infrastructure in the area which is already straining from increases in traffic from Portishead developments. The railway will not solve this.		
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Justified • Effective • Consistent with national policy	Unsure	Unsure	Lack of community involvement and consultation methods. NSC has not engaged properly with local community of Pill and Easton in Gordano about the plan. An increase of 44% in population requires extensive consultation with local residents in the villages. Deviation from Settlement Boundaries (SP6). Land outside established settlement boundaries should not be included in proposed development allocation in Pill and EIG. Extending beyond the settlement boundaries will undermine the planning rules for SP6 and SP11. This will increase pressure on infrastructure, set precedent for further expansion, and affect cohesion of the villages. Spatial strategy and transport. Pill and EIG have limited facilities, services and jobs.They will become dormitory areas for Bristol. The proposed new railway will not encourage people to use this to get to Bristol as there will be few trains per hour and 3 carriages, likely to be full from Portishead. Car traffic will be increased considerably on A369 and bottle necks into Bristol causing adverse impacts on this route. Placemaking. The proposed sites suggest a high density of houses not appropriate to the locations, not producing sustainable communities. Too many houses are proposed for the land. Green belt land. No reasonable alternatives to using Green Belt have been considered. These include maximising brownfield sites and optimising sites in the city with higher- density capacity.	1. A well publicised public meeting with the local community 2. Review of sites to ensure compliance with NSC proposed policies. 3. Acknowledgement of existing settlement boundaries and no extension to them. 4. Review of the transport infrastructure in the area which is already straining from increases in traffic from Portishead developments. The railway will not solve this.		

Name: Jenny Leavett **I.D:** 58641441

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Strategic Policies					The current proposals for housing allocation in Backwell represent an unsustainable concentration of development that threatens the distinct identity and character of the village. Backwell, like many surrounding settlements, has already absorbed considerable planned growth, yet this continuous expansion often on Green Belt land risks eroding the amenity that makes the area desirable. As a resident who specifically chose Backwell for its immediate, uncompromised access to the countryside and associated quality of life, I object to the loss of this vital green infrastructure, which serves a crucial recreational role for the community, including dog walking and health benefits. A more justifiable, strategic approach to housing growth for North Somerset would be to resist the uncoordinated expansion of existing, constrained villages and instead prioritise the creation of new, self-sufficient towns or large-scale urban extensions on appropriate sites, where comprehensive infrastructure (schools, healthcare, transport) can be planned and delivered before development, ensuring genuine sustainability and preventing the irrevocable damage to established local communities.			
SP7:						Greenbelt grade 1		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Green Belt						land should be protected.		
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy			I strongly contest the proposed scale of development on the grounds of unsustainable infrastructure and the destruction of irreplaceable Green Belt resources. Backwell's existing road network is already severely congested, exacerbated by ongoing construction disruption and the cumulative impact of houses already consented; the current local roads and critical junctions demonstrably lack the capacity for any further large-scale growth. Furthermore, the village is significantly constrained by an acute deficit in essential amenities, including insufficient capacity in local schools and GP surgeries, a problem compounded by the poor accessibility of Nailsea & Backwell Station which lacks step-free access across platforms, discouraging sustainable transport use. Crucially, the land is noted as high-quality Grade 1 agricultural Green Belt land, and significant portions are susceptible to high rates of surface water flooding during heavy rain, making it fundamentally unsuitable and unsafe for building and creating unacceptable risk. Continuing this linear expansion also poses an immediate threat of merging with Nailsea, destroying the separate identity of both settlements. The Council must reject this approach and instead explore strategic alternatives, such as a new planned settlement adjacent to the new road infrastructure (like the A370/A38 corridor or a new bypass link), allowing for the creation of genuinely sustainable communities with dedicated schools, doctors, and transport links delivered upfront, avoiding the environmental and safety hazards presented by the current site.	Based on the issues raised above, I consider the Plan to be Unsound and suggest the following specific modifications: Add a new policy that requires the Council to investigate and allocate land for a New Strategic Settlement or major Urban Extension outside the existing Green Belt, prioritising locations near the new Anton Bandock Way infrastructure. Amend the infrastructure policy for Backwell to mandate the full delivery and funding of a new primary school, a dedicated new GP surgery and disabled access (step-free) at Nailsea & Backwell Station, prior to the occupation of any new dwelling, as a minimum requirement for any development in the area. Ensure that there are suitable walking areas for residents on Backwell in all areas of the village to help maintain health. Ensure that building does not cause the level of disruption caused by the current projects in Backwell and that no more than one site can build at any		

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						time.		

Name: Jenny Lee **I.D:** 58558369

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Justified	Unsure	Unsure	NSC has not properly considered: Alternative brownfield or greenfield sites with far lower ecological impact, both in Portishead and across North Somerset. Opportunities to increase housing density on proposed brownfield sites, which could remove the need to develop Tower Farm and Black Rock. The strategic ecological importance of these sites in protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor. The fact that both areas were added to the Green Belt in the late 1980s due to their high ecological value. National planning policy allows Green Belt changes only in exceptional circumstances — and these have not been demonstrated. In addition: Neither site can provide safe or suitable access. Development would create unacceptable transport impacts, failing national soundness tests. -The existing public infrastructure utilities in the Tower Farm estate (water, sewage, electricity, broadband) is not capable of supporting the proposed expansion without significant infrastructure upgrade with the associated significant disruption to the existing area and residents. -The wider Portishead local amenities such as schools, dental, pharmacy and doctor have not been considered and therefore require to be considered in more detail prior to acceptance of this plan. -The previous local plan clearly has not been taken into account and in light of this latest consultation has not provided value for money for the taxpayer. The National Audit Office (NAO) and National Infrastructure and Service Transformation Authority (NISTA) should provide a review of the assurance and scrutiny that was conducted and feasibility of the delivery of the previous plan prior to a revision or replacement plan is approved or considered. For these reasons, Tower Farm and Black Rock should be removed from the Local Plan. Consider other areas for development. Tower Farm is unsuitable.			

Name: Jenny Shah **I.D:** 62865121

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and	No	• Positively prepared • Justified	No	No	North Somerset Council have failed to hold any community meetings regarding this proposed plan Re Policy LP4 . The Plan is not sound as there has been no consultation between NSC with the Developers regarding roads and traffic. There are no plans for extra traffic lights, new roads. The A369 will not be able to cope with a 44% increase in traffic at the junctions between St George's Hill and the A369, the A369 is a single carriageway in and out of Bristol and already	1. A public meeting with the local community 2. A review of sites to ensure	Yes I wish to participate	

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Easton-in-Gordano		• Effective			suffers from bottlenecks with the existing amount of traffic. Since the Clean Air zone introduced on the Portway many more vehicles use the A369 to get into Bristol. Easton in Gordano and Pill will not be able to cope with extra traffic when traffic is diverted through these villages as it is regularly when roadworks exist on the A369. Junction 19 is regularly backed up with traffic all the way back to Avonmouth. SP3 and transport re SPlO. Pill and EIG do not have a wide range of facilities, services and jobs. Large new developments will be dormitory areas where people have to travel to work. Although the new railway is proposed, the number of trains per hour and carriages proposed is highly unlikely to encourage people to use this particularly when they are likely to be full from Portishead. There will still be a significant increase in the number of car journeys into and out of Bristol (particularly from the proposed Pill Green site), putting further pressure on the A369 and the bottle neck at Abbots Leigh. The Highways Authority's views and representations on the road infrastructure does not appear to have been taken into account. SP3 specifically requires that development should not be of a disproportionate scale which adversely impacts on the character of a settlement or leads to a significant increase in the number of car journeys. Far too much emphasis is being placed on the new railway. There is deviation regarding the Settlement boundaries for Easton in Gordano and Pill. The proposed areas infringe the settlement boundaries. Any dwellings within the Settlement boundary should be for the existing rural community only. These boundaries exist to manage growth responsibly. SP6 clearly states that residential development outside settlement boundaries "will be restricted to replacement dwellings, subdivision of existing dwellings, residential conversion of rural buildings where alternative economic use is inappropriate or unfeasible, dwellings for essential rural workers or the redevelopment of previously developed land in suitable locations". Village infrastructure covers essential physical and "soft" systems like roads, water, power, education, and healthcare, crucial for rural economic development, quality of life, and access to services, often requiring tailored, community-focused solutions due to lower density and income levels compared to urban areas, focusing on sustainability and local empowerment. The Pill and EIG community work together as a village. Village status will be lost with so many new homes.	compliance with the Council's own proposed policies. 3. An acknowledgment of the importance for culture and cohesion of the settlement boundaries and an attempt to work to avoid extending these. 4. A proper review of the transport infrastructure in the area given further development in Portishead and the increased journeys from there and Pill/ EIG along the A369. The railway is not going to solve that.		

Name: Jeremy Baber **I.D:** 58442753

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Leighton Crescent	No	• Positively prepared • Justified	Unsure	Unsure	The plan is not sound as NSC are completely disregarding the issues around infrastructure, environmental impact and the interests and safety of current residents: 1. Infrastructure on Winterstoke Road and Bleadon Hill is not capable of sustaining all these proposed sites for both vehicular and additional residents. Bleadon Hill particularly you are proposing 81 additional properties so approx 150-200 cars that is madness and dangerous 2. The is NO pedestrian access or walkways in this area so the risk of accidents will be significantly increased 3. WiFi, drainage, electricity and water supply to the area is already problematic due to the age of the legacy services 4. Planning permission was already denied on the field opposite due to the environmental and infrastructure impact on the area - how is this different? 5. This green space is the agreed natural barrier between WsM and Bleadon why is it ok to remove it? 6. From my own planning experience there are protected species of bats in this area - how is this different?	Remove the Land at Leighton Crescent from the 2041 plan and greatly reduce the development sites on Winterstoke Road. Look at developing west of the A370 on the flats this allows easy access to the A370 for vehicles and is on recognised public transport routes!		

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					Adding 81 properties to the land near Leighton Crescent will impact the animals flight paths, not to mention the impact on deer, pheasants, small mammals and hawks that reglarly frequent these fields. Again as per 4 above all were reasons to deny planning permission on the site opposite so this is a nonsense to include the Leighton Crescent site as it breaks your own previous rulings and precedent.			

Name: Jeremy Blatchford **I.D:** 27331553

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP7: Green Belt		• Consistent with national policy	Unsure	Yes	There appears to be no attention paid to the Avon Forest, by whatever name now known. Green belt is strategically essential to secure domestic food production and air quality			
Policy LP6: Educational, sporting, leisure and community use allocations	Unsure		Unsure	Yes	Sites need to be provided for primary schools, special needs and secondary schools. Demand must take into account the large numbers operating cross border to other authorities and the numbers migrating from the private sector to state schools and academies. 1. There appears to be undue reliance placed upon commuting to Yatton. 2. There will be fewer places available in B&NES academies and schools. 3. Nailsea School has geological issues as well as a strategic role that will restrict growth on that site, while Backwell Academy is at the limit of effective capacity. 4. There are existing difficulties in providing home to school transport for SEND pupils. Numbers will rise due to delayed birth patterns and the ease of identification using modern software. Movement to school during the construction phases of developments and the provision of safe walking routes BEFORE occupation of new houses is a breach of UN Convention on the Rights of the Child and therefore Children Act 2004 and others.	1. It is suggested that land be set aside in Nailsea for a second site for Nailsea School. 2. Expansion of Ravenswood School. The existing building's life needs to be examined, as the Consortium for Method steel frame buildings are now outside their design lives.		
Policy DP35: Nature conservation	Unsure		No	Yes	There may be a failure to comply with the European protected species provisions of the Conservation of Habitats and Species Regulations 2017 in respect of: Otters Beavers The Land Yeo around Nailsea and water courses near Backwell Lake are frequented by otters. These extend both up and downstream. Beavers are allegedly to be found upstream on Land Yeo.	Beavers are allegedly to be found upstream on Land Yeo.		Otters advice for making planning decisions - GOV.UK.pdf

Name: Jerry Evans **I.D:** 30802721

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP7: Green Belt	No	• Consistent with national policy	Yes	Yes	This representation concerns the designation of Green Belt, as shown on the proposed Policies Map of an area to the southeast of the village of Pill. We do not consider the proposed changes to be sound because they are not consistent with national policy on the Green Belt. Specifically, although the area designated Green Belt has been reduced, this reduction appears arbitrary because some of the retained area does not serve any one of the specific five purposes of the Green Belt which are stated in paragraph 138 of the National Planning Policy Framework as follows: “a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; c) to assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic towns; and e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.” Proposed Policy LP6 (Extent of the Green Belt) page 55 of the North Somerset Local Plan 2039 Pre-submission Plan reads: “Adjustments will be made to existing settlement boundaries, where applicable, to correct inconsistencies and anomalies and ensure the robustness of the boundary”. The proposed changes are inconsistent because there is no substantive difference between the gardens of numbers 38, 36 and 34 Ham Green and the garden to number 40 Ham Green. Therefore the proposed changes have failed to remove this anomaly. This argument was made in detail in a document submitted to the North Somerset Council Local Plan 2038: Preferred Options Consultation - March 2022. This document forms part of this new representation. Please see attached files	Please see attached files		GreenBeltComments3(1)_Redacted.pdf GreenBeltComments(1)_Redacted.pdf
Easton-in-Gordano/ Pill	No	• Consistent with national policy	Yes	Yes	Specifically this relates to the Green Belt designation and the settlement boundary as shown on the proposed Policies Map of an area to the southeast of the village of Pill. The narrow northern projection of Green Belt designation to the east of Markham Brook and to the rear of numbers 24 – 44 Ham Green is anomalous. The land is largely hidden from public view, visible only from a single location in Brookside. There are no public footpaths or other rights of way crossing this area. Designating this area as Green Belt does not serve any one of the specific five purposes of the Green Belt which are stated in paragraph 138 of the National Planning Policy Framework as follows: “a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; c) to assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic towns; and e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.” The area in question has two distinct characters. 1. The larger, eastern part of this area consists of long established domestic gardens. Normal planning and development management policies are adequate to protect the character and amenity of this area. 2. The smaller, western part of this area comprises the floodplain and	The Green Belt designation should be removed from part of the garden to 40 Ham Green, consistent with its proposed removal from part of the gardens of numbers to numbers 34 – 38 Ham Green and following the same line. The Green Belt designation should be removed from the floodplain and banks of Markham Brook below numbers 24 – 44 Ham Green, which currently have special designation. The settlement boundary should include part of the garden to number 40 Ham Green and continue to exclude the banks and floodplain of Markham Brook. The status of this long established garden was confirmed in the Certificate of Lawful Development reference 16/P/0891/ LDE dated 8 June 2016. This is consistent with the proposed removal of part of the lower garden to numbers 34 – 38 Ham Green which is shown on the 2038 Local Plan Proposals Map. Please see attached files for maps		Jerry Evans.pdf

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					banks of Markham Brook, which are currently designated as a Wildlife Site. Markham Brook itself is designated a “Main River” by the Environment Agency and the valley bottom is in Flood Zone 3. These designations render the Green Belt designation redundant. To the south of this narrow northern projection of Green Belt the extent of the Green Belt widens considerably and here it does serve the purpose of safeguarding the country from encroachment. In addition, the line of the settlement boundary includes some gardens and excludes others which is inconsistent and should be amended. Summary of recommendations: The Green Belt designation should be removed from part of the garden to 40 Ham Green, consistent with its proposed removal from part of the gardens of numbers to numbers 34 – 38 Ham Green and following the same line. The Green Belt designation should be removed from the floodplain and banks of Markham Brook below numbers 24 – 44 Ham Green, which currently have special designation. The settlement boundary should include part of the garden to number 40 Ham Green and continue to exclude the banks and floodplain of Markham Brook. The status of this long established garden was confirmed in the Certificate of Lawful Development reference 16/P/0891/LDE dated 8 June 2016. This is consistent with the proposed removal of part of the lower garden to numbers 34 – 38 Ham Green which is shown on the 2038 Local Plan Proposals Map. These changes would ensure that the settlement boundary is consistent with the established extent of settlement and that Green Belt designation is applied to areas where this special designation is needed to safeguarding the countryside from encroachment. Neither of these changes would undermine the planning controls which exist to protect character and amenity nor would they prevent sustainable development where this is acceptable against ordinary and long established planning policies Please see attached files			

Name: Jess DS **I.D:** 62611713

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	Unsure	Grade 1 land. This land needs to be safeguarded at all costs.			

Name: Jessica Adams **I.D:** 62849665

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP12: Bristol Airport	No	• Effective	Unsure	Unsure	The plan should not halt current expansion plans for Bristol airport and halt any future plans on the grounds that we are in a climate emergency and have gone beyond seven of the nine planetary boundaries needed to sustain life on this planet. Millions of people have already died in the Global South due to the impacts of climate change and we are in the midst of the sixth mass extinction. Everything Bristol Airport is currently doing and proposing goes against all life and the future of humanity. In time, Bristol Airport expansion will be viewed as an act of ecocide which wittingly contributed to the death of millions of people globally and knowingly negatively impacted the health of local residents, biodiversity and ways of developing the local area economically which would restore nature, community and life to this planet.	Stop any further expansion activity by Bristol airport and block future planning applications.		

Name: Jessica Houlden **I.D:** 62847969

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared	Unsure	Unsure	Area 381 which currently has no planning permission has an abundance of wildlife and especially to the east of the area is wetland which backs onto the river Land Yeo and the Ty sculpture trail which is part of the woodland trust. I regularly see herons walking in the field, partridges and other multiple bird species. We also have lots of squirrels in the ancient oak trees and hear multiple Owls at night I feel that building on this area would kill all the wildlife and also be a flood risk to the new proposed properties.			

Name: Jessica King **I.D:** 51431169

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The field to the east of West Leigh Primary School (off Rodney Road, in Backwell) provides a vital green buffer between the school and the new Rodney Road development. This land provides value currently for local families and residents, which is beneficial to mental health, as well as to the community of pupils who can use this for play, informal learning, and outdoor activities. The housing numbers can be met without inclusion of this green space, As Policy LP3 prioritises provision of new green infrastructure and open space, this existing field should be retained rather than built on. Protecting this important green space now will ensure current and future generations benefit from reduced noise and air pollution and overheating, as well as loss of biodiversity. Development here would represent avoidable harm to children's outdoor provision, at a time when national policy strongly emphasises active travel, outdoor learning, physical activity, and mental wellbeing. This is not spare land and the opportunity it represents to meet the above priorities would be permanently lost if it's absorbed into the other development already underway in the Rodney Road development (and then future Grove Farm development).	Set this space aside and exclude from the housing allocation. Instead, designate it as Local Green Space. I have read plans for an alternative vision, that are compliant with the Parish Council's aspirations, which plant this as a community orchard and community garden, with a small area allocated to support expanded outdoor play for West Leigh Primary School (and a pupil population that will see rapid expansion based on the scale of development in the area).		
Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with	Unsure	Unsure	I do not believe the plan is sound, based on a multitude of reasons. These are my main concerns: The proposed development would destroy valuable wildlife habitats. It is situated on an area highly prone to flooding. The road systems between Nailsea and Backwell are already strained, and prone to high levels of traffic, which the proposed road would not address sufficiently. It also requires engineering to			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
		national policy			route it under or over the railway line, which is prohibitively expensive as well as possibly unfeasible. Finally, the large population of school children who attend schools in the area would become more vulnerable to dangerous road conditions, when walking to school. Station Road, sees considerable daily pedestrian traffic from 1000s of school children of all ages. The narrow pavements are already a health risk, which would worsen considerably within the proposed plans as they stand.			
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I do not believe the plan is sound, based on a multitude of reasons. These are my main concerns: The proposed allocations would see Backwell grow in population by around 80%. This is a disproportionate level of growth for a village that is not a strategic location for employment, and which does not have the required infrastructure to support and sustain this level of growth at this pace. The proposals don't consider or assess the practical impact on the area in terms of . They lack a social cohesion impact assessment, and there has been no viability analysis conducted on the extra 1,000 houses that are proposed. Current infrastructure and services can't support this level of growth, and there are no funding guarantees for the new services that the Infrastructure Delivery Plan sets out, which in itself is insufficient, lacking proper analysis of function and cost. The road proposed would not ease the key traffic difficulties sufficiently to mitigate the considerably increased volume of traffic on a network of small and semi-rural roads, e.g. Station Road, Backwell Common, Chapel Hill. I am highly skeptical that passing this road under or over the railway would be deemed feasible or affordable - it is costed in the millions. The environmental impact of building on Greenbelt land, destroying biodiversity, and threatening roosts of rare bat species that use the land as feeding grounds, is considerable. This volume of additional housing would greatly increase the flooding, in an area that floods frequently. It would also further reduce the minimal high quality land left in North Somerset, which contradicts the government policy on food security. Finally, the large population of school children who attend schools in the area would become more vulnerable to dangerous road conditions, when walking to school. Station Road, Dark Lane, and Rodney Road all see considerable daily pedestrian traffic from 1000s of school children of all ages. These small roads with narrow pavements are already a health risk, which would worsen considerably within the proposed plans as they stand.			
Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I do not consider the plan sound, and have specifically and precisely commented on this elsewhere. In relation to the settlement boundary, I want to emphasise the importance of the green space and fields by the recycling centre. These have been identified as outside the village boundary, which I agree with. This is very well used green space.	This green belt space just outside the boundary of the village, to the south, should be protected and secured as a community asset.		

Name: Jessica Storrar **I.D:** 28639969

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Strategic	Yes		Yes	Yes			The councils local plan supports sustainable development by identifying towns, brown field sites and transport hubs as	

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Policies							suitable for development. This will help towards coping with the changes that will come with climate change. By contrast, Wrington is unable to provide sustainable development: there are very few accessible job opportunities so most people would need to travel by car. Healthcare and educational activities are restricted to a Primary School and a very busy surgery in a neighbouring village. Secondary schooling and further education would require travel, again by car. Further housing development in Wrington has recently been shown to be impratical for many reasons, including access, flooding, the need to preserve the view of Wrington's grade 2 listed church and to preserve habitat for foraging bats.	

Name: Jill Arnold **I.D:** 62772865

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Effective	No	No	The proposal is not workable for the people of Portishead. Portishead is already a town that is full to bursting. The GP surgeries are struggling, the schools are full and the roads are already grid locked with cars. Tower Farm has only one access road into Down Road. This is a residential road which cannot cope with anymore cars. The primary school is next to access road and it's a ticking time bomb for children to get hurt from any more cars accessing the road. The infrastructure is just not in place for 400 cars to go in and out of one small access road in a heavily residential road. This planning application is not sound. The infrastructure is not in place. And the area is part of Portishead's green belt area. Including birds and animals including deer.			

Name: Jill Hellings **I.D:** 58575905

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The proposed allocation of Land at Tower Farm (≈ 400 homes) lies immediately beside Weston Big Wood — an ancient woodland and Site of Nature Conservation Interest (SNCI) managed by Woodland Trust and supported by Avon Wildlife Trust. The woodland forms part of the Gordano Valley ecological network and a nationally important habitat mosaic of open grassland, wetland and woodland. There is no robust published alternatives assessment demonstrating that this sensitive site is the only or most appropriate option for growth. The loss of best and most versatile(BMV) farmland (Grade 2/3a by reference to the ALC dataset) and the risk of irreversible damage to the ancient woodland make this allocation unsuitable. The allocation conflicts with the National Planning Policy Framework (NPPF) paragraphs180–182, which require that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland) should be refused unless wholly exceptional reasons exist. The Council's reference to an "ecological buffer" is vague, unenforceable and insufficient to address indirect impacts such as root-zone damage, hydrological change or wildlife disturbance. The Woodland Trust and Avon Wildlife Trust state that ancient woodland is irrecoverable once damaged. Moreover the Framework requires delivering biodiversity net gain, yet the allocation offers no clear mechanism for ensuring that outcome. The location intensifies existing pressures in Portishead: schools, healthcare and transport infrastructure are already under strain (for example the A369 corridor). This peripheral site would likely increase private vehicle usage and pollution rather than support sustainable travel patterns, contrary to NPPF paragraphs 104–106. Delivery depends on multiple unresolved dependencies: new school provision, bus service contributions, off-site biodiversity management, and upgrades to rights-of-way/buffer zones. No phasing plan,			ptc-response-for-policy-sp7-why-policy-is-not-sound-251209.pdf ptc-response-for-policy-lp5-why-policy-is-not-sound-251209.pdf avon-wildlife-trust-draft-response-to-north-somerset-local-plan-2041 (1).pdf gordano-valley-ecological-development-strategy-report.pdf ptc-response-for-policy-sp8-why-policy-is-not-sound-251209.pdf gordano-valley-

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					funding mechanism or legal agreement is published to secure these. Without such mechanisms the allocation cannot be considered deliverable within the plan period (NPPF paragraph 35(c)). The farmland/woodland edge acts as a critical ecological and landscape transition zone. Development here would fragment habitat, diminish the Gordano Valley wildlife corridor and erode the rural fringe character. Even with a buffer the visual and ecological intrusion into the woodland and surrounding landscape would be significant. Construction and built development would alter surface-water run-off and soil compaction on the former farmland, potentially affecting the hydrological regime that sustains the adjacent ancient woodland. The risk of nutrient runoff, altered infiltration and woodland root zone damage is material. When considered alongside other allocations in the Portishead area (such as Black Rock north of Clevedon Road), the combined pressure on ecology, infrastructure and transport is significant and undermines the Council's commitments to nature recovery and sustainable growth. No modification short of removing the allocation entirely would make this site appropriate. Given its direct adjacency to ancient woodland, its loss would be irreversible and cannot be mitigated sufficiently. The land should instead be retained as undeveloped green space, managed to enhance biodiversity and provide sustainable public access, in line with the Avon Wildlife Trust's 2030 Strategy and national "30 by 30" nature recovery goals. I do not support the the North Somerset Local Plan 2041 for the Tower Hill Farm location.			ecological-study.pdf avon-wildlife-trust-draft-response-to-north-somerset-local-plan-2041.pdf

Name: Jim Eason **I.D:** 62851649

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Churchill Avenue	No	• Effective	No	No	Penny fields is an irreplaceable resource not owned by the council and they have no right to sell it or develop it. The people of clevedon own the land and it is a valuable green space that cannot be replaced.	No construction should take place on public amenity land.		

Name: Jim Harwood **I.D:** 27088257

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Dark Lane, Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Not needed. Backwell is NOT an employment hub, most people commute. Extra traffic. Dangerous roads on the school route. Loss of natural habitat. Increase in flood potential which is already as issue for Backwell. Existing infrastructure not adequate to deal with all the already proposed new builds, this would just make things worse. Doctors already stretched. Backwellbis being asked to expand 80% if all the proposed houses are built. Its not proportionate for Backwell as a village. I moved to Backwell for Backwell. If all the building goes ahead it will not be Backwell any more. Totally object.			
Land east of Backwell	No	• Positively prepared	Unsure	Unsure	Totally object to this being a sound choice of where to build. Backwell is being asked to increase its size by 80% if all the planning is allowed. I moved to Backwell because it was Backwell. It wont feel anything like Backwell with an extra 80% of housing. The fields/land in question is on a flood plan and often holds surface water. Being built on will inevitably worsen backwell flooding, which is already an issue. The land is GRADE 1 AGRICULTURAL LAND, and in the GREENBELT. We			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
		• Justified • Effective • Consistent with national policy			should NOT be using this type of land for building. I thought the government wanted England to be more self sufficient rather than less. Growing and producing food on this type of land should be the priority. The loss of land will be extremely detrimental to the wildlife which surrounds Backwell. Appreciate Bats are often mentioned as a protected species but all other types of wildlife too. Deers roam free and i often hear owls. Building of this magnitude WILL make the roads busier. More dangerous for the children, and elderly people crossing the roads. The new road is a total pipe dream. Totally irrelevant as wont really mitigate the issues on Station road or the surrounding Backwell roads which are already crazily busy at times. The medical provision will be stretched even further along with the academic situation. All in all mental and doesnt make sense. I didnt agree with the Grove farm application but for slightly different reasons. This application is even worse. There is no needs or viability analysis for an extra 1,000 houses. No social cohesion impact assessment has been provided. Backwell is not an employment hub, most residents commute. Government policy states that “we must protect our best and most versatile land” to safeguard food security. The proposals contradict this policy and undermine food security. The sheer volume of growth with the required investment infrastructure and services over such a short period is destabilising, unsustainable and undeliverable.			

Name: Jim Wakefield **I.D:** 62860833

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Churchill Avenue	No	• Justified • Consistent with national policy	Unsure	Unsure	In relation to the 44 proposed dwellings for Penny Fields, i do not believe this is compliant with the below national policies / frameworks. National Planning Policy Framework (NPPF): Introduces "Local Green Space" (LGS) designation, allowing communities to protect valued local areas through local plans, offering strong development protection like Green Belts. Green Infrastructure Framework (GIF): Aims for everyone to reach good quality green space, providing tools and analysis for urban areas. Urban Greening Factor (UGF): A target for new residential builds to incorporate green roofs, walls, or spaces. Environment Act 2021: Places a duty on public bodies to conserve/enhance biodiversity, supported by Local Nature Recovery Strategies (LNRS). Additionally it does not adhere to other national Initiatives such as: 15-Minute Commitment: Aims for everyone to be within a short walk (300m) of green space, calculated via walkable streets. Nature-Based Solutions: Partnerships focus on using nature for health, climate resilience, and economic growth, providing resources for local action. Moreover, the proposed number of houses is too great for the small pocket of green space and would significantly increase traffic in the already tight local streets. This is not a well thought out option and I would suggest further analysis would see other brownfield sites chosen over and above this one.	Remove the relevant schedule for housing development north of Churchill avenue.		

Name: Jo Bryant **I.D:** 58578593

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Nailsea	Unsure		Unsure	Unsure		This planned growth, for so many new houses in one area is completely unsustainable for Nailsea and Backwell. Objections have already been raised on multiple occasions due to the environmental, traffic, flooding and public services impact, which would simply leave the area unable to cope and are not adequately addressed by this Plan.		

Name: Jo Court **I.D:** 21243681

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	As a Backwell resident for over 60 years I am horrified at the latest proposals for new building on the land esst of Backwell. Already we have seen new development, with these new proposals we will cease to be the the beautiful friendly village I once new. A 40% increase is just not sensible. Nor is it feasible. There is a deficit of school places, there will be no investment in health services. Traffic is already a problem, especially station rd. The new road would I very much doubt make anything better. This is prime agricultural land, grade 1. Why must this land be sacrificed for wreckless and irresponsible housing development. As someone who loves the countryside, It saddens me to think of the impact this will have on flora and fauna.			

Name: Jo Cox **I.D:** 29062017

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	No	Although North Somerset Council started the correct procedure of a public consultation in 2025, there was no regard for the serious comments that were made or for information that was imparted to them from the public. In this way the consultation was ineffective, planning could not be influenced and the duty to cooperate was not followed. For example, at one of the community consultation meetings, we spoke to Lyndsay Margerison (Transport Policy Team Manager , NSC) and learned that NSC was still considering a new road and bridge across the river Kenn floodplain below Backwell reservoir as recently proposed by Gleeson Land Ltd in their planning application. He was unaware that such a road and bridge would pose an unacceptable flood risk and that the Environment Agency, Lead Local Flood Authority and Internal Drainage Board had already objected to the Gleeson Land proposal for this reason. Their flood risk modelling had been unacceptable (and a new model recently submitted by them has also been rejected by the EA). Despite him hearing this in person and despite our comments on the website and to NSC Highways and Transport in writing, we find that this road is still being suggested in the Local Plan 2041 (TR33) to provide access for the proposed new developments South of Nailsea to a new link road east of Backwell to the A370 and make transport connections between Clevedon Nailsea Backwell and Bristol. This road, if built, will cause an increased flood risk to several adjacent properties including our own and the lack of cooperation with the public could have serious consequences. Backwell Lake is in fact a reservoir and building new road structures close to this and across the floodplain will cause an increase risk of reservoir flooding and erosion it's banks. In addition, the safety issues of increased traffic from a new road exiting close to the busy station and between two comprehensive schools are prohibitive to this suggested project and particularly to the proposed new A370 Link road. There has recently been a death caused by a vehicle close to the junction of Station Close and Station Road, which is close to where these proposed new roads would meet Station Road. Flooding is already a big problem in Backwell, particularly in the floodplain areas of the River Kenn and other	Other areas should be looked at more closely for development without the flood risk and transport issues eg. Long Ashton and along the proposed Portishead railway line.		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					streams nearer Backwell Common. The proposed A370 Link road and adjoining proposed East Backwell housing development will greatly increase flood risk to already vulnerable properties, including our own. This proposal along with climate change affects will affect our safety. We have evidence that the National Policy Planning Framework especially in regard to flood risk modelling has not been adhered to by developers and the EA has not approved the flood risk model. The housing allocation for Backwell is out of proportion to the rest of North Somerset purely because there is a station. It is inappropriate for such a small village with few facilities. The enormous amount of new housing will turn it into a town with none of the required infrastructure that other North Somerset towns enjoy. It will essentially be a commuting ghetto with inadequate shcools, medical access and shops. The roads will be congested and unsafe and properties will be flooded.			

Name: Jo Halfpenny **I.D:** 39299073

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP2: Climate Change	Unsure		Unsure	Unsure				
SP7: Green Belt	No	• Justified	Unsure	Unsure		The building of houses on parts of the Green Belt is inconsistent with the policy on climate change and protection of nature. There is also the issue of food security and once agricultural land is lost to development it is gone for ever. Building more and more houses on green spaces is not the answer. Stop land banking, change the law around second homes, empty buildings etc.		

Name: Jo Hollis **I.D:** 21279489

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The Plan is not sound. Backwell community is a village. Which is already getting an increase of 40% with 800 houses already approved. We have already been allocated a higher number of houses than any other village in North Somerset. Already there will be a deficit in school places and health services. What is being proposed as another 1000 houses and road will destabilise the area. It will affect the local's health physically and mentally and they will not be able to get help from health services. Selling the idea to people of buying a brand new house in a village which will no longer exist. The road and proposed houses. Separation of Backwell Common community. Backwell Community will be separated we will not be able to drive the length of the road from Station Road and Backwell Bow. The proposal wants Backwell Common to become pedestrianised from just after Old Diary all the way under the little old bridge to Woollies farm. The road going from the Lake then over Backwell Common under the railway Bridge and up to A370. I live right next to the proposed road on Backwell Common it swings round the bottom of my garden and round my house to the railway bridge. The plan is not sound because of all the damage it will cause. Flooding – increase the flooding astronomically. We are already on a flood plain. My access to getting out of my property will be to go under the current Bridge and enter the new road Backwell East where all the proposed 889 block of houses proposal. We already have flooding under that Bridge and when that happens I drive towards Backwell Bow as it is the only way out. The proposed road means when it does flood my family and our neighbours will be stranded in our properties as under our old bridge will be the only way out but it will be flooded. This intern means emergency vehicles will also not be able to get to us. The surface run off from the new road and 889 proposal and the already 125 plus 94 houses straight over the A370 are being built will cause a vast increase in flooding down here			Bridge by Farleigh House flood.jpg

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					where we are at the lowest point in the valley. Woolies Brook already flows through my garden has flooded it in the past. Also just out of my driveway just under the old bridge Wraxall Ditch has broken its banks and flooded under the Bridge. I have photos if you want to see as evidence. Our well as of today is full to ground level already and we have not had a particularly rainy Autumn winter season yet. These things have already been happening. We have got on with it as we have been able to turn in the other direction. The new road means there will be no other way to turn when the floods happen. And these floods have been happening before any new houses over the A370 have been fully developed and proposed new road. So for a new road and 889 new houses Backwell East – otherside of the railway will increase the flooding down here astronomically. Also the new road proposals are to go under the railway bridge under the water levels. A similar road which goes under the railway line already exists on Backwell Bow. This Bridge already flooded this Autumn several times and has caused blockage and people to take risks and right their cars off in the flood water. Where emergency services have been called out to rescue them. This has been in the National news several times over the years. So if an even larger road to accommodate two lanes is built under the bridge and deeper to allow buses and other large vehicles under the flooding there will be dangerous. Pedestrians will not be able to walk under the bridge, and they will also not be able to walk under the current bridge to use the pedestrian way from the Old Dairy to Woollies farm. The proposed road will be out of use. Backwell Bow will be out of use and the old little Bridge will be out of use because of flooding. River Kenn runs along side Backwell Bow by the Backwell Common junction so higher up than the Bridge on that road. By the Backwell Common Junction the River Kenn broke its banks and flooded the road. If that can happen there it can certainly happen along the proposed new road as it come up from the Bridge as there is the Stream that flows into the Old Dairy. If a pump is used it can break also where will the excess water be flown into? The Streams all down here are flowing at full capacity already in Autumn winter and spring. The fields and gardens already get flooded and a tremendous amount of surface water clogging. As I say my well is already at capacity. If it goes over the top there is no where else for it to travel to. Food for humans and safe home for wildlife biodiversity is important especially near to a city which is depleted of wildlife. The land is grade 1 Agricultural land. And there is only 7% left in North Somerset! Once gone it cannot be brought back. We have cows and sheep in the surrounding fields. Also crops for both animals and humans grown in the area of Backwell Common and Backwell East. It is a lovely farm land area which has a vast diversity of plant and animals grown. The hundreds of year old Oaks who's roots will be damaged and the thousands of animals and insects who rely on healthy trees. In my shed I have two types of very important bats as well as others. We also have Barn owls and tawny owls who use my garden and the surrounding fields for foraging there food. The road will destroy that. Animals and insects do not move house. How about not using Grade 1 land but use brown sites. Protect this land for our children's children as in the future we may desperately need this to feed our population. Pollution We are Greenbelt land. Not much of this is around Bristol. We are the lungs and escape of the city. An oasis between towns and villages. Cyclists and pedestrians regularly use Backwell Common a place without vehicle fumes. A road with little thunderous noise of vehicles. The proposed road will bring that steaming across the common. At night it is pitch dark here and stars can been seen quite easily there is hardly any light pollution. Night animals can live in peace and feed in peace without being run over or crashed into. We have a large deer population that roam the fields. And the bats use the hedgerows as they superhighway. Dark spaces are decreasing and very important for a full area to be diverse. Climate change Before any road or housing has been developed there is the increased risk of flooding due to climate change. So will increase the flooding even more.			

Name: Jo Ryder **I.D:** 62851265

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Churchill	No	Justified	Unsure	Unsure	Penny Field should be protected as a Local Green Space. It's one of Clevedon's last true greenspaces, a Nature Recovery priority site, and vital for wildlife, community wellbeing, and access to nature. Better brownfield and greyfield sites across the town exist for development so these should be considered instead.			

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Avenue								

Name: Jo Smith **I.D:** 21462657

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure		This is over development – there are already 800 new homes approved for Backwell. Backwell has more houses allocated then any other parts of North Somerset. There is nothing to show how this and the other developments will integrate with the existing housing and not result in separate “enclaves”. The proposed road which goes under the main line railway has not been accessed properly or costed. This needs to be built first before any development but it will be funded through agreements with the developers and the council - payment is only due after the houses are built There is no guarantee that the Council will then use the money for the road. Previous CIL money from Backwell has been used to funded the Banwell Bypass! Also, the amount of money NSC will receive will be reduced due to the government’s targets for affordable housing. There is a lack of infrastructure – the health services will not cope with a further 800 houses especially when the request for funds in relation the Grove Farm development was ignored by NSC when they approved the application. There is no employment (or very limited) in Backwell which means that most people will need to commute to work. The site is grade 1 agricultural land – we need to be able to feed people and animals (food security / towards net zero are also policies of this government) so need to stop building on this site North Somerset Council has just completed a consultation on extending the Special Area of Conservation for bats and these fields will be upgraded to a Band A – bats rely on this area for food. Flooding is an issue in this area and more houses (concrete) will only make this worse. The railway station is not fully accessible due the steps to reach the platform - campaign to make it accessible have been ongoing for many years but Network Rail / the government have not prioritised this. The car park is now nearly at capacity so where will the people park. The X7 bus service has been downgraded and now only runs hourly rather than every 30 minutes so people will have to use their cars to go to Nailsea. NSC said the need to this allocation is in response to the urgent need for housing – how can housing that won’t be built for 10 years be an urgent response.			

Name: Joan Bannister **I.D:** 31066273

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at North West Nailsea	No		Unsure	Unsure	This plan does not take account of how narrow and busy the roads around the area are already without extra traffic from all this development. I have personally been caught up in traffic jams at the pinch points as well as serious delays through Tickenham. The location is not easily accessible from the train station and cycling is not practicable. Nor is walking so people will have to use their cars to get into Bristol and surrounding areas. We already have problems with flooding as seen by me only recently and this development will make things worse. There is an SSSI nearby which would be badly affected. The Council's Nature Emergency Toolkit says development should protect and strengthen wildlife corridors and natural drainage. This site would do the opposite. There is a high pressure pipeline running right across the site which is another reason for it being unsuitable. The site should not be considered as suitable for release of green belt as the Council has not demonstrated that all other reasonable options have been exhausted. No sustainable transport links have been shown to compensate for loss of green belt. The			

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					allocation for North Nailsea conflicts with the Wraxall and Failand Neighbourhood Plan which has already been adopted by the Council and forms part of the legal development plan which strongly protects the Green Belt, rural character and road safety. Another site should be found for any extra houses that may be required.			

Name: Joanna O'Halloran **I.D:** 21471393

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Objection to Additional Sites Proposed in the Local Plan – Backwell I object to the proposed additional housing developments in Backwell for the following reasons: 1. Lack of Infrastructure and Services Backwell does not have the infrastructure to support such large-scale development. There is already a deficit in school places, and no investment is planned for health services, leisure facilities, or transport improvements. Adding 1,000 more houses on top of the 800 already approved will overwhelm existing resources and negatively impact residents' quality of life. 2. Overdevelopment of Backwell Backwell has already been allocated 800 new houses, representing a 40% increase in size. The proposed additional sites would push this to over 80% growth—far higher than any other village in North Somerset and even greater than some towns. This level of expansion is disproportionate and unsustainable. 3. Loss of Greenbelt and Agricultural Land The proposed sites include Grade 1 agricultural land, which is among the best and most versatile farmland in the country. Government policy states this land should be protected to safeguard food security. Only 7% of such land remains in North Somerset, and its loss would irreversibly damage the environment and local food production. 4. Traffic and Road Safety Concerns The A370 and surrounding roads are already congested and dangerous, particularly for schoolchildren who walk along these routes. The proposed developments would significantly increase traffic volumes, creating safety hazards and worsening congestion. The suggested new road lacks any detailed plans, feasibility studies, or funding guarantees, making it an unreliable solution. 5. Environmental and Flooding Risks Development on Backwell Common and near Backwell Lake would destroy wildlife habitats, harm biodiversity, and increase flood risk in areas already prone to flooding. These proposals threaten protected species and Sites of Special Scientific Interest (SSSI), including roosts for rare bats. 6. Plan Unsoundness The Local Plan fails to provide a needs or viability analysis for these additional houses, lacks an Infrastructure Delivery Plan with costings and funding guarantees, and does not assess social cohesion impacts. This makes the plan unsound, unsustainable, and undeliverable.			

Name: Joanne Stevens **I.D:** 51458785

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Firstly, Backwell already has been subject to a huge increase in planned housing - 800 houses approved so far - and any more will lead to overdevelopment when there is little new infrastructure planned. It will grow completely out of proportion - compared to other towns and villages in N Somerset it would have the highest growth rate. Currently, the A370 cannot cope with traffic at busy times, especially if there are any issues on the M5 as it becomes a cut through to Bristol and the M4. Effectively doubling the size of the village and the amount of traffic would lead to severe traffic problems. There is no analysis of why Backwell makes a suitable place for this amount of housing - it is not an employment hub, the roads are already under strain and the railway station is not accessible for anyone with mobility issues or pushchairs.			

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					Some of the proposed areas regularly flood - Backwell Lake, Backwell Common and surrounding fields. Any times built here would suffer from flooding. The land proposed for development is vital agricultural land and also important wildlife habitat for legally protected species including Greater and Lesser Horseshoe bats. Most of the houses that have already been given consent have not been built yet and so their impact is uncertain except for one thing - impact on traffic and pedestrians, especially primary school children walking to school. Any further development would only make this worse. There is no guarantee that the new road will built - logistically and financially it will be very challenging and I suspect it will not be built with disastrous results.			

Name: Joanne Sweet **I.D:** 62764321

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell is allocated 7% of North Somerset's entire housing requirement—more than any other village and even more than some towns. This level of growth is unjustified. The proposed new road would not relieve congestion on Station Road, Backwell Common or Chapel Hill. Engineering a crossing under/over the railway is costly, uncertain and may be undeliverable. There is already a deficit in school places and no confirmed investment for health, leisure or other essential services. No needs assessment or viability study has been provided to justify 1,000 additional houses in this location. Backwell is not an employment hub; most residents commute. The proposal does not support sustainable patterns of living or working. No social cohesion or community impact assessment has been provided. Nailsea & Backwell railway station is inaccessible for many users and unsuitable as a transport hub for a development of this size. Backwell Common and land around Backwell Lake are on a floodplain and flood regularly. Additional housing would worsen flood risk. The Infrastructure Delivery Plan lacks detailed analysis, costings, or secure funding for the new road or community services. Green Belt policy requires 50% affordable housing, reducing developer contributions and leaving insufficient funding for necessary infrastructure.		No	

Name: Joe Boardman **I.D:** 58528865

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm					I am a Portishead resident and have lived here all my life. I would like to comment on the Local Plan 2041 proposals, specifically the Tower Farm and Black Rock development plans.			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					I disagree with these plans and believe them to be ill thought through. Several good points in this vein are: NSC has not properly considered: Alternative brownfield or greenfield sites with far lower ecological impact, both in Portishead and across North Somerset. Opportunities to increase housing density on proposed brownfield sites, which could remove the need to develop Tower Farm and Black Rock. The strategic ecological importance of these sites in protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor. The fact that both areas were added to the Green Belt in the late 1980s due to their high ecological value. National planning policy allows Green Belt changes only in exceptional circumstances — and these have not been demonstrated. In addition: Neither site can provide safe or suitable access. Development would create unacceptable transport impacts, failing national soundness tests. I found these on the Portishead Town Council website and wholeheartedly agree. Furthermore, my childhood home is on The Downs, which is very close to the proposed developments at Tower Farm. It’s an absolute nightmare already with High Down school traffic which I believe these plans will only make worse. You’re taking away from a beautiful green belt area that is loved by many in (and outside) of Portishead. I think it would be a great shame if this went ahead. I hope you decide to take into consideration people’s views who live nearby and love this green space.			
Black Rock, north of Clevedon Road					I am a Portishead resident and have lived here all my life. I would like to comment on the Local Plan 2041 proposals, specifically the Tower Farm and Black Rock development plans. I disagree with these plans and believe them to be ill thought through. Several good points in this vein are: NSC has not properly considered: Alternative brownfield or greenfield sites with far lower ecological impact, both in Portishead and across North Somerset. Opportunities to increase housing density on proposed brownfield sites, which could remove the need to develop Tower Farm and Black Rock. The strategic ecological importance of these sites in protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor. The fact that both areas were added to the Green Belt in the late 1980s due to their high ecological value. National planning policy allows Green Belt changes only in exceptional circumstances — and these have not been demonstrated. In addition:			

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					Neither site can provide safe or suitable access. Development would create unacceptable transport impacts, failing national soundness tests. I found these on the Portishead Town Council website and wholeheartedly agree. Furthermore, my childhood home is on The Downs, which is very close to the proposed developments at Tower Farm. It’s an absolute nightmare already with High Down school traffic which I believe these plans will only make worse. You’re taking away from a beautiful green belt area that is loved by many in (and outside) of Portishead. I think it would be a great shame if this went ahead. I hope you decide to take into consideration people’s views who live nearby and love this green space.			

Name: Joe Groves **I.D:** 51427905

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	This land is green belt and grade 1 agricultural land - it is used for food production and grazing. We must protect this precious land, only 7% of it left in North Somerset. Government policy states that we must protect our best and most versatile land. The green space is used extensively by residents (the paths are very well trodden). Backwell already has 800 new houses approved, which equates to a 40% increase for the village. If approved these houses would almost double the number of houses in the village - a total overdevelopment, with no provision for new infrastructure or services. Roads around and through the village are already congested. The proposed road has congested routes at either end and isn't costed or funded. It will be an incredibly expensive engineering project at the intersection with the railway line.			

Name: Joe Hornsey **I.D:** 62865409

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell has already approved 800 new houses, which is a 40% increase. Any additional numbers would be a massive over development. There is a deficit in school places and no additional investment in local health services. The area cannot support another 1000 houses (3000+ people). The proposal is on Grade 1 Agricultural land, currently used for food crops and grazing. There's only 7% left of this land type in North Somerset as a whole. Development would no doubt destroy valuable wildlife habitats. Including feeding areas for Lesser and Greater Horseshoe Bats. The local roads already suffer from major bottlenecking and cause delays to public transport in and out of Bristol. The proposed additional road will do nothing to alleviate this problem along Farleigh Road.			

Name: Joe Knowles **I.D:** 58012641

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	‣ Positively prepared ‣ Justified ‣ Effective	Unsure	No	The number of dwellings proposed is far, far too high for the wider area in Portishead. While provisions have been made for the junior school (though nothing said of how or the disruption), there's none for secondary schools. Where do we expect all the children to go to after high down? There's also no apparent thought given to the sheer amount of traffic this will introduce to the area and Portishead in general. It's already gridlocked most mornings due to there being one principal road in and out of the town - this only exacerbates the issue. That's before you consider the environmental aspect around Weston wood and the general area. It would make the town overloaded. It's not 'sound' to suggest we can incorporate 400 more dwellings, especially on that land. Green belt land, next to an ancient wood, SSSI. I don't want to be a NIMBY, and recognise more housing is needed, but the number is plain stupid. You could reduce it significantly but still build and make everyone happy. Destroying our green belt is surely not something anyone wants on their cv.			

Name: Joe Morris **I.D:** 62686401

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm					I have lived in Portishead for 45 years and in general enjoyed my time in the Town. However, in that time we have experienced an increase in the population of almost a factor of 3 from 10,000 residents to 27,000 residents. We feel this increase has effectively "saturated" the Town in terms of the Infrastructure which for most of the basic amenities is at "breaking point". In addition, another very important issue is the impact on the environment. The development plans currently under review will impact the Town generally and definitely have an adverse impact on Weston Big Wood. This site is designated Green Belt and has a iii rating, which makes it unique in the area. While we realize it is unlikely you will obtain planning permission to build on Weston Big Wood, although not fully guaranteed in the future, the only way affordable housing can be built within a certain price range, is to build Highrise flats, which will adversely affect the Woods, particularly as there is only a 50 metre corridor between the development and the Woods. We cannot emphasis enough how important this area is for animals, birds, insects, plants and trees, some of which are rare and unique to these Woods. Loss of such an area to community would be unforgivable to this generation and the generations to follow. In addition, the Woods provide a wonderful setting for people to enjoy the wildlife etc, which for many people improves their health both physically and mentally.. While we appreciate affordable housing is necessary, there has to be a balance with the cost to the infrastructure, environment and physical and mental well being of the population. It is well reported that the Governments housing development targets throughout the Country are impossible to achieve and are ill conceived with no real consideration of the impact on communities around the Country. Surely, a partial solution is to utilize some of the vast number of empty buildings in and around Portishead which could be turned into affordable housing at a reasonable cost. As an example, the area around the Old Mills could be developed as it is close to the Town Centre and has easy access to the main roads and amenities in the Town. In conclusion, we are opposed to any new development in the Town, but if some houses are required then it should be restricted to as few as houses as possible and be built on a Brown Field site.			

Name: Joe Tallis-Chisnall **I.D:** 62864097

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at North West Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	I object to Policy LP7 – Land North of Nailsea (Schedule 1) on the grounds that its inclusion renders the North Somerset Local Plan 2041 unsound, not legally compliant, and inconsistent with national policy. The site comprises open countryside, part of the Strategic Gap between Nailsea and surrounding settlements, and supports important landscape, ecological, and hydrological functions. Its allocation is contrary to the National Planning Policy Framework (NPPF 2021) in several respects: NPPF para 137 & 138: The Plan does not demonstrate exceptional circumstances for Green Belt/Strategic Gap release. NPPF para 92 & 104: The allocation fails to provide safe, sustainable, and accessible transport options, with cumulative impacts on the B3130, Clevedon Road, and local junctions unmitigated. NPPF para 174 & 180: There is insufficient evidence that ecological networks, protected species, and biodiversity will be preserved or enhanced. NPPF para 159 & 167: Flood risk and surface-water management for this elevated site and downstream receptors have not been satisfactorily addressed. The Sustainability Appraisal does not demonstrate that reasonable alternatives were considered, including brownfield-first approaches or growth redistribution to less constrained settlements. The site's allocation is therefore not positively prepared, not justified, not effective, and not consistent with national policy, failing the tests of soundness set out at NPPF para 35.	To achieve soundness and legal compliance, the following modifications are required: Remove or significantly reduce the LP7 allocation until exceptional circumstances for Green Belt/Strategic Gap release are demonstrated, including a clear comparative assessment of alternatives consistent with NPPF paras 137–139. Update the Sustainability Appraisal to show that reasonable alternatives were properly assessed, including brownfield sites, urban intensification, and redistributing growth to locations with superior infrastructure and sustainable transport access. Provide a fully funded, deliverable transport mitigation strategy, including cumulative modelling of the B3130 corridor, Clevedon Road, and key junctions, with clear links to the Infrastructure Delivery Plan (NPPF paras 104–105). Strengthen the ecological and landscape evidence base, including protected species surveys, habitat networks, and Biodiversity Net Gain proposals (NPPF paras 174–180). Provide detailed flood risk and drainage assessments, demonstrating compliance with NPPF paras 159–167, including sustainable drainage solutions and no increase in fluvial or surface-water flood risk downstream. Demonstrate Duty to Cooperate compliance (Planning & Compulsory Purchase Act 2004, s33A) with neighbouring authorities and statutory infrastructure providers regarding transport, utilities, and cross-boundary planning impacts. Without these modifications, Policy LP7 is not justified, not effective, and cannot be considered sound or legally compliant.		
Land north of Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	I object to Policy LP7 – Land North of Nailsea (Schedule 1) on the grounds that its inclusion renders the North Somerset Local Plan 2041 unsound, not legally compliant, and inconsistent with national policy. The site comprises open countryside, part of the Strategic Gap between Nailsea and surrounding settlements, and supports important landscape, ecological, and hydrological functions. Its allocation is contrary to the National Planning Policy Framework (NPPF 2021) in several respects: NPPF para 137 & 138: The Plan does not demonstrate exceptional circumstances for Green Belt/Strategic Gap release. NPPF para 92 & 104: The allocation fails to provide safe, sustainable, and accessible transport options, with cumulative impacts on the B3130, Clevedon Road, and local junctions unmitigated.	To achieve soundness and legal compliance, the following modifications are required: Remove or significantly reduce the LP7 allocation until exceptional circumstances for Green Belt/Strategic Gap release are demonstrated, including a clear comparative assessment of alternatives consistent with NPPF paras 137–139. Update the Sustainability Appraisal to show that reasonable alternatives were properly assessed, including brownfield sites, urban intensification,	No	

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					NPPF para 174 & 180: There is insufficient evidence that ecological networks, protected species, and biodiversity will be preserved or enhanced. NPPF para 159 & 167: Flood risk and surface-water management for this elevated site and downstream receptors have not been satisfactorily addressed. The Sustainability Appraisal does not demonstrate that reasonable alternatives were considered, including brownfield-first approaches or growth redistribution to less constrained settlements. The site's allocation is therefore not positively prepared, not justified, not effective, and not consistent with national policy, failing the tests of soundness set out at NPPF para 35.	and redistributing growth to locations with superior infrastructure and sustainable transport access. Provide a fully funded, deliverable transport mitigation strategy, including cumulative modelling of the B3130 corridor, Clevedon Road, and key junctions, with clear links to the Infrastructure Delivery Plan (NPPF paras 104–105). Strengthen the ecological and landscape evidence base, including protected species surveys, habitat networks, and Biodiversity Net Gain proposals (NPPF paras 174–180). Provide detailed flood risk and drainage assessments, demonstrating compliance with NPPF paras 159–167, including sustainable drainage solutions and no increase in fluvial or surface-water flood risk downstream. Demonstrate Duty to Cooperate compliance (Planning & Compulsory Purchase Act 2004, s33A) with neighbouring authorities and statutory infrastructure providers regarding transport, utilities, and cross-boundary planning impacts. Without these modifications, Policy LP7 is not justified, not effective, and cannot be considered sound or legally compliant.		
Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	I object to the proposed housing allocations and associated road infrastructure in and around Backwell and Nailsea. In addition, I consider that the Local Plan fails the tests of soundness, is not legally compliant, and does not meet the Duty to Cooperate requirements. The Plan is not positively prepared. It relies on large-scale housing development in Backwell and Nailsea without a credible or funded transport and infrastructure strategy. The road upgrades and new links referred to in the Plan, including connections to the A370 and access improvements near Nailsea and Backwell Station, have no confirmed funding, no defined delivery mechanism, and no realistic prospect of being completed within the plan period. New housing would therefore come forward without the infrastructure required to support it, contrary to national policy expectations for infrastructure-led development. The Plan is not justified. The Council has not demonstrated that reasonable alternatives have been properly assessed. Alternatives such as greater use of brownfield land, directing growth toward areas with stronger transport capacity, or reducing pressure on Green Belt villages have not been robustly evaluated. The scale of proposed development in Backwell and Nailsea is disproportionate to the size, character, and environmental sensitivity of these settlements. The Plan has not evidenced exceptional circumstances for the release of Green Belt or high-quality agricultural land, nor has it justified why these areas should bear such a large share of district housing growth. The Plan is not effective. Many of the proposals rely on uncertain or speculative infrastructure provision, including highways, sustainable transport improvements, school capacity increases, and healthcare expansions. These depend on future work, funding	To make the Local Plan legally compliant and sound, the following modifications are necessary. The scale of development proposed for Backwell and Nailsea should be reduced to a level that can be supported by realistic, funded and deliverable infrastructure. The Plan must not rely on speculative or uncosted transport schemes. The Council must produce and publish a credible, evidence-based transport strategy for the A370 corridor, Nailsea and Backwell, setting out the specific road, public transport, walking and cycling improvements required, who will deliver them, how they will be funded, and when they will be delivered. Housing allocations dependent on unfunded infrastructure should be removed or reduced. The Plan must re-evaluate all reasonable alternatives for distributing growth, including greater focus on brownfield development and areas with stronger transport capacity. A clear, robust assessment of these alternatives must be	Not at all applicable.	

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					bids, or third-party agencies without firm commitments. Without guaranteed and deliverable infrastructure, the Plan's growth strategy cannot be implemented as written. The result is an ineffective plan that will fail to meet its own objectives. The Plan is not consistent with national policy. The NPPF requires protection of the Green Belt unless exceptional circumstances are demonstrated, promotes sustainable transport, and expects local plans to create sustainable patterns of development. The proposed allocations around Backwell and Nailsea would create car-dependent extensions with no realistic prospect of achieving sustainable travel patterns. Green Belt release is proposed without clear evidence of exceptional circumstances or of the alternatives considered and discounted. The Plan therefore does not align with core NPPF principles. The Plan is not legally compliant. The evidence base, particularly relating to transport assessments, sustainability appraisal, Green Belt review, and infrastructure delivery, is incomplete and insufficient. Consultation on changes affecting Backwell and Nailsea has been inconsistent and has not met the expectations set out in the Council's own Statement of Community Involvement. Exceptional circumstances for Green Belt release have not been demonstrated in a manner consistent with statutory requirements. The Plan does not meet the Duty to Cooperate. There is no convincing evidence of active, ongoing, and constructive engagement with neighbouring authorities or key infrastructure providers such as National Highways, WECA, Network Rail, education authorities, or health service providers. There are no binding agreements or shared strategies in place to support the scale of development proposed. Key stakeholders appear not to have reached any meaningful consensus on the infrastructure needed to support the housing growth in Backwell and Nailsea. This falls short of the statutory Duty to Cooperate. I also object on site-specific grounds. The Backwell and Nailsea proposals would more than double the size of Backwell and place severe strain on an already congested road network including the A370, Station Road, and access to Nailsea and Backwell Station. Local services including schools, GP practices, and public transport are already under pressure and no viable plan is provided to expand capacity. The proposals would result in the loss of valuable agricultural land, important habitats, and areas at risk of surface-water flooding. I request that the Council removes or reduces the Backwell and Nailsea housing allocations, reassesses the spatial strategy to make better use of brownfield land, ensures infrastructure is deliverable before allocating major growth, and undertakes proper Duty to Cooperate engagement with evidence of outcomes. Until these issues are addressed, the Local Plan cannot be considered sound, legally compliant, or fit for submission.	included in the Sustainability Appraisal and Green Belt review. Proposed Green Belt release around Backwell should be withdrawn unless exceptional circumstances can be demonstrated through a complete, transparent and properly evidenced process. This requires a full comparison of all alternative development options. The Infrastructure Delivery Plan must be strengthened to include firm commitments from transport bodies, education authorities, health services and utility providers, demonstrating that required infrastructure is deliverable within the plan period. The Council must provide evidence of active, ongoing and constructive Duty to Cooperate discussions with neighbouring authorities and key infrastructure agencies, including the outcomes of these discussions. Where agreements are absent, the Plan must not rely on external infrastructure that has not been formally supported. Site allocations around Backwell and Nailsea must be reconsidered to avoid the loss of high-quality agricultural land, environmentally sensitive sites and locations with known flood risk constraints. The spatial strategy should be revised so that settlement expansion does not double the size of existing villages or produce car-dependent growth patterns that conflict with national policy on sustainable transport. Only by making these modifications can the Plan become justified, effective, positively prepared, legally compliant, and consistent with national policy.		
Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	This representation submits that the North Somerset Local Plan 2041 is unsound, not legally compliant and fails the statutory Duty to Cooperate. The strategy for accommodating significant growth in Backwell and Nailsea, including allocations and cumulative schemes such as South Nailsea (Gleeson's), is unsupported by the evidence base, contrary to national policy and incapable of effective delivery. The Plan fails all four tests of soundness under NPPF paragraph 35. First, it is not positively prepared. The Plan's spatial strategy is not based on a demonstrably deliverable infrastructure framework. It relies heavily on speculative transport interventions in the A370 corridor and around Nailsea and Backwell Station without secured funding, delivery mechanisms, or evidence of capacity improvements sufficient to support the scale of growth proposed. This conflicts with the NPPF requirement for infrastructure-led development. Second, the Plan is not justified. The Sustainability Appraisal and evidence base do not	To make the Local Plan legally compliant and sound, the following modifications are necessary. The scale of development proposed for Backwell and Nailsea should be reduced to a level that can be supported by realistic, funded and deliverable infrastructure. The Plan must not rely on speculative or uncosted transport schemes. The Council must produce and publish a credible, evidence-based transport strategy for the A370 corridor, Nailsea and Backwell, setting out the specific road, public transport, walking and cycling improvements required, who will	N/A	

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					demonstrate that reasonable alternatives have been objectively assessed, particularly in relation to the concentration of development in Backwell and Nailsea despite their known constraints. The proposed release of high-quality agricultural land, Green Belt, and land performing Strategic Gap functions is inadequately evidenced, and exceptional circumstances for Green Belt release have not been robustly established in accordance with national policy and case law. The assessment of alternatives is insufficiently detailed and does not demonstrate comparative advantage over brownfield or more sustainable locations. Third, the Plan is not effective. The delivery of the spatial strategy depends on infrastructure and services that lack confirmed commitment from statutory bodies including National Highways, WECA, Network Rail, education authorities and NHS bodies. The Infrastructure Delivery Plan does not provide evidence that the mitigation necessary to make the proposed allocations deliverable within the plan period is secured or realistically achievable. The reliance on future, unquantified schemes renders the strategy ineffective. Fourth, the Plan is not consistent with national policy. The concentration of development in locations with inadequate sustainable transport provision contradicts NPPF policies seeking to reduce car dependency and promote modal shift. The proposed erosion of the Strategic Gap between Nailsea and Backwell conflicts with national policy objectives relating to settlement identity, landscape protection and preventing settlement coalescence. The Plan promotes development patterns that are not aligned with climate and sustainable transport principles within national policy. The Plan is also not legally compliant. The evidence base is incomplete and does not meet statutory requirements for plan-making. The Sustainability Appraisal fails to provide a clear audit trail demonstrating how reasonable alternatives were assessed and why preferred options were chosen. The Green Belt assessment fails to articulate exceptional circumstances in accordance with section 13 of the NPPF. Consultation has not been undertaken in accordance with the Council's Statement of Community Involvement, as key elements of the strategy affecting Backwell and Nailsea have not been transparent nor subject to adequate public engagement. The Duty to Cooperate has not been met. There is insufficient evidence of constructive, active and ongoing engagement with neighbouring authorities or key infrastructure bodies as required under sections 33A and 20(5)(c) of the Planning and Compulsory Purchase Act 2004. In particular, there is no clear record of agreed outcomes relating to transport capacity, strategic infrastructure dependencies or cross-boundary housing and employment relationships. The Plan's reliance on external infrastructure bodies without agreed commitments indicates a failure of the Duty to Cooperate. On a site-specific basis, the growth proposed for Backwell and Nailsea would materially worsen congestion on constrained road networks including the A370 and key junctions at Backwell crossroads and Station Road. It would place unsustainable pressure on schools, primary healthcare and public transport services, contrary to the NPPF's requirements for adequate service capacity. The cumulative effects of allocations, when combined with speculative applications such as South Nailsea (Gleeson's), would result in loss of valued open space, increased surface-water flood risk, ecological harm and the erosion of the Strategic Gap, all of which represent material planning harms insufficiently mitigated by the Plan. In summary, the Plan requires fundamental modification. These include the removal or substantial reduction of allocations around Backwell and Nailsea; the protection of Green Belt and Strategic Gap land; a reassessment of alternatives prioritising brownfield and sustainable transport corridors; a fully evidence-based and funded transport strategy; and demonstrable Duty to Cooperate compliance. Without such modifications, the Plan cannot proceed as sound or legally compliant.	deliver them, how they will be funded, and when they will be delivered. Housing allocations dependent on unfunded infrastructure should be removed or reduced. The Plan must re-evaluate all reasonable alternatives for distributing growth, including greater focus on brownfield development and areas with stronger transport capacity. A clear, robust assessment of these alternatives must be included in the Sustainability Appraisal and Green Belt review. Proposed Green Belt release around Backwell should be withdrawn unless exceptional circumstances can be demonstrated through a complete, transparent and properly evidenced process. This requires a full comparison of all alternative development options. The Infrastructure Delivery Plan must be strengthened to include firm commitments from transport bodies, education authorities, health services and utility providers, demonstrating that required infrastructure is deliverable within the plan period. The Council must provide evidence of active, ongoing and constructive Duty to Cooperate discussions with neighbouring authorities and key infrastructure agencies, including the outcomes of these discussions. Where agreements are absent, the Plan must not rely on external infrastructure that has not been formally supported. Site allocations around Backwell and Nailsea must be reconsidered to avoid the loss of high-quality agricultural land, environmentally sensitive sites and locations with known flood risk constraints. The spatial strategy should be revised so that settlement expansion does not double the size of existing villages or produce car-dependent growth patterns that conflict with national policy on sustainable transport. Only by making these modifications can the Plan become justified, effective, positively prepared, legally compliant, and consistent with national policy.		

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Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	I object to the inclusion or implied reliance on development in South Nailsea (Gleeson's site) as part of the North Somerset Local Plan 2041 because it contributes to an overall housing strategy that is unsound, not legally compliant, and inconsistent with national planning policy. This site and its cumulative impact with other large allocations around Nailsea and Backwell would contribute to disproportionate housing growth in an area already under strain from multiple high-impact development proposals. The Local Plan strategy does not evidence exceptional circumstances for large-scale development in this location and fails the tests of soundness: it is not positively prepared, not justified, not effective, and not consistent with national policy (NPPF para 35). Specific concerns include: Transport and accessibility: South Nailsea is poorly served by sustainable transport modes, with limited public transport, constrained local highway capacity and heavy existing congestion. The Local Plan does not show deliverable, funded mitigation that would address the additional travel demand generated (NPPF paras 104–105). Infrastructure delivery: There is no compelling evidence that essential services—schools, healthcare, utilities—can accommodate the growth envisaged without significant delay or additional investment, breaching the requirement that plans should ensure delivery of infrastructure to support new development (NPPF paras 92, 157). Environmental impacts: Development here would result in loss of valued open green space and would harm valued habitats and biodiversity in a district already recognised as nature-depleted, without credible ecological mitigation or net gain proposals (NPPF paras 174–180). Flooding and drainage: South Nailsea has known surface water and drainage constraints; current Sustainable Drainage Systems (SuDS) plans are demonstrably insufficient and do not protect existing residents from increased flood risk (NPPF paras 159–167). nailseaactiongroup.org.uk Community and town form: Allowing large growth sites such as South Nailsea/Gleeson's without integrated planning undermines community cohesion, erodes green gaps between settlements, and is inconsistent with sustainable settlement patterns promoted by national and local policy. The Local Plan has not adequately justified why this site (and other large allocations around Nailsea) should be prioritised over alternatives, nor demonstrated that the cumulative impacts are manageable. For these reasons, the Plan in its current form cannot be considered sound or legally compliant.	To make the Local Plan legally compliant and sound in respect of the South Nailsea / Gleeson's site and its impacts, the following modifications are necessary: Remove or significantly reduce the reliance on large allocations at South Nailsea / Gleeson's and other high-impact peripheral sites until exceptional circumstances are fully evidenced, in line with national policy on sustainable development and Green Belt/strategic gap protection. Update the evidence base with credible transport modelling that tests the cumulative impact of all allocations in the Nailsea/Backwell area and identifies deliverable and funded mitigation measures for the local highway network, sustainable transport access, and active travel infrastructure. Demonstrate infrastructure deliverability and funding, including confirmable mechanisms for schools, healthcare, utilities, and drainage capacity prior to allocation, rather than relying on future negotiations. Reinforce ecological and landscape evidence, including surveys of protected habitats and species, full biodiversity net gain proposals, and landscape sensitivity studies to justify that environmental harm is avoided or mitigated in line with national policy. Provide robust flood risk and drainage assessments, showing how surface water, sewer capacity, and SuDS measures will manage risk both on and off site without increasing flood exposure for existing and future residents. Reassess alternatives through an updated Sustainability Appraisal that transparently compares brownfield redevelopment, urban intensification and redistribution of growth away from peripheral, unconstrained greenfield sites. Ensure Duty to Cooperate compliance with neighbours and statutory agencies (education, transport, environment, water/sewerage undertakers) demonstrating active, ongoing engagement and resolutions on strategic issues relevant to South Nailsea / Gleeson's development. Without these modifications, the Local Plan, including its approach to the South Nailsea site, cannot meet the tests of positive preparation, justification, effectiveness, or consistency with	N/A	

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						national planning policy, and is not legally compliant.		
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	I object to Policy LP7 – Land East of Backwell (Schedule 1, capacity 889) on the grounds that it renders the North Somerset Local Plan 2041 unsound, not legally compliant, and inconsistent with national planning policy. The scale of this allocation is unprecedented for Backwell, which already has 800 new houses approved, representing a 40% increase for the village. Adding a further ~889 houses would constitute complete overdevelopment, placing unsustainable pressure on the local community, services, and infrastructure. The proposed development is not deliverable or sustainable for multiple reasons: Transport and congestion – The new road intended to serve the development would not effectively relieve congestion on Station Road, Backwell Common, or Chapel Hill. Engineering solutions to route the road under or over the railway would be extremely expensive and may not be feasible. The railway station is not fit for purpose as a transport hub, particularly for people with mobility issues or families travelling with young children. (NPPF paras 104–105) Infrastructure deficits – Despite already-approved growth, there is a shortfall of school places and no planned investment in health, leisure, or community services. The proposed additional housing would exacerbate these deficiencies, rendering the development undeliverable (NPPF para 92). Disproportionate growth – Backwell is allocated a higher number and percentage of housing than any other village or even some towns in North Somerset. It is expected to take 7% of the district's housing allocation compared to Clevedon's 2%, which is disproportionate and unjustified. Lack of evidence – No needs assessment, viability analysis, or social cohesion impact assessment has been provided for the additional 889 homes. Backwell is not an employment hub, so most new residents will commute, worsening traffic and environmental pressures. Agricultural land and food security – The site contains Grade 1 agricultural land, one of only 7% remaining in North Somerset. Development would contradict government policy to protect the best and most versatile land, undermining long-term food security. Environmental impacts – The proposals would destroy wildlife habitats, including those critical for biodiversity in one of the most nature-depleted countries. The site supports the Brockley Maternity Roost and SSSI, with rare Lesser and Greater Horseshoe Bats relying on the area for feeding. Flood risk – Backwell Common, Backwell Lake, and adjacent fields are prone to flooding, which would be exacerbated by additional housing and road construction. The Infrastructure Delivery Plan does not adequately analyse or cost mitigation measures. Green Belt / Strategic Gap – The allocation would result in the loss of Green Belt and high-quality landscape, eroding settlement identity and rural character. Government policy requires 50% affordable housing on Green Belt land, reducing funds available for necessary infrastructure, making the proposals economically and practically challenging to deliver. Deliverability and sustainability – The sheer volume of housing, combined with insufficient investment in roads, schools, health, and utilities over a short period, is destabilising and undeliverable. NPPF para 35 requires plans to be effective and deliverable, which this allocation fails to meet.	To make Policy LP7 and the Local Plan legally compliant and sound, the following modifications are necessary: Remove or substantially reduce the allocation of Land East of Backwell until exceptional circumstances for Green Belt and Strategic Gap release are robustly demonstrated, in accordance with NPPF paras 137–139. The Plan must justify the scale of growth relative to the existing village and district-wide housing strategy. Provide a comprehensive needs and viability assessment, including the impact of 889 additional dwellings on schools, healthcare, leisure facilities, utilities, and social cohesion. The Plan must demonstrate that infrastructure and services can accommodate the proposed growth without destabilising the community (NPPF paras 35, 92). Prepare a deliverable, funded, and evidence-based transport mitigation strategy, including: Cumulative traffic modelling for the A370, Station Road, Backwell crossroads, Chapel Hill, and other local roads. Feasible solutions for railway crossings or road links under/over the railway. Upgrades to the railway station to address accessibility and mobility challenges. Measures to encourage sustainable transport and reduce car dependency (NPPF paras 104–105). Strengthen environmental and ecological evidence, including: Surveys of habitats, protected species, and biodiversity corridors. Detailed mitigation proposals for Lesser and Greater Horseshoe Bats and the Brockley Maternity Roost SSSI. Biodiversity Net Gain calculations and long-term management plans (NPPF paras 174–180; Environment Act 2021). Prepare detailed flood risk and drainage assessments, demonstrating that development can be accommodated safely without increasing	N/A	

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					In addition, there is no credible evidence that the proposed road or other infrastructure could be funded, delivered on time, or successfully mitigate the cumulative impact of this scale of growth. The Sustainability Appraisal does not consider reasonable alternatives, including brownfield redevelopment or redistribution of housing to less constrained locations. For all these reasons, Policy LP7 fails the tests of soundness (positively prepared, justified, effective, and consistent with national policy), and the Local Plan cannot be considered legally compliant or deliverable.	surface-water or fluvial flood risk to Backwell Common, Backwell Lake, and downstream areas. Include SuDS feasibility and maintenance strategies (NPPF paras 159–167). Assess alternatives and provide a transparent Sustainability Appraisal, considering brownfield redevelopment, urban intensification, and redistribution of growth to settlements with existing infrastructure. The Plan must demonstrate that Land East of Backwell is the most sustainable and deliverable option. Demonstrate Duty to Cooperate compliance with neighbouring authorities, statutory infrastructure providers, and environmental agencies to ensure cross-boundary impacts on transport, ecology, and utilities are addressed (Planning & Compulsory Purchase Act 2004, s33A). Provide a credible funding and phasing plan for all infrastructure required to serve the allocation, ensuring that delivery aligns with housing construction to prevent unsustainable growth. Without these modifications, Policy LP7 is not justified, not effective, and cannot be considered sound or legally compliant.		
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	I object to Policy LP7 – Land East of Backwell (Schedule 1, capacity 889) on the grounds that it renders the North Somerset Local Plan 2041 unsound, not legally compliant, and inconsistent with national planning policy. The scale of this allocation is unprecedented for Backwell, which already has 800 new houses approved, representing a 40% increase for the village. Adding a further ~889 houses would constitute complete overdevelopment, placing unsustainable pressure on the local community, services, and infrastructure. The proposed development is not deliverable or sustainable for multiple reasons: Transport and congestion – The new road intended to serve the development would not effectively relieve congestion on Station Road, Backwell Common, or Chapel Hill. Engineering solutions to route the road under or over the railway would be extremely expensive and may not be feasible. The railway station is not fit for purpose as a transport hub, particularly for people with mobility issues or families travelling with young children. (NPPF paras 104–105) Infrastructure deficits – Despite already-approved growth, there is a shortfall of school places and no planned investment in health, leisure, or community services. The proposed additional housing would exacerbate these deficiencies, rendering the development undeliverable (NPPF para 92). Disproportionate growth – Backwell is allocated a higher number and percentage of housing than any other village or even some towns in North Somerset. It is expected to take 7% of the district's housing allocation compared to Clevedon's 2%, which is disproportionate and unjustified. Lack of evidence – No needs assessment, viability analysis, or social cohesion impact	To make Policy LP7 and the Local Plan legally compliant and sound, the following modifications are necessary: Remove or substantially reduce the allocation of Land East of Backwell until exceptional circumstances for Green Belt and Strategic Gap release are robustly demonstrated, in accordance with NPPF paras 137–139. The Plan must justify the scale of growth relative to the existing village and district-wide housing strategy. Provide a comprehensive needs and viability assessment, including the impact of 889 additional dwellings on schools, healthcare, leisure facilities, utilities, and social cohesion. The Plan must demonstrate that infrastructure and services can accommodate the proposed growth without destabilising the community (NPPF paras 35, 92). Prepare a deliverable, funded, and evidence-based transport mitigation strategy, including: Cumulative traffic modelling for the A370, Station Road, Backwell crossroads, Chapel Hill, and other local roads.	No	

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					assessment has been provided for the additional 889 homes. Backwell is not an employment hub, so most new residents will commute, worsening traffic and environmental pressures. Agricultural land and food security – The site contains Grade 1 agricultural land, one of only 7% remaining in North Somerset. Development would contradict government policy to protect the best and most versatile land, undermining long-term food security. Environmental impacts – The proposals would destroy wildlife habitats, including those critical for biodiversity in one of the most nature-depleted countries. The site supports the Brockley Maternity Roost and SSSI, with rare Lesser and Greater Horseshoe Bats relying on the area for feeding. Flood risk – Backwell Common, Backwell Lake, and adjacent fields are prone to flooding, which would be exacerbated by additional housing and road construction. The Infrastructure Delivery Plan does not adequately analyse or cost mitigation measures. Green Belt / Strategic Gap – The allocation would result in the loss of Green Belt and high-quality landscape, eroding settlement identity and rural character. Government policy requires 50% affordable housing on Green Belt land, reducing funds available for necessary infrastructure, making the proposals economically and practically challenging to deliver. Deliverability and sustainability – The sheer volume of housing, combined with insufficient investment in roads, schools, health, and utilities over a short period, is destabilising and undeliverable. NPPF para 35 requires plans to be effective and deliverable, which this allocation fails to meet. In addition, there is no credible evidence that the proposed road or other infrastructure could be funded, delivered on time, or successfully mitigate the cumulative impact of this scale of growth. The Sustainability Appraisal does not consider reasonable alternatives, including brownfield redevelopment or redistribution of housing to less constrained locations. For all these reasons, Policy LP7 fails the tests of soundness (positively prepared, justified, effective, and consistent with national policy), and the Local Plan cannot be considered legally compliant or deliverable.	Feasible solutions for railway crossings or road links under/over the railway. Upgrades to the railway station to address accessibility and mobility challenges. Measures to encourage sustainable transport and reduce car dependency (NPPF paras 104–105). Strengthen environmental and ecological evidence, including: Surveys of habitats, protected species, and biodiversity corridors. Detailed mitigation proposals for Lesser and Greater Horseshoe Bats and the Brockley Maternity Roost SSSI. Biodiversity Net Gain calculations and long-term management plans (NPPF paras 174–180; Environment Act 2021). Prepare detailed flood risk and drainage assessments, demonstrating that development can be accommodated safely without increasing surface-water or fluvial flood risk to Backwell Common, Backwell Lake, and downstream areas. Include SuDS feasibility and maintenance strategies (NPPF paras 159–167). Assess alternatives and provide a transparent Sustainability Appraisal, considering brownfield redevelopment, urban intensification, and redistribution of growth to settlements with existing infrastructure. The Plan must demonstrate that Land East of Backwell is the most sustainable and deliverable option. Demonstrate Duty to Cooperate compliance with neighbouring authorities, statutory infrastructure providers, and environmental agencies to ensure cross-boundary impacts on transport, ecology, and utilities are addressed (Planning & Compulsory Purchase Act 2004, s33A). Provide a credible funding and phasing plan for all infrastructure required to serve the allocation, ensuring that delivery aligns with housing construction to prevent unsustainable growth. Without these modifications, Policy LP7 is not justified, not effective, and cannot be considered sound or legally compliant.		

Name: Joe Tristram **I.D:** 47565121

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy DP46: Housing Type and Mix	Yes		Unsure	Yes		Accessbility of new homes. I consider 5% of new homes in developments of over 10 homes to be inadequate and would prefer to see a figure of 10%. This is from discussions with a WECIL access consultant.	In general terms apart from my comment above I congratulate NS planners on an excellent plan after a lot of hard work.	

Name: Joel Cox **I.D:** 62860673

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The site is not demonstrated to be deliverable or developable There is insufficient evidence that the site can realistically be delivered within the plan period. There are unresolved issues with land ownership, access, viability, infrastructure costs, drainage, utilities and environmental constraints. The Council has relied heavily on future technical work to be completed at the planning application stage, which is contrary to the NPPF requirement that allocated sites must be supported by proportionate, up-to-date evidence at the plan-making stage. For these reasons, the allocation does not meet the tests of “justified” or “effective”. The site is in an unsustainable location The proposed allocation performs poorly in terms of access to essential services such as schools, healthcare, shops and public transport. The location would increase car dependency and commuter traffic, contradicting both North Somerset Council’s own sustainability objectives and national policy requiring plans to promote sustainable travel and reduce reliance on private vehicles. The Council has not demonstrated that essential services or public transport improvements can be delivered, funded or supported by operators. Transport and access impacts not resolved The transport evidence is incomplete and in places relies on outdated data. The plan does not show that surrounding roads and junctions have the capacity to support the additional traffic associated with this allocation. There is no clear or funded package of mitigation measures, nor any timetable for delivery. Without credible transport solutions, the plan is not “effective” and does not comply with the soundness requirements of the NPPF. Harm to landscape, settlement character and separation Development of this site would result in the loss of important open land and harm the landscape setting of the area. It would erode the character of the settlement and risk coalescence between neighbouring communities. These impacts have not been adequately assessed or mitigated. The allocation is therefore not “justified” and is inconsistent with national policy protecting the character and distinctiveness of settlements. Insufficient evidence on biodiversity and environmental impacts Survey work is incomplete or missing, particularly in relation to protected species, habitat value and ecological connectivity. The Council relies on future mitigation without demonstrating that it is deliverable or effective. This approach risks non-compliance with the Habitats Regulations and fails the requirement for a sound evidence base. Flood risk concerns and inadequate assessment Portions of the site and surrounding area may be vulnerable to surface water flooding or insufficient drainage capacity. The sequential test and exception test have not been adequately demonstrated. Reliance on future drainage solutions, without proven feasibility or funding, fails national policy requirements for flood risk management. Infrastructure delivery not guaranteed			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					The Infrastructure Delivery Plan does not provide clear evidence of how schools, GP capacity, highways upgrades, utilities and community facilities will be delivered in step with development. Many items are unfunded, lack committed partners, or are dependent on contributions that may be insufficient. Without a realistic delivery mechanism, the plan cannot be considered effective. Failure to consider reasonable alternatives (potential legal issue) The Sustainability Appraisal does not demonstrate that reasonable alternatives were assessed in a fair, comparable and lawful manner. Some alternative sites or strategies appear to have been dismissed without transparent or proportionate analysis. This raises a potential failure to comply with the Environmental Assessment of Plans and Programmes Regulations 2004. Inadequate publication or availability of evidence (potential legal issue) Certain technical documents, background papers or assessments were not made available at the correct stage or were published late. This may constitute a failure under the Town and Country Planning (Local Planning) (England) Regulations 2012, as all relevant evidence must be available to the public during consultation. This raises questions of legal compliance. Consultation process may not meet statutory requirements (potential legal issue) If key documents were missing, changed late, referenced but not published, or consultation materials were unclear or incomplete, this could constitute a procedural failure under Regulation 19. Any procedural irregularity risks rendering the plan legally non-compliant. For all these reasons, the proposed allocation is not sound, not legally compliant, and should be removed from the Local Plan or substantially revised.			
Black Rock, north of Clevedon Road	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The site is not demonstrated to be deliverable or developable There is insufficient evidence that the site can realistically be delivered within the plan period. There are unresolved issues with land ownership, access, viability, infrastructure costs, drainage, utilities and environmental constraints. The Council has relied heavily on future technical work to be completed at the planning application stage, which is contrary to the NPPF requirement that allocated sites must be supported by proportionate, up-to-date evidence at the plan-making stage. For these reasons, the allocation does not meet the tests of “justified” or “effective”. The site is in an unsustainable location The proposed allocation performs poorly in terms of access to essential services such as schools, healthcare, shops and public transport. The location would increase car dependency and commuter traffic, contradicting both North Somerset Council’s own sustainability objectives and national policy requiring plans to promote sustainable travel and reduce reliance on private vehicles. The Council has not demonstrated that essential services or public transport improvements can be delivered, funded or supported by operators. Transport and access impacts not resolved The transport evidence is incomplete and in places relies on outdated data. The plan does not show that surrounding roads and junctions have the capacity to support the additional traffic associated with this allocation. There is no clear or funded package of mitigation measures, nor any timetable for delivery. Without credible transport solutions, the plan is not “effective” and does not comply with the soundness requirements of the NPPF. Harm to landscape, settlement character and separation Development of this site would result in the loss of important open land and harm the landscape setting of the area. It would erode the character of the settlement and risk coalescence between neighbouring communities. These impacts have not been adequately assessed or mitigated. The allocation is therefore not “justified” and is inconsistent with national policy protecting the character and distinctiveness of settlements. Insufficient evidence on biodiversity and environmental impacts			

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					Survey work is incomplete or missing, particularly in relation to protected species, habitat value and ecological connectivity. The Council relies on future mitigation without demonstrating that it is deliverable or effective. This approach risks non-compliance with the Habitats Regulations and fails the requirement for a sound evidence base. Flood risk concerns and inadequate assessment Portions of the site and surrounding area may be vulnerable to surface water flooding or insufficient drainage capacity. The sequential test and exception test have not been adequately demonstrated. Reliance on future drainage solutions, without proven feasibility or funding, fails national policy requirements for flood risk management. Infrastructure delivery not guaranteed The Infrastructure Delivery Plan does not provide clear evidence of how schools, GP capacity, highways upgrades, utilities and community facilities will be delivered in step with development. Many items are unfunded, lack committed partners, or are dependent on contributions that may be insufficient. Without a realistic delivery mechanism, the plan cannot be considered effective. Failure to consider reasonable alternatives (potential legal issue) The Sustainability Appraisal does not demonstrate that reasonable alternatives were assessed in a fair, comparable and lawful manner. Some alternative sites or strategies appear to have been dismissed without transparent or proportionate analysis. This raises a potential failure to comply with the Environmental Assessment of Plans and Programmes Regulations 2004. Inadequate publication or availability of evidence (potential legal issue) Certain technical documents, background papers or assessments were not made available at the correct stage or were published late. This may constitute a failure under the Town and Country Planning (Local Planning) (England) Regulations 2012, as all relevant evidence must be available to the public during consultation. This raises questions of legal compliance. Consultation process may not meet statutory requirements (potential legal issue) If key documents were missing, changed late, referenced but not published, or consultation materials were unclear or incomplete, this could constitute a procedural failure under Regulation 19. Any procedural irregularity risks rendering the plan legally non-compliant. For all these reasons, the proposed allocation is not sound, not legally compliant, and should be removed from the Local Plan or substantially revised.			

Name: John Addiss **I.D:** 62687617

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	There are already an excessively large number of houses planned for Backwell, representing a 40% increase in the number of houses in the village. The additional almost 1000 houses proposed for this development would lead to complete overdevelopment. The proposed road is unfeasible and nobody realistically expects it to happen - engineering the road under the railway line would be extremely expensive. In addition, the road would not relieve the extra pressure on the already at-capacity Backwell crossroads that would be caused by the additional journeys from 2000 extra cars (assuming 2 cars per new household). The traffic at Backwell crossroads regularly backs up to Robinson Way heading towards Bristol. Such a new road would also damage the green belt separation between Nailsea and Backwell, and destroy the environment of Backwell common which is a very popular cycling and walking route. An additional junction from such a new road onto the A370 would only exacerbate traffic problems on the A370, more than counteracting any reduction in traffic entering the A370			

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					from station road. There is a lack of infrastructure and services in Backwell to support another 1000 households. The new Grove Farm site being approved without any construction or contribution (other than land) towards a new school shows how empty any promises of such infrastructure are. Backwell is not an employment hub. The vast majority of residents commute, many into Bristol. Many of these commutes are done by road, and additional road traffic on the A370 will cause additional delays to the X1 service. Many of the additional 1000 households will involve one or more adults commuting daily into Bristol or Weston along the A370. Sites closer to Bristol would be more suitable for such a development. There is no needs or viability analysis for an extra 1000 houses. Backwell is allocated an excessively disproportionate number of houses in comparison to any other village in North Somerset and even many towns which have many more local employment opportunities. This stie includes Grade 1 agricultural land currently used for food crops and grazing. Government policy states that "we must protect our best and most versatile land" to safeguard food security. The proposals contradict this policy. The Infrastructure Delivery Plan lacks analysis and costings, and there is no funding guarantees for the new road or services. Given that the plan appears to acknowledge that such a new road is an essential requirement for this development, this omission is not acceptable. Backwell common and the surrounding areas are prone to flooding, which would be aggravated by more housing. The railway station is not fit for purpose as a transport hub. It is accessible on one of the platforms only by a large number of steep metal stairs, and is therefore not accessible for prams, young children or people with mobility issues. It is inappropriate to designate Backwell as an area for strategic growth given its lack of local employment opportunities, the need to develop in greenbelt farmland, the huge growth anticipated in a small period of time, and the required investment in infrastructure that is unlikely to be delivered leaving residents with health care and other services that are not fit for purpose.			

Name: John Barratt **I.D:** 31074337

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP7: Green Belt	No	‣ Justified	Unsure	Unsure	You cannot make the opening statement when you have just destroyed the most important strategic green belt that previously prevented urban sprawl, to build an appalling science park that could have been sited anywhere. This has opened the way for 3500 houses to be built on the next section of green belt, undoubtedly without amenities or suitable infrastructure or employment, and no doubt more will follow. At best it is disingenuous, but more likely it is a blatant lie. What does your declared climate emergency mean ? A hollow, pointless political statement.	Stop pretending you care about the greenbelt. Amend so that it reflects your honest intentions - what ever they might be. They are clearly not what is written.		

Name: John Belton **I.D:** 29290881

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP3: Spatial strategy	No	‣ Positively	Unsure	Unsure	Each North Somerset town or village conducts a community-led improvement plan of key sites, including underused, vacant, dilapidated and locally preferred brownfield and greenfield sites. The target allocation of homes for each area will remain, however the type, location and arrangement can be designed to benefit the local population. The construction methods are to			

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		prepared • Justified			be low impact, local and energy efficient. The benefits of this approach would be improvements in community health, local jobs, reduced loneliness, economic prosperity, sustainable travel routes, better living conditions, older residents remain in their community, kids have safe places to play, nature recovery and reduced anti-social behaviour.			

Name: John Beringer **I.D:** 31048545

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	We were appalled when we saw the proposals for Backwell and are finding it extremely hard to see what role North Somerset Council is playing in housing development. The Council appears to be simply accepting Government demands without any effort to support existing communities. Where is the Council fight to reject the demand for 24,500 houses when there is so little suitable land for housing? Where is there any indication that if the very worse happens and the houses are built, that there will be good (let alone adequate) infrastructure? Looking at the proposed developments in Backwell and Nailsea it is very hard to see any other long-term plan than to merge the town and village because the virtual doubling of the size of Backwell is hardly compatible with it continuing to be a village. We doubt vey much that there is any value in submitting objections to the present Local Plan because of the Council's apparent indifference to local concerns. However, we feel an obligation to comment and, on that basis, have the following observations: • Backwell is a commuter village with very few local employment opportunities. Increasing the number of people living here will simply increase commuting into Bristol. Spend whatever you like on bus lanes, but who would seriously expect most of the new inhabitants to travel on public transport? • Without the proposed new road, congestion on Station Road in Backwell would move from bad to extremely bad. The B3130 and other routes from Nailsea to Bristol are already completely inadequate, so there is little room for argument that the Nailsea expansion would not add very seriously to the Backwell traffic problems. However, other than being mentioned, there is not any indication that the Council has considered the costs, environmental harm and societal disruption that building the road would entail, let alone that magnitude of the problem of crossing the railway. We do not believe that any major development should start without proper costed infrastructure planning, but sadly recognise that this has become standard practice in North Somerset. • There appears to be an assumption that the railway will carry much of the commuting burden. We see no clear vision on how to make the station accessible on both sides of the track or how services can be improved when intercity trains have priority. As stated above, the lack of detail or commitment for infrastructure is a major deficit in the Plan. • We recognise that new houses are needed and that building them will have negative environmental impacts. However, development should surely be predicated on minimising these harms. The proposed plan includes real risks to Greater Horseshoe bats as well as the harm from flood plain development, loss of Greenbelt land, and loss of Grade 1 farming land which would be additional to the usual wildlife losses from major developments?			Response to the North Somerset local plan as they affect Backwell.docx

Name: John Brooks **I.D:** 62521217

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	There is no road network to support the plan and main road through Backwell is not suitable for widening. The increase in road traffic from the plan will cause traffic chaos and much increased air pollution. The Nailsea/Backwell rail station is not suitable for a substantial increase in numbers of people using it. Backwell Lake and adjacent fields where housing is planned are on a floodplane which floods regularly.			

Name: John Clement **I.D:** 21266721

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	800 new houses are already approved in Backwell. which is a 40% increase for the village. These additional homes constitutes an over-development. There is already a deficit of school places locally and health services are already pushed. Most Backwell residents commute to work so a development of this scale would cause congestion on the already busy roads. The rail service from the local station is often full to capacity at busy commuting times and the station has accessibility issues. The area is prone to surface water flooding which would be made worse by further development.			

Name: John Glason **I.D:** 62831297

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The 'Land East of Backwell' (policy LP3 Strategic Location Nailsea & Backwell) proposed allocation 889 dwellings is a disproportionate over development of the village. The proposed 515 dwelling development at Grove Farm in Backwell, alongside the suite of other development sites, more than deliver the housing requirement. There are no 'exceptional circumstances' that meet the emerging policy aspirations of SP7 concerning Green Belt. Emerging policy SP8 Housing states that the proportion of housing supply in Nailsea and Backwell should be 15%. Combining the settlements in terms of housing numbers is flawed, reducing the designated Green Belt area (policy SP7) and compromising the 'strategic gap' (policy LP10) are strong reasons for not allocating 889 dwellings in an area of flood risk and high quality grade 1 agricultural land (policy DP53 Best and most Versatile Land). Why should Backwell see an 80% growth when the proportionate housing growth target figure for the village is only 7 (policy SP8 Housing)? The higher order settlements of Weston-Super-Mare, Portishead and Clevedon are allocated a significantly reduced amount of residential development relative to their size, made possible by the removal of Green Belt land in Backwell to facilitate an over development of the village which will require several new schools? These higher tier settlements are better strategic growth locations in terms of housing growth potential, because of their service and infrastructure provision as well as their superior connectivity. With the imminent arrival of the Planning & Infrastructure Bill and the questionable Government 'standard methodology of housing need', the total strategic housing figures for the district are fundamentally flawed. There has also been no recognition of the fact that 228 dwellings have been delivered through the windfall allowance - a high provision in the village of Backwell that needs to be factored in to future housing delivery calculations. The evidence to support a 5 or 6 hectare provision for employment land in north Nailsea & east of Backwell is questionable, especially given the historical delivery and change in employment land requirements and increase in home working. Policy DP35 Nature Conservation should acknowledge the existence and protection requirements for the lesser horseshoe bat habitat and Biodiversity Net Gain material consideration in this location. In addition, the strategic flood risk should be carefully assessed as this will also have a significant impact on the viability of the phased release of developments sites. Certainty of delivery is required if the plan is to be found 'sound'. In addition to this, significant sites are being proposed to the south of Nailsea near Backwell Lake which are in close proximity to the East of Backwell proposal. There are ground conditions and other parallel issues to be considered (highlighted above), but the cumulative impact of the residential development proposals are significant and mean that Nailsea and Backwell are allocated far too much housing development compared to higher order settlements. In addition, the road proposal has not been modelled to demonstrate traffic alleviation for Station Road. The Infrastructure Delivery Plan does not give any funding guarantees. What assurances are being given regarding future Section 106 or Community Infrastructure Levy developer contributions and the sequencing of development to a comprehensive and costed masterplan? Fundamentally, the housing proposals for the East of Backwell represent 'over development' in a lower tier settlement that			

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					'strategically' should be allocated in the higher order settlements.			

Name: John Langley-Davis **I.D:** 62578561

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell already has 800 new houses approved which is over 40% increase for the village, the infrastructure is already failing the villagers and this would lead to overdevelopment. The road proposed would not serve the needs of Nailsea's traffic or releive congestion of Station Rd which is currently out of control as it is and totally unsafe at Backwell Secondary School drop off and pick up. The cost of the road under or over the railway would be a completely ridiculous use of public funds when it is currently impossible to get NSC to do anything about safety around Backwell Secondary School. A village should not be expected to take 7% of the extra houses in North Somerset when town's like Clevedon are only taking 2%. There is no needs or viability analysis for 1,000 houses. There is very little employment in Backwell, almost everyone commutes to work. No social cohesion impact assesment had been provided. The land proposed floods terribly, I walked it last week and it was a complete mud bath after the rain and in some places up to 30cm deep mud. I have young children and the railway station is not fit for purpose if you have a wheelchair or a buggy. There is a deficit in school places and no investment in health or leisure facilities. In fact the footpaths in these fields are well used so there would be less space for people to exercise. Government policy states that our best land should be protected to safeguard food security. This site is grade 1 agricultural land and as such to develop this land would directly contravene government guidance. There are no modifications that would make it sound or legally compliant, it has no merit whatsoever and should be shelved in favour of the great many other sites that could work in North Somerset.			

Name: John McGrath **I.D:** 55749537

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SP7: Green Belt	No	• Consistent with national policy	No	No	Infrastructure does not support more building in Portishead, particularly on Green belt when alternative non Green belt sites are available, for example in or near Weston-Super-Mare As there are few schools, jobs, doctors, dentists etc people will have to use cars on roads already overused, to get to schools or work in places like Bristol, Weston-Super-Mare etc. Public transport is not sufficient to cover the amount of travel necessary. House prices in Portishead would be too high (due to market forces) for any first-time buyers. Ie the sort of people who need new homes. Weston-Super-Mare (or nearby) would far better support first-time buyers as house prices will be lower.	Significantly reduce the build in Portishead, making any such properties for higher end buyers, ie moving up the ladder and freeing up cheaper houses elsewhere. Substituting this with more build elsewhere, such as W-S-M, which is not Green belt and more suitable	No I do not	

Name: John Moore **I.D:** 62914945

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Policy LP3: Strategic location: Nailsea and Backwell					Response to NSC REG 19 Local Plan 2041 1 Increase in size of Backwell of 80% over a relatively short period is UNSUSTAINABLE. 2 The proposed road to avoid the village centre goes through GREENBELT FARMLAND, WILDLIFE HABITATS AND FLOOD PLAIN. It is also UNFUNDED. 3 DEVELOPERS HAVE NOT PLANNED OR SHOWN CONCERN for the increased requirement for school places, medical provision (our surgery is at capacity) or leisure facilities for a massively increased population. Backwell only has a tired and over-used swimming pool, and a charity-run playing field which is being totally encroached on by current housing construction. 4 DISPROPORTIONATE ALLOCATION of housing development in Backwell compared to other villages in North Somerset. 5 UNPROVEN that Backwell needs/can support a market for SO many new houses. No plan to cater for the increasing number of older people living in existing large houses who could down-size if suitable small houses were built – its all 3-5 bedroom houses. 6 Additional traffic at ALL times, esp. peak times as there is very little employment in Backwell – mostly COMMUTERS. 7 I am concerned that our COMMUNITY SPIRIT WILL BE ERODED by so many new residents. There will NOT BE ROOM AT THE LOCAL SCHOOLS for such an influx, so many will drive their children elsewhere for education, adding to TRAFFIC CONGESTION. 8 Loss of high quality farmland – once built on it will never be farmland again – LOSS OF FOOD SECURITY 9 Proposals go against Government's stated policy of "PROTECTING BEST AND MOST VERSATILE LAND" Food security ignored. 10 HABITATS AND WILDLIFE CORRIDORS will be destroyed, along with space and tranquillity for residents. 11 ENDANGERED/RARE SPECIES of Horseshoe bats threatened by development. 12 Infrastructure Development Plan inadequate – NOT ANALYSED, COSTED OR FUNDED. Who pays? 13 All the proposed land is PRONE TO FLOODING, especially at the bottom of the valley around Backwell Common. Housing would be AT RISK. 14 The CHARACTER OF THE VILLAGE would be changed out of all recognition. Loss of greenbelt land and the massive increase in hard landscape will lead to FREQUENT FLOODING, eroding of FOOD SECURITY, loss of QUALITY OF LIFE for existing residents, TRAFFIC CHAOS with huge disruption to roads both during the 10+ years of construction and afterwards with the 80% increase in residents. 15 At Backwell lake the TRANQUILLITY, AMBIENCE AND THE MANY WILDLIFE HABITATS will be destroyed by building a bypass road opposite. Plus this road will pass right through the floodplain. 16 The 50% AFFORDABLE HOUSING government policy will be IGNORED by the developers with seemingly no consequences. 17 This volume of growth is completely UNSUSTAINABLE for a RURAL village of Backwell's size. 18 The RAILWAY is not a suitable transport hub. The station totally is INACCESSIBLE for anyone with mobility issues or children in pushchairs. Also the train does not go to most places people need to go to, it is only relevant to people who work near the stations – so most COMMUTERS WILL DRIVE.			NSC Reg 19 Local Plan 2041 11Dec25.pdf

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					19 There is already a huge amount of development approved for Backwell. Why is it not shared more evenly around the surrounding villages? No development of any consequence planned at Cleve or Flax Bouton and yet they too are surrounded by farmland.			

Name: John Pickard **I.D:** 62774337

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Gordano Services	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	No	North Somerset is required to build 23,475 new homes over the coming 15 years. 1,100 of those homes are proposed for Pill and District, an area of some 4,500 residents. This represents an unjustifies and unfairly large proportion. I do not consider the Pre-submission plan to be sound because 1. There has been a lack of community involvement - no public exhibition has been held in our village, unlike Weston-Super-Mare, Long Ashton, Backwell and Nailsea, all of which had public exhibitions. This, despite a petition from residents objecting to over-development having raised over 1800 signatures. 2. The plan proposes to build on Green Belt land and claims 'exceptional circumstances' under the terms of Section 13 of the National Planning Policy Framework 2024 (NPPF) because it says it cannot meet its target from sustainable locations beyond the Green Belt. I am not convinced that the Council has yet fully examined available alternatives 3. The 'additional sites viability addendum' provided by the council described its own target of 50% affordable housing as 'challenging' for the sites it proposed in the Green Belt around our village. 4. Traffic congestion at Junction 19 of the M5 is already a serious issue, as anyone caught up in it at rush hour will know. The proposed development of the land east of Gordano Services will place an intolerable additional burden on an already overwhelmed junction. I believe the report overstates the positive impact of the proposed railway link, which is actually very limited in scope. It is, to take one example, useless to those like me who work in Clifton, since it will go to Temple Meads. I already use the rail link from Portway Park and Ride to Clifton Down, fighting through the traffic each morning at J.19 to drive to the station, and often struggling even more to return home due to regular tailbacks on motorway at J.19. When I do catch the train, it is never full, even at peak times.	1. Fully consult the community, including an exhibition and a public meeting 2. Explore more fully the brownfield alternatives before building on Green Belt 3. The Council must consider its own stated pessimism over its ability to meet the 50% affordable housing target and modify its proposal accordingly 4. Withdraw the distastrous plan to develop the land east of Gordano Services dues to the unacceptable environmental and transport pressures this will cause.		

Name: John Pilgrim **I.D:** 62847073

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Policy LP11: Transport infrastructure, allocations and safeguarding	No	• Effective	Unsure	Unsure	As you will be aware, the primary focus at this stage of the Local Plan's preparation is on the soundness of the plan, with regard to it being positively prepared, justified, effective and consistent with national policy. The following detailed comments set out Department for Education's (DfE) view of the plan's soundness in respect of education provision. The Department notes the objective of safeguarding land for "the improvement of existing services or the creation of sustainable transport links and facilities" within Policy LP11 Transport infrastructure, allocations and safeguarding and the corresponding Schedule 7 which identifies potential routes. The DfE welcomes the sustainable travel objectives of this policy, however, we are concerned about the alignment shown on the Policies Map for the strategic cycle link between Clevedon and Portishead. The proposed route would utilise the single narrow access to Clevedon School (via Valley Road) and pass through the			

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					school's playing fields along the southern boundary, crossing Holly Lane. Clevedon School is currently within the DfE's school rebuilding programme (SRP). The DfE's design concept for the new school does not currently include provision for a cycle route across the site. Introducing this change at this stage would result in additional cost, operational challenges, and potentially delays to the delivery of the new school. We request that the draft Policies Map be amended to show the cycle route following an alignment that runs outside the school boundary. The SRP Team would welcome the opportunity to work with North Somerset Council to explore and agree a more suitable alignment for the cycle path. This will help to ensure the strategic cycle route is delivered in a way that most effectively meets local needs, whilst minimising the impact on the operational requirements of the school. I hope the above comments are helpful in shaping North Somerset's Local Plan, with specific regard to positive planning for education infrastructure.			

Name: John Pirouet **I.D:** 58509345

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The plan does not appear to recognise the feedback to the earlier consultation, whereby the land at Tower Farm received a great dal of justified opposition and the conclusions of the consultation did not appear to fall in favour of development at this location. Many of the points made in that consultation still hold true in terms of lack of justification for this site, given the significantly adverse impacts on nature, amenity and infrastructure. NSC has not properly considered alternative brownfield or greenfield sites with far lower ecological impact. Green Belt changes are only allowed by national planning policy in exceptional — and these have not been demonstrated. In addition: • The site cannot provide safe or suitable access. • Development would create unacceptable transport impacts, failing national soundness tests To preserve the greenbelt land and all the positives this brings to the community, through proper consideration of the below the Council should find more appropriate sites than the land at Tower Road: • Alternative brownfield or greenfield sites with far lower ecological impact, both in Portishead and across North Somerset. • Opportunities to increase housing density on proposed brownfield sites, which could remove the need to develop Tower Farm. The council needs to recognise the strategic ecological importance of these sites in protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor. Both these areas were added to the Green Belt in the late 1980s due to their high ecological value.			

Name: John Polden **I.D:** 62802881

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP8: Housing	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The plan's section on housing is largely silent on the type of housing to be provided to comply with the overall housing targets. In my opinion this misses a serious opportunity to rethink the provision of housing and move away from the implicit assumption that most of the housing will be provided by private developers building on green fields. The country's urgent need is for high density, starter homes and social housing that are much better organised by local government (see attached letter). Such housing should be sited near public transport service hubs rather than the implicit assumption that cars will continue to be the primary transport mode in the area	The plan should include a projection of housing needs in the area highlighting the social and financial nature of the housing to be provided. I believe this will support my assertion that the primary need is for well designed high density, starter homes and social housing.		NSC REG 19 LOCAL PLAN 2041^J Autumn 2025 consultation.pdf
Policy LP12: Bristol Airport	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I believe the national government is in gross breach of its obligations for lowering carbon emissions set out in legislation such as UK Climate Change Act 2008. It has been promoting and potentially approving expansion in aviation traffic when there is no clear way whereby this will lead to the UK meeting its carbon emission targets for aviation. There have been numerous examples of this and the anticipated application for a Heathrow third runway will lead to this being tested in the courts. Any actions by a local council to enable an expansion of airport capacity could lead to the council becoming responsible to condoning a breach of climate change obligations	The Plan should clearly state that as it is possible that any extension to Bristol airport will be in breach of UK carbon emission targets for aviation, it will not support any such expansion.		
Policy DP14: Highway safety, traffic and provision of infrastructure associated with development	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	While my main concern relates to issues local to Backwell where we live, I feel the plan understates the serious issues relating to transport in the area. In particular it is largely silent on the major issues of traffic relating to the frequent closure of the M5 due to accident, incidents and road works. (see my detail letter). Little mention is made on the need to seriously invest in improving the use of the main rail link into Bristol by upgrading service frequency and improving stations (such as Backwell. (see my detail letter)	The plan should include a serious analysis of road traffic levels under various stress conditions. The plan should include proposals for the upgrading of the rail services in the area		NSC REG 19 LOCAL PLAN 2041^J Autumn 2025 consultation.pdf
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I have a more detailed document that outlines my overall view of the N Somerset Local Plan 2041 which I will attach to these detail comments if this is possible. Meanwhile my detail comments are:- With 800 new houses already approved, this new development leads to the complete overdevelopment of Backwell. I understand this amounts to an 80% projected population growth of Backwell. There are inadequate plans for infrastructure relating to this development. It is not clear that the construction of the proposed link road to Nailsea is a pre-condition of this development going ahead. A development of this scale will inevitably lead to regular grid-lock on the A370, particularly if the M5 is closed (see my detail letter). There is no serious impact analysis on the effect of this and other developments on Backwell. It is a fundamental mistake of the plan to leave private developers to develop such an area of high-grade, green belt agricultural land. This will inevitably lead to large swathes of 3/4 bedroom homes when there is a desperate need in the country for starter homes and social housing (see my detail letter) The railway link at Backwell is under-used and poorly provided for access etc. Little comment on this is made in the plan	The plan should make ANY significant granting of new development at Backwell conditional on:- A detail review of the traffic capacity of the A370 in the event of peak conditions (such as M5 blockage). A detail impact assessment on the effect of this scale of development at Backwell. A detail plan for the improvement of Backwell/Nailsea station as a transport hub. Redistribution of housing development plans to [provide for a much more dramatic provision of high density, good quality housing as social housing and starter homes (not to be confused with the ludicrous "low cost housing" in planning proposals		NSC REG 19 LOCAL PLAN 2041^J Autumn 2025 consultation.pdf

Name: John Reed **I.D:** 62674849

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP5: Housing,	Yes		Yes	Yes	Devil’s Elbow Farm, Hillend, Locking			Letter to Planning Policy Team - North

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
employment and mixed use allocations					We note that the pre-submission Local Plan does not currently include the Site as a proposed allocation. We therefore welcome the opportunity to provide further information to assist the Council in its ongoing plan-making process and to reaffirm the Site's suitability, availability and deliverability. Please see attachment for full submission.			Somerset Council 28.11.25.pdf

Name: John Ricketts **I.D:** 58582177

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Poplar Farm, Nailsea	No	• Justified	Unsure	Unsure	I do not feel that this proposal is soundly based.The road network to the site is inadequate particularly along North Street at the junction with Firlease where traffic becomes one way only.I overlook the site and confirm Bat activity to be very high on summer evenings. Then main drain,which also crosses my property,is overloaded as evidenced by back flows into my domestic system.Wessex Water have had to clear up several times.The site is prime agricultural land which would be taken out of productive use.			

Name: John Scott **I.D:** 58443777

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Justified • Effective	Yes	Yes	This proposal has not thought through access issues from The Downs this road is not appropriate for a development of this size. Being that the development will be larger than the existing housing and that the road is gridlocked at school drop off and pick up times and the surrounding area. Big wood is an area of special scientific interest this development will have a negative impact on the nature and wildlife that reside there. It is used as a place for physical activity as well as a place i regularly use to aid my mental health wellbeing.			

Name: John Shyne **I.D:** 62859873

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The Tower Farm allocation isn't backed by a transparent assessment of alternatives and would result in the loss of good-quality farmland beside an ancient woodland, making the site poorly chosen. The plan risks irreversible harm to Weston Big Wood, contrary to national policy protecting irreplaceable habitats. Proposed "buffers" are unclear and don't address indirect impacts such as hydrology changes or wildlife disturbance. Local services and transport routes, already stretched, would face further pressure. The location would likely increase car use rather than support sustainable travel. Essential elements needed to make the development deliverable—school funding, transport improvements and biodiversity measures—are not secured, calling the allocation's effectiveness into question. Development would erode the farmland–woodland transition zone, weaken ecological connectivity across the Gordano Valley and alter the area's landscape character. With Weston Big Wood being a	Only by not continuing with the plan and removing allocation entirely. Keep the land as essential green space in Portishead		

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					SSSI. Surface-water and soil changes from construction pose risks to the woodland’s hydrology and root environment. In combination with nearby proposed sites, the cumulative ecological and infrastructure impacts undermine commitments to nature recovery and sustainable growth. I do not support the soundness or legal compliance for Tower Hill Farm area.			

Name: John Sleigh **I.D:** 31213601

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Grove Farm	Unsure		Unsure	Unsure				

Name: John Speight **I.D:** 8062305

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land south of Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	1)The proposed new road seems to be badly planned and uncosted . The present road under the railway is subject to a height restriction and without extensive landscaping the new road will not be an improvement and will also have to cross the river. 2)Many houses on the new estates are unsold. The demand in Nailsea is for smaller housing with facilities to suit the elderly (not homes). There are many family houses which were sold in the 1970 expansion which could be freed up as their owners face changed circumstances. We do not require estates full of 4,5 and 6 bedroom houses. 3)There are no plans to alleviate the bottlenecks on Nailsea's major roads and much of the proposed traffic will end up on the country lanesThe causeway has already become a rat run and with no speed restriction and no enforcement of the weight limit it has become a dangerous place for pedestrians. This could well be repeated on many of the other smaller routes. 4) what guarantee will there be that the removal of the greenbelt and its relocation will not set a precedent and be quoted at the convenience of any future development. 5) There are issues with the biodiversity of the area and the Environmental area controlled by the NEWT charity although not scheduled for development will be subject to major disruption and may result in the displacement of species including the otters that reside there. 6)The developers have given the usual promises re the infrastructure(possible two schools)What guarantee will we get that this will happen if they are not constructed before the estates are built. There are many other facilities that Nailsea will need if it is to absorb this housing (Doctors : dentists ; the railway station; and bus services to outlying parts of the town to name but a few. 7)Much of the area listed especially that around the pound lane area acts a soak away during the times of heavy rain. The climate forecasts are that this will continue . Although this area is not designated as a flood plain it acts as one and extensive development will greatly increase the risk of flooding for the new housing and the present surrounding areas. 8)Greenfield crescent is used as a sports field for the youth of Nailsea . Its loss would be a severe blow to a town which has precious few facilities for its children . If young families are to be encouraged into the proposed housing the need for these facilities will be even greater.			

Name: John Storey **I.D:** 62915169

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm					Please reconsider the plans for the above development. The ecological impact that the proposals for the development of Tower Farm and Black Rock will be			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					devastating There are alternative brownfield sites already approved for development, or greenfield sites with lower ecological impact The strategic ecological importance of both these sites in relation to Weston Big Wood (designated a SSSI) and the Gordano Valley green corridor do not appear to have been taken into consideration There has been no demonstration of the exceptional circumstances for using these Green Belt sites for development. For these reasons, Tower Farm and Black Rock should be removed from the Local Plan and alternative proposals considered as mentioned above.			
Black Rock, north of Clevedon Road					Please reconsider the plans for the above development. The ecological impact that the proposals for the development of Tower Farm and Black Rock will be devastating There are alternative brownfield sites already approved for development, or greenfield sites with lower ecological impact The strategic ecological importance of both these sites in relation to Weston Big Wood (designated a SSSI) and the Gordano Valley green corridor do not appear to have been taken into consideration There has been no demonstration of the exceptional circumstances for using these Green Belt sites for development. For these reasons, Tower Farm and Black Rock should be removed from the Local Plan and alternative proposals considered as mentioned above.			

Name: John Turner **I.D:** 59606017

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP2: Climate Change	No	• Effective	Unsure	Unsure	Following points are not described or explained to sufficient detail to confirm Local plan 2041 is effective (i.e. will work for existing & new NS residents): 1) 'Carbon neutral by 2030' statement - How can this be delivered with the thousands of additional house & road building, which will both require huge amounts of concrete, a man-made substance that has a huge carbon footprint? 2) 'enable heathy lifestyles' - How can this be delivered when the local countryside is being moved away from the existing residents? A walk in the countryside is beneficial for the physical & mental heath of the existing population. By reducing countryside owing to large house building projects then population will have to travel further to get to countryside; 3) The Wovershill location - It is unclear how NS will mitigate the additional residents car/bus travel, negative impact to the existing residents car/bus travel & additional public demand on existing essential services? e.g. GPs, hospital, dentists, schools, water/sewerage, waste, 999 services; 4) No new M5 J21a is proposed. How will NS mitigate the additional Banwell bypass traffic impact to the A370 & Morrison's roundabout? 5) There is no explanation of how many of the couple of thousand extra affordable houses will be allocated to asylum seekers & refugees, with their added impact onto local key services and existing population? How will this impact be mitigated when Weston-super-Mare population has recently (in 2025) requested removal from the Council of Sanctuary scheme? 6) When were the local job growth figures modelled? If it was before the Labour government started (July 2024), which has reduced the UK economy and future prospects, what is the revised job growth figure? How does the current economic situation impact the local new business growth? How will it impact the predicted worker additional car/bus travel out of the large towns (e.g. Weston-super-Mare) to the larger job regions (e.g. Bristol, Swindon, Exeter)?			

Name: John Zinn **I.D:** 62744129

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell village has already seen an increase in residential properties of 40% due to the building of 800 new houses having been approved. Generally, the starting price for these houses are in the region of £375,000. The Government has stated that affordable housing for young people is a priority, however, prices as stated above are simply NOT affordable for new buyers. Provision of housing should go hand in hand with support for the local infrastructure. Schools, doctors, dentists, leisure facilities are required to stop people having to travel elsewhere. Currently, the road and rail network does not support this and environmentally, it is not adhering to the Government's Policies in this respect. No social cohesion impact assessment has been provided. The allocation of housing in Backwell is higher than any other village in North Somerset and the expectation is that Backwell will take 7% of the district's housing allocation. As an example, the housing allocation for Clevedon is only 2% despite its population being approximately 5 times greater than Backwell at around 22,000. Station Road and the A370 are already congested, particularly at peak times. The area around Backwell School is narrow and must cope with large buses taking children to school. Additionally, there are no cycle paths and consequently cyclists cannot be safely overtaken by cars resulting in yet more congestion. Along the A370 bypass the bus lane which sees very little bus traffic has resulted in unnecessary delays to commuters since there is now only one lane for cars and lorries which again adds to the congestion problems. The station car park in Backwell is not large enough to cope with commuters working in Bristol, Bath & London and by building the proposed 1,000 houses will result in people having to park along residential streets in Nailsea & Backwell. It is not usual to find that many households now have 2 cars and the strain of an additional 2,000 cars on local roads will be an issue both in terms of the environmental impact and severe congestion on local roads. The A370 is already a very busy road, particularly at peak times and introducing a further 1,000 plus cars will result in sever congestion, delays and frustration to local residents. Additionally, when the M5 is closed due to an accident the traffic is diverted through Backwell on the A370 and when this occurs there are significant tailbacks and congestion. I have personally experienced this, and a journey of 5 miles took 4 hours. This was 2 years ago!! The proposed new road has no timeline for development neither does it yet have approval. The proposed route would seriously impact the Backwell Common area and significantly reduce prime agricultural land but is also an area prone to flooding. The approved Bristol airport expansion has also not been taken into consideration. With such a large increase in proposed housing in Backwell and Nailsea and since the airport buses do not run from Backwell or Nailsea, there will be added congestion seen on local roads, particularly since there is no plan for better road access to the airport. Many local areas are already subject to flooding, in some cases severe, and with increased land being taken up with layers of concrete this water will no longer be able to be absorbed thus exacerbating the flooding issues seen on Farleigh Road, Chapel Hill, Backwell Common and Backwell Bow. Although the rhynes in the latter three areas are maintained by the North Somerset Internal Drainage Board they are already filled to capacity after heavy rain and building on surrounding areas will compound the flood risk to local residents. The sheer volume of growth with the required investment infrastructure and services over such a short period is destabilising, unsustainable and undeliverable. Overall, the proposed plan lacks coherency and planned thought simply endeavouring to build houses on any green land just to satisfy the Government’s flawed policy of “build, build, build”!			

Name: Jon Gittoes **I.D:** 41006625

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Justified • Effective	Unsure	Yes	There are a number of aspects relating to the transport assessment for the proposed Pill developments that makes the basis for identifying Pill as a strategic development area unsound. These are: M5 J19 (Strategic Road Network) M5 J19 is very congested, with several junctions at or above capacity and with junctions close to J19, especially the Portbury junction and the A369 to St Georges Hill junction also at or near capacity. (Local Plan Transport Assessment: Portishead, Portbury & Junction 19)	The evidence base supporting the selection of Pill should be brought up to the same standard as the other areas, and deficiencies in the strategic transport model and the rail usage addressed. The decision to select Pill as a strategic development area could then be assessed on a proper basis.		

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					The effect of the planned developments is to increase the utilisation of these junctions. (Local Plan Transport Assessment: Portishead, Portbury & Junction 19) The mitigations to the increased congestion are to facilitate public transport by converting the A369 HOV to a bus lane and by remodelling the southbound off-ramp section of J19 (Local Plan Transport Assessment p71) No detailed modelling of the proposed J19 redesign has been carried out, although it is acknowledged that "there will be increases in congestion on the circulatory of the roundabout, which has the potential for knock-on impacts" (Local Plan Transport Assessment para. 5.166) The proposed redesign of J19 does not form part of funded schemes as part of RIS3 (National Highways planned schemes) to 2031. The impact of the developments on J19 are therefore likely to be unmitigated, with the effect of the increased congestion has not been adequately addressed by the Transport Assessment. A369 (Primary Road Network) The A369 and the two junctions which serve Pill, St Georges Hill and Pill Road, are all predicted to become more congested as a result of the housing developments, and the conversion of the A369 HOV to a bus lane Local Plan Transport Assessment para. 4.63) The North Somerset strategic transport model is particularly poorly validated along the A369 near Pill (appendix c). The model is noted as failing validation checks at both the Portbury and Beggar Bush Lane junctions which bound the section of the A369 serving Pill. In the worst case, the model underestimates traffic flow in these locations by 350 vehicles (observed=1044, modelled=694). This indicates that the modelled traffic flows around Pill are particularly poor and may well be underestimating the traffic flows into Pill (given that the discrepancy reduces from one side of Pill to the other). Given the scale of these errors, the model does not provide a sound basis for the assessment of the magnitude of any impact, or effectiveness of any mitigation around Pill. The proposed change of the HOV lane to a bus lane is dependent on National Highways RIS3 due to the potential impact on J19. This improvement is judged as "hypothetical" by North Somerset and RIS3 has been delayed, which makes the delivery of this mitigation uncertain (appendix e) The shortfalls in the modelling, and uncertainties in the deliverability of proposed mitigations, make the assessment of the impact on the primary road network inadequate. Local Roads There has been no attempt to quantify the effect of changes to traffic within Pill due to the crude representation of the model of road network within the village. A number of active travel improvements are proposed along Lodway, which are likely to increase congestion affecting both cars and buses through the village due to necessary narrowing of the road required to replace the existing footpath. Public transport: Trains Trains are planned to operate hourly between Portishead via Pill to Bristol from mid 2027 The trains are expected to have 3 carriages, with a total capacity of ~200 seats Weekday AM peak passenger demand from Portishead is forecast to exceed capacity (in 2031) before accounting for the proposed developments (at around 255 passengers) (DCO transport assessment, Table 6.8 & Figure 6.5). This calculation is based on 35% of total of 729 Portishead passengers. The corresponding demand in Pill is expected to be 43 (35% of 123 (DCO transport assessment, Table 6.8			

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					& Figure 6.55) The modelling approach used to derive these forecasts (MOIRA) has significantly underestimated demand in previous schemes (for example: Borders Railway beats forecast passenger levels by 22% - CILT(UK), Dartmoor Line: early impact evaluation (page 8)), which makes it more likely that Pill residents will struggle to travel by train during the AM peak times. This approach has also been found to underestimates new trips generated by housing growth: otm-rail-demand-forecasting.pdf It is likely that the forecasts for rail demand have been underestimated, which makes it less likely that Pill residents will be able to use the train to commute. This means that any traffic reductions in Pill as a result of the new railway are likely to have been overestimated. Buses Proposals for increased bus provision include: A new bus service from Hengrove Park to Aztec West via the A369 (Local Plan Transport Assessment Figure 4-8) This is stated to be included in the Do Something Scenario modelling (Local Plan Transport Assessment, Section 5.13), but is not mentioned in the Transport model development report or in the infrastructure uncertainties log, making it unclear whether this bus route has actually been included in the assessed mitigation scenario for Pill. This route is not part of the WECA BSIP. A new mobility hub on the A369 is proposed, which would include a bus stop and real time information. However, no new crossings to allow safe access to the northbound bus service are proposed or have been assessed in the travel. Such a crossing could affect traffic flow along the A369 especially at peak times (Local Plan Transport Assessment, para 4.61) Conversion of the A369 HOV lane to a bus lane. Active Travel The effect of additional traffic within Pill has not been assessed in any detail. Any significant increase in traffic is likely to make active travel less viable for residents, unless separate cycle paths or quite routes are introduced. One proposed The active travel plans include a proposal for an east-west link between the Pill Green and Pill road development sites (a cycle bridge), which is described in several of the consultation documents as crucial / essential. Markham Brook is designated as ancient woodland so any development which could affect the ecology or nature of the site would need to be properly considered.			

Name: Jonathan Wells **I.D:** 62796193

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land south of	No	• Positively	Unsure	Unsure	In planning terms, the proposal for 1,817 new homes in Nailsea represents a wholly inappropriate scale of growth, amounting to an over-development that the town simply cannot accommodate. The proposed new road offers no meaningful benefit to Nailsea, failing to address existing traffic issues or alleviate the persistent congestion on Station Road.			

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Nailsea		prepared • Justified • Effective • Consistent with national policy			Furthermore, the level of development envisaged would place untenable pressure on already stretched health and leisure services, undermining the quality and accessibility of local provision. The scheme would also result in the permanent loss of Grade 2 agricultural land to the south of Nailsea, an impact that is both unnecessary and irrecoverable. Transport modelling confirms that the development would generate significant additional vehicle movements on the surrounding rural lane network, creating congestion and rendering these routes increasingly unsafe for pedestrians, cyclists and horse riders. Collectively, these impacts would fundamentally alter—and ultimately diminish—the existing character of the area, to the detriment of both residents and the wider environment.			

Name: Joseph Sawtell **I.D:** 56042753

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Churchill Avenue					Penny Field must be protected and made a Local Green Space. Under local planning policy, Penny Field is the perfect candidate for Local Green Space designation because it'd be in the top 24% of sites based on policy alignment. Clevedon Town Council, two petitions (2022 and 2025) of 600+ signatures and the consultation for Clevedon's placemaking strategy all called to protect Penny Field. Penny Field is a prime candidate for Local Nature Recovery, as identified by WECA, due to the presence of three priority species. Penny Field is also located on a Green Infrastructure Corridor under NSC's own policy. Under any Equalities Impact Assessment the reduction of green space would adversely affect lower income households.			

Name: Josh Dyer **I.D:** 62532065

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Nailsea	No	• Positively prepared • Justified • Effective	Unsure	Unsure	There is daily traffic north and south of this site. The most recent traffic survey was completed during school holidays which is deliberately cynical timing. The road to the north goes past a secondary school, with sections of reduced and zero pavement. The lorries moving around other local building sites in Backwell have consistently demonstrated a lack of safety. Roads have been torn up, cars have been scratched, and a woman received life changing injuries after being hit by a truck less than 300m from this site. The train station is overcrowded at rush hours. There is not enough space for people to safely stand. Also there is no ramp access on one platform, meaning that mums with pushchairs and wheelchair users are excluded and vulnerable, especially during busy periods. The site is a known flood plain. It is literally flooded this week, as is the case at least twice a year every year. It's also connected to Backwell Common, another flood risk area. Given that so many of the new build houses in Nailsea have failed to sell in Iver 12 months, why are we trying to squeeze more nearby, in an area prone to flooding and further from local shops and amenities?			
Land east of Backwell	No	• Positively	Unsure	Unsure	If agreed, which would be in addition to the 800 new houses already approved for Backwell, the size of the village would be doubled in a short space of time.			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
		prepared • Justified • Effective • Consistent with national policy			Already, the local infrastructure struggles to cope with the current number of residents. Backwell is a commuter village with very few employers based here. The Station Road connecting to Nailsea and the A370 connecting to Bristol are both already subject to regular traffic and congestion. Additionally, the temporary traffic lights associated with house-building work at Farleigh Fields resulted in daily delays of 30+ minutes, which demonstrates how close to a tipping point the traffic along the A370 is. With no clear and approved plans for new roads, it is unreasonable to believe that the current road network can cope with a total of 1700 new houses (800 agreed; 900 proposed). The train station is often crowded and the platform is not big enough for commuters or the carriages of the trains that pass through, resulting in people getting dangerously close to the end of the platforms to reach quieter/less occupied carriages at peak times. The secondary school is over-subscribed for new entrants into Year 7. The land and open space for dog-walking, a vital activity for many residents' physical and mental health, has been so diminished already that many are driving further afield to walk their dogs, which has a negative environmental and health impact. In addition to capacity issues, the land under proposal is Grade 1 Greenbelt land. Building here would destroy habitats and decrease food production security. Food security is a national priority and recent events in Ukraine, for example, have highlighted the justification for this. The propose new site also sits above a known floodplain (Backwell Common), which has flooded last week (beginning Nov 10th) after only half a day of heavy rain. New building work would significantly increase the risk of flooding and threaten the safety of existing residents of Backwell Common. In summary, the proposed development will destabilise the local community and infrastructure and pose genuine risks to wildlife, houses in Backwell Common, and food security.			

Name: Josh Litster-Mitchell **I.D:** 62852065

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Church Hill, Clevedon	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Penny field is not an area for development. It is a green space used by the local people and it's wildlife. To build dwellings on this land would cause harm to it's people and environment			

Name: Jude Chambers **I.D:** 38759137

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land off Millcross	Yes	• Positively prepared • Justified	Yes	Yes				

Name: Judy Hall **I.D:** 21402753

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I oppose the plan because: The land is often flooded and unsuitable for housing. There is an oil pipe line which will be traversed many times in building. Additional development will place immense pressure on existing health and leisure provision. The land in question is Green Belt, and building on this will destroy much needed green space. The houses planned at Moorend Spout will destroy the nature reserve which houses many protected species. The B3130 is too narrow to support associated increase in traffic. The local station is not nearby and walkable, so more traffic will be on the connecting roads.			

Name: Judy Shore **I.D:** 61028801

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Vision, Strategic Priorities and Sustainability Objectives	No	• Effective	Yes	Yes				

Name: Julia Gregory **I.D:** 58452161

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy DP9: Flood risk	No	• Consistent with national policy						
Policy DP14: Highway safety, traffic and provision of infrastructure associated with development	No	• Effective • Consistent with national policy						
Policy DP35: Nature conservation		• Consistent with national policy	Unsure					
Land at Tower Farm	No	• Consistent with national policy						

Name: Julia Kennaby **I.D:** 62851585

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Churchill Avenue	Unsure		Unsure	Unsure	Penny Field should be protected and designated a Local Green Space. There are too few green spaces in Clevedon and each one we have is precious. It is a prime site for habitat enhancement, which will help towards local nature recovery and encourage community wellbeing through increased access to nature.	Penny Field should be protected and designated a Local Green Space. There are too few green spaces in Clevedon and each one we have is precious. It is a prime site for habitat enhancement, which will help towards local nature recovery and encourage community wellbeing through increased access to nature.	Penny Field should be protected and designated a Local Green Space. There are too few green spaces in Clevedon and each one we have is precious. It is a prime site for habitat enhancement, which will help towards local nature recovery and encourage community wellbeing through increased access to nature.	

Name: Julia Mary Rothery **I.D:** 62741601

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	Unsure	Alternate brown and green field sites with much less ecological impact both in Portishead and across North Somerset. The opportunity to increase housing density on proposed brown field sites across North Somerset which would mean these sites are not required to meet local housing targets. The strategic ecological contribution of these sites in protecting the unique environment of Weston Big Wood (SSI) and the Gordano Valley strategic green corridor. The fact that these sites were specifically added to the Green Belt in the late 1980. because of their high ecological value. For the above reasons, The Local Plan is unsound because National Planning Policy state that sites can only be removed from Green Belt for development under exceptional circumstances and these exceptional circumstances are not proven. No modification short of removing the allocation entirely would make the site appropriate. Given its direct adjacency to ancient woodland, its loss would be irreversible and cannot be mitigated sufficiently. The land should be retained as undeveloped green space managed to enhance biodiversity and provide sustainable public access, in line with the Avon Wildlife Trust's 2030 Strategy and national "30 by 30" recovery goals. I do not support the North Somerset Local Plan 2041 for the Tower Farm location.			

Name: Julian Bowyer **I.D:** 62795393

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	The community involvement & methods of consultation was not ‘sound’. There was no public exhibition in Pill or Ham Green. I now know that public exhibitions that took place in Long Ashton, Weston-Super-mare, Nailsea & Blackwell. These were not sufficiently advertised & I was unaware of them at the time. consequently I & many other residents missed these exhibitions. Also, these exhibitions would not have been easily accessible to many people that live in Pill & Easton in Gordano. There is a proportionally large number of proposed developments in Pill/ Easton in Gordano & there was a relatively small number of responses that were uploaded to this planning portal at the time. This demonstrates community involvement & methods of consultation was not ‘sound’.	Further public consultation that is well publicised & easily accessable.		
Land at Lodway Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Traffic & transport issues. The development in this area will massively increase traffic in the narrow windy streets of the village. it would increase congestion & slow the flow of traffic through the village. Increased traffic would be an increased hazard to pedestrians & cyclists.	Reducing the number of proposed dwellings in this area would limit limit the increase traffic congestion.		
Land east of Gordano Services	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent	Unsure	Unsure	Traffic & Transport issues. this aspect of the plan is not sound. Development in this area would massively increase traffic through the narrow roads of the village. This would be problematic for flow of traffic through the village. This area was highlighted in	Reducing the number of dwellings in this area would help keep increase of traffic to level that the narrow roads of the village could cope with.		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
		with national policy			National highways report Land off Marsh Lane, Easton-in-Gordano, (Dated 18/08/25) (Council Reference 25/P/1413/OUT) (National Highways Ref: NH/25/12173) It states 'Referring to the consultation on a planning application dated 21 July 2025 referenced above, in the vicinity of the M5 Junction 19 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we: c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);' It goes on to say that the applicant needs to resubmit a revised drainage proposals & provide further information To demonstrate the development complies with the requirements of DfT Circular 01/2022.			
Pill Green	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Traffic & transport issues. this aspect of the plan is not sound. The A369 is an already very busy road it can be very difficult & time consuming accessing the M5 at junction 19 at this current time. This large proposed large number of proposed house will significantly increase traffic congestion in this area.	Further community involvement providing easily accessible/understandable information demonstrating that this issue has been considered. Reducing the number of proposed dwellings would help limit the increased traffic.		
Land at Pill Road	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I am concerned about the increased traffic on Pill Road (A369) I regularly commute from Ham Green to Bristol on the cycle path that is adjacent to the A369. To do this I have to cross this already busy road. more traffic will make this harder & more dangerous for cyclists crossing the road & people accessing the bus stop.	Further community involvement & easily accessible/ understandable information demonstrating that this issue has been considered. A pedestrian/cycle crossing on the A369 would help mitigate this issue, it could be placed where there is already a small island on the A369 (not far from the junction with Blackmoor road & not far from the bus stop) Reducing the number of proposed dwellings would help limit the increase in traffic to a safer level that he road to cope with.		
Land at Ham Green	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I am concerned about the increased traffic to the proposed Ham Green site. Macrae road always has cars parked on one side of it, when vehicles are travelling in opposite directions one or other of the vehicles must reverse to suitable point to allow other to pass. Although this is a not a big problem now, I can see that with increased traffic it could become a big problem.	Further community involvement & easily accessible/ understandable information demonstrating that this issue has been considered. This would need to show appropriate modifications to Macrae road have been designed to allow for free flowing traffic. Reducing the number of proposed dwellings would also limit the increase of traffic.		

Name: Julian E **I.D:** 62229345

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano						How do you propose to protect the special ancient woodland of Markham Brook? Potentially undisturbed for 1000+ years, it will be destroyed by the development opposite St Katherines.		
Policy LP4: Strategic location: Pill and Easton-in-Gordano					I am owner of part of "Markham Brook" which I am aware is a recorded ancient woodland. It looks deceptive on maps and unless you are aware, there is a vertical drop onto rocks into the ravine down which the brook runs. I would be happy to take you down there but am certain there is a danger inherent in building anywhere near it, both to the status of the ancient woodland and to unsuspecting "explorers" on both sides of the brook. Such "Explorers" would erode and eventually destroy the natural and unusual ecology in the ravine.			

Name: Julian Ridge **I.D:** 18202785

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Summary of Key Objections Over-concentration of development in Backwell and Nailsea, far beyond what existing infrastructure can support. Severe transport and traffic implications for Brockley, especially on the A370, Brockley Combe and rural lanes already under strain. Loss of Green Belt, high-quality agricultural land and valued countryside, undermining settlement separation and harming the rural character that Brockley relies on. Lack of credible, funded infrastructure commitments—highly concerning given the scale of growth proposed. Disproportionate burden of housing numbers on a small cluster of villages, while better alternatives and brownfield locations exist elsewhere in North Somerset. Detailed Objections Scale of Development is Unreasonable and Unsustainable The draft Plan proposes approximately 3,700–4,000 new homes across the Backwell–Nailsea area. This represents the largest single concentration of new housing in the district's rural settlements. Backwell alone is projected to almost double in size, representing a dramatic and irreversible change to the settlement pattern and landscape setting of neighbouring parishes such as Brockley. Such a concentration is not justified when: it conflicts with historic settlement hierarchy, it contradicts previous village-scale planning (e.g., the Backwell Neighbourhood Plan), and	As a Brockley resident, I request that North Somerset Council: Remove or significantly reduce the large-scale allocations around Backwell and Nailsea. Retain Green Belt and high-grade agricultural land, particularly in areas serving as landscape buffers between settlements. Rebalance development across the district, prioritising brownfield regeneration in urban centres. Provide a clear, costed and committed infrastructure plan that must be delivered before major housing growth is permitted. Protect rural parishes such as Brockley from disproportionate impacts on traffic, landscape, services and environmental quality.		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					the sites are predominantly greenfield or Green Belt, rather than regeneration-led. This scale of change will inevitably spill environmental, traffic and service impacts outward into adjoining communities. Severe Transport Impacts on Brockley Brockley is situated on key commuter routes between Backwell, Nailsea and Bristol Airport. Even at current levels, the A370, Brockley Combe Road, Chelvey Road and surrounding lanes are heavily used, often congested, and already suffer from safety issues. The Plan does not adequately demonstrate: how thousands of new peak-hour car movements will be absorbed, where road capacity improvements will occur, how rural lanes will be protected, or how public transport will be upgraded reliably and at sufficient scale. Increased traffic from Backwell and Nailsea will inevitably funnel through Brockley, including short-cutting and diversion during congestion. This will worsen: vehicle pollution, road safety risks on narrow rural lanes, pressure on Brockley Combe (already an accident hotspot), and noise and disturbance affecting residents and the local environment. Without guaranteed, funded mitigation, this is not an “effective” plan under NPPF definitions. Loss of Green Belt, Farmland and Rural Character The draft Plan proposes to release large areas of Green Belt and high-grade agricultural land around Backwell and the valley approaching Brockley. This directly conflicts with national policy that Green Belt should only be released in exceptional circumstances—and no such justification has been convincingly demonstrated. Impacts include: erosion of the countryside that defines the identity of Brockley as a rural village; loss of the environmental buffer between Nailsea, Backwell and the Chew/Brockley valleys; increased risk of future coalescence of settlements; damage to wildlife habitat and ecological corridors that run through the valley and up towards Brockley Woods and the Combe. For Brockley, maintaining the rural setting and the open landscape gap to neighbouring communities is critical. The Plan does not safeguard this. Infrastructure Promises are Not Credible or Guaranteed			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					The draft Plan provides no firm, costed, or deliverable infrastructure package to accompany the thousands of new homes proposed. There is no clear commitment or timeline for: highway improvements, investment in local schools, health facilities, public transport enhancement, cycle/pedestrian connectivity between villages. Without enforceable mechanisms (e.g., legally binding S106 obligations or masterplans with guaranteed funding), the proposals risk the familiar pattern of “build the houses first, infrastructure later (or never)”. This is a major risk for both Brockley and Backwell/Nailsea residents. A Local Plan cannot be considered “sound” without a credible evidence base demonstrating infrastructure delivery. Unfair Burden on One Area of North Somerset The Plan places a disproportionate share of the district’s housing in the Backwell/Nailsea area, with secondary impacts on villages like Brockley that have: no services to support growth, no capacity to absorb extra traffic, no desire for urban expansion, and a strong established rural character. North Somerset should pursue a brownfield-first strategy, distributing necessary growth to areas with: public transport hubs, existing employment centres, brownfield sites suitable for regeneration, established infrastructure capacity. This would be more equitable, sustainable and consistent with national planning aims.			

Name: Julie Coffin **I.D:** 62766433

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively	Unsure	Unsure	Alternative brownfield sites have not been considered. The strategic ecological importance of the site has not been considered.			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
		prepared • Justified • Effective • Consistent with national policy			It's a Green Belt site due to its high ecological value. National planning policy allows green belt changes only in exceptional circumstances; these have not been demonstrated. There is no suitable access. There would be unacceptable transport impacts. Drop the idea.			
Land at Tower Farm					In response to the above… There are alternative brownfield and greenfield sites with less ecological impact and the fact that the proposed sites were in fact added to the green belt in 1980s because of their high ecological value. Neither site can provide suitable or safe access. Such development would result in unacceptable transport impact and thereby likely to fail national sound tests. Portishead is already stretched for facilities..limited school places, particularly in area proposed, limited access to medical services, currently one pharmacy, soon no banks, small postal facility and limited parking throughout the town. Traffic along Down Road, particularly at school times, often results in gridlock so additional access in this area would make that situation even worse and add to the potential for road accidents. Therefore we believe, based on the above facts alone, the Tower Farm and Black Rock sites should be removed from the Local Plan.			
Black Rock, north of Clevedon Road	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Alternative brownfield sites have not been considered. The strategic ecological importance of the site has not been considered. It's a Green Belt site due to its high ecological value. National planning policy allows green belt changes only in exceptional circumstances; these have not been demonstrated. There is no suitable access. There would be unacceptable transport impacts. Drop the idea			

Name: Julie Hayward **I.D:** 62857025

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Lodway Farm	No	• Positively prepared • Justified	No	No	Consultation - I was aware of, and able to attend the first consultation meeting held in Pill. I was not aware of the second meeting. I do not believe that the consultation was inclusive. It did not take into account that a large proportion of Easton in Gordano residents are elderly/infirm/disabled and would find it difficult to attend in Pill. Why was it not held at a hall in Easton in Gordano, considering that Court Farm (HE206) and the nearby site HE20491 both directly impact Easton in Gordano residents more so than Pill residents. For those residents (such as elderly) who would require a paper version of this	As above - more inclusive consultation, and consideration		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
		• Effective			form to respond, the form had to be collected from Pill resource centre (quite a distance from the proposed sites for the infirm to travel without driving). No public meeting was held in the village of Easton in Gordano. Traffic - Many of the roads surrounding the two above mentioned sites are narrow and lack pavements. If the proposals go ahead, the impact of additional traffic in these areas would be huge, and massively detrimental to existing residents. The building phase would be even more of a problem. Since the introduction of the ULEZ in Bristol, traffic volume has increased in the area. The congestion on the J19 roundabout and the Martcombe Road often causes queues where I live on St Georges Hill.I often cannot get in and out of my driveway as it is blocked by queuing traffic during busy times of day. I understand that National Highways have yet to complete their assessment of these areas. There is much talk of the Pill railway in the planning speel, but this is something that has been in the pipeline for decades and is yet to materialise. I do not think it should be taken into consideration until it reaches fruition (as at this rate it likely never will!) Green belt and green spaces - Green belt should only be used in exceptional circumstances. I do not believe that building on the green spaces here is warranted, and do not believe that that other sites have been adequately explored. If these proposals go ahead, almost all of the green space around Easton in Gordano will be lost. As many of the residents are elderly, it would cut of access to green space for them as they would have to travel to reach it. There is also a good deal of wildlife in these sites which would suffer. Lack of amenities - Easton in Gordano has one small GP surgery, and no other amenities. There is no dentist, no post office, no pharmacy, no banks, as far as I aware no hairdresser or barber, no shops. The shop in Gordano Services is a very small Waitrose - it is expensive and aimed at people travelling. It is somewhere you can grab a sandwich, snack, drink. It is not somewhere you can do a household shop - no meat/fish/veg/fruit/cooking & baking essentials/cleaning materials etc. The Precinct at Pill has a post office, a pharmacy and a small co-op, but being in Pill is quite a distance for some. Public transport - there is one bus that runs through Easton in Gordano & Pill. The inbound stop on St Georges Hill is tiny - room for only 1-2 people to stand. It is on the brow of the hill, with no pavements to access it.	of the points I have listed.		

Name: Julie Main **I.D:** 8187041

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP12: Bristol Airport	Unsure		Yes	Yes	In relation to the points around the airport, I would like to call out some of the points that North Somerset are making which already the airport in their master plan are looking at ignoring, or have a very differing view: Government policy is for airports to make better use of their existing runways. Bristol Airport are looking to extend their current runway to allow for transatlantic flights. Extending a runway does not fall into the overall Government Policy. Government Policy is for clear surface access proposals, and to limit the increase in demand for additional parking provision. Bristol Airport have not improved access to the airport as it is still served by an A road, there has been no rapid transit network, i.e. trains, trams etc.. or a park and ride, this leads to huge congestion at certain time severely affecting not just local traffic but beyond. In relation to reducing additional parking provision, 37% of Bristol Airports revenue in 2024 was generated from airport parking, as opposed to just 34% being from aeronautical revenue, it does not benefit them in increasing profits by reducing airport parking, profits will grow by them increasing overall airport parking. In regards to the criteria for airport-related development within the green belt inset, and having to demonstrate special circumstances that outweigh the harm to the Green belt, Bristol Airport conveniently forgot to mention in their masterplan that an extension to the runway would require them to compulsive purchase part of Felton Common as they would need to move the landing lights for safety reasons. This is their special circumstance to try and get access to own part of a historically important and very important green space and local amenity. However, this is not required if they do not extend the runway, or if they extend it to the West of the airport. Therefore it no longer become a special circumstance as they would not need it for safety			

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					purposes then.			

Name: Julie Moon **I.D:** 62683009

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm					I ask you to please remove Tower Farm and Black Rock, Portishead from the Local Plan for the following reasons: - These areas are vital to supporting the ecologically important West Big Wood. They form a wildlife corridor and habitat. Deer, buzzards, many birds of prey and a huge range of song birds use the land for habitat, access and food. Both these areas were added to the Green Belt in the 1980s because of their high ecological value. National planning policy allows Green Belt changes only in exceptional circumstances and there are none in this case. Portishead traffic is very congested and the roads in and out of town and within the town are not coping at present. 500 more houses with an extra 1,000 or more cars will not be feasible or safe. The Clevedon Road B3124 which would be most impacted by building on Black Rock and Tower Farm is already constantly busy. There is often flooding near Gordano school which creates traffic queues and any M5 congestion creates severe traffic problems on this road. More traffic will add to this. The transport impacts would fail national soundness tests. Other brownfield sites with far lower impact are available within Portishead and across North Somerset. There is room within existing developments to increase housing density negating the need for developing Tower Farm and Black Rock. Portishead facilities e.g. schools, GP surgeries, sports facilities, parking in town will not cope with potentially 2,000 or more new residents. This green space is very important to the mental and physical health of current residents. These precious areas are essential to wildlife and the people of Portishead. Please protect them.			
Black Rock, north of Clevedon Road					I ask you to please remove Tower Farm and Black Rock, Portishead from the Local Plan for the following reasons: These areas are vital to supporting the ecologically important West Big Wood. They form a wildlife corridor and habitat. Deer, buzzards, many birds of prey and a huge range of song birds use the land for habitat, access and food. Both these areas were added to the Green Belt in the 1980s because of their high ecological value. National planning policy allows Green Belt changes only in exceptional circumstances and there are none in this case. Portishead traffic is very congested and the roads in and out of town and within the town are not coping at present. 500 more houses with an extra 1,000 or more cars will not be feasible or safe. The Clevedon Road B3124 which would be most impacted by building on Black Rock and Tower Farm is already constantly busy. There is often flooding near Gordano school which creates traffic queues and any M5 congestion creates severe traffic problems on this road. More traffic will add to this. The transport impacts would fail national soundness tests. Other brownfield sites with far lower impact are available within Portishead and across North Somerset. There is room within existing developments to increase housing density negating the need for developing Tower Farm and Black Rock. Portishead facilities e.g. schools, GP surgeries, sports facilities, parking in town will not cope with potentially 2,000 or more new residents. This green space is very important to the mental and physical health of current residents.			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					These precious areas are essential to wildlife and the people of Portishead. Please protect them.			

Name: Justin Clayton-Jones **I.D:** 62849345

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Backwell already has 800 new houses approved which is a 40% increase. The additional proposed numbers would lead to complete over development. The proposed road would not effectively serve Nailsea traffic or relieve congestion on station road, Backwell Common or Chapel Hill. Engineering the road under or over the railway would be highly expensive and possibly infeasible. There is a deficit in school places and no investment in health services or leisure facilities. Current infrastructure will not be able to support a further 1000 houses. Backwell's allocation is higher than any other North Somerset village: Backwell's increase is 7% whereas Clevedon's is only 2% - Clevedon has far more infrastructure to support new dwellings. No needs or viability analysis for an additional 1000 houses exists. Backwell is a commuter village, not an employment hub. No social cohesion impact assessment has been provided. The proposed sites will destroy Grade 1 agricultural and grazing land - only 7% of this type of land remains in North Somerset. Indeed, the proposals counter government policy which states that the 'best and most versatile land' must be preserved to sustain food security: the proposal contradicts this. Also, the development will, undeniably, destroy wildlife habitats and harm biodiversity. For example, the proposals threaten Brockley Maternity Roost and SSSI with rare lesser and greater Horseshoe bats relying on the land for food. The Infrastructure delivery plan lacks analysis and costings and there is no funding guarantee for the new road or services.Backwell common and the surrounding area are prone to flooding, a threat which would be aggravated by further housing development. The plans raise huge concern of detriment to the area's character, loss of Greenbelt and high quality agricultural land, risk of flooding and uncertainty over whether the road can be funded or delivered on time to support new housing.Backwell Lake and the surrounding fields are on a floodplain and flooding is a regular occurrence. Government policy requires that 50% of affordable housing is on Greenbelt land but this reduces the funds developers have to contribute towards infrastructure. The sheer volume of growth with the attendant development of services and infrastructure to support it is unsustainable and undeliverable over such a short timeframe. Finally, Nailsea and Backwell Railway station is not fit for purpose as a transport hub. It remains inaccessible to those with disabilities or mobility issues and presents serious challenges when travelling with young children.			

Name: Justin Mohan **I.D:** 62785665

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Grove Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Plan is not sound or in the interest of local environment / residents. 1/ 800 Houses already approved 2/ Road access and nearby insufficient 3/ lack of infrastructure (schools) 4/ No needs or viability for houses here 5/ unfair balance in house increase in Backwell compared to other villages 6/ Backwell has no employment and all would commute on roads that are not big enough 7/ No social cohesion impact assessment 8/ grade 1 land used for grazing and crops 9/ not protecting versatile land			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					10/ development would destroy nature 11/ proposals threaten brockley maternity roost 12/ no funding guarantees for new roads 13/ flooding would be aggravated by more housing (common) 14/ all building is planned for a flood plain which isn't very clever 15/ affordable housing not going to pay for developers plans 16/ too much growth in too short a time 17/ railway station is unfit for high volume use and access / children			

Name: Justin Saunders **I.D:** 51079969

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP3: Spatial strategy	No	‣ Positively prepared ‣ Justified ‣ Effective	No	Yes	LP4 does not align with the spatial strategy. Pill and Easton-In-Gordano is a rural community with central facilities constrained by the River Avon; it is not an urban centre. There is no strategy for improved public transport or any plans for additional employment. Additional leisure facilities are also not considered despite significant demand on existing facilities.	LP4 needs to be withdrawn and alternative proposals that meet the spatial strategy developed		
SP6: Villages and rural areas	No	‣ Positively prepared ‣ Justified ‣ Effective	No	Yes	Pill and Easton-In-Gordano is a rural community. The new locations on the south edge of the community do nothing to complement the existing local centres and contribute to viability and vitality because they are not connected in a way that will encourage use of that centre and provide no facilities to bring the community to the developments. The development is completely out of scale with community needs; surveys in the previous Neighbourhood Plan suggest less than 20% of this target would meet community need.	LP4 needs to be withdrawn and proper consideration given to development areas within the current settlement boundary that have already been developed but are much more likely to meet community needs and complement the existing rural community.		
SP7: Green Belt	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	Yes	LP4 means that a small community has the second highest loss of green belt to houses in North Somerset. This equates to 80% of the accessible green belt around the community and creates urban sprawl with the port. The current green belt provides active travel opportunities in nature for the most deprived areas of the community which will be significantly reduced by these proposals. Insufficient work has been done to identify smaller brownfield sites which could meet a substantial part of this need rather than relying on the easy approach of looking at areas land banked by large developers over a number of years with previously failed planning applications.	LP4 needs to be withdrawn and alternative sustainable sites within settlement boundaries given due consideration ahead of green belt allocation.		
SP8: Housing	No	‣ Positively prepared ‣ Justified ‣ Effective	No	Yes	The policy identifies 24,495 houses when the requirement is for 23,700 over the term of the plan. This represents an oversupply of 795 houses. Pill and Easton-In-Gordano Parish represents around 2% of the population but is expected to provide 4% of the housing (one location is in Abbots Leigh but is adjacent to Pill and Easton-In-Gordano). As the rate of 1,500 per annum is unsustainable based upon historical figures. Removing these 795 from LP4 aligns growth in Pill and Easton-In-Gordano with community needs using sites	LP4 should be withdrawn and a smaller more proportional development proposal put forward using		

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		• Consistent with national policy			previously built rather than green belt farmland.	previously built on sites which would keep within the overall housing target.		
SP9: Employment	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	Yes	Policy LP4 is not consistent with this policy. No provision is made for providing locations for additional employment or improving access to employment opportunities. Lack of active travel improvements to local employment opportunities, or provision of additional employment opportunities in the community will mean that the default mode of transport will be cars which will further overload Junction 19 of the M5 and the A369.	LP4 needs to be withdrawn and local employment opportunities provided as part of an integrated plan in the same way as other strategic locations		
SP10: Transport	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	Yes	Active travel for employment and to schools opportunities is limited in the rural community of Pill and Easton-In-Gordano. LP4 does not address this. On the main sites to the south, there are natural barriers to east to west travel, and little connectivity with the port which is the nearest large employment location - particularly from Easton-In-Gordano. The proposed active travel route from the largest site damages ancient woodland and does not address access issues for other sites. There is no structured plan to improve any modes of transport for employment or leisure in line with the LP4 development. No additional bus transport planning, no capacity improvements on the once an hour rail link in line with developments in the area, no structured plan for dealing with Junction 19 of the M5 or the A369 despite significant growth in Portishead and the strategic site LP4. This is unsustainable and will harm the delivery of this plan.			
SP11: Historic and natural environment	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	Yes	Policy LP4 is not consistent with this policy. The green belt land for all sites in LP4, other than Ham Green, is either grade 1 or grade 2 agricultural land. This is “best and most versatile agricultural land”. The Pill Road and Pill Green farmland sites, in addition to being grade 2 land adjoin and are above a river where uncommon wildlife have been observed in the area of ancient woodland either in or adjacent to the new development areas proposed. No specific buffering is proposed and destruction of some of the ancient woodland will take place for an inappropriate active travel route to link these two sites to the existing secondary school.	LP4 needs to be withdrawn and reconsidered through greater use of areas that have been built within current settlement boundaries.		
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	Yes	LP4 fails to meet the criteria for sustainable development in the following ways: 1. The large scale sites are on the edge of the community and away from facilities regarded as a reason for the selection of the location, so the largest is far from the railway station and the facilities in the centre of the location and only linked by active travel routes which will be too far from the facilities. 2. There are no considerations of any additional facilities or employment opportunities within the communities beyond a possible primary school. Other strategic sites include areas for employment and strategic connectivity to existing facilities \- there is none of this in this plan beyond an active travel route across ancient woodland to the school. 3. No specific plans for improvement of public transport, taking into account an overall increase of housing in both LP4 and Portishead. For example additional bus routes through the largest development to service the whole community or capacity improvements to the railway to take it beyond a once an hour service. 4. No improvements to the connectivity of the sites to the nearest major areas of employment like the port to encourage active travel. Without a significant change to the connectivity of the larger sites and a plan for other facilities these will be disconnected dormitory estates where cars will be the predominant way of getting to any facilities which is very unlikely to benefit the local community.	LP4 needs to be withdrawn and brownfield sites in more sustainable locations considered.		

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					Development of the Ham Green site and other brownfield infill schemes within the current community boundaries do align with this objective. However the other brownfield sites have not been given due consideration.			
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	Yes	Policy LP4 appears to be a collection of six previous development plans submitted by land owners in the past. These development plans were piecemeal and turned down for strategic reasons beyond just being on green belt land. These strategic reasons have not changed and other policies have failed to address these. In particular this conflicts with SP1, SP3, SP4, SP6, SP8 (and LP9), SP9, SP10 (and LP11) and SP11. There is no overarching requirement for a masterplan for all sites that addresses the items of scale such as new facilities, employment opportunities and transport infrastructure. Without significant changes to all sites with the exception of Ham Green and coordination to ensure that facilities are provided on a timely basis this plan will create disconnected dormitory estates with no on site facilities or employment and no easy access to existing facilities except by car. Facilities proposed in this local plan are less than those previously proposed by previous developer plans particularly leisure and sporting facilities. Taking the conflicting policies in turn: SP1 - this strategic development site is on the edge of the community and because of the semi-circular nature is far away from existing facilities with the exception of the Ham Green site. Lodway Farm is the closest to most of the existing facilities but is still far from the secondary school. The sites south of this are far enough from the existing centre of the community and the transport links that active travel is unlikely on a regular basis. There are no plans for connectivity by car for the largest and most isolated site at Pill Green. There are no proposals beyond a possible school to provide any other facilities that will encourage the new community to integrate with access to the site being on a road over a mile from any existing facilities. No provision of additional public transport routes within the facilities to improve the resilience of bus services in the village which are typically rerouted 2-3 weeks per year. No improvements to the capacity of the new rail link to provide a better than hourly service. All other sites of this size have a master plan and allowance for improved facilities and access to employment or new employment sites to make developments of this scale sustainable. SP3 - Pill and Easton-In-Gordano is a rural community it is not a town. The development is out of scale with this rural location (community need is around 20% of the proposed development based upon previous surveys) and disconnected from the existing local centre. Pill and Easton-in-Gordano makes up 2% of the population of North Somerset but is expected to contribute 4% of housing, this is not proportionate for a rural setting. There are no requirements in this policy to complement existing local centres or contribute to their viability. With the exception of Ham Green previously developed locations closer to the facilities have been ignored and developers with large land banks of high grade farmland prioritised. SP7 - This strategic location means that 80% of the immediately accessible green belt outside the current settlement boundary will be built on. This provides access to nature for the deprived community of Pill without the need for public transport, this facility would diminish significantly if this development - particularly the Pill Green site - goes ahead. This is grade 1 or grade 2 farmland that should be preserved. The proposal also includes ancient woodland that would be felled as part of these proposals. SP8 - Pill and Easton-in-Gordano makes up 2% of the population of North Somerset but is expected to contribute 4% of housing. The current figures show an oversupply of 795 houses over the required target. The current building rates of the previous local plan are not sustained so any overallocation is reckless. The least suitable sites in LP4 should be removed on that basis Pill Green, Gordano Services, Pill Road, Lodway Farm respectively in terms of the sustainability requirements. Little work seems to be done on using existing built on land to provide the requirements in more connected locations within the Pill and Easton-In-Gordano. SP9 - No provision for additional employment and no improvement of active travel or public transport to local large sites of employment like Portbury Dock. These sorts of improvements need a strategic masterplan. SP10 - No provision of improved public transport - for example the old X3 route coming into the Pill Green estate. No provision for easy access to the train station for active travel from the Pill Green, Pill Road and Gordano Service sites. No plans to upgrade the railway to allow for more than hourly running. This will lead to car usage significantly increasing and there are no plans to increase capacity on the A369 or Junction 19 of	LP4 needs to be withdrawn and previously developed sites with settlement boundaries need to be prioritised.		

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					the M5. SP11 - The land allocated for all the sites outside the current settlement boundary is grade 1 or grade 2 green belt farmland. Sites include ancient woodland which will be disturbed by these plans and rivers with locally rare wildlife (as documented in the Neighbourhood Plan for the parish).			
Policy LP5: Housing, employment and mixed use allocations	No	‣ Positively prepared	No	Yes	For Pill and Easton-In-Gordano this does not include smaller sites of over 10 units that are in the planning process which are far more sustainable than the locations defined in LP4. This list needs to be reviewed.			
Policy LP9: Extent of the Green Belt	No	‣ Positively prepared ‣ Justified ‣ Effective	No	Yes	LP4 means that a small community has the second highest loss of green belt to houses in North Somerset. This equates to 80% of the accessible green belt around the community and creates urban sprawl with the port. Current green belt provides active travel opportunities in nature for the most deprived areas of the community which will be significantly reduced by these proposals. Insufficient work has been done to identify sites that have been built on before which could meet a substantial part of this need rather than relying on the easy approach of looking at areas land banked by large developers over a number of years.	LP4 needs to be withdrawn and greater consideration given to sites within the settlement boundary.		
Policy LP11: Transport infrastructure, allocations and safeguarding	No	‣ Positively prepared ‣ Justified ‣ Effective	No	Yes	LP4 and Portishead expansion do not provide any improvements in transport infrastructure in Pill and Easton-In-Gordano. The transport hubs mentioned in the schedule are already being delivered as part of other programmes. Junction 19 and the A369 are at capacity and need work. At present this is down to the port to consider these changes. Adding 2200 houses and extra employment in the area needs a better plan for these pieces of infrastructure. The current rail service has a capacity of one passenger train per hour. Why is there no increase in capacity as part of this Local Plan	Any developments and increased use by the port needs a development plan for the A369, Junction 19 of the M5, bus service improvements and rail capacity.		
Land at Lodway Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	Yes	The most sustainable of the farmland developments outlined in LP4. However this is grade 2 farmland. Without improve links to the port opportunities for employment will be limited. There are more sustainable previously built on locations within settlement boundaries which should be considered ahead of the release of this green belt site			
Land east of Gordano Services	No	‣ Positively prepared ‣ Justified ‣ Effective	No	Yes	An inaccessible site disconnected from the existing community with no safe walking routes identified or proportionate traffic access with egress onto narrow, dangerous roads. This is Grade 1 farmland on DEFRA maps and so its removal from the Green Belt should be considered after all other sites.	Remove this site from development and LP4 as there is an overallocation of housing numbers in the Housing Strategy.		
Pill Green	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	Yes	The least sustainable of all sites identified in LP4. No requirement or capability to link to the existing community. The impacts on the A369 and Junction 19 have not been planned for and no additional leisure or employment opportunities within the community have been considered. This is grade 2 farmland with ancient woodland adjoining Markham Brook. This woodland is not identified except with the entirely inappropriate active travel route. No upgrades to existing public footpath infrastructure providing safe walking routes or to public transport.	Remove site entirely from LP4 because of the unsustainable location.		

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Land at Pill Road	No	‣ Positively prepared ‣ Justified ‣ Effective	No	Yes	One of the more sustainable locations identified in LP4 however a significant buffer 15m is required to the ancient woodland. The active travel route across the Markham Brook is unsustainable crossing ancient woodland. Provision of improved space for bus turning points for when Pill is closed to buses (happens at least 2-3 weeks a year) to provide public transport access for the deprived areas of Pill in the circumstances. Active travel route should cross site and link with existing incomplete paths from Haberfield Bridge to Pill Road rather than going to ancient woodland.	Site plan to take into account existing concerns.		

Name: Justina Lewis **I.D:** 62866657

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Policy LP3: Strategic location: Nailsea and Backwell	No	‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	I am writing to object to the proposed building and expansion in the village of Backwell in North Somerset. There has been new building within the village already under the pretence of creating affordable housing and allow younger people to be able to afford their own homes. This has not happened, the new builds at the top of Bucklands batch have not all been sold and are out of the price range of first-time buyers. Taylor Wimpy, who are currently building on the ‘Backwell Grove’ site, are advertising the homes there as available to ‘bulk buy’ for housing associations and Landlords. This is directly in contradiction to the proposed building plans to create affordable housing for lower incomes families and first-time buyers. This is only creating investment opportunities. Backwell currently has a thriving nature reserve. Only this week have otters been filmed within the lake. Water voles are often photographed. The sites proposed to build on around this area will require draining, this will directly affect the delicate wildlife and biodiversity of the nature reserve as well as causing pollution. There are colonies of the Greater Horseshoe bat in the vicinity of the proposed building. These bats are protected, not only will the building of the sites disturb the present colonies but the light pollution will affect the hunting times of the bats and their hibernation times. The proposed buildings in Backwell are going to affect the last remaining 7% of North Somerset Grade 1 farmland. We should be protecting this and encouraging farmers to use this precious commodity, not sell the land for a quick fix to the current farming crisis in the UK. The United Kingdom is presently among the most nature-depleted nations globally, with 56% of its native species experiencing decline and 15% classified as endangered. The extinction of numerous plant and animal species within the UK has been strongly associated with human population increase. A considerable proportion of these plant and animal species were endemic to the United Kingdom, rendering their reintroduction impossible. The majority of these extinctions are attributable to wetland drainage and environmental pollution. I have included a chart that illustrates the correlation between human population levels and extinction rates in the UK. Notably, the most recent recorded extinction occurred in 2008 and involved a plant species native exclusively to the UK, which has now been permanently lost. Clinical evidence indicates that exposure to natural environments has a positive impact on mental health. Considering the current mental health challenges facing the UK and the resulting strain on the National Health Service, further reduction of countryside areas near small villages may exacerbate these issues at a national level. Individuals who opt to reside in rural communities should not have an urban environment forced upon them due to directives from local authorities, as this may infringe upon their human rights to maintain a private and family life. The Central Government 2023 environmental improvement plan, states on page 13: “environmental hazards. We will:	Leave nature alone the UK is in the last 5 of nature depleted countries globally.	I am willing to engage with NSC to assist with Ecology and wildlife conservation, as per my studying at UWE in regards to these issues.	

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					• deliver our investment plans to improve coastal and flood defences, including hundred million pounds in the most frequently flooded areas. • Reward actions to reduce the risks and impacts from floods and droughts and wildfires to our new future farming schemes. Improving our bio security to restore biodiversity, we need to enhance our bio security. The risks of pests, pathogens, and invasive non-native species is increasing as we have just seen this winter when the UK has experienced its largest outbreak of bird flu to protect our bio security against this and future threats we will: • Deliver the five-year action plan of the 2023 plant bio security strategy for GB, mitigating threats such as design Ilha and emerald ash borer. • Seize the opportunity host Bracks it to tailor our border input controls with a new targeted and risk-based target operating model. Improving the beauty of nature our final goal is to enhance, heritage, and engagement with the natural environment. We all understand that spending time in nature is part of what makes the United Kingdom such a special place. We want everyone to enjoy our landscapes and coastlines, but also recognise that to stop restore nature responsibly. We will: • work across government to fulfil new and ambitious commitment that everybody should live within 15 minutes' walk of a green or blue space. • continue to direction our delivery of the England coast path and the coast-to-coast national trail. • Green the green belt as set out in the levelling up White Paper by identifying key areas for nature restoration. • invest in a new national landscape partnership of the national parks, areas of outstanding natural beauty, and national trails. • extend the delivery of our farming protected landscapes programme, using lessons learned to inform future farming schemes. • Invest in active travel, with a vision for half of all journeys in towns and cities to be cycled or walked by 2020 2030. £35 million funding has already been committed this financial year. By developing grade 1 and used farmland as proposed building site is in direct contradiction to the governments manifesto and increasing the carbon footprint of the country, which will need to import more food and produce from abroad to feed the increasing population. A huge increase in population of North Somerset, will of course cost the local council far more money to support the increased low income and non-working classes in the countless benefits required. There is no police response to the area, which will only get worse with increased population in the area. Currently the lack of police response has been justified as urban response times. The drains in Backwell are insufficient for the current housing situation, block, and overflow whenever there is a rainstorm. Who is going to put the infrastructure in place for such a significant increase in the size of the village. The village of Backwell is mentioned in the Domesday book of 1086 and therefore is of historical significance. It is referred to as Bacoile. It was listed as a significant settlement with fifty-six households, fourteen ploughlands, meadows, pasture and woodlands, one mill and two furlongs. (shared fields divided into strips).			

Name: K Baker **I.D:** 21286337

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Policy LP9: Extent of the Green Belt	No	‣ Positively prepared ‣ Justified ‣ Effective	Yes	Unsure	To remove from green belt land that is rich in wildlife and is an important, natueal green space, but to justify it by designating alternative green belt areas seems absolutely counterintuitive. The land to the north or Nailsea where this has been suggested is an important area for all sorts of species, contains the Land Yeo that feeds into the regional wildlife site at Moorend Spout and the Tickenham and Nailsea Moora SSSI, provides separation between Nailsea town and properties within Tickenham and Wraxall. It is a wetland during winter, making this an inefficient proposal as an area to build on. The land doesn't even fall within the town boundary, yet you are proposing to develop it as part of the town. And changing the boundaries is an unsatisfactory solution to this, as per the comments on the separate consultation about this.	Retain current green belt - what is the point of it, if it can just be changed whenever anyone wants to build on it?! What a farce.		

Name: K Chan **I.D:** 62851713

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Land north of Churchill Avenue	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Penny Field should not be allocated for housing. It is one of the last remaining open greenspaces in Clevedon and is uniquely placed as the town’s only land-based Nature Recovery priority site. The field offers substantial potential for grassland restoration, species habitat creation, improved river corridor health, and community access to nature. These qualities cannot be replicated elsewhere. Developing Penny Field would permanently remove an invaluable natural asset and undermine local biodiversity and climate-resilience objectives. There are more suitable brownfield and greyfield sites in Clevedon that should be prioritised instead. I therefore strongly support its protection as a Local Green Space.	Penny Field should not be allocated for housing. It is one of the last remaining open greenspaces in Clevedon and is uniquely placed as the town’s only land-based Nature Recovery priority site. The field offers substantial potential for grassland restoration, species habitat creation, improved river corridor health, and community access to nature. These qualities cannot be replicated elsewhere. Developing Penny Field would permanently remove an invaluable natural asset and undermine local biodiversity and climate-resilience objectives. There are more suitable brownfield and greyfield sites in Clevedon that should be prioritised instead. I therefore strongly support its protection as a Local Green Space.		

Name: K Collier **I.D:** 51460097

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Land south of Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	The allocation of Land South of Nailsea should be removed from the Local Plan because the required new road is unlikely to be delivered, is technically difficult, and would not relieve existing congestion. Much of the land is flood-prone, making large-scale development unsafe. The site includes scarce Grade 1 agricultural land that should be protected for food security, and development would destroy important habitats, including those used by protected species. There is no evidence of need, viability, or funding for the required infrastructure, and the scale of proposed growth is disproportionate and unsustainable for the area. The area is surrounded by minor single track country roads not designed to cope with large scale housing developments, associated traffic and ongoing use.			
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	The proposal to add 1,000 more houses to Backwell is seen as unacceptable because the village is already absorbing significant growth (800 approved homes, a 40% increase) without the necessary infrastructure. To take the further growth as well would increase the size of the village by over 80%. The village is a commuter hub, not an employment one. Backwell is 'allocated' a higher number of houses than any other village in North Somerset, and even a higher growth percentage than towns. It is also not an employment hub so much of the proposed growth in houses will drive more people to use roads already at capacity. Backwell is being asked to take a disproportionately high share of North Somerset’s housing allocation despite not being an employment centre, with no needs, viability, or social cohesion assessments to justify the scale. The development would also cause the loss of Grade 1 agricultural land, contradicting government policy on protecting high-quality farmland and threatening local food security. Significant environmental harm is expected, including loss of wildlife habitat and risks to protected bat species.			

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					The proposed new road is unlikely to solve existing traffic problems and may not be deliverable at all. It would be extremely costly, technically difficult, especially where it must cross the railway and flood-prone land, and no responsible body has committed to funding or building it. As a result, there is a high risk the road will never be constructed, despite being essential to the plans. Essential services including school places, healthcare, and leisure facilities are already insufficient, and no funding guarantees or detailed costings have been provided. Flooding risks on Backwell Common, the lake/reservoir area, and surrounding floodplain land would be worsened. The railway station is not suitable as a major transport hub. Overall, the volume and pace of proposed growth are viewed as unsustainable, damaging to the area's character, and not deliverable with current infrastructure or funding.			

Name: K Crawford **I.D:** 29010721

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I wish to formally object to the inclusion of land at East Backwell, a huge 50 Hectare site, being included in North Somerset Councils Local Plan. It is proposed to take this large site out of the Green Belt and seemingly ignore that it is all designated Grade 1 Agricultural Land. Government is seeking to retain the "Best and Most Versatile Land" – Grade 1,2 and 3a and yet, despite only 7% of this land being left in North Somerset, has included this allocation in the Local Plan. Backwell has more than satisfied Government's requirement and actual need for housing with an additional 800 houses with planning permission. The additional 900/1,000 houses proposed on East Backwell would result in the complete overdevelopment of the village, which in my view is unsustainable and would irreversibly alter the character and nature of our village, as well as destroying the few remaining fields for wildlife, biodiversity, food, crops and grazing for cows. There are indeed few walks left in the village for residents to enjoy exercise and quiet enjoyment for mental wellbeing. We are in danger of no longer having access, without driving, to our own countryside. I have not seen any viability analysis for an additional 1,000 houses. I have not seen any impact statements, I have not seen any assessment, viability study, detailed plans or costings on the proposed new "road" which would supposedly support this level of additional housing. Indeed, the notion of a road going either under or over the railway line seems completely unrealistic when it has been impossible to even make our train station fully accessible. This Plan raises more questions and serious concerns than it addresses. It would destroy high quality land, which we can never replicate, in order to hit a spreadsheet target. This Plan is completely Unsound and North Somerset Council should remove Land at Backwell East with immediate effect and ensure it's previous protections are restored.			

Name: K Dickens **I.D:** 20752993

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Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	NSC has not properly considered: Alternative brownfield or greenfield sites with far lower ecological impact, both in Portishead and across North Somerset. Opportunities to increase housing density on proposed brownfield sites, which could remove the need to develop Tower Farm and Black Rock. The strategic ecological importance of these sites in protecting Weston Big Wood (SSSI) and the Gordano Valley Corridor. The fact that both areas under consideration were added to the Green Belt in the late 1980s due to their high ecological value.			

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					National planning policy allows development to Green Belt in exceptional circumstance only. These have not been demonstrated. In addition: Neither site can provide safe or suitable access. Development would create unacceptable transport impacts, failing national soundness tests. Tower Farm: Down Road, Tower Road, The Deans and The Downs are already congested at school drop-off and pick-up and the additional traffic from 400-500 houses would further compound the proposed single access point issues. It is already necessary to time arrivals and departures to the cul-de-sacs off Down Road due to this congestion. Walking accessibility assumptions are unrealistic due to the gradient of the Avon Way gradient. The timings provided are very optimistic and ignore the hills in the area, maybe the are close for walking down the hills, but certainly not up them. The suggested use of e-bikes does not consider the lack of safe and segregated pedestrian routes. There is no evidence that these would be suitable for the prospective householders, or in reducing the number of car journeys to the school. There is limited public transport in the area, and the forthcoming railway line will do little to alleviate this, the hourly service is unlikely to change the habits of current households. There are little shopping options, 2 small supermarkets and a pharmacy, in the area so the use of cars would increase. The proposal states that flood risk is very low (Flood Zone 1) but includes Attenuation basins throughout the site. The proposal also states that the development will provide green space for all which is rather ironic since it will be covering an existing Green Belt area with 400-500 dwellings.			
Black Rock, north of Clevedon Road	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	NSC has not properly considered: Alternative brownfield or greenfield sites with far lower ecological impact, both in Portishead and across North Somerset. Opportunities to increase housing density on proposed brownfield sites, which could remove the need to develop Tower Farm and Black Rock. The strategic ecological importance of these sites in protecting Weston Big Wood (SSSI) and the Gordano Valley Corridor. The fact that both areas under consideration were added to the Green Belt in the late 1980s due to their high ecological value. National planning policy allows development to Green Belt in exceptional circumstance only. These have not been demonstrated. In addition: Neither site can provide safe or suitable access. Development would create unacceptable transport impacts, failing national soundness tests. Tower Farm: Down Road, Tower Road, The Deans and The Downs are already congested at school drop-off and pick-up and the additional traffic from 400-500 houses would further compound the proposed single access point issues. It is already necessary to time arrivals and departures to the cul-de-sacs off Down Road due to this congestion. Walking accessibility assumptions are unrealistic due to the gradient of the Avon Way gradient. The timings provided are very optimistic and ignore the hills in the area, maybe the are close for walking down the hills, but certainly not up them. The suggested use of e-bikes does not consider the lack of safe and segregated pedestrian routes. There is no evidence that these would be suitable for the prospective householders, or in reducing the number of car journeys to the school. There is limited public transport in the area, and the forthcoming railway line will do little to alleviate this, the hourly			

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					service is unlikely to change the habits of current households. There are little shopping options, 2 small supermarkets and a pharmacy, in the area so the use of cars would increase. The proposal states that flood risk is very low (Flood Zone 1) but includes Attenuation basins throughout the site. The proposal also states that the development will provide green space for all which is rather ironic since it will be covering an existing Green Belt area with 400-500 dwellings.			

Name: K Gardner **I.D:** 8037089

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Land at North West Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	No	I object to this application for the following reasons. Local infrastructure issues Nailsea is already the subject of hundreds of new houses under development with nothing being spent on improving the local roads which are essentially country lanes which were suited to the town in the 1970s but not now. Every single access road to Nailsea has a pinch point where two buses or lorries cannot pass, and in the Backwell direction a single span low railway arch. Most people who live in Nailsea work elsewhere which largely involves commuting to Bristol, where access to the M5 is very poor, relying on narrow country lanes and the A370 which has recently been downgraded from a dual carriageway to a single lane road with adverse impact on local villages such as Long Ashton. The Highways Agency have advised that most M5 junctions in North Somerset are at capacity with peak time traffic queuing on the motorway. The country roads from Nailsea to Bristol through Backwell are already badly congested and the Backwell Station Road junction with the A370 is frequently backed up for miles, which creates fumes from idling traffic, contrary to NSC climate plans. Alternatives to car travel by rail and bus to Bristol are slow, inconvenient and insufficiently attractive to remove cars from the roads. Backwell rail station is oft quoted to be nearby but it is too far to walk conveniently for most in Nailsea. In addition it is acknowledged by Network Rail that the station is often overcrowded with narrow platforms and passengers are unable to board overcrowded trains. The station does not meet required accessibility standards with no wheelchair ramp on the southbound side. Problems on the M5 as recently seen simply cause gridlock around Backwell, Congresbury and Tickenham. Roads to the M5 from Nailsea are either narrow lanes or through Tickenham with already carries too much heavy traffic.			

Name: K Garland **I.D:** 62865281

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Policy LP3: Strategic location: Nailsea and Backwell	No	‣ Justified	No	No	No matter what you say or the words you use - Our village of Backwell is under threat of saturation of new additional house building - 640 have already been approved by NSC, with 154 already being currently built. Another 800 - 1000 plus homes on precious GRADE 1 agricultural GREENBELT land will damage our village & environment. We in Backwell have done our bit towards losing green areas of land building new homes, with no thought of further infrastructure or services	Do not use this area of land in the first place. Cut the number down to a minimum Without the proposed road first, the narrow Station Road cannot be used for all the extra wide traffic - has this been checked & reviewed? It's already impossible with the small development traffic on that road, which is the only access road to the area in question		

Name: K Humphries **I.D:** 62661473

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Land north of Banwell Road, Locking /Elborough	No	• Justified • Consistent with national policy	No	No	Ref: North Somerset Council - Ref:25/P/1282/EA1 I write to raise my concerns and objections to the proposal of homes and a shop and or community building north of Banwell Road Elborough and the eastern end proposal of south of Old Banwell Road, Locking. I have raised my objections to SP Broadway in response to their communications on behalf of Mac Mic Strategic Land and will also be sharing my objections with the parish council and local MP. I am writing to strongly object to the proposed planning application for 295 houses a shop and communal building north of Banwell Road, Elborough and 105 houses south of Old Banwell Road, Locking (specifically the eastern end). I will start with my personal feeling which are shock and despair at the proposal which looks to build a community building, shop and houses at the end of my garden /boundary completely destroying our outlook, encroaching significantly on our privacy, whilst devaluing mine and other's homes as well as devastating the natural landscape and increasing the flood risk to my property and surrounding area. The proposal does not demonstrate any knowledge, or identify the true impact to the local road network and the infrastructure has not been considered properly in this area or plan which, can only impact negatively on both the residents of Elborough Village and Hutton who will also have to suffer the huge increase in traffic passing through to access the 'new' development on what is not much more than a country lane not wide enough for 2 cars to pass in places. It is also not a viable route for buses or lorries to access regularly and the continually f looding causes the road to be in constant need of repair with the current levels of traffic. We have chosen to live in this rural area since 2011 having moved to achieve the rural home and outlook we desired. We have recently extended our home to encapsulate the view, the natural landscape and the wildlife within it which regularly provides deer, owls, bats, badgers, hedgehogs, foxes and birds of prey to name a few, some of which are covered by the Wildlife & Countryside Act 1981. Numerous birds nest in the area every year and this valley is recognised as a bat migration route with the proposed land being directly between the bat nursery on the old banwell road and the location of the North Somerset and Mendip Bat area of conservation. I do not accept that maintaining a 'small area' of the natural habitat in place of the current footprint can constitute the requirement by law to 'not intentionally or recklessly disrupt a protected species'. Any building work will impact and there can be no enhancement to bio-diversity by destroying a natural and long established habitat or migration route. The area for development currently serves as a valuable green space contributing to the rural open character of Elborough Village. The building of such a development will permanently remove the natural land that forms part of the village landscape and will reduce the habitat and ecological value of this area as well as significantly impact on the 'street scene' of the village. The proposal also has the ability to impact on environmentally sensitive features including Sites of Significant Scientific Interest (SSSI) (Banwell Caves/Crooks Peak to Shute Shelve Hill Site) SNCI, Special Area of Conservation (SAC) and the national landscape and Mendip Hills Area of Outstanding Natural Beauty (AONB). The plan to deal with the flood risk significantly underrates the levels of flooding that occurs regularly on the old banwell road and does not deal with the problem areas at all which sees the water draining from the fields behind Elborough farm onto the road and also the f looding of the pond within Elborough often leaving the village difficult to access from either end. Flood levels currently can quickly become impassable in a car. I would suggest the plan has completely disregarded or is unaware of the main areas of flooding which will only increase with global warming and increased hard surfacing for the new development which will only worsen the drainage and surface water run off for the existing properties and surrounding roads. A significant proportion of the site is within flood zone 2 and 3. I am aware that the North Somerset internal Drainage board states the sites vulnerability and these are not considered or addressed within the proposal. The sites low lying nature and proximity to the coast also adds to the vulnerability of tidal flooding. The impact on our personal privacy is significant in the proposal primarily from the proposed community area and/or shop neither of which we support or see any requirement for. There are numerous convenience stores less than 3 miles away/5 minute drive and walkable these include; Asda local (1.7 miles), Co-op (1.4miles), Morrisons Local and Tesco Express (2.4 miles away). A post office/shop, pharmacy, cafe and barbers are within walking distance in Locking Village alongside a park and playing field. Further proposed shops are within the Locking Parklands site. The requirement to have another shop is excessive and given it seems only the 'big' supermarket brands survive in local convenience shops the thought of impacting the beautiful landscape with a neon sign of another Co-op or Asda is incomprehensible. The village also currently has access to multiple halls and community spaces available in Hutton; Banwell, Locking and Parklands some of which struggle to survive. Access through cycle routes/walking paths to create a safe route to those already in existence would seem a much more appealing and environmentally friendly solution than creating another. The land proposed is the natural divide between the villages of Elborough and the village of Locking. These proposals start to merge the villages together leaving what can only be described as a small strip of land to delineate the boundaries of the villages. The activity associated with a shop and communal building is not compatible with a quiet residential environment, impacting with light pollution from signage, security lighting and late night activity. A communal facility and shop will	I respectively request that the planning authority refuses the proposal suggested by SP Broadway and any subsequent planning applications to develop this land	Please refer to attachment supplied	K humohries.pdf

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					naturally bring large numbers of people into an area very close to the rear of my property and all those along the boundary of Elborough. The proposal will reduce privacy within the living space of my home and my garden and create a general sense of intrusion and loss of separation between public and private residential area. My home and garden will be exposed to passing foot traffic and activity, resulting in an increase in noise and disturbance from visitors and vehicles gathering as well as evening and weekend disturbance associated with this type of building. Any such buildings will create a loss of privacy due to overlooking windows and properties, result in a loss of outlook from my property and destroy the peaceful character that is currently enjoyed by us as a family. Core strategy CS12 (high quality design) requires development to protect residential amenity. DM40 Residential amenity states development must not result in unacceptable levels of noise, disturbance or activity near residential homes. The proposal also harms the character of the area which is a quiet residential, semi rural location. A development of this intensity is not compatible with the character or scale of the current properties in Elborough and undermines the privacy that i as a resident am entitled to expect in a residential setting with the living conditions protected in accordance with DM32 and DM38 of North Somerset sites and policies and North Somerset residential design guide SPD Section 1 protecting living conditions. ("DM32" is a key planning policy in the North Somerset Sites and Policies Plan (Part 1) The policy is used by the North Somerset Council to ensure that the design and layout of new buildings are of high quality, contribute positively to the local character, and do not negatively affect the living conditions of nearby residents or the surrounding environment) (“DM38” whilst applied to extensions is relevant as this proposal, as an extension to the village, does cause harm to the street scene and living conditions of the adjoining properties) • Street Scene/Local Area Impact: The proposal should not harm the street scene or the local area, including preventing the loss of characteristic boundary features or visually important trees. • Living Conditions: The development should not prejudice the living conditions of the occupiers of the proposed extension or adjoining properties (e.g., through loss of privacy or light). A shop often attract issues such as littering in the local area, loitering after hours causing noise which subsequently keep my young family awake as the rear of the property faces the proposed development which is in very close proximity. The increase in footfall also raises security concerns to my property A shop or commercial development of this nature within such a close proximity to my property does not align with the following principals. Protecting the character residential, avoiding developments that negatively impact on privacy, noise levels and the local environment. The proposed location of communal building and shop is inappropriate for the intensity and type of use proposed. Such buildings should be located in a centre or main settlement rather than positioned behind existing properties. Therefore the proposed location conflict with CS13 Scale & location of development which aims to ensure developments are appropriately located relative to their function. DM15 (Location of Main Town Centre uses) which discourages placing commercial uses in inappropriate, isolated residential setting. The proposed development will draw additional vehicles, delivery vans and service traffic into a residential area that is not designed for commercial use. As a result the already busy roads will be further congested bringing additional safety concerns for children, pedestrians, horse riders and dog walkers. The proposal fails to mitigate or show what consideration have been made for traffic calming and pedestrian crossings and traffic impact to existing homes. The proposal also fails to offer adequate traffic management solutions to prevent congestion. Given the limited road infrastructure in Elborough village the proposal fails to satisfy these requirements in line with North Somerset Core Strategy Policy CS10 Transport and congestion and DM24 Safety, Traffic & Transport Impact states the development must not compromise the safety of road users and provided suitable access. The impact of the proposed development will be felt not only in Elborough but also in Hutton where 20 MPH speed limits are in place to try and allow safe passage for our children into the local school. A development of this size with the addition of commercial building and residential development with such close proximity to existing residential boundaries does not align with the principles of protecting residential character. The proposal represents an over-intense use of a plot that directly borders homes, contrary to the aim of protecting residential amenity. This conflict with Core Strategy CS12 Achieving High Quality Design - requiring developments to protect residential amenity and DM40 residential Amenity -states a development must not result in unacceptable levels of noise, disturbance or activity near homes. In conclusion and for the reasons outlined, noise, traffic increase, loss of green space impact on the biodiversity of the area, amenity disturbance, flooding risk, security and privacy concerns and incompatibility with a residential environment I respectively request that the planning authority refuses the proposal suggested by SP Broadway and any subsequent planning applications to develop this land			

Name: K Hunt **I.D:** 50797505

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell already has 800 new houses approved, a 40% increase for the village. This will lead to a significant strain on resources for which there is no available space for improvement. These additional numbers would lead to complete overdevelopment of this area leading to an increase in congestion, crime and unsocial behaviour. As there is currently a deficit in school places and with no obvious investment in health services or leisure facilities another 1,000 houses for which there has been no viability analysis, cannot be supported. Backwell is allocated a higher number of houses than any other village in North Somerset, and an even higher growth percentage than towns. Whilst the attractiveness of Backwell as a place to live cannot be underestimated this proposed substantial increase in housing will significanly reduce this draw factor and consign the village to a gradual decline in its appeal as well as reducing the stock of high grade farming land. Whilst we are being encouraged to be self sufficient and secure from a farming and food point of view the loss of this high quality Grade 1 Agricultural Land currently used for food crops and grazing would ignificantly reduce the 7% left in the whole of Somerset. This development would destroy valuable wildlife habitats and corridors to other wildlife areas and further harm biodiversity in one of the world's most nature-depleted countries. I have already seen a noticeable wildlife reduction in the area due to the significant number of large delivery and construction vehicle serving the current building projects. Once destroyed these wildlife areas will take a decade to recover to there current status even assuming the developments have not caused the extinction of some of the current species. The promise to introduce new wildlife areas or green space leisure facilities will not be a replacement for those lost habitats. In particular these developments threaten the Brockley Maternity Roost and Sssl, with rare Lesser and Greater Horseshoe Bats relying on this land for food. The Infrastructure Delivery Plan lacks full analysis and costings with no funding guarantees for the new road or services being suggested or improvements to the flooding preventions that would be necessary due to the introduction of this new housing development. Backwell Lake (Reservoir) and adjacent fields, where new roads and housing are planned are on a floodplain. This area regularly floods and the massive infrastructure development needed to overpass or underpass the main Bristol railway line would signifiantly negatively impact the area. That road would not achieve the supposed benefits as the railway station is not fit for purpose as a transport hub; remains Inaccessible for people with mobility issues, presents serious challenges when travelling with young children and will just move any congestion from the A370 to the station area. In conclusion the sheer volume of growth and the necessary investment in infrastructure and services over such a short period is, I believe, destabilising, unsustainable and undeliverable.			

Name: K Riches **I.D:** 30361825

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SP3: Spatial strategy	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The inclusion of Nailsea and Backwell as a Strategic Location is Not Sound. Nailsea is a Town and Backwell is a Village - they should be treated separately in all respects, especially with respect to all sections of SP5 for Nailsea and SP6 for Backwell. SP5 and SP6 contain different requirements for very good reasons.	Nailsea and Backwell are separate and very different communities and should be treated as such in the Local Plan.		

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SP7: Green Belt	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The removal of 'Land East of Backwell' from the Green Belt is Not Sound and the test of exceptional circumstances is not agreed.	The removal of 'Land East of Backwell' from the Green Belt should be re-considered.		
SP8: Housing	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The inclusion of Nailsea and Backwell as a single Strategic Location hides the true impact of proposed new housing in the Village of Backwell - an amount which is totally unreasonable.	Nailsea and Backwell should be treated separately.		
Policy LP7: Settlement boundaries	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell has a Settlement Boundary (SB). I note that planning applications should be treated differently depending on whether they are inside or outside the SB. Four recent planning applications in the Parish, outside the SB, have been approved. The Local Plan now proposes changes to Backwell's SB to include the above and more. I do not understand the relevance of the SB.	Reconsider the application of SB policies.		
Policy DP55: Agriculture and land based rural businesses	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I would like to propose a more comprehensive policy on Agriculture here, or in a new Policy. There are sections in the Local Plan addressing eg Mineral Extraction as well as other major industries eg Portbury Dock and The Airport. Agriculture is a significant industry in North Somerset. It employs people and produces an important output - food. Note issues relating to Food Security. The Local Plan should address Agriculture by considering the current situation and crucially, the impact which must surely result from allocating significant areas of agricultural land, including Grade 1&2 Best and Most Versatile Land - including reduced output and impact on Food Security. At the moment, the absence of this information creates the impression that agricultural land is simply a resource to be used for new housing and employment with no other effects on the local economy etc. This is Unsound.	Address the above.		
Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Although most of this site is outside Backwell's Parish Boundary, the developer has proposed an access road across a flood prone, low lying route which is within Backwell's Parish Boundary. This is yet another large development which would exacerbate traffic issues in Backwell. This allocation would have a serious negative impact on a swathe of open country including Backwell Lake (Reservoir), in terms of character, setting and wildlife.	This allocation should only continue if Nailsea needs it, but the access should be off the Perrings and should NOT encroach into the Parish of Backwell.		

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Grove Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	On the Local Plan Policies Map, the pink area denoting the Grove Farm (GF) development extends to the east of the actual GF development site to include: 1) The separate development on land off Rodney Rd (already in construction) and 2) A small separate field owned by NSC situated between the Infants School and the site mentioned at 1). I can find no other reference to the field at 2), but note previous understanding that this field would NOT be used for housing but would be made available to the Infants School. The situation regarding this field is therefore unclear and Not Sound.	Clarify the above situation.		
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell is a Village and a Parish; it is wholly wrong to treat it as part of a Strategic Development Location. Backwell already has four approved development sites, which will result in a 40% increase in the number of houses. All of these are outside the existing Settlement Boundary. Any further new allocations should be considered in the context of the growth already coming to Backwell. The new proposed allocation 'Land East of Backwell' (EB) would bring a further 900 (approx) houses; this is development on a totally inappropriate scale for a Village. Development on this scale would have a significant adverse impact on the social cohesion and character of the Village; this has not been addressed in the draft Local Plan. EB is Contrary to SP3 and SP6 and there has been no needs analysis to confirm that the Village of Backwell needs all these new houses. The allocation is NOT Sound. The Local Plan proposes to take this large site out of the Green Belt; it is all designated Grade 1 Agricultural Land. The Government is seeking to retain BMV to assist with Food Security. In the Supporting Document 'Best & Most Versatile Agricultural Land Topic Paper Oct 25' (BMV), the only justification provided for using this BMV is that without it the new road across the site would not be deliverable. Very curious logic and NOT Sound. The proposed new road from Station Road (near the station) and the A370 would in itself have a serious negative impact on the character and setting of Backwell Common in the Green Belt. Proposed development for housing, employment and other infrastructure would contribute hugely to this negative impact. The utility of the proposed road is questionable and it would have to cross the railway which is on an embankment surrounded by land which is often very damp. The technical and financial feasibility of this proposal, in a suitable timescale, is NOT established in the IDP or Strategic Transport Assessment. It is NOT Sound planning. Backwell is blighted with too much, ever increasing traffic. The scale of proposed development will obviously exacerbate the situation. I cannot see any likelihood of the proposed road being built in a suitable timescale, but even if it were to be built the impact of so much development would swamp any minor improvements brought about by the new road. Although Schedule 1 and the IDP acknowledge the need for improved Health, Education and Leisure facilities at Backwell they offer nothing more than a 'wish list'. Flood risks across this area have yet to be properly assessed. Existing risks will be increased by proposed large scale development. Development of EB would have a serious, negative impact on wildlife in the area, with large scale loss of habitat and wildlife. North Somerset Council considers Backwell to be a sustainable village in large part due to Nailsea and Backwell Station. However the station has restricted access (stairs only) to one platform, and both platforms are too short to accommodate anything more than short trains. These are serious constraints	The proposed allocation of Land East of Backwell should be re-examined and further consideration should be given to other more suitable sites elsewhere.		

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					making the station unsuitable to be a proper transport hub. EB is contrary to many of the excellent Policies in the draft Local Plan, including: SP1, SP3, SP6, SP11, LP3, DP53.			
Farleigh Fields, Backwell	Yes		Unsure	Unsure			I support the inclusion of this LGS area.	
Backwell Lake	Yes		Unsure	Unsure			I support the inclusion of this area of LGS.	
Park adjacent to West Leigh Infants School, Backwell	Yes		Unsure	Unsure			I support the inclusion of this area of LGS.	

Name: K Simmons **I.D:** 31033025

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Policy LP2: Strategic location: Woodspring (south west of Bristol)	Unsure		Unsure	Unsure		In order to safeguard the existing village of Long Ashton the future of Yanley Lane needs to be considered. It is still a "rat run" despite the SBL. In view of proposals should the lane be closed off? There will be an increased flood risk with so many houses..Yanley Lane flods regularly..what can be done to further mitigate risk? The ridge at Yanley needs to be protected as a green buffer zone along the entire length and enlarged to protect the ridge landscape. Local footpaths need to be retained across the area.		

Name: K Snook **I.D:** 62865217

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Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	1. The proposed figure of 1,817 new homes in Nailsea would lead to a total over development of the town. 2. The proposed new road would not serve Nailsea's traffic or relieve congestion on Station Road, nor would it help traffic travelling from Backwell to the M5 3. The new link road, under a rail crossing is likely to be extremely expensive and the engineering problematic due to the proximity to the river Kenn 4. Although 3 new primary schools are proposed for Nailsea and Backwell, they will be funded through developer contributions and will be phased with no locations identified as yet 5. Additional development will place immense pressure on the towns existing health and leisure provision. There will be no direct investment to combat this pressure 6. Greenfield Crescent playing field is not protected under Local Green Space Policy LP15 7. Grade 2 agricultural land which is high yielding and of very good quality will be lost permanently through housing development to the south of Nailsea 8. All proposed development sites in Nailsea have been assessed for foraging locations for the rare greater and lesser horseshoe bats which are protected species			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					9. One hundred homes are proposed adjacent to Moor End Spout nature reserve a site hosting many protected species. Development would destroy valuable wildlife habitats and further harm biodiversity in our area 10. Transport modelling shows there will be notable increases in vehicle movements on the network of rural lanes around Nailsea. There are no clear workable plans to mitigate this. The lanes will become congested and unsafe for pedestrians, cyclist and horse riders. 11. There are no plans to improve the accident blackspots at Stone Edge Batch, Wraxall Hill or Portbury Lane all of which will see a marked increase in vehicles 12. Development is proposed west and south of Backwell Lake. The new roads and housing will be in the floodplain which actually does flood regularly 13. The railway station is not fit for purpose as a transport hub, it remains unaccessible for people with mobility issues and presents serious challenges when travelling with young children			
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	1. Backwell already has 800 new homes approved, a 40% increase for the village. Additional numbers would be complete over development. 2. The proposed road would not effectively serve Nailsea's traffic or reduce congestion on Station Road, Backwell Common or Chapel Hill. Engineering the road over or under the railway would be highly expensive and potentially unfeasible. 3. Despite the proposed increase there will be no additional school, leisure facilities or health services. The lack of infrastructure services cannot support another 1000 homes. 4. Backwell is allocated a higher percentage of housing increase than any other North Somerset village and an even higher number of percentage growth. 7% of the regions compared to only 2% for Clevedon. 5. There is no needs or viability analysis for an extra 1000 homes. 6. Backwell is not an employment hub, most residents commute. 7. No social cohesion impact assessment has been provided. 8. Grade 1 agricultural land used for crops and grazing. There is only 7% of this land left in the whole of North Somerset. 9. Government policy states 'we must protect our best and most fertile land' to safeguard food security. This is a contradiction of this policy and haram food security. 10. Development would destroy valuable wildlife habitats and further harm biodiversity in one of the worlds most nature depleted countries. 11. The proposals threaten the Brockley maternity roost and SSSI with rare lesser and greater horseshoe bats relying on the land for food. 12. The infrastructure delivery plan lacks analysis and costings, and there are no funding guarantees for the road or services. 13. Backwell Common and surrounding areas are prone to regular flooding, new houses would exacerbate the problem. 14. Concerns regarding the strategic growth location designation include the impact on the areas character risk of flooding, the loss of greenbelt and agricultural land, and uncertainty over the funding for the road. 15. Backwell Lake where the new houses and road are planned is on a floodplain and regularly floods. 16. Government policy requires 50% affordable housing on greenbelt land but this reduces the funds developers contribute towards infrastructure. 17. The sheer volume of growth and requires infrastructure over a short period of time is unsustainable, destabilising and undeliverable. 18. The railway station is not fit for purpose as a transport hub, it remains unaccessible for people with mobility issues and presents serious challenges for those travelling with children.			

Name: K Sturdy **I.D:** 62786881

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent	Unsure	Unsure	I cannot believe NSC’s intention to include the parcels of land east of Backwell for housing. It is totally inappropriate given it is designated as Green Belt and is prime Grade 1 agricultural land. To lose this when the UK but particularly NSC, has so little agricultural land would be a travesty, not to mention the impact on local wildlife and natural flora and fauna. If destroyed by developers none of this can ever be replaced. In addition it is in an area prone to flooding, already this winter we have seen several incidents of intense flooding on local			

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		with national policy			roads resulting in stranded cars. Development on this land would only exacerbate the existing flooding problems. The proposed road under the railway bridge on Backwell Common has obviously not been considered properly as again it is in an area known to flood so by lowering the road to get under the bridge would simply be impractical. Additionally, making Backwell Common a dead end at the point of any bridge would effectively cut the road in half and isolate the community on the far side of the road. This would result in them being stranded in the event of flooding on Backwell Bow and Chapel Hill. Totally unacceptable. Backwell is a village NOT a town - it does not have much employment and workers have to commute. The proximity of the railway station has been used as a reason for such development but as buses cannot get under the railway bridge to access the railway and in any event the station is inaccessible to anyone with mobility problems, despite many attempts to make it accessible in the past. To make it a 'transport hub', as NSC proposes, would just seem totally ridiculous to consider. Despite this, there has been regular house building and already 794 new homes have been approved despite this increasing the size of Backwell by 40%. The schools and medical practice are already full and the roads inappropriate for the volume of current traffic without the addition of these houses. The majority of roads around the area are at best B roads and mainly country lanes. The only exception being the A370 which is totally clogged with commuter transport to and from Bristol and Weston-super-mare. To add a further 889 houses to the mix, increasing Backwell still further and adding substantially to the transport problems, would be totally unsustainable and frankly ludicrous to even be considering. Whilst we all appreciate the need for more housing, and which Backwell are addressing already with the agreed developments, there seems no valid reason why NSC have included this additional land in the local plan without completing any studies to consider the validity and sustainability of such a suggestion on such a historic village.			

Name: K Tailor **I.D:** 62658817

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	I consider the North Somerset Local Plan 2041: Pre-submission Plan to be unsound because it is not justified, not effective, and not consistent with national policy. Backwell has already accepted 800 new homes, representing a 40 percent increase in the size of the village, yet the Plan proposes around 1,000 additional houses. This level of growth is disproportionate and unjustified: Backwell is expected to take 7 percent of the district's total housing numbers, more than any other village and even more than towns such as Clevedon, which is allocated only 2 percent. No needs assessment, viability study, or evidence has been provided to justify concentrating such a high proportion of the district's growth in a rural village that is not an employment hub and where most residents must commute. The allocation is also undeliverable due to the severe infrastructure deficit. There are already insufficient school places, no additional health service capacity, and no investment in leisure or community facilities. The Infrastructure Delivery Plan lacks credible analysis, costings, and funding guarantees, particularly for the proposed new road that underpins the entire growth strategy. It is unclear whether this road can be engineered across or beneath the railway line, and it may be unfeasible or prohibitively expensive. Even if delivered, the road would not alleviate congestion on Station Road, Backwell Common, or Chapel Hill. The Plan assumes improvements in sustainable transport,	To make the North Somerset Local Plan 2041 legally compliant and sound, the housing strategy for Backwell needs substantial amendment. The scale of development identified for the village must be reduced to a level that is proportionate to its size, existing commitments and environmental constraints. Backwell already has around 800 approved homes, which represents a 40 percent increase in the village, and any further allocation must be supported by a clear needs assessment, a viability assessment and evidence that the location is deliverable without harming Green Belt purposes or high quality agricultural land. The plan should remove allocations from Grade 1 agricultural land and land that performs recognised Green Belt functions, and instead focus on brownfield sites, larger settlements and locations with genuine employment opportunities. To be sound, the plan must also include a credible Infrastructure Delivery Plan. This requires detailed, costed and funded proposals for transport, education, health services, drainage, biodiversity mitigation and utilities. The current assumption that a new link road or rail underpass would resolve congestion is not supported by any detailed modelling and must be replaced with evidence based transport assessment and a full consideration of alternatives. The plan must also demonstrate how additional school places, GP capacity, active travel routes and community facilities will be delivered at the same pace as development. It must also take into account national policy which states that Green	I do not consider the North Somerset Local Plan 2041: Pre-submission Plan to be sound or legally compliant because it allocates housing on Green Belt land, including the Backwell Strategic Growth Location. I cannot provide support for the plan's soundness or legal compliance in its current form. In my view, the plan would only be sound and compliant if all Green Belt housing allocations were removed and the focus shifted to brownfield sites, urban intensification, and locations with sufficient infrastructure and employment opportunities.	Document.docx

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					yet Nailsea and Backwell station remains inaccessible for people with mobility issues and is unsuitable as a transport hub for the significantly expanded population. The Plan is inconsistent with national policy due to the loss of Green Belt and Best and Most Versatile agricultural land, including Grade 1 farmland, of which only 7 percent remains in North Somerset. National policy requires that this land be protected to support food security, and the Council has not demonstrated the exceptional circumstances needed to justify Green Belt release. Development would also harm biodiversity, threatening the Brockley Maternity Roost, nearby SSSI habitats, and foraging land for protected Lesser and Greater Horseshoe Bats. Flood risk further undermines deliverability. Backwell Common, Backwell Lake, and surrounding fields lie on known floodplains that already flood regularly, and the Plan provides no robust evidence that increased flood risk can be safely mitigated. No assessment has been made of the impact of such rapid growth on social cohesion or the character of the existing community, which is a significant gap in the evidence. Taken together, these issues show that the Backwell allocation is not justified by the evidence, not deliverable in practice, and not consistent with national policy on Green Belt protection, agricultural land, biodiversity, sustainable transport, and flood risk. For these reasons, the Local Plan is not sound, and the Backwell Strategic Growth Location should be removed from the Plan.	Belt sites that deliver 50 percent affordable housing will significantly reduce developer contributions, and therefore cannot be relied upon to fund major new infrastructure. Environmental soundness also requires modification. The plan must remove or revise any allocations that would damage the ecological network, including designated wildlife corridors, the SSSI setting, bat foraging habitat and the Brockley Maternity Roost. It must also fully reassess flood risk, taking into account the regular flooding around Backwell Common, Backwell Lake and the surrounding fields, and ensure that no development is proposed in areas that fail the sequential or exception tests within national policy. The plan must also be modified to show compliance with national policy on social cohesion, settlement identity and sustainable communities. This requires an assessment of how very large scale development would affect the function of a village with limited services, no local employment base and a railway station that is not accessible and cannot operate as a transport hub. Without these changes, the plan cannot meet the tests of being justified, effective or consistent with national policy.		

Name: K Watson **I.D:** 62775937

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No		Unsure	Unsure	Backwell has already been asked to accept nearly 800 new houses despite objections from a very large percentage of the villagers, which were totally ignored. The proposed development will take up valuable agricultural land in a Green Belt area. It will have disastrous effect on the wildlife and fauna and potentially create a flood risk. The current health services and leisure facilities will not cope with this size of housing development and where will the money come from to improve this situation - certainly not from the Government or NSC. The road infrastructure will not cope and the new road proposed will add little to relive the pressure already on the A370 or Station Road. This proposal will totally destroy the village ethos many enjoy in Backwell today and turn it into a dormitory for Bristol. Backwell is being asked to take more than its fair share in this NSC REG 19 Local Plan 2041. I am totally against this proposed development.			

Name: Kamala Das **I.D:** 32607745

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	‣ Positively prepared ‣ Justified ‣ Effective	No	No	The allocation which increases the population size of the area by about 44% is unsound and may be in breach of the duty to co-operate because it was only introduced in June 2025 and unlike all the other proposed sites there was no public exhibition consistent with NSC's Statement of Community Involvement. It is unsound as there has been no transport modelling, no habitat surveys, no updated sustainability appraisal (in particular none which uses Defra MAGIC maps or takes into account floodplains or existing rights of way), no assessment of the loss of best and most versatile agricultural land) and no landowner agreements for the proposed active travel routes. It is unsound in not taking account or proper account of ancient woodland, floodplain or existing rights of way. It is not effective in terms of impact on traffic. The proposed 5 LP4 sites would add about 1540 more journeys as well as additional numbers as a result of more housing in Portishead and areas nearby in which is in excess of what is sustainable on the A369 and at Junction19 of the M5 as well as at Bower Ashton. Duty to co-operate: There are no updated statements of common ground with National Highways, Natural England or the Environment Agency own J19, habitats or SuDS.Consultation with National Highways has yet to be completed.	Delete Pill Green site from the LPO8 Schedule of Sites or amend Policy LP8 as follows: No development on Pill Green until exceptional circumstances are independently verifies (NPPF para 147Delete the Pill Green Site (600 homes) from the LP8 Schedule of Sites or amend Policy LP8 as follows: "No development on Pill Green until exceptional circumstances are independently verified (NPPF para 147) and sequential testing confirms no viable non-Green Belt alternatives are available, prioritizing brownfield sites in Weston-super-Mare, Portishead and Bristol fringe. Cap total LP8 allocation across all sites; require full funding (via s106/CIL agreements) for flood defences to 1-in-1000 year standard + 45% climate change allowance, A369 and M5 J19 capacity upgrades, and additional school and GP places alongside associated additional communal infrastructure before granting outline permission". Insert new para 6,79: "Allocations must demonstrate no disproportionate impact on village populations, defined as <5% increase per site without evidenced need. Allocations in villages with a population under 10,000 must not result in a population increase of more than 5% from any single site unless exceptional circumstances are independently verified and full infrastructure delivery (transport, education, health, drainage) is secured upfront via s106/CIL. Cumulative impacts across all sites within a settlement must not exceed 20% without a master planned, funded delivery strategy."	N/A	

Name: Karen Bird **I.D:** 62584449

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at North West Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	These comments apply to all proposed development sites in Nailsea. The proposed figure for development will lead to a total overdevelopment of the town. There is no funding for additional infrastructure, such as the new road, schools and no evidence that these will be provided. Land to the north of Nailsea will be removed from the greenbelt. Development is planned on land which is prone to consistent flooding. There will be notable increases in vehicles on the network of rural lanes around Nailsea, and no clear workable plans to mitigate against this. Roads will be unsafe to use for pedestrians, cyclists and horse riders Existing accident blackspots at Stone Edge Batch, Wraxall Hill or Portbury Lane have no plans to improve them and they will see a marked increase in vehicles.			
Youngwood Lane	No	‣ Positively prepared ‣ Justified ‣ Effective	Unsure	Unsure	These comments apply to all proposed development sites in Nailsea. The proposed figure for development will lead to a total overdevelopment of the town. There is no funding for additional infrastructure, such as the new road, schools and no evidence that these will be provided.			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
		• Consistent with national policy			Land to the north of Nailsea will be removed from the greenbelt. Development is planned on land which is prone to consistent flooding. There will be notable increases in vehicles on the network of rural lanes around Nailsea, and no clear workable plans to mitigate against this. Roads will be unsafe to use for pedestrians, cyclists and horse riders Existing accident blackspots at Stone Edge Batch, Wraxall Hill or Portbury Lane have no plans to improve them and they will see a marked increase in vehicles.			
Land north of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	These comments apply to all proposed development sites in Nailsea. The proposed figure for development will lead to a total overdevelopment of the town. There is no funding for additional infrastructure, such as the new road, schools and no evidence that these will be provided. Land to the north of Nailsea will be removed from the greenbelt. Development is planned on land which is prone to consistent flooding. There will be notable increases in vehicles on the network of rural lanes around Nailsea, and no clear workable plans to mitigate against this. Roads will be unsafe to use for pedestrians, cyclists and horse riders Existing accident blackspots at Stone Edge Batch, Wraxall Hill or Portbury Lane have no plans to improve them and they will see a marked increase in vehicles.			
Poplar Farm, Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	These comments apply to all proposed development sites in Nailsea. The proposed figure for development will lead to a total overdevelopment of the town. There is no funding for additional infrastructure, such as the new road, schools and no evidence that these will be provided. Land to the north of Nailsea will be removed from the greenbelt. Development is planned on land which is prone to consistent flooding. There will be notable increases in vehicles on the network of rural lanes around Nailsea, and no clear workable plans to mitigate against this. Roads will be unsafe to use for pedestrians, cyclists and horse riders Existing accident blackspots at Stone Edge Batch, Wraxall Hill or Portbury Lane have no plans to improve them and they will see a marked increase in vehicles.			
Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	These comments apply to all proposed development sites in Nailsea. The proposed figure for development will lead to a total overdevelopment of the town. There is no funding for additional infrastructure, such as the new road, schools and no evidence that these will be provided. Land to the north of Nailsea will be removed from the greenbelt. Development is planned on land which is prone to consistent flooding. There will be notable increases in vehicles on the network of rural lanes around Nailsea, and no clear workable plans to mitigate against this. Roads will be unsafe to use for pedestrians, cyclists and horse riders Existing accident blackspots at Stone Edge Batch, Wraxall Hill or Portbury Lane have no plans to improve them and they will see a marked increase in vehicles.			

Name: Karen Clement **I.D:** 62684289

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The addition of so many more houses in addition to those already approved would overwhelm the existing infrastructure in Backwell. The extra traffic generated by the increased number of commuters (there are no employment opportunities in Backwell) would cause further congestion and misery on our roads. The planned build would be on an area prone to flooding, with water also running off from the A370. More tarmac and hardstanding will make the situation worse for the surrounding area. The area is Grade 1 agricultural land, land which is being slowly eroded by builds such as this. this seems so short sighted when there is so little now left in N Somerset. Once it is gone, it cannot be recovered.			

Name: Karen Meeson-Logan **I.D:** 62840961

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I have lived in Backwell for 5 years now and have watched it grow. While I don't oppose growth in principle, there has to be a sensible limit dictated by infrastructure. I use the bus to commute to work in Bristol, taking my preschooler with me to attend nursery – the service is already strained and unreliable. When I have to commute by car the journey is horrific due to roads already being unable to cope with levels of traffic. I know very few people working in the village itself so it seems inevitable that any new inhabitants would have similar needs to myself in terms of travel and yet there appear to be no funding guarantees for the new road or services. It all seems like empty promises that no none will be held to account on. I have one daughter in school in the village already and soon will have a second. There appear to be no plans to address the deficit of school places – how will all of our children be educated? As a family we also make use of the local NHS doctor surgery which already seems over burdened – 1000 extra houses is too large a strain on the local health infrastructure. Withy all of this in mind, why is Backwell expected to take 7% of North Somerset's housing allocation while Clevedon seems to expect 2% - this makes no logical sense. I can't make sense of presenting development opportunities near land that is known to flood or even be an actual flood plain. The new development on the main road has already caused issues regarding water drainage-what plans could possibly be put in place on a area that already floods. Finally there is the environmental concern – Plans appear to take away Grade 1 Agricultural Land which is currently used for food crops and grazing. With only 7% of this high quality land left in the whole of North Somerset, how can shrinking this already tiny number be justified. The government's policy says "we must protect our best and most versatile land" to safeguard food security, but the proposals contradict this policy and directly undermine food security. It is all utter madness – it seems to be a "do now" strategy, "think later". Proposals and plans should be exactly that, and yet no of the necessary planning seems to have been put into these proposals.			

Name: Karen Todd **I.D:** 62853857

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Churchill Avenue	No	• Justified	No	No	I wish to record that I do not support this planning application. The proposed building will result in the loss of both football and rugby pitches which are used by hundreds of adults and children to keep physically fit and enjoy playing sport and socialising - a great shame for the local community and a step backwards from a positive future for our children .	I wish to record that I do not support this planning application. The proposed building will result in the loss of both football and rugby pitches which are used by hundreds of adults and children to keep physically fit and enjoy playing sport and socialising - a great shame for the local community and a step backwards from a positive future for our children .	.	

Name: Karl Harrison **I.D:** 57951457

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	My objection is that the allocation of Land at Tower Farm is Unsound because it fundamentally fails the tests of being Positively Prepared, Justified, and Effective, and is Inconsistent with National Policy. The arguments directly challenging the Plan's Soundness are as follows: Inconsistent with National Policy / Justified - The allocation conflicts with core policy objectives and fails to be justified by its own evidence base, particularly concerning Green Belt protection and sustainability. - Green Belt (Policy SP7): The allocation is inconsistent with the primary purpose of Green Belt protection. The Green Belt Assessment Stage 2 (2023) rates the parcel as performing a "strong Green Belt function.". - Sustainability (Policy SP1): The allocation is not supported by the core sustainability principle (Policy SP1, page 16), which requires development to minimise car reliance. The	The necessary modification is the REMOVAL of the Land at Tower Farm allocation from Schedule 1 (Portishead Allocations, page 297) and the removal of the site from the Green Belt release list in Policy SP7 (page 29). Alternatively, if the allocation is retained, a specific modification must be included prohibiting all vehicular access into the site via Tower Road or other unsuitable minor residential roads in the area, to ensure compliance with Policy DP14 (Highway Safety, page 146).		North Somerset Plan - Karl Harrison - Response.pdf IMG_0256.jpeg

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					Sustainability Appraisal Report (LUC, 2025) (pages 93–94, Section 5.39) explicitly finds that sites distant from rail and cycling networks reinforce car dependency, contradicting the plan's net zero objectives. Effective / Justified - The site is rendered undeliverable and ineffective due to severe, unmitigable constraints on highways and flood risk, failing the test of an effective policy. - Highway Safety (Policy DP14): Relying on Tower Road for access guarantees a severe residual impact, violating Policy DP14 (Highway Safety, page 146). This policy prohibits development that introduces traffic of "excessive volume, size or weight into... residential areas." The Stage 7 Transport Assessment (AECOM, 2025) confirms the network is constrained and that all adverse impacts must be mitigated to avoid being 'severe'. The use of this narrow residential road makes the mitigation ineffective. - Flood Risk (Policies DP9/DP10): The allocation conflicts with Policy DP9 (Flood Risk, page 132) and DP10 (Sustainable Drainage, page 135). Developing this area replaces crucial permeable land, increasing surface-water runoff and undermining natural flood defences (Strategic Flood Risk Assessment, 2022). ---------- 1. Summary I am submitting this representation in strong objection to the proposed allocation of Tower Farm, Portishead, as identified in the North Somerset Local Plan 2041 – Pre-submission Plan (Regulation 19). If the Council nonetheless proceeds with the allocation, I strongly object to any proposal that would allow vehicular access via Tower Road into or out of the development. 2. Objection to the Tower Farm Allocation 2.1 Inappropriate loss of Green Belt land The Local Plan 2041 identifies Land at Tower Farm within Schedule 1 (Portishead Allocations) (page 297) for about 400 dwellings. This site lies within the Green Belt. Under Policy SP7 (Green Belt) (page 29), the Tower Farm site is explicitly listed for release. However, development should only be permitted in exceptional circumstances and must preserve openness and prevent urban sprawl. The North Somerset Green Belt Assessment Stage 2 (2023) rates the Tower Farm parcel as performing a strong Green Belt function, preventing sprawl and maintaining separation between Portishead and surrounding countryside. Allocating Tower Farm therefore conflicts with the stated objectives of SP7 and undermines the Local Plan's objective of protecting sensitive landscapes around Portishead. 2.2 Unsustainable and poorly supported location Policy SP1 (Sustainable Development Principles) (page 16) states that new housing should be located to minimise private-car reliance. Tower Farm sits at the top of a steep hill, distant from the town centre and public-transport corridors, making it inherently car-dependent. The Stage 7 Transport Assessment (AECOM, 2025) (pages 96–103, Section 5.4) analyses the constraints of the Portishead network and requires all adverse impacts to be mitigated to avoid being 'severe' (Section 1.5, page 8). The Sustainability Appraisal Report (LUC, 2025) (pages 93–94, Section 5.39) finds that			

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					allocating sites distant from rail and cycle networks reinforces car dependency, contradicting the plan's sustainability aims. Earlier Stage 4 & 5 Transport Assessments (AECOM, 2021) identify the A369 corridor and connecting minor roads as "operating near or at capacity." Together, these documents demonstrate that the allocation fails SP1 and the Plan's sustainability objectives. 2.3 Flood risk and water management concerns Policy DP9 (Flood Risk) (page 132) and Policy DP10 (Sustainable Drainage) (page 135) require development to reduce, not increase, flood risk. The Strategic Flood Risk Assessment (2022) identifies upper-slope farmland such as Tower Farm as crucial for water infiltration, supporting flood protection in lower Portishead. Development would replace permeable land with hard surfacing, increasing surface-water runoff and undermining these natural defences, contrary to DP9 and DP10. 3. If Development Proceeds: Vehicular Access via Tower Road Must Be Prohibited 3.1 Tower Road is unsuitable for additional traffic Policy DP14 (Highway Safety, Traffic and Infrastructure) (page 146) requires that development: "...not generate traffic that would prejudice highway safety or overload the local network." Furthermore, Policy DP14 states that permission will be refused where development "introduces traffic of excessive volume, size or weight into a network of country lanes, or residential areas". Tower Road is a narrow residential street with limited width, poor visibility with residents cars lining the streets at all times of day / night. Using it for estate access would compromise safety for existing residents and pedestrians. The Stage 7 Transport Assessment (2025) explicitly requires mitigation to avoid severe traffic impacts. The inevitable consequences of using Tower Road would violate this requirement. The entrance to Tower Road already features a large square planter and traffic-calming layout, deliberately installed to slow vehicles entering from Down Road. This measure supports pedestrian safety, particularly for children walking to and from school. In practice, Tower Road operates as single-file for most of the day, not only at peak times. Parked cars line both sides of the street, so vehicles must regularly wait to allow others to pass. Queues frequently form on Down Road as drivers wait to turn into Tower Road. Tower Road and its smaller side roads together serve roughly 100 existing homes. Introducing traffic for an additional 400 dwellings (from the proposed Tower Farm site) would be catastrophic for safety and congestion. 3.2 The Plan discourages access through residential streets The site requirements listed in Schedule 1 for the Tower Farm site explicitly direct the provision of: "Active travel connections required to The Downs, St Marys Road/Wetlands Lane."			

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					The intent of the Plan's policy for strategic sites (Policy LP5, referenced via Schedule 1) is to promote safe, sustainable movement, implicitly discouraging reliance on unsuitable narrow residential lanes. 3.3 Impacts on amenity, safety, and environment Increased traffic would endanger pedestrians and cyclists, including children walking to nearby schools. Noise, air pollution, and vibration would harm residential amenity, contrary to Policy DP1 (High-Quality Design) (page 113), which requires developments to protect neighbouring amenity. Road-widening or junction works could remove hedgerows and mature trees, conflicting with Policy DP37 (Trees, woodlands and hedges) (page 196) and Policy DP38 (Landscape) (page 199). Additional hard surfacing would heighten runoff, breaching DP9 and DP10. 4. Conclusion The allocation of Tower Farm: Conflicts with SP7 (Green Belt), SP1 (Sustainability), DP9/DP10 (Flood Risk and Drainage), and DP14 (Highway Safety). Lacks credible mitigation in the evidence base (Transport Assessment, SFRA, and Sustainability Appraisal). Would permanently damage landscape character, Green Belt openness, and local amenity. If the Council continues with this allocation, vehicular access via Tower Road must be expressly prohibited, consistent with the principles of Policy DP14 and the sustainability aims of the Local Plan.			

Name: Kate Enright **I.D:** 62833217

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land south of Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I am a resident of Backwell and I’m writing to strongly object to the current housing planning proposals for new development. Backwell already has 800 new houses approved. That alone is a huge change for a small village. Adding another 1,000 houses on top of that is completely unreasonable. It feels like Backwell is being targeted—expected to take far more growth than any other village in North Somerset, and even more than some towns. Being handed 7% of the district’s total housing numbers, while places like Clevedon take just 2%, is totally unbalanced. There is also no proper needs or viability analysis to justify this huge extra number of houses. There’s nothing that explains why Backwell needs this level of development - why the numbers have not be spread over other areas in North Somerset to minimise the negative impact - or whether the area can realistically support it. The simple truth is that these numbers are not sustainable. There’s no clear or credible plan showing how essential services—healthcare, schools, transport, shops, community facilities, leisure spaces, utilities—are meant to cope. Nothing in the proposals demonstrates how the area will sustainably absorb thousands more people in the area without significant negative impact.			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					Part of the plan seems to rest on a new link road, yet there are no proper plans, no costings, and no confirmed funding at all. It's impossible to take this seriously when nobody can say who will build it or pay for it. Our roads are already overloaded and struggling. Sticking 1,000 more houses here without a guaranteed transport solution will make everyday life worse for everyone who already lives in the village. The proposals would also destroy Grade 1 agricultural land—some of the best farmland we have. Only a tiny amount of this land is left in North Somerset. Government policy says we should protect our most productive land, yet this plan ignores that completely. Once this land is built on, it's gone forever. In a time when food security is becoming more important, it makes no sense to concrete over high-quality farmland. On top of that, the plan chips away at the Green Belt and the character of the village. It changes Backwell beyond recognition, and it does so without proving that the infrastructure or road network can support it. Even the council's own documents raise concerns about flooding, the loss of high-quality land, and whether the road can even be delivered on time—yet the proposals still push ahead regardless. Flooding is already a serious issue. Backwell Common and the surrounding areas flood regularly, and building on this land will only make the situation worse. The proposals offer no convincing solutions and no long-term protection for the community. Overall, the scale and intensity of what's being proposed is the real problem. Forcing this much development into Backwell—without the evidence, without the infrastructure, without the funding, and without any clear justification—is destabilising, unsustainable and undeliverable. It puts huge pressure on a village that simply cannot cope with what's being demanded of it. For all of these reasons, I strongly object to the proposal.			
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I am a resident of Backwell and I'm writing to strongly object to the current housing planning proposals for new development. Backwell already has 800 new houses approved. That alone is a huge change for a small village. Adding another 1,000 houses on top of that is completely unreasonable. It feels like Backwell is being targeted—expected to take far more growth than any other village in North Somerset, and even more than some towns. Being handed 7% of the district's total housing numbers, while places like Clevedon take just 2%, is totally unbalanced. There is also no proper needs or viability analysis to justify this huge extra number of houses. There's nothing that explains why Backwell needs this level of development - why the numbers have not be spread over other areas in North Somerset to minimise the negative impact - or whether the area can realistically support it. The simple truth is that these numbers are not sustainable. There's no clear or credible plan showing how essential services—healthcare, schools, transport, shops, community facilities, leisure spaces, utilities—are meant to cope. Nothing in the proposals demonstrates how the area will sustainably absorb thousands more people in the area without significant negative impact. Part of the plan seems to rest on a new link road, yet there are no proper plans, no costings, and no confirmed funding at all. It's impossible to take this seriously when nobody can say who will build it or pay for it. Our roads are already overloaded and struggling. Sticking 1,000 more houses here without a guaranteed transport solution will make everyday life worse for everyone who already lives in the village. The proposals would also destroy Grade 1 agricultural land—some of the best farmland we have. Only a tiny amount of this land is left in North Somerset. Government policy says we should protect our most productive land, yet this plan ignores that completely. Once this land is built on, it's gone forever. In a time when food security is becoming more important, it makes no sense to concrete over high-quality farmland. On top of that, the plan chips away at the Green Belt and the character of the village. It changes Backwell beyond recognition, and it does so without proving that the infrastructure or road network can support it. Even the council's own documents raise concerns about flooding, the loss of high-quality land, and whether the road can even be delivered on time—yet the proposals still push ahead regardless.			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					Flooding is already a serious issue. Backwell Common and the surrounding areas flood regularly, and building on this land will only make the situation worse. The proposals offer no convincing solutions and no long-term protection for the community. Overall, the scale and intensity of what's being proposed is the real problem. Forcing this much development into Backwell—without the evidence, without the infrastructure, without the funding, and without any clear justification—is destabilising, unsustainable and undeliverable. It puts huge pressure on a village that simply cannot cope with what's being demanded of it. For all of these reasons, I strongly object to the proposal.			

Name: Kate Ingham **I.D:** 62856001

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	No enough school places, poor road infrastructure for the additional families that will move the area. There is no provision of work in Backwell so everyone is commuting and the roads and schools cannot cope with this. No funding guarantee for new roads and infrastructure which is problematic. Also as a regular user of the railway station I am not convinced it is fit for purpose for all the additional people.	Better walking and school infrastructure and more school places		

Name: Kate McKee **I.D:** 18479073

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Loss of Green Belt - The site lies in a portion of the Green Belt which fulfils the purpose of preventing sprawl from Nailsea, and preserving the rural setting of the settlement and openness of the countryside. Green Belt release must be justified within a strict framework that prioritizes minimizing harm and using other land first. The Council has not demonstrated that all other reasonable options have been exhausted (brownfield, urban infill, higher densities in the existing settlement). No sustainable transport links have been shown which would compensate for the loss of green belt. This site should not be considered as suitable for release of green belt. Traffic - B roads at either end of the Valley, no plans seen to alleviate this to cope with extra burden on these roads. They are already narrow, with well-known pinch points at both ends Location is not easily accessible from train station, too far to walk, and cycling on narrow roads dangerous. Extra buses to the site would exacerbate the problems already on the narrow B roads at either end of the site. People will get into their cars. Flooding – a serious issue, witnessed by all residents living locally. The land slopes down towards the river, which floods regularly. Developing it would almost certainly increase surface-water run-off and make flooding worse further downstream. The Land Yeo flows directly in the SSSI of the Nailsea and Tickenham Moors. Road at west end of the Valley flood. Nature Conservation - The Council's own Nature Emergency Toolkit says development should protect and strengthen wildlife corridors and natural drainage, yet this site would do the opposite. It is disappointing that this important Toolkit is not even mentioned in the Plan. Pipeline – there is a strategic high-pressure aviation fuel pipeline running right across the site. This is not mentioned as a constraint.			

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					In addition, the allocation for north Nailsea conflicts with the Wraxall & Failand Neighbourhood Plan (2022–2038), which has already been adopted by the Council and forms part of the legal Development Plan. That plan strongly protects the Green Belt, rural character and road safety.			

Name: Kate Rose **I.D:** 62852353

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Farleigh Fields, Backwell	No	• Justified • Effective • Consistent with national policy	No	No	I moved to Backwell from central Bristol 3 years ago for the health benefits: a reduction in smog and increase of green space. What is happening now is horrific! Moving somewhere surrounded by green belt was a choice that cost me hugely financially but also emotionally-I feel betrayed and robbed by this government. this arbitrary plan is a non-sensical numbers game. The houses on the market here sit unmoved - why? There isn't the demand for the small numbers, let alone the exodus proposed. The proposal represents an unjustifiable and unsustainable level of development in Backwell and is contrary to the principles of sound planning, sustainable growth, environmental protection, and infrastructure capacity. My specific concerns are outlined below. 1. Overdevelopment and Disproportionate Housing Targets Backwell already has 800 new homes approved, representing a 40% increase in the size of the village. The addition of a further 1,000 dwellings would constitute complete overdevelopment and fundamentally alter the character of Backwell. Backwell is being asked to accommodate an unprecedented 7% of North Somerset's entire housing allocation, a higher proportion than any other village and even surpassing some towns such as Clevedon (2%). This scale of growth is disproportionate, unjustified, and inconsistent with the principle of balanced distribution. 2. Transport Failures and Impracticality of Proposed Road The proposed relief road would not alleviate existing congestion on Station Road, Backwell Common, or Chapel Hill nor serve Nailsea's traffic effectively. Serious concerns remain over the feasibility of taking the road either under or over the railway line—an engineering challenge that would be extremely costly, complex, and possibly unachievable. Without a guaranteed and deliverable solution, the transport case is fundamentally flawed. 3. Severe Infrastructure Deficit Backwell already faces insufficient school places, and there is no investment planned for health services or leisure facilities. The current infrastructure cannot support the already-approved growth, let alone the addition of another 1,000 households. There are no guarantees, funding commitments, or realistic timescales for the supporting infrastructure required. 4. Lack of Needs and Viability Assessments No genuine assessment has been provided to demonstrate the need, market demand, or economic viability of an additional 1,000 homes in Backwell. The absence of evidence-based justification undermines the credibility of the proposal. 5. Unsustainable Commuter Village Expansion Backwell is not an employment centre. Most residents commute to Bristol or further afield, meaning additional housing would increase car dependency and congestion, contrary to sustainable transport policy. 6. No Social Cohesion Impact Assessment No assessment has been provided on the social impacts or how such rapid and large-scale growth would affect the existing community, cohesion, and service demand. This breaches fundamental planning principles requiring an	To be placed in areas of actual employment and infrastructure such as Weston, Clevedon, Portishead. For other towns to take a fairer proportion not us with the 80% increase		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					understanding of community impact. 7. Loss of Grade 1 Agricultural Land The site includes Grade 1 Agricultural Land, currently used for food crops and grazing. Only 7% of North Somerset's land falls into this highest-quality classification. Government policy expressly states that the UK must "protect our best and most versatile land" to ensure food security. Building on this land is contrary to national policy and is not justified. 8. Biodiversity Harm and Threat to Protected Species The proposals threaten valuable habitats in one of the world's most nature-depleted countries. The site is essential feeding ground for Lesser and Greater Horseshoe Bats, linked to the Brockley Maternity Roost and SSSI, both of which are highly sensitive and protected. The ecological harm would be profound and irreversible. 9. Flood Risk and Unsuitable Location Backwell Common and surrounding areas are already highly prone to flooding, including land around Backwell Lake (Reservoir) and adjacent fields earmarked for development. Increasing hard surfacing and housing on a floodplain would significantly worsen local flood risk and contradict national guidance directing development away from areas susceptible to flooding. 10. Lack of Infrastructure Delivery Plan Credibility The Infrastructure Delivery Plan (IDP) lacks detailed analysis, realistic costings, and—critically—any guarantee of funding for the new road or essential services. A development of this magnitude cannot proceed without clear, secured, and deliverable infrastructure. 11. Green Belt and Character Impacts The proposal contributes to the erosion of the Green Belt and would irreversibly damage the rural character of Backwell. Government policy requires 50% affordable housing on Green Belt sites, which would in turn reduce developer contributions, further undermining the funding of critical infrastructure. 12. Unsustainable Timeline and Undeliverable Growth The sheer volume of housing, combined with the massive infrastructure required, over such a short period is destabilising, unsustainable, and unrealistic. There is no evidence that the proposed road or supporting services can be funded or built in time to accommodate this growth. 13. Inadequate Transport Hub Backwell railway station is not fit for purpose as a transport hub. It remains inaccessible to people with mobility needs, and no funded, deliverable plan exists to upgrade it. Relying on it to justify major growth is flawed. Conclusion For the reasons above—overdevelopment, lack of infrastructure, environmental harm, severe flooding risk, loss of Grade 1 agricultural land, and the absence of viable transport or funding plans—the proposal is unsound, unsustainable, and contrary to national and local planning policy. I therefore urge North Somerset Council to reject the application in full.			
Backwell Lake	No	Positively	No	No	I am writing to register my strong objection to the above planning application. The proposal represents an unjustifiable and unsustainable level of development in Backwell and is contrary to the principles of sound planning, sustainable growth, environmental protection, and infrastructure capacity. My specific concerns are	Fairer distribution-not Backwell taking 80%		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
		prepared • Justified • Effective • Consistent with national policy			outlined below. 1. Overdevelopment and Disproportionate Housing Targets Backwell already has 800 new homes approved, representing a 40% increase in the size of the village. The addition of a further 1,000 dwellings would constitute complete overdevelopment and fundamentally alter the character of Backwell. Backwell is being asked to accommodate an unprecedented 7% of North Somerset's entire housing allocation, a higher proportion than any other village and even surpassing some towns such as Clevedon (2%). This scale of growth is disproportionate, unjustified, and inconsistent with the principle of balanced distribution. 2. Transport Failures and Impracticality of Proposed Road The proposed relief road would not alleviate existing congestion on Station Road, Backwell Common, or Chapel Hill nor serve Nailsea's traffic effectively. Serious concerns remain over the feasibility of taking the road either under or over the railway line—an engineering challenge that would be extremely costly, complex, and possibly unachievable. Without a guaranteed and deliverable solution, the transport case is fundamentally flawed. 3. Severe Infrastructure Deficit Backwell already faces insufficient school places, and there is no investment planned for health services or leisure facilities. The current infrastructure cannot support the already-approved growth, let alone the addition of another 1,000 households. There are no guarantees, funding commitments, or realistic timescales for the supporting infrastructure required. 4. Lack of Needs and Viability Assessments No genuine assessment has been provided to demonstrate the need, market demand, or economic viability of an additional 1,000 homes in Backwell. The absence of evidence-based justification undermines the credibility of the proposal. 5. Unsustainable Commuter Village Expansion Backwell is not an employment centre. Most residents commute to Bristol or further afield, meaning additional housing would increase car dependency and congestion, contrary to sustainable transport policy. 6. No Social Cohesion Impact Assessment No assessment has been provided on the social impacts or how such rapid and large-scale growth would affect the existing community, cohesion, and service demand. This breaches fundamental planning principles requiring an understanding of community impact. 7. Loss of Grade 1 Agricultural Land The site includes Grade 1 Agricultural Land, currently used for food crops and grazing. Only 7% of North Somerset's land falls into this highest-quality classification. Government policy expressly states that the UK must "protect our best and most versatile land" to ensure food security. Building on this land is contrary to national policy and is not justified. 8. Biodiversity Harm and Threat to Protected Species The proposals threaten valuable habitats in one of the world's most nature-depleted countries. The site is essential feeding ground for Lesser and Greater Horseshoe Bats, linked to the Brockley Maternity Roost and SSSI, both of which are highly sensitive and protected. The ecological harm would be profound and irreversible. 9. Flood Risk and Unsuitable Location			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					Backwell Common and surrounding areas are already highly prone to flooding, including land around Backwell Lake (Reservoir) and adjacent fields earmarked for development. Increasing hard surfacing and housing on a floodplain would significantly worsen local flood risk and contradict national guidance directing development away from areas susceptible to flooding. 10. Lack of Infrastructure Delivery Plan Credibility The Infrastructure Delivery Plan (IDP) lacks detailed analysis, realistic costings, and—critically—any guarantee of funding for the new road or essential services. A development of this magnitude cannot proceed without clear, secured, and deliverable infrastructure. 11. Green Belt and Character Impacts The proposal contributes to the erosion of the Green Belt and would irreversibly damage the rural character of Backwell. Government policy requires 50% affordable housing on Green Belt sites, which would in turn reduce developer contributions, further undermining the funding of critical infrastructure. 12. Unsustainable Timeline and Undeliverable Growth The sheer volume of housing, combined with the massive infrastructure required, over such a short period is destabilising, unsustainable, and unrealistic. There is no evidence that the proposed road or supporting services can be funded or built in time to accommodate this growth. 13. Inadequate Transport Hub Backwell railway station is not fit for purpose as a transport hub. It remains inaccessible to people with mobility needs, and no funded, deliverable plan exists to upgrade it. Relying on it to justify major growth is flawed. Conclusion For the reasons above—overdevelopment, lack of infrastructure, environmental harm, severe flooding risk, loss of Grade 1 agricultural land, and the absence of viable transport or funding plans—the proposal is unsound, unsustainable, and contrary to national and local planning policy. I therefore urge North Somerset Council to reject the application in full.			

Name: Kate Shields **I.D:** 18208705

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I believe the Plan 2041 is not sound, not legally compliant and not in compliance with the duty to co-operate for the following reasons: Backwell is a VILLAGE, not a town. It already has approval for 800 new house which represents an increase in size of 40%. These proposed additional numbers would result in complete overdevelopment of the village. This land is Grade 1 agricultural land. Food security should be a priority nationally, and building on good quality farmland should be avoided wherever possible. We are already far too reliant on imports for food. There is only 7% if this high-quality land left in the whole of North Somerset so every acre is precious and should not be built on. There are alternative brownfield sites. Government policy states that “we must protect our best and most versatile land” to safeguard food security. The proposals contradict this policy and undermine food security. The proposals involve building on greenbelt land. This land was designated as greenbelt to prevent un-checked creep of development into farmland. Backwell is not an employment hub. Most residents commute to Bristol and Weston for work. This would not change with the building of vast numbers of housing – it would just increase the amount of commuters.	Development should be focussed around the towns where services and transport facilities can be centred and were there are employment opportunities.		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					There is already a deficit in school places, and health services and leisure facilities are not adequate for the current population. These services cannot support another 1000 houses. The road network is at capacity already. Local roads are frequently gridlocked, with narrow country lanes being used as rat-runs. Where there is no pavement, this causes immense danger to pedestrians and cyclists. The proposed new road link would not relieve this congestion – Station Road would still have to absorb huge amounts of extra traffic. There is no funding for the new road link, and the cost to get it under or over the railway would be prohibitive. Backwell Common and Chapel Hill are already far too busy for the size of the lanes. Backwell has been allocated a higher number of houses than any other village in North Somerset, being expected to take 7% of the district's housing allocation. This is not feasible or sensible in a rural village – development should be focused on the towns where shops and employment are more accessible. Backwell Lake and adjacent fields, where the new roads and housing are planned are on floodplain, which floods regularly. The development would destroy valuable wildlife habitats and harm biodiversity. We need to be preserving these habitats to ensure the future of our native species. Rare species like Lesser and Greater Horseshoe Bats rely on this land for food and the proposals would threaten the Brockley Maternity Roost and SSSI. There has been no consideration for social cohesion and no impact assessment. The Infrastructure Delivery Plan lacks analysis and costings, and there is no funding for the proposed new road or any services. These would most likely be ignored until the local area was at breaking point. The railway station is not fit for purpose as a transport hub for the proposed growth in population. It is not accessible to passengers in wheelchairs or those with pushchairs. In the 21st century this is unacceptable, and yet there is not funding or proposal to rectify this situation. In summary, this proposal represents massive overdevelopment in a rural area where services and facilities are just not suitable for such growth.			

Name: Kate Travis **I.D:** 62855681

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Pill Green	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	No assessment of Brownfield alternatives have been laid out (Reg 12/2024) No duty to cooperate on Bristols 8000 unmet need. Why, without any consultation are 1100 houses now being dumped in Easton in Gordano There is no evidence made out by the council that Green Belt exceptional circumstances has been carried out The amount of houses will create a 44% population increases in Pill and Easton in Gordano, which is disproportionate and unjustified - To suddenly make the area a strategic location, just because the train will now pass through pill, once an hour with 3 carriages is not a justification. No plan for A369, M5 Junction 19 Schools or drainage There is no document from Highways England about the impact of these additional houses will have on the junction 19 roundabout. I believe they have been asked to produce one, will the council publish it? As a local, the roundabout at present is not fit for purpose. I note there are similar planning for additional houses in Portishead, which will put even more added strain on Junction 19 Pill Green breaches NPPF 159 Can the council make sure a independent verification of Exceptional Circumstances is made	No development on Pill Green until exceptional circumstances are independently verified. Cap total LP8 allocation against all sites and require full funding for flood defences, additional schools and GP places The allocation of houses must demonstrate no disproportionate impact on the village population We have seen many times in previous developments. The infrastructure is just an after thought.		

Name: Kate Wickens **I.D:** 61656193

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP7: Green Belt	No	‣ Justified ‣ Effective	Yes	Yes	If you consider that the local plan is not sound, legally compliant or in compliance with the duty to cooperate, please provide details. Please be as precise as possible. The local plan requires approximately 27% of the new houses be built on Greenbelt, the majority of which is not grey belt and currently undeveloped. The risk to biodiversity and nature degradation is high, as there is great reliance in the plan for developers to contribute to protecting and preserving nature. For example developers are expected to contribute to the delivery of the new Nature Park. There is anecdotal evidence as well as the Lost Nature report, a Wild Justice report, written by researchers at the University of Sheffield, that reveals that housing developers are not keeping legally-binding promises to help wildlife on housing developments. (Report attached to email) The proposed sites in Nailsea and Backwell corresponds with land identified on the Local Nature Recovery strategy map as focus areas of nature recovery.	Please set out any modification(s) you consider necessary to make the plan legally compliant and sound, in respect of any issues you have identified. More provision in enforcing provisions regarding bio diversity and wildlife protections and enhancements.		
SP10: Transport	No	‣ Justified ‣ Effective		Yes	The increase of 3500 houses to Nailsea and Backwell (LP3) would increase car usage, rather than be mitigated by the provisions in the local plan. Page 67 states “ Nailsea is a main town on the A370 corridor.” It’s not as it is 2 miles from the town centre to Backwell crossroads, the current junction with the A370. The local plan appears to be directing Nailsea residents to Bristol via bus via the A370. This would be particularly an issue for the residents of the site planned north of Nailsea (381 dwellings). Developments generally north of Nailsea would need new bus routes as the reasonable distance requirement would only be met in certain areas of the development. Nailsea town centre is 1.5 miles to Nailsea and Backwell railway station. Behaviour change as written about on Page 149 is unlikely regarding developments north of Nailsea as the distance to the train station and the A370 bus corridor is not attractive to walk to and the route to the station, especially the return up a steep hill with a curve on the brow of it, will not appeal to the less confident cyclist. Station is currently not accessible to those with mobility issues due to the length of the ramp from ground level to the station platform north bound of the distance from the car park, to the ramp to the platform south bound. There are no toilet facilities at the station either. New employment land “must facilitate effective active travel links to the railway station” For that designated to be built north of Nailea, this is unlikely for the same reasons. Car usage is more likely to rise. The local plan does not consider the road issues that Nailsea has regarding adequate main roads out of the town in all directions. An increase of 3500 houses, would increase the road usage issues because the infrastructure issues have not been adequately addressed.			
Policy LP3: Strategic location: Nailsea and Backwell	No	‣ Justified ‣ Effective		Yes	The increase of 3500 houses to Nailsea and Backwell (LP3) would increase car usage, rather than be mitigated by the provisions in the local plan. Page 67 states “ Nailsea is a main town on the A370 corridor.” It’s not as it is 2 miles from the town centre to Backwell crossroads, the current junction with the A370. The local plan appears to be directing Nailsea residents to Bristol via bus via the A370. This would be particularly an issue for the residents of the site planned north of Nailsea (381 dwellings). Developments generally north of Nailsea would need new bus routes as the reasonable distance requirement would only be met in certain areas of the development. Nailsea town centre is 1.5 miles to Nailsea and Backwell railway station. Behaviour change as written about on Page 149 is unlikely regarding developments north of Nailsea as the distance to the train station and the A370 bus corridor is not attractive to walk to and the route to the station, especially the return up a steep hill with a curve on the brow of it, will not appeal to the less confident cyclist. Station is currently not accessible to those with mobility issues due to the length of the ramp from ground level to the station platform north bound of the distance from the car park, to the ramp to the platform south bound. There are no toilet facilities at the station either. New employment land “must facilitate effective active travel links to the railway station” For that designated to be built north of Nailea, this is unlikely for the same reasons. Car usage is more likely to rise. The local plan does not consider the road issues that Nailsea has regarding adequate main roads out of the town in all directions. An increase of 3500 houses, would increase the road usage issues because the infrastructure issues have not been adequately addressed.			
Policy DP36: Biodiversity Net Gain	No	‣ Justified ‣ Effective	Yes	Yes	Please be as precise as possible. The local plan requires approximately 27% of the new houses be built on Greenbelt, the majority of which is not grey belt and currently undeveloped. The risk to biodiversity and nature degradation is high, as there is great reliance in the plan for developers to contribute to protecting and preserving nature. For example developers are expected to contribute to the delivery of the new Nature Park. There is anecdotal evidence as well as the	More provision in enforcing provisions regarding bio		Wild-Justice-Lost-Nature-Report.pdf

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					Lost Nature report, a Wild Justice report, written by researchers at the University of Sheffield, that reveals that housing developers are not keeping legally-binding promises to help wildlife on housing developments. (Report attached to email) The proposed sites in Nailsea and Backwell corresponds with land identified on the Local Nature Recovery strategy map as focus areas of nature recovery.	diversity and wildlife protections and enhancements.		

Name: Kateryna Zubinska **I.D:** 62761057

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	I believe the allocation of Land at Tower Farm is not sound because this location is extremely sensitive and directly borders Weston Big Wood, which is a well-known ancient woodland and part of an important ecological network. Any large development so close to the woodland risks long-term damage to wildlife, the landscape and the character of the area. In addition, Portishead is already under significant pressure. My own child has just started Reception this year, and there were very few school places available. Adding 400 new homes will place even more stress on the already limited school capacity, healthcare services and local transport. This development would also increase the number of cars in an area where the roads are already congested, especially during school runs. This would not only make transport more difficult but also reduce the quality of life for families. Another concern is community wellbeing. A sudden increase in population of this scale, without enough community facilities, risks creating areas with low cohesion. This can lead to social and psychological stress for families, particularly children, and may affect the overall safety and character of the neighbourhood. Finally, the document itself shows that this site requires many unresolved conditions: ecological mitigation, new school provision, transport upgrades and more. None of these are clearly planned or guaranteed, making the proposal unreliable and not deliverable. The only modification that would make this plan acceptable is to remove the Tower Farm allocation entirely. The location is too environmentally sensitive, the infrastructure is already overstretched, and the community cannot absorb this level of development without significant harm to families, schools and the local environment. Instead, the land should remain as open countryside and be used to support biodiversity and accessible green space for the community. I do not support the North Somerset Local Plan 2041 for the Tower Farm location.			

Name: Kath Scargill **I.D:** 30736993

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP3: Spatial strategy							We support the Spatial Strategy	
SP5: Towns							We support housing at the main towns including Portishead. If the new train station comes into operation.	
SP7: Green Belt	Yes		Yes	Yes				
SP7: Green Belt							We support the release of green belt so housing can be next to the town and services	
SP8: Housing	Yes		Yes	Yes			I support more housing generally especially for young people particularly at Portishead	

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SP10: Transport	Yes		Yes	Yes				
SP10: Transport							Active travel including Gordano Greenway and the fact that Trains will again be running to Portishead	
SP11: Historic and natural environment							I support the active travel green routes and the reopening of the train station	
Policy LP2: Strategic location: Woodspring (south west of Bristol)	Yes	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	No	That the housing at the Woodspring golf course will meet the needs of Bristol housing		We need more housing to support the young people	
Policy LP9: Extent of the Green Belt	Yes		Yes	Yes				
Policy LP9: Extent of the Green Belt							I support the release of Green Belt and housing near to existing main towns and large villages and services	
Policy LP11: Transport infrastructure, allocations and safeguarding	Yes		Yes	Yes				
Policy LP20: Wyndham Way							I object to the plan as it's unsound on this, it's aspirational, multiple owners, housing won't be delivered on time.	
Petersfield, Church Road South	Yes	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes			Yes I support housing here especially affordable and to meet the needs of our young people	
Downside							I support housing here especially affordable and to meet the needs of our young people	
Land at Tower Farm							I support affordable housing here and also to help our young people	
Black Rock, north of Clevedon Road							I support housing here, affordable and also to meet the needs of our young people	

Name: Katharin Gilbert **I.D:** 29254785

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national	Unsure	Unsure	In the last few years Backwell has had an increase of over 40% in housing developments approved by the council, over 800 houses. There has been no input into the community or any infrastucture put in place to support this increase let alone for a further 1000 houses. The roads are set to bursting, the doctors impossible to get an appointmet and the schools over subscribed, it is all too much. There has been no investment to improve the services with the current planning applications, so a further 1000 odd houses would be disasterous for the village and destroy the community. Plus there is no need or viability anaylsyis for these extra houses. The development is also proposed to be put on Grade 1 green belt land which is not only prone to flooding, it is also beautiful countryside with many rare bat species and wildlife and there is only 7% of greenbelt left in North Somerset all together. The government policy states "we must protect out best and most versatile land" and this proposal	I do not think there are any modifications that can be made to make this plan more viable, Backwell and Nailsea are already bursting with new developments and this plan to build on		

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		policy			contradicts that. The development would change the community and the village as a whole it would almost double it's size which seems excessive when there is no funding or investment into the area or into the infrustructure and there has been no social cohesion impact assessment provided to show the impact. There is no guarentee that the developers will fund the proposed road and the council don't have the money to fund it. Therefore the increase in traffic from extra houses could increase in the area by more than 2000 cars, the roads are already stretched to breaking point, the queues during rush hour times are constant so without the new road this traffic increase would be insane. Even if the new road was to be built it may not serve the huge increase in traffic to the area and the train station is not fit as a travel hub as it still has no accessibility for disabled access. The village has already taken on a huge increase in housing over 40%, when will it stop? The reason people like living in the area is because of the green space. If NSC continue to approve houses at the current rate without regard to the people already living in the area there will be no green space left. It is incredibly sad to see the land disappearing when there are areas of Brown land standing disused. The GRADE I listed land that this plan proposes to build on is NOT the Brown/grey land that Labour wanted to build on it is beautiful green space that will be destroyed forever. Please think about the impact this will have on the people and the area not just about lining the developers pockets when you make a decision on this unwanted development.	GRADE I listed land is not ethical or viable and will destroy rare and precious wildlife.		

Name: Katherine Ashby **I.D:** 39280129

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I do not understand why Backwell has been allocated 7% on the housing target which is the same as Portished: Backwell is a small village, Portishead is a decent-sized town with many facilities and buisnesses and much better able to absorb new housing. Clevedon is also a town and it has only be allocated 2% - this does not seem proportionate to me. Backwell is not an employment hub - it is more a commuter village with most people being employed in Bristol. Building more housing here will result in increased road traffic on the already congested A370 which does not make it a 'sustainable location'. I doubt that the proposed link road is actually deliverable. It would require an expensive crossing of the railway - can this really be funded by the government, the local authority or the developer? Backwell Common is a single track country lane which twists and turns, with many blind corners. The development of this land would inevitably lead to a dangerous increase in traffic and congestion on this road. It would also lead to accidents between cars and also between cars and pedestrians and cyclists who regularly use this road for leisure. My young children regularly walk along Backwell Common to school and Beaver Scouts; with no pavements and no street lights, I worry about their safety in the case of these developments taking place and the subsequent increase in traffic. The field bordered by The Avenue and the railway line and Backwell Common has no feasible access route except via Backwell Common - this WOULD make Backwell Common busier and therefore more unsafe for children, walkers, cyclists and cars. The fields adjacent to Backwell Common regularly have standing water during the winter months. During times of heavier rainfall (which are increasingly common), water pours from the fields onto the road and can cause flooding especially under the 2 railway bridges (by Farleigh House and at the bottom on Chapel Hill) and sometimes by Woolleys Farm.. Building on the fields will very obviously worsen this problem considerably 'sustainable' I cannot see how building on grade 1 agricultural land which is used for grazing, hay-making and food crops could be considered 'sustainable'. The world seems increasingly unstable and lessening the UK's ability to produce our own food is not really helping to increase our national security. It is also damaging to the wildlife, including bats that live and forage on our fields. If 50% of the houses built on our Greenbelt land are 'affordable' how will the developer afford any to build the link road or contribute to infrastructure improvement required as a result of all this development. There aren't any employment opportunities in Backwell and it is a village so I worry that this will not lead to a socially cohesive village.	I wish for the Land East of Backwell to be removed from the plan and a more appropriate site found at a larger settlement (e.g. WsM, Clevedon or Portishead).		

Name: Katherine Knowles **I.D:** 58013857

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	Unsure	The plan is in breach of the following sections of the NPPF - s110, s115, s147, s156, s187, s192 and s193. This is not a sustainable site for significant development. The site is over 300ft elevation, and over a mile walk from GP surgeries, nurseries, the high street, secondary school, and all the large supermarkets, and leisure facilities. This means that walking and cycling are not realistic. Bus services are limited and slow. The reality is that this means residents would drive both to the main facilities of Portishead and to leave Portishead to access the motorway etc. s110 requires that sites limit the need to travel and offer a genuine choice of transport modes. The proposals would mean adding around 500 cars to the single access road for the town centre and to leave Portishead to access the motorway or to Bristol. There is a primary school adjacent to the site and the roads surrounding the area are significantly congested and dangerous particularly at school pick up and drop off times. Congestion extends down to the High Street, the Portbury Hundred, and the M5 junction 19 roundabout particularly at peak times. Adding an estimated 500 additional cars to this limited road network would be unsustainable and dangerous. This would include for emergency services vehicles (the police headquarters being next to this site). Safe and suitable access to the site cannot be achieved, as required by s115 of NPPF. The transport impacts would be unacceptable and fail national soundness tests. Employment - there are not sufficient employment opportunities within a reasonable distance. A business area at West Hill/ Avon Way consists of approximately 10 very small shops and businesses. This is not sufficient to employ over 400 residents and therefore a significant proportion of residents would be driving to work. This is therefore not a sustainable site. School places - there are insufficient school places at High Down primary school for the proposed number of additional homes. Plans to extend the primary school have not been agreed or thought through. No proposals have been made for secondary school places - there being only one secondary school in Portishead which could not accommodate the number of proposed additional residents. It should also be noted there are no nursery facilities for under 3's within walking distance of this site. GP surgeries - there are two GP surgeries in Portishead which are significant distance from this site and would not have sufficient resources to accommodate the proposed number of additional residents. Ecological impact - NSC have not demonstrated that there are exceptional circumstances to release this land from the Green Belt, as required under s147. This land was only added to the Green Belt relatively late, in the 1980s, recognising its ecological importance. Weston Big Wood is an SSSI area. The surrounding fields are equally as important for the wildlife as the wood itself, and developer plans for a limited "buffer" around the wood are wholly insufficient and do not address the light and noise pollution of such a significant development, as well as the lack of food for the wildlife from the destruction of the open fields. NSC have not proposed making as much use as possible of brownfield sites or optimising the density of other sites. For example, density could be increased at Wyndham Way, and Castlewood, and Land South of Clevdon Road. There are at least two other brownfield sites not included in the Local Plan - land between Wyndham Way and Cheviot Meadows, and land next to the Poacher Pub. Others are likely to be available as this shows that NSC have not properly and carefully searched for sites. NSC have not demonstrated that they have properly and carefully considered all other possible sites and therefore that exceptional circumstances exist for development on the Green Belt. Tower Farm is also exceptional Green Belt due to its strategic ecological importance to the Gordano Valley, and the need to protect the Gordano Valley green corridor - as noted by the Secretary of State in 1988. s156 states that where major development is proposed on Green Belt land, certain Golden Rules must be made, including improvements to local or national infrastructure, and the provision of other new or improved green spaces for the public. The plan does not comply with these requirements. There is no proposal for improved infrastructure (other than vague plans for extending one primary school, which would at most mitigate the harm caused by the development, and not be an overall improvement or anywhere near sufficient infrastructure to support this plan), and no plans for how the green belt land (which is enjoyed by the public every day) would be replaced for local residents. There is no provision for access to new or improved green spaces. s187 states that planning policies should support and contribute to and enhance the natural and local environment. National Planning Policy also mandates that there should be no adverse impacts to SSSIs, that there should be no deterioration to irreplaceable habitats including ancient woodland, and ecological networks and wildlife corridors should be created/maintained. s193 states that development on land within or outside an SSSI and which is likely to have an adverse effect on it should not normally be permitted. And that development resulting in the loss or deterioration of irreplaceable habitats should be refused unless there are wholly exceptional reasons and a suitable compensation strategy.			

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					As set out above there are not exceptional reasons, as other sites have not been properly considered, and no suitable compensation strategy has been set out. Careful consideration should be given to the ecological concerns being raised - this land is very important for Weston Big Wood (an SSSI) and has specific unique characteristics which have ensured its protection thus far. Far from supporting, and enhancing the natural environment, this plan would ensure the destruction of an SSSI and ensure significant harm to biodiversity. The Local Plan and the developers "vision" does not set out how a development of this scale could possibly protect the SSSI, or ensure wildlife corridors. The proposed "buffers" are wholly inadequate and weight should be placed on the views of ecological and wildlife experts, and not property developers, as to the likely impact of this proposal. The proposal is also not compliant with the Portishead Neighbourhood Plan Policy PEN4. Land at Tower Farm and Black Rock should be removed from the Local Plan.			
Black Rock, north of Clevedon Road	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	Unsure	Ecological impact - NSC have not demonstrated that there are exceptional circumstances to release this land from the Green Belt, as required under s147. This land was only added to the Green Belt relatively late, in the 1980s, recognising its importance as Weston Big Wood is an SSSI area. The surrounding fields are equally as important for the wildlife as the wood itself, and developer plans for a limited "buffer" around the wood are wholly insufficient and do not address the light and noise pollution of such a significant development, as well as the lack of food for the wildlife from the destruction of the open fields. NSC have not proposed making as much use as possible of brownfield sites or optimising the density of other sites. For example, density could be increased at Wyndham Way, and Castlewood, and Land South of Clevdon Road. There are at least two other Brownfield sites not included in the Local Plan - land between Wyndham Way and Cheviot Meadows, and land next to the Poacher Pub. NSC have not demonstrated that they have properly and carefully considered all other possible sites and therefore that exceptional circumstances exist for development on the Green Belt. Black Rock is also exceptional Green Belt due to its strategic ecological importance to the Gordano Valley, and the need to protect the Gordano Valley green corridor - as noted by the Secretary of State in 1988. s156 states that where major development is proposed on Green Belt land, certain Golden Rules must be made, including improvements to local or national infrastructure, and the provision of other new or improved green spaces for the public. The plan does not comply with these requirements. There is no proposal for improved infrastructure (other than vague plans for extending one primary school, which would at most mitigate the harm caused by the development, and not be an overall improvement or anywhere near sufficient infrastructure to support this plan), and no plans for how the green belt land (which is enjoyed by the public every day) would be replaced for local residents. There is no provision for access to new or improved green spaces. s187 states that planning policies should support and contribute to and enhance the natural and local environment. National Planning Policy also mandates that there should be no adverse impacts to SSSIs, that there should be no deterioration to irreplaceable habitats including ancient woodland, and ecological networks and wildlife corridors should be created/maintained. s193 states that development on land within or outside an SSSI and which is likely to have an adverse effect on it should not normally be permitted. And that development resulting in the loss or deterioration of irreplaceable habitats should be refused unless there are wholly exceptional reasons and a suitable compensation strategy. As set out above there are not exceptional reasons, as other sites have not been properly considered, and no suitable compensation strategy has been set out. Careful consideration should be given to the ecological concerns being raised - this land is very important for Weston Big Wood (an SSSI) and has specific unique characteristics which have ensured its protection thus far. Far from supporting, and enhancing the natural environment, this plan would ensure the destruction of an SSSI and ensure significant harm to biodiversity. The Local Plan and the developers "vision" does not set out how a development of this scale could possibly protect the SSSI, or ensure wildlife corridors. The proposed "buffers" are wholly inadequate and weight should be placed on the views of ecological and wildlife experts, and not property developers, as to the likely impact of this proposal.	Black Rock and Land at Tower Farm should be removed from the Local Plan.		

Name: Kathleen Atherton **I.D:** 62845345

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective	Unsure	Unsure	Overall I do not believe this plan is a sound one. In support of this view, I rely on the consistent failures in recent years of NSCC to take any heed of the views of local residents or small retailers when developing their plans. Often these plans lack anything that even passes for remote common sense (vis the parking changes on Clevedon seafront and the changes to the A370 Long Ashton bypass). If Nailsea is suffering from being a dead town, the councillors only need to look at the new parking charges introduced this year. Based on what I understand is to happen on Clevedon, it will soon also be sharing a no future fate with Nailsea. Backwell meanwhile has become a very painful (and sad) place to live in due to the already shockingly bad infrastructure (the endless roadworks and water works on the A370 being points in example). The schools are creaking and bursting and the quality of education has stated to suffer in consequence. While it does remain mostly still possible to get an urgent GP appointment, getting an actual physical prescription on time is becoming unheard of. As for what's happened to the local fields and wildlife, it has been heartbreaking this year to bear witness to the churning up of Farleigh fields among others. Our councillors however seem intent on pushing through nonsensical plans which bring negligible if any benefit to the local Community. Naturally this begs a question of what's in it for them. A very sorry state of affairs indeed.			

Name: Kathryn Elizabeth Phillips **I.D:** 34264321

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm					Objection to Proposal for 400 New Homes on Tower Farm, Portishead I wish to register my strong objection to the proposal to build 400 new homes on this site. The development would be a travesty for the local area and represents an irreversible threat to one of the last remaining green spaces available to the community. The planner who has devised this scheme is clearly locked away in a dark room and oblivious the catastrophe his or her "on paper" idea will have! Area of Outstanding Natural Beauty & Ecological Importance The proposed development would severely damage an area of outstanding natural beauty that plays a critical ecological role in protecting Weston Big Wood. This woodland is of strategic importance to local biodiversity, supporting numerous species of plants, birds, and mammals. Replacing the surrounding landscape with dense housing would be an irreversible ecological error, fundamentally undermining the woodland's long-term stability. Protected Green Belt Land – No Exceptional Circumstances Demonstrated This land was added to the Green Belt in the 1980s specifically to safeguard Weston Big Wood, preserve natural beauty, and prevent inappropriate development. National planning policy is clear: Green Belt boundaries should only be altered in exceptional circumstances, which must be fully evidenced. No such circumstances have been demonstrated. Failure to Adequately Consider Alternative Sites The developer has not meaningfully explored alternative brownfield or lower-impact greenfield sites across North Somerset, many of which would offer far less ecological and social harm. A Green Belt release cannot be justified while viable alternatives remain unexamined. Loss of the Only Local Green Space The site is the only significant green space in the area and is widely used by walkers, dog walkers, families, and residents daily for recreation and wellbeing. Its destruction would remove a vital community asset and permanently diminish the area's character and quality of life. Unacceptable Transport and Highway Impacts			

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					The sole access proposed is via a small side road located behind a school. This entire area is already severely gridlocked at school drop-off and pick-up times, with traffic congestion, dangerous manoeuvres, and regular accidents. Adding hundreds of vehicles from a 400-home estate would dramatically increase risks to children, residents, and all road users. This fails national soundness tests and planning policy requirements for safe and suitable access. Insufficient Local Infrastructure (Health, Services, Roads) The community already struggles with inadequate local infrastructure. We do not have sufficient capacity in GP surgeries, dental practices, pharmacies, or other essential services. This development would not only exacerbate the problem—it would overwhelm services that are already stretched to breaking point. Irreversible Long-Term Harm Once this land is developed, its ecological, community, and landscape value is lost forever. The proposal prioritises short-term gains over long-term environmental and social wellbeing. Future generations will bear the consequences of a planning decision that ignores both local needs and national policy. _____ Conclusion For all of these reasons—ecological, environmental, social, transport-related, and policy-based—I strongly urge the council to reject this proposal. It is unnecessary, unsustainable, dangerous, and wholly unjustified.			

Name: Kathy Freeman **I.D:** 50923969

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy			Backwell already has a massive amount of house building going on and these extra houses would constitute huge overdevelopment for what is currently a village. The road which is proposed - not only has no funding plan but would be hugely expensive and would not relieve traffic issues on Station Road where children currently walk to and from school daily. The local infrastructure can in no way support the addition of another 1000 houses as there are simply not the school places or health services. One of the biggest objections that I have to the development is the fact that it would be built on agricultural land. We do not have anything like food security in this country and losing any of our agricultural land takes us further away from that objective - an objective supported by government. These proposals contradict the governments policy on this as well as impacting on local farmers who use the land for crops and grazing. Once this prime land is lost there is no getting it back so generations to come will have lost the opportunity to provide food security for the locals and for the country. There is also the question of flooding. We all know that Chapel Hill floods regularly and this land soaks up much of the excess water which prevents further flooding. By building on this land the risk of much more serious flooding is raised immeasurably risking lives, properties and businesses. This is an area which is very valuable to me personally as I regularly use these fields to walk and run giving me fresh air and exercise which has enormous benefits to my health and wellbeing. This is the same for many residents and locals. These benefits are fundamental to our way of life in Backwell and the health implications of years of building works, removing green space and destroying the wildlife habitats of numerous species cannot be underestimated.			

Name: Katie Cuss **I.D:** 51429985

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Backwell already has 800 new homes approved, which is a 40% increase in the size of the village. Adding even more would amount to overdevelopment. - The proposed new road would not properly help Nailsea's traffic problems or ease congestion on Station Road, Backwell Common, or Chapel Hill. Building a road under or over the railway would be extremely costly and might not even be possible. - Even with the current growth, there aren't enough school places, and there has been no investment in health or leisure services. The existing infrastructure cannot cope with another 1,000 homes. - Backwell has been given more new housing than any other village in North Somerset, and even more (in percentage terms) than some towns. It is expected to take 7% of the district's total housing, compared with Clevedon's 2%. - There has been no assessment of whether an extra 1,000 homes are needed or financially viable. - Backwell is not a major employment centre, and most residents commute elsewhere for work. - No assessment has been carried out on how this level of development would affect community cohesion. - The land involved is Grade 1 Agricultural Land used for growing food and grazing animals. Only 7% of this top-quality land remains in North Somerset. - Government policy says we must protect our best agricultural land to ensure food security. These proposals go against that policy. - The development would destroy important wildlife habitats and further damage biodiversity in a country already severely depleted of nature. - The plans threaten the Brockley Maternity Roost and the nearby SSSI, where rare Lesser and Greater Horseshoe Bats rely on the land for feeding. - The Infrastructure Delivery Plan does not include proper analysis or costings, and there is no guaranteed funding for the new road or other services. - Backwell Common and nearby areas already flood, and more housing would make this worse. - The "strategic growth location" designation raises concerns about the impact on the area's character, the loss of Greenbelt and high-quality farmland, increased flood risk, and uncertainty over whether the road can be funded and built in time to support the new homes. - Backwell Lake (the reservoir) and the surrounding fields—where the new road and housing are planned—sit on a floodplain that floods regularly. - Government policy requires 50% affordable housing on Greenbelt land, but this reduces the money developers can contribute to infrastructure. - The scale of development, combined with the level of investment needed for infrastructure and services in such a short time, is destabilising, unsustainable, and unrealistic. - The railway station is not suitable as a transport hub. It is inaccessible for people with mobility issues and difficult to use for families with young children. If you want, I can also turn this into a polished letter, a speech, or a shorter summary.			

Name: Katie Gore **I.D:** 29242145

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land south of Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	These houses would be located next to Backwell Lake, which is on a flood plain and floods regularly. There are already hundreds of houses planned to be built in the Nailsea and Backwell area, with no additional infrastructure provisions. The road from these 582 houses would emerge onto Station Road which can already become log-jammed at peak travel times			
Land east of Backwell	No	‣ Positively prepared ‣ Justified	Unsure	Unsure	There are already 800 new houses approved for build in in Backwell and these extra 1,000 houses would completely overwhelm local services and traffic infrastructure. There are no proper plans in the proposal for how the road under the railway would be built and who would pay for it - it lacks details, plans, feasibility studies, costings or funding. Therefore there's a risk it doesn't get built at all and the			

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		• Effective • Consistent with national policy			new houses are built without the required traffic infrastructure The proposal is to build houses on Grade 1 agricultural land, but there is only 7% of this high quality land left in the whole of North Somerset. Building houses on this land contradicts Government policy of 'protecting our best and most versatile land' to safeguard food security Backwell common and the surrounding area are prone to flooding which would be aggravated by more housing - Backwell Lake and adjacent fields (where new roads and housing is planned) are on a floodplain which floods regularly. Finally, Backwell is not an employment hub - most locals commute, so building these houses would worsen traffic pollution problem.			

Name: Kaylee Sayer **I.D:** 57893697

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Pill Green	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Green belt exceptional circumstances not evidenced (NPPF 147) 44% population boom in Pill which is disproportionate and unjustified No deliverable plans for schools GP or drainage	Delete the pill green site. Cap total allocation across all sites and at least consider all amenities required for a large build. Allocations must demonstrate no disproportionate impact on village populations, defined as less than 5% increase per site without evidenced need.	NA	

Name: Keir Hart **I.D:** 62851457

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I was born in Backwell 25 years ago and have lived here all my life. I do not think the existing schools and local facilities will be able to cope with such a huge influx of families. Backwell is lucky to have diverse wildlife within range of a big city but this will be destroyed by such a large development. I used to take the bus to school which collected us outside our house as we are rural - as the new plans are no bus would get to us anymore as the Common is projected to be closed. The common is one of the oldest historic lanes in the area, the proposals will destroy this history. All new residents are likely to work in Bristol or Aztec West, they will drive to work as the bus service is unreliable so traffic and environmental impact will increase. New developments should be planned to consider environmental impact. As youngsters we will have to live with these decisions for many years to come, once habitat is destroyed it cannot be replaced.			

Name: Keith Barkwith **I.D:** 58534241

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Consistent with national policy			In summary: “Before including the Tower Farm and Black Rock sites in the Local Plan, NSC has not properly considered:			response-to-north-somerset-local-plan-2041-tower-farm-latest-20251127.pdf

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					Alternative brown and green field sites with much less ecological impact both in Portishead and across North Somerset. The opportunity to increase housing density on proposed brown field sites across North Somerset which would mean these sites are not required to meet local housing targets. The strategic ecological contribution of these specific sites in protecting the unique environment of Weston Big Wood (SSSI) and the Gordano Valley strategic green corridor The fact that these sites were specifically added to the Green Belt in the late 1980's because of their high ecological value. For the above reasons, the Local Plan is unsound because National Planning Policy states that sites can only be removed from Green Belt for development under exceptional circumstances and these exceptional circumstances are not proven. In addition, neither site is sustainable or capable of providing safe and suitable access, and would give rise to unacceptable transport impacts, which fails the soundness tests set out in National Planning Policy. Therefore, the Tower Farm and Black Rock sites should both be removed from the Local Plan Please see attached document for full response.			
Black Rock, north of Clevedon Road	No	• Consistent with national policy			In summary: "Before including the Tower Farm and Black Rock sites in the Local Plan, NSC has not properly considered: Alternative brown and green field sites with much less ecological impact both in Portishead and across North Somerset. The opportunity to increase housing density on proposed brown field sites across North Somerset which would mean these sites are not required to meet local housing targets. The strategic ecological contribution of these specific sites in protecting the unique environment of Weston Big Wood (SSSI) and the Gordano Valley strategic green corridor The fact that these sites were specifically added to the Green Belt in the late 1980's because of their high ecological value. For the above reasons, the Local Plan is unsound because National Planning Policy states that sites can only be removed from Green Belt for development under exceptional circumstances and these exceptional circumstances are not proven. In addition, neither site is sustainable or capable of providing safe and suitable access, and would give rise to unacceptable transport impacts, which fails the soundness tests set out in National Planning Policy. Therefore, the Tower Farm and Black Rock sites should both be removed from the Local Plan. See attached document for full comments.			response-to-north-somerset-local-plan-2041-black-rock-latest-20251127.pdf

Name: Keith Hallett **I.D:** 30793441

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I have a number of comments to make on why I think the plan is Not Sound:- Backwell has 800 new houses already approved; this represents a 40% increase on the present population. Any further increase is not sustainable on several grounds as follows Backwell has few employment opportunities; most Backwell people commute to work and any increase in housing will create an even bigger population of commuters – many by car. This will put greater pressure on roads than they are able to accommodate. Much of the land being put forward for new housing development is Grade 1 Agricultural Land; we cannot afford to lose such valuable land needed for crop growing, to provide for housing development. Wildlife habitats must be retained and improved not lost to more housing. There is a deficit in school places and no investment in health services proposed. The railway station is already below standard and there is not the space to provide for upgrading the line to four tracks. In short, the huge volume of Backwell's growth during the Pre-submission (Reg 19) Plan (2025-2040) period is not sustainable nor deliverable given the lack of provision of infrastructure.			

Name: Keith Shepherd **I.D:** 62784417

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	This area is exceptional Green Belt in contradiction to the NSC Green Belt assessment which fails to factor in the special circumstances that led to this relatively late designation as Green Belt in 1998. There is no robust published alternatives assessment demonstrating that this sensitive site is the only or most appropriate option for growth. The site is not close to employment opportunities or reliable public transport and therefore there will be a increase in private vehicle use - the current road infrastructure is already struggling. Completely remove the allocation of this site from the plan. The site should be left as undeveloped green space to protect Weston Big Wood and the Gordano Valley Green corridor. I do not support the North Somerset Local Plan 2041 for the Tower Hill Farm location.			
Black Rock, north of Clevedon Road	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	These points have not been considered: Alternative brownfield or greenfield sites with far lower ecological impact, both in Portishead and across North Somerset. Opportunities to increase housing density on proposed brownfield sites, which could remove the need to develop Black Rock. The strategic ecological importance of this site in protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor. The fact that this area was added to the Green Belt in the late 1980s due to its high ecological value. National planning policy allows Green Belt changes only in exceptional circumstances — and these have not been demonstrated.			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					This car dependent site would add to cumulative ecological, transport and infrastructure burdens around Portishead. I do not support the the North Somerset Local Plan 2041 for the Black Rock location.			

Name: Kelly Packham **I.D:** 30660673

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Strategic Priorities		• Effective	Unsure	No		How can you state the intention to try and make the town centre more attractive and viable whilst introducing parking charges reducing footfall of patrons and making it less attractive as an employment opportunity.		
Sustainable development objectives	No	• Justified				The plan will have a negative impact on the protection of Weston Big Wood and the natural ecosystem it supports. The few natural green spaces provide mental health benefits to many adults and children. The importance of protecting this SSSI can not be underestimated. Exceptional circumstances have not been demonstrated to allow the destruction of this ancient ecosystem.		
Land at Tower Farm	No	• Justified	Unsure	No	The plans to build on Tower Farm and Black Rock should not be considered whilst brownfield sites remain undeveloped. The infrastructure of Portishead will not cope with the intended number of extra vehicles. The NHS services are already pushed to their limit of providing safe healthcare.	Brownfield sites used first. Consider the Castlewood site in Clevedon as an alternative to Portishead since there has been very little expansion in Clevedon.		
Black Rock, north of Clevedon Road	No	• Justified	Unsure	No	The plans to build on Tower Farm and Black Rock should not be considered whilst brownfield sites remain undeveloped. The infrastructure of Portishead will not cope with the intended number of extra vehicles. The NHS services are already pushed to their limit of providing safe healthcare.	Brownfield sites used first. Consider the Castlewood site in Clevedon as an alternative to Portishead since there has been very little expansion in Clevedon.		

Name: Kenn Parish Council **I.D:** 2557121

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP9: Employment	Unsure		Unsure	Unsure	On page 35 Policy SP9 indicates and area of Employment land of 9.0 as in Clevedon. On page 315 under Other Towns a Site Location 'Land to the west of Kenn Road' also 9.0	Are both of these pieces of land the same site? If so, page 35 needs to be amended to state Kenn and not Clevedon. The land is with the parish of Kenn		1.North Somerset Local Plan Pre-submission Plan - Representation form Part B.docx
Land to the west of Kenn Road	Unsure			Unsure	(1)SA_ID_1 & SA_ID_71 appear to be the same site – Land to the west of Kenn. (2)SA_ID_2 states Clevedon Business Park – this land is within the parish boundary of Kenn	Please check 1 above for possible duplications (SA_ID_1 & SA_ID_71) and correctly identify 2 above as Kenn Business Park or Clevedon Business Park, Kenn		2.North Somerset Local Plan Pre-submission Plan - Representation form Part B.docx

Name: Kerris Harrop **I.D:** 62547905

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell is a village which already has 154 new dwellings under construction and a further 640 approved by North Somerset Council. These additional 794 properties represent a 40% increase on the number of dwellings which, alone, makes a significant impact on the village. The existing infrastructure is unsustainable, and services will no longer be sufficient in the short-term. The railway station is not suitable as a larger transport facility, neither is the station car park – with cars already parking on local streets disrupting residents where driving is already difficult, if not dangerous, through the narrow roads. Many residents of the village came here either because of the excellence of the local school or as a relatively easy commute into Bristol – or both. They are being disadvantaged because the current volume of traffic in and around the village mean that there are lengthy queues at the traffic lights in all directions. With an additional 800 properties, Backwell will become totally overwhelmed. Parking is well-nigh impossible outside the doctor's surgery and increasingly difficult at the post office. The post office itself is no longer a quick pop-in to buy a stamp and is often a much longer wait. It is the only way many residents (mostly elderly) do their banking as we no longer have a bank in the village; and the collection and drop-off facility provided often adds to the wait for service. Villages, and those who live in and cherish them, must not suffer in order to salve the consciences of councillors wishing to prove their credentials.			

Name: Kerry Dewfall **I.D:** 62865729

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell already has 800 new houses approved which is a 40% increase for the village. The village does not have the infrastructure to support more houses, there is not enough schools, facilities or health services available to all the extra population that all these houses would bring. There is only 7% of grade 1 agricultural land left in North Somerset and this should be protected not built on. The area is constantly flooded in bad weather which will get worse with more housing. The railway station is only small and there is not enough parking spaces for everyone who currently uses it. I cannot park on my own street outside my house due to railway users which will get worse once the other extra 800 houses have been built let alone with another 1,000 proposed. The schools are not adequate for a higher population, they are already set over two sites with traffic being terrible at school pick up and drop off times. It will become even more dangerous once the population increases by 80%. We will not have any green spaces left to walk in and enjoy the scenery and nature which is why we moved to the village in the first place, to be surround by nature which is currently all being built on. All the wildlife habitats have been destroyed and causing further harm to the biodiversity.			

Name: Kerry Ross **I.D:** 58634753

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Justified • Effective • Consistent with national policy	No	Unsure	The site is in the greenbelt. From the REPRESENTATIONS IN RESPONSE TO THE NORTH SOMERSET LOCAL PLAN REGULATION 19: ADDITIONAL SITES CONSULTATION March 2025 - prepared for Parker Strategic Land Limited : Purpose 3 - to assist in safeguarding the countryside from encroachment	Identify brownfield sites that have yet to be developed (e.g. Wyndham Way), and sites closer to the town centre and public transport.		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					The Site is scored as making a ‘Moderate’ contribution to this purpose (purpose c). It states: “This land is mainly an open land on an elevated site. Development would not significantly encroach into the wider countryside as it would be contained for the most part behind the ridge of woodland however harm to openness is augmented by the visible location.” The 'ridge' of Woodland is of course, Weston Big Wood, an ancient Woodland and SSSI. Not just 'any' land. The Wood itself is not huge and would is also potentially be further affected by the plan to build to the south at Black Rock. Though 'buffer zones' are proposed the impact of urbanisation so close to such a delicate habitat is bound to be harmful. Footfall is bound is bound to increase which will also impact the natural habitat. Weston Big Wood is also part of a much larger nature corridor which makes up the Gordano Valley. Losing any part of the 'corridor' affects the whole valley. Indeed in the Parker Report there is a suggestion that the site could be increased to include more Green Belt land: "Whilst the site can be delivered as a ‘standalone’ option, the updated Vision Document also demonstrates the possibility of extending the site to include redundant and underused parts of the land associated with the Avon and Somerset Police Headquarters. This option could enable a continuous connection to Valley Road to the west of the site, and increase the development potential to approximately 500 dwellings" The site is on the outskirts of the town and not an easy walk to the centre of town. This does not seem like the most sensible location for a new housing estate. In summary the proposal seems to contravene S110, S115, S147, S156, S187, S192 & S193 sections of the NPPF			
Black Rock, north of Clevedon Road	No	• Justified • Effective • Consistent with national policy	No	Unsure	In the same way that the propose Tower Farm development with impact the fragile ecosystem of Weston Big Wood, Black Rock bring development close to the boundary of the Wood and impact the 'green corridor' which makes up the Gordano Valley. Its only redeeming feature seems to be that is it not on a flood plain, but this just looks like and gradual encroachment around Weston Big Wood into the Valley. The proposal by Bloor Homes does not take into the account the proposal for development at Tower Farm (and similarly, the Tower Farm development is considered 'standalone' with no consideration for the impact of the proposed development at BlackRock). Both these developments 'squeeze' the SSSI of Weston Big Wood which is already acknowledged to be 'fragile' town - being relatively close to the local secondary School is the only point in its favour. Also, as with the development at Tower Farm, the development is at the fringes of the As detailed by Portishead Town Council, this proposed change to the Green Belt seems to contravene In summary the proposal seems to contravene S110, S115, S147, S156, S187, S192 & S193 sections of the NPPF	Identify brownfield sites that have yet to be developed (e.g. Wyndham Way), and sites closer to the town centre and public transport.		

Name: Kevin Hirst **I.D:** 62849121

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Proposed Land Use The development of this land would destroy valuable wildlife habitats and further harm biodiversity in one of the world’s most nature-depleted countries. The land proposed is Grade 1 Agricultural Land currently used for food crops and grazing. There is only 7% of this high quality land left in the whole of North Somerset. It goes against Government policy, which states that “we must protect our best and most versatile land” to safeguard food security. The proposals contradict this policy and undermine food security. It is understood that the use of this land would threaten the Brockley Maternity Roost and SSSI, with rare Lesser and Greater Horseshoe Bats relying on the land for food. Flooding Risk The land of which this development is proposed is liable to flooding. Backwell Common and surrounding areas are historically prone to flooding, this would be increased by this development. Transport	Remove the land east of Backwell as a proposed location for 890 houses.		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					The proposed new road is a joke. There is no way that they would be able to tunnel under a mainline railway line and this would be cost prohibitive. An additional 890 houses would drastically increase vehicle traffic along the A370 as most residents would be commuting to work or driving their children to schools (assuming they actually could obtain places in the village schools). Village Infrastructure IMHO the village schools would be totally unable to provide required spaces unless major expansion investment is provided. The local medical centre is insufficient for the required increase in number of residents. They would require major investment and probable a location move to have sufficient facilities and access.			

Name: Kevin Payne **I.D:** 57928993

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP3: Spatial strategy	No	• Positively prepared • Justified • Effective • Consistent with national policy			Policy SP3 is unsound because it elevates Pill—a Category A village—to a full strategic growth location without any prior consultation, evidence, or justification. The February–March 2025 consultation explicitly presented all sites as non-strategic “other potential” allocations (Table 7.1). No question was asked about strategic status. The Cabinet report (18 June 2025) then incorrectly claimed “general support for the principle of development” to justify reclassifying Pill as a strategic location. This is a direct breach of the Local Plan’s spatial hierarchy and consultation requirements. Not Positively Prepared (NPPF 36a): SP3 imposes disproportionate growth (55% increase in housing stock) on a small village with very limited services, flood risk constraints, and no strategic infrastructure capacity. It overrides the made Neighbourhood Plan, which capped growth at 150–200 homes to 2038 (endorsed by 81% of voters). This shows the strategy is not needs-led or community-informed. Not Justified (NPPF 36b): Evidence is incomplete. The Sustainability Appraisal ignores key constraints shown in DEFRA MAGIC, including floodplain woodland and interacting fluvial–tidal risks at Pill Green. No alternatives assessment shows why Green Belt land near Pill was preferred over brownfield, higher-density, or urban options. No evidence justifies bypassing the spatial hierarchy. Not Effective (NPPF 36c): The strategy is undeliverable. The Draft IDP (Feb 2025 §8.3) identifies unfunded major infrastructure (including Junction 19). No cumulative transport modelling exists for Pill Green, Pill Road, Court Hay, Portbury Wharf, or Portishead growth, contrary to NPPF paras 116–118 and National Highways’ requirements. Flood minimisation principles in SP3 are not met. Not Consistent with National Policy (NPPF 36d): • Concentrates 4.6% of district housing in a parish with only 1.9% of the electorate.	SP3 should be modified by removing Pill/Easton-in-Gordano as a strategic growth location. If Pill is to remain a strategic location, the Council must first: • conduct full public consultation on strategic status; • provide an alternatives assessment including brownfield and urban options; • demonstrate deliverable infrastructure capacity with cumulative transport modelling (agreed with National Highways); • provide full flood-risk sequential testing; • demonstrate Green Belt exceptional circumstances; • provide Statements of Common Ground for cross-boundary impacts. Without this evidence, SP3 cannot be made sound.		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					• Conflicts with neighbourhood plan conformity (NPPF 74). • Proposes Green Belt release without exceptional circumstances (NPPF 147–152). • Duty to Cooperate failures: no updated Statements of Common Ground with Bristol or National Highways. Conclusion: SP3 fails all four soundness tests and is unjustified, undeliverable, and inconsistent with national policy. The policy should be removed or fundamentally rewritten.			
SP7: Green Belt	No	• Justified • Effective • Consistent with national policy	Unsure	Unsure	I consider the proposed allocation of Pill Green unsound, not legally compliant, and not demonstrably compliant with the Duty to Cooperate for the following reasons: The Plan does not demonstrate exceptional circumstances for Green Belt release. The evidence base does not show a comprehensive examination of reasonable alternatives, including maximising brownfield land, increasing densities in existing settlements, or cooperating with neighbouring authorities. Instead, the Council appears to be taking Green Belt land as the default or “easy” option, rather than properly testing other approaches. Four of the five Pill sites are high-quality agricultural land (Grades 1–3a), yet no assessment demonstrates that lower-grade land or brownfield alternatives have been exhausted, contrary to NPPF requirements. No evidence demonstrates that Pill Green must be released from the Green Belt; alternatives including brownfield sites, higher-density urban development, or cooperation with neighbouring authorities have not been fully considered. The Parish Council highlights that Pill/Easton-in-Gordano comprises only 1.9% of North Somerset’s electorate, yet the Plan proposes it would accommodate 4.6% of all new housing, far exceeding the growth cap in the made Neighbourhood Plan (150–200 homes to 2038, supported by 81% of voters). The Parish Council strongly objects to the scale of proposed allocations in the parish. The evidence base acknowledges that achieving 50% affordable housing may be challenging. Releasing Green Belt without delivering genuinely affordable housing contradicts the NPPF requirement that exceptional circumstances must yield clear community benefits. The lack of affordable housing would undermine the NPPF ‘golden rules’ required when releasing Green Belt. The allocation conflicts with the existing Neighbourhood Plan, which was supported by 81% of voters and limits growth on principle; there is no demonstrated justification for overriding that democratic and statutory local policy. The proposed 600 homes at Pill Green represent a disproportionate share of growth for the parish and are not supported by adequate infrastructure or evidence of sustainable development. The Council has already permitted development on Green	To make SP7 sound, the Council must provide robust evidence demonstrating exceptional circumstances for any Green Belt release and show that reasonable alternatives have been fully considered, including brownfield sites, higher densities in existing settlements, and cooperation with neighbouring authorities. The Council must also demonstrate that cumulative impacts on traffic, transport infrastructure, flood risk, and local biodiversity have been properly assessed and mitigated. If this cannot be demonstrated, the strategic allocation of Green Belt land around Pill and Easton-in-Gordano should be removed.		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					Belt land near Long Ashton, including the EPIC technology campus, despite concerns about Green Belt protection and local opposition. This suggests a trend of approving development in Green Belt locations without clear exceptional circumstances, reinforcing the concern that Green Belt release at Pill Green is being treated as the default option rather than as a last resort. Transport and infrastructure are not adequately addressed. Junction 19 of the M5 already experiences acute congestion. National Highways raised concerns in relation to the Court Hay application (25/P/1413/OUT) and required cumulative transport modelling. There is no evidence in the Plan that these concerns have been addressed. There appears to be an over-reliance on the proposed railway station without showing that rail and bus services can realistically absorb demand from up to 600 homes at Pill Green plus other sites. The Parish Council has stated that no cumulative transport modelling has been published for Pill Green, Pill Road, Court Hay, Portbury Wharf, and other nearby sites. Without a cumulative assessment, the transport evidence is not reliable or robust. The constrained local network (A369, Pill Centre, Martcombe Road, Pill/E-in-G lanes) has very limited capacity. I live on the A368, which already experiences high traffic volumes, noise, and strong loud vibrations that rattle windows. The development is likely to increase traffic, worsen noise and vibrations, and create a “noise tunnel” effect, as fields that currently absorb sound are removed. The removal of open fields is likely to amplify road noise due to reflective surfaces and the loss of natural sound-dampening landform, yet no acoustic assessment has been carried out at allocation stage. LP4 and Schedule 1 propose school and active travel links, but no funded or deliverable plan. The proposed green belt sites also lay within a civil aerodrome safeguarding area, which imposes restrictions on building heights, layout, and lighting. The Plan does not assess how these constraints would affect the deliverability of the proposed allocation. The proposed allocation at Pill Green should be considered in combination with other nearby sites, including Pill Road, Court Hay, Portbury Wharf, and Ham Green. The Plan provides no cumulative assessment of the impacts on traffic, noise, infrastructure capacity (including schools, healthcare, drainage, and utilities), or local biodiversity. Without this assessment, the transport and infrastructure evidence is not robust, environmental impacts are not mitigated, and the Plan cannot be considered effective, justified, or consistent with national policy. Biodiversity and environmental impacts are inadequately addressed. Sites lie within bat SAC consultation zones and near the Severn Estuary SSSI. Pill and Easton-in-Gordano lie within sensitive ecological zones, including: • consultation zones for the North Somerset & Mendip Bats			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					SAC • proximity to the Severn Estuary SSSI • wildlife corridors identified in the Wild Service Ecology Review (2019) The Wild Service Ecology Review (2019) identifies the Pill Green area as part of an important ecological corridor. Development would sever habitat connectivity unless significant mitigation is provided, which the Plan does not set out. The proposed release of Pill Green from the Green Belt (SP7) directly affects sensitive ecological areas identified under SP11 and DP35–DP37. The Plan does not provide site-specific mitigation measures, buffers, or enforceable biodiversity net gain to ensure that protected habitats, ancient and veteran trees, and ecological corridors are safeguarded. Without such measures, the release of this Green Belt land undermines the objectives of SP11 and DP37 and fails to meet NPPF requirements for biodiversity protection. Concerns: • It is unclear whether the Plan has fully assessed impacts on protected species and habitats when proposing the release of Green Belt land (SP7). • Policies SP11, DP35–DP37 lack site-specific mitigation measures, and there is no clear, funded strategy for habitat protection around Pill Green. • The Plan does not demonstrate how measurable biodiversity net gain will be secured or how ecological buffers will be enforced. • High-quality agricultural land near the village does not appear to have been protected, contrary to NPPF Section 15. • The site also contains several ancient and veteran oak trees and lies near sensitive ecological zones, which should be protected under DP37 and the NPPF. The Plan provides no site-specific measures, buffers, or measurable biodiversity net gain to comply with NPPF requirements and ensure their long-term protection. Land around Markham Brook and Pill Green includes areas within Flood Zone 3 with both fluvial and tidal risk. There is insufficient evidence that sequential testing was properly applied, as required by the NPPF (NPPF, pp. 49–52) to ensure that lower-risk areas were considered before higher-risk sites. The Parish Council notes that the flood modelling used for this allocation is not suitable for allocation-level decision-making and does not reflect the interactions between tidal and fluvial flows in the Pill/Easton-in-Gordano area. It is also unclear whether LP4 and Schedule 1 provide adequate assurance that future development at Pill Green will avoid high-risk areas or include robust, enforceable mitigation. Sequential testing is unclear, and high-risk areas may be included in the allocation. Lower-risk sites exist elsewhere in the district, meaning Pill Green should have been screened out at an early stage of the sequential test, yet no evidence demonstrates this happened. Policies DP9 and DP11 do not guarantee that flood risk will be avoided or			

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					mitigated. Conclusion: The allocation does not meet NPPF requirements on managing flood risk. The Pill Green site also forms part of the rural setting separating Pill from Easton-in-Gordano. Its development would visually merge the settlements and erode their landscape character, contrary to NPPF guidance on protecting valued landscapes and settlement identity. No landscape-led assessment appears to have informed this allocation.			
SP8: Housing	No	• Justified • Effective • Consistent with national policy	Unsure	Unsure	I object to Strategic Policy SP8 because the Plan's housing strategy relies heavily on Green Belt release in Pill and Easton-in-Gordano without demonstrating exceptional circumstances or fully considering alternatives. The Plan does not show that housing needs could not be met through maximising brownfield land, higher densities in existing settlements, or cooperation with neighbouring authorities. This approach undermines the justification for the strategy and makes the proposed allocations in Pill and Easton-in-Gordano, including Pill Green and Pill Road, potentially undeliverable. The housing allocation detailed in this local plan directly conflicts with the existing Neighbourhood Plan, which was supported by 81% of voters and limits growth on principle; there is no demonstrated justification for overriding that democratic and statutory local policy. The proposed 600 homes at Pill Green represent a disproportionate share of growth for the parish, exacerbate cumulative impacts with nearby allocations, and are not supported by adequate infrastructure, transport, or evidence of sustainable development. As a result, SP8 is not justified, not effective, and not consistent with NPPF paragraphs 60–68.	To make SP8 sound, the Council must demonstrate that its housing strategy does not rely on unjustified Green Belt release and that reasonable alternatives have been fully explored. If exceptional circumstances cannot be shown, the strategy should be adjusted to remove or reduce allocations in Pill and Easton-in-Gordano, and/or show how housing needs can be met elsewhere.		
SP10: Transport	No	• Justified • Effective • Consistent with national policy	Unsure	Unsure	I object to Strategic Policy SP10 because the Plan does not provide adequate evidence of cumulative transport impacts for Pill and Easton-in-Gordano. The A368 and Pill Road are already heavily trafficked, generating noise and vibration that affect residents. The policy does not demonstrate how these roads could accommodate additional traffic from proposed developments, nor how noise and vibration impacts will be mitigated. Junction 19 of the M5 is already congested, and the Plan lacks cumulative modelling or deliverable infrastructure plans. There is also an over-reliance on the proposed railway station without confirming that rail and bus services could realistically absorb demand from new homes. The Plan also fails to demonstrate how increased traffic from Pill Green and other allocations would avoid or mitigate adverse impacts on air quality, contrary to the Local Plan's sustainable development and environmental protection objectives (SP1, SP11, DP37) The parish council observes that no cumulative transport	To make SP10 sound, the Council must provide cumulative transport modelling for Junction 19 and all local roads affected by strategic growth, including the A368 and Pill Road, and demonstrate that necessary infrastructure and public transport capacity will be deliverable and funded. Noise and vibration mitigation must be properly assessed and included in the policy.		

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					modelling has been published for Junction 19 or local roads, undermining the policy's effectiveness. Junction 19, the A369, and village lanes cannot safely accommodate the additional vehicles, and the plan over-relies on a new railway station without evidence that it can absorb the increased demand. The Infrastructure Delivery Plan identifies essential transport and flood mitigation as high-risk and unfunded, suggesting the Plan's effectiveness is unproven.			
SP11: Historic and natural environment	No	• Justified • Effective • Consistent with national policy	Unsure	Unsure	I object to Strategic Policy SP11 because the Plan does not provide adequate evidence that development around Pill and Easton-in-Gordano will avoid, mitigate, and provide measurable biodiversity net gain. The area includes sensitive ecological zones, such as consultation zones for the North Somerset & Mendip Bats SAC and proximity to the Severn Estuary SSSI. The plan lacks up-to-date habitat surveys and fails to consider ancient woodland and priority habitat buffers, weakening its biodiversity soundness. The Plan does not show clear, funded, or deliverable strategies for habitat protection or ecological buffers. There is also no assurance that high-quality agricultural land and wildlife corridors will be adequately protected. Flood risk near Markham Brook and Pill Green is significant, and the policy does not clearly ensure sequential testing or mitigation for areas at high risk of flooding. As a result, SP11 is not justified, not effective, and not consistent with NPPF paragraphs 174–182.	To make SP11 sound, the Council must provide site-specific, funded strategies to protect habitats and species, secure biodiversity net gain, maintain ecological buffers, and protect high-quality agricultural land. It must also ensure that flood risk is fully assessed using sequential testing and that development is restricted or mitigated in high-risk areas. Without these measures, allocations around Pill and Easton-in-Gordano should be reconsidered.		
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Justified • Effective • Consistent with national policy	Unsure	Unsure	I object to Policy LP4: Strategic location: Pill and Easton-in-Gordano because, while the policy sets out an aspirational vision for growth, it does not demonstrate that this vision can be delivered in a justified, effective or consistent way. This Local Plan allocation directly conflicts with the existing Neighbourhood Plan, which was supported by 81% of voters and limits growth on principle; there is no demonstrated justification for overriding that democratic and statutory local policy. The proposed 600 homes at Pill Green represent a disproportionate share of growth for the parish and are not supported by adequate infrastructure or evidence of sustainable development. Traffic modelling for Pill Green is inadequate. Junction 19, the A369, and village lanes cannot safely accommodate the additional vehicles, and the plan over-relies on a new railway station without evidence that it can absorb the increased demand. The Parish Council notes that Pill & Easton-in-Gordano's strategic location status was introduced late and is not supported by an updated Sustainability Appraisal, suggesting the policy is not properly justified.	To be made sound, LP4 must be supported by evidenced, deliverable infrastructure, including cumulative transport modelling for Junction 19, the A369, Pill Road, and village lanes, agreed with National Highways and with confirmed mitigation and funding. The Plan must also demonstrate exceptional circumstances for Green Belt release, showing that reasonable alternatives, including brownfield sites, higher densities, and cross-boundary cooperation, have been fully considered. Full flood-risk sequential testing and mitigation measures must be provided, alongside clear, funded biodiversity protection and measurable net gain strategies. Evidence must also be provided that affordable housing requirements are deliverable and that noise and vibration impacts on existing homes are mitigated. If these cannot be provided, the Pill/Easton-in-Gordano strategic allocation should be removed from the Plan.		

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					The policy assumes that the proposed development (including Pill Green, Pill Road, and other allocations) can be coordinated with necessary infrastructure (transport, school, active travel, green spaces), but there is no robust evidence that these will be funded or delivered in a timely and effective manner. For example, cumulative transport modelling for Junction 19 of the M5 and local roads such as the A369 and Pill Road has not been provided, despite known congestion issues and National Highways raising concerns about cumulative impacts. The requirement for 50% affordable housing on each site is acknowledged in Council evidence as “challenging” for Green Belt sites such as Pill Green and Pill Road, but Policy LP4 does not explain how this will be achieved or how viability issues will be addressed. Four of the five Pill sites are high-quality agricultural land, yet no assessment demonstrates that lower-grade land or brownfield alternatives have been exhausted, contrary to NPPF requirements. The policy refers to active travel links and a proposed transport hub, but these are aspirational and lack clear evidence of deliverability — there is no confirmed funding, timetable, or guarantees that bus and rail services will be sufficient for the additional homes. The policy requires Green Belt release to meet the ‘Golden Rules’ of the NPPF, yet the Plan does not convincingly demonstrate the exceptional circumstances needed for releasing multiple Green Belt parcels around Pill and Easton-in-Gordano, nor does it explain why reasonable alternatives (maximising brownfield capacity, higher densities, or cooperation with neighbouring authorities) have not been fully pursued. The policy does not adequately address existing real issues such as noise and vibration from traffic and the risk of a “noise tunnel” effect once open fields are developed (for example on the A368 and Pill Road). Neither does it show how these impacts will be mitigated . Similarly, while buffers and sound mitigation are mentioned for sites adjacent to the M5, the policy lacks detail on how mitigation will be secured and enforced. There is insufficient evidence in Policy LP4 that flood risk has been properly assessed and managed through sequential testing and mitigation (for example relating to Markham Brook and Flood Zone 3). Nor does the policy provide clear, funded strategies for biodiversity protection and measurable net gain for protected habitats near the sites. For these reasons, Policy LP4 is not justified, not effective, and not consistent with national planning policy. It relies on untested assumptions and aspirational requirements without proportionate evidence of deliverability, viability or compliance with NPPF requirements.			

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Policy LP9: Extent of the Green Belt	No	• Justified • Effective • Consistent with national policy	No	No	LP9 is unsound as applied to the Pill/Easton-in-Gordano allocations because exceptional circumstances for Green Belt release have not been demonstrated. No proportionate assessment has been provided showing that reasonable alternatives (brownfield land, higher densities in sustainable locations, and cross-boundary options) have been exhausted, contrary to NPPF paras 148–152. The Sustainability Appraisal fails to assess Green Belt harm robustly, particularly at Pill Green where openness and settlement separation would be permanently lost. Infrastructure evidence is not deliverable or funded (J19/ A369), meaning the case for exceptional circumstances collapses. Until a lawful alternatives assessment, Green Belt harm analysis and infrastructure plan are provided, the Pill allocations should be removed from the Plan.	The Plan should be modified so that Green Belt release at Pill/Easton-in-Gordano is removed unless the Council can demonstrate lawful, fully evidenced exceptional circumstances. To be made sound, Policy LP9 must be supported by: • A complete, proportionate alternatives assessment (brownfield capacity, higher densities in sustainable locations, cross-boundary options) demonstrating that Green Belt release is the last resort, as required by NPPF paras 148–152. • A robust Green Belt harm assessment showing the degree of harm to openness, settlement separation, and the purpose of preventing sprawl at Pill Green, Pill Road and related parcels. • Deliverable and funded infrastructure evidence, including cumulative transport modelling agreed with National Highways (J19, A369, Pill Road, local lanes) to demonstrate development is achievable without severe impacts. • Clear evidence that environmental and flood constraints have been assessed, including the Defra MAGIC-designated floodplain woodland and Zones 2/3 at Pill Green. • Biodiversity mitigation and measurable net gain strategies with identified, funded delivery mechanisms. • A conformity assessment with the Pill & Easton-in-Gordano Neighbourhood Plan explaining how Green Belt release aligns with adopted local policy and the spatial hierarchy. If the Council cannot provide this evidence, the Pill/Easton-in-Gordano Green Belt allocations should be deleted from the Plan.		
Policy DP9: Flood risk	No	• Justified • Effective • Consistent with national policy	No	No	DP9 has not been applied correctly to the allocation at Pill Green. The site contains ancient and veteran oaks, ecologically valuable hedgerows, and lies within key bat foraging and commuting corridors identified by local surveys and referenced in the Parish Council response. The Local Plan does not demonstrate that these constraints were assessed at the earliest stage as required by DP9. Nor does it show that long-term retention and realistic future growth of trees—particularly veteran oaks—has been factored into layout, root protection areas, overshadowing, or conflict with gardens, windows, and infrastructure. DP9 also requires protection of irreplaceable habitats and avoidance of adverse impacts on designated bat SAC zones. The plan's evidence base does not show how these requirements were met for Pill Green.	Reassess Pill Green against the full requirements of DP9, including ancient/veteran tree protection, habitat connectivity, and bat corridor sensitivity. Sites where irreplaceable habitats or veteran trees cannot be realistically retained or protected should be removed from allocation.		
DP11: Rivers, watercourses and springs	No	• Justified • Effective • Consistent with national policy	No	No	The requirements of DP11 have not been properly applied to the Pill Green allocation. The site lies adjacent to Markham Brook and is subject to localised surface-water and fluvial–tidal interaction flood risk. The Parish Council notes that no robust sequential test has been carried out, and there is no evidence of safe access or egress during flood events, nor any assessment of downstream flood displacement.	To make DP11 sound, the Pill Green site must be fully reassessed against the policy requirements, including a robust sequential test, an evaluation of hydraulic impacts on Markham Brook (including fluvial–tidal interactions), and evidence that safe access and egress can be achieved in all flood conditions. If these cannot be demonstrated, the site should be removed from the Plan.		

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					DP11 requires development to avoid areas of flood risk wherever possible and to demonstrate that flood risks can be safely mitigated. The Local Plan evidence does not demonstrate this for Pill Green. The allocation has not been assessed against climate-change-driven increases in rainfall intensity and peak flows, which are particularly relevant in this location given its proximity to Markham Brook and tidal influences. The Plan therefore fails to meet the requirements of DP11 and is not justified or effective.			
Policy DP35: Nature conservation	No	• Justified • Effective • Consistent with national policy	Unsure	Unsure	I object to DP35 because the Plan does not demonstrate that development at Pill Green or Pill Road will adequately protect habitats and protected species. Both sites are near the North Somerset & Mendip Bats SAC, the Severn Estuary SSSI, and key wildlife corridors. The Plan lacks up-to-date habitat surveys and fails to consider ancient woodland, veteran trees, and priority habitat buffers, weakening its biodiversity soundness. Pill Green contains ancient and veteran trees and lies within sensitive ecological zones. The Plan does not provide sufficient site-specific mitigation, buffers, or measurable biodiversity net gain to comply with NPPF requirements. There is insufficient site-specific mitigation, monitoring, or evidence that biodiversity impacts will be avoided, minimized, or compensated. Without this, DP35 is not justified, not effective, and inconsistent with national policy on habitat protection (NPPF 174–180).	To make DP35 sound, the Council should require site-specific mitigation plans, measurable monitoring, and enforceable protections for all habitats and protected species affected by development at Pill Green and Pill Road, ensuring compliance with NPPF paragraphs 174–180.		
Policy DP36: Biodiversity Net Gain	No	• Justified • Effective • Consistent with national policy	Unsure	Unsure	I object to DP36 because the policy does not provide sufficient detail to ensure measurable biodiversity net gain for development at Pill Green and Pill Road. The plan lacks up-to-date habitat surveys and fails to consider ancient woodland and priority habitat buffers, weakening its biodiversity soundness. Pill Green contains ancient trees and lies near sensitive ecological zones. The plan does not provide sufficient site-specific mitigation, buffers, or measurable biodiversity net gain to comply with NPPF requirements. There is no clear mechanism for monitoring or enforcing the required 10% net gain, and it is unclear how off-site mitigation would be applied if on-site gain is not achievable. Without these assurances, DP36 is not justified, not effective, and inconsistent with NPPF biodiversity requirements (174–180).	To make DP36 sound, the Council should require a clear, enforceable biodiversity net gain plan for all allocated sites, with monitoring and reporting mechanisms, and specify how off-site mitigation would be applied if on-site gain is insufficient.		
Pill Green	No	• Justified • Effective • Consistent with national	No	No	I consider the proposed allocation of Pill Green unsound, not legally compliant, and not demonstrably compliant with the Duty to Cooperate for the following reasons: The consultation process in Pill and Easton-in-Gordano was not proportionate to the scale of proposed development. The February–March 2025 consultation included five sites in the	The Plan should be modified by removing Pill Green from Schedule 1 in full. Based on the current evidence, the allocation is not justified, not effective, not legally compliant, and not consistent with national policy. The site performs a significant Green Belt function, has unresolved transport and infrastructure constraints, and the cumulative impacts have not been robustly assessed. For these reasons, the allocation is		

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		policy			area but no local public exhibition. Response volumes were very low: 125 responses from 29 individuals across five sites, compared to much higher numbers in similar areas (Portishead 689, Long Ashton 591, Wrington 484, Nailsea/ Backwell 1,049). This indicates that the area did not receive a level of engagement proportionate to the magnitude of proposed development. The Council's own Statement of Community Involvement requires enhanced, targeted engagement where large-scale change is proposed. No such additional engagement was carried out in Pill/Easton-in-Gordano, despite the scale of potential allocation. This means the area did not receive a level of consultation proportionate to the magnitude of proposed development. Over 1,800 residents signed a petition objecting to large-scale housing. This raises serious doubt that the Council complied with its Statement of Community Involvement, the requirement for inclusive consultation, and the Public Sector Equality Duty under the Equality Act 2010. The Parish Council has also confirmed that the community had no meaningful opportunity to consider this scale of change, which further supports the view that consultation was neither adequate nor inclusive. Conclusion: The Local Plan is not legally compliant due to insufficient and non-inclusive consultation in an area facing major change. Strategic Policy SP7 proposes Green Belt release based on "exceptional circumstances," but the Plan does not demonstrate exhaustive examination of alternatives such as maximising brownfield capacity, optimising densities in towns and higher density development, or cross-boundary planning. The Council has already permitted development on Green Belt land near Long Ashton, including the EPIC technology campus, despite concerns about Green Belt protection and local opposition. This suggests a trend of approving development in Green Belt locations without clear exceptional circumstances, reinforcing the concern that Green Belt release at Pill Green is being treated as the default option rather than as a last resort. The Parish Council highlights that Pill/Easton-in-Gordano comprises only 1.9% of North Somerset's electorate, yet the Plan proposes it would accommodate 4.6% of all new housing. This far exceeds the growth cap in the made Neighbourhood Plan (150–200 homes to 2038, supported by 81% of voters). The Parish Council strongly objects to the scale of proposed allocations in the parish. This represents a disproportionately large part of Green Belt release, undermining the principles of a balanced spatial strategy, while suitable sites elsewhere appear not to have been fully assessed. There is also no evidence that North Somerset Council carried out a full comparative assessment of options, as required by the NPPF, including maximising	unsound and should be deleted. If the Council nevertheless proposes to retain Pill Green, the Council must provide the following evidence to demonstrate soundness: • Provide a fully evidenced Green Belt exceptional circumstances case • Provide comprehensive cumulative transport modelling agreed with National Highways • Provide demonstrable compliance with the Statement of Community Involvement • Provide full flood risk sequential testing • Provide site-specific ecological mitigation strategies with funded delivery • Provide confirmation of infrastructure deliverability (school, transport, drainage, health services) • Provide assessment and mitigation of traffic noise and vibration impacts on existing homes, particularly along the A368 which contains mainly old houses over 100 years old.		

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					brownfield capacity or higher densities in sustainable urban locations. The evidence base acknowledges that achieving 50% affordable housing may be challenging. Releasing Green Belt without delivering genuinely affordable housing contradicts the NPPF requirement that exceptional circumstances must yield clear community benefits. The lack of affordable housing would undermine the NPPF 'golden rules' required when releasing Green Belt. The site also contains Best and Most Versatile (BMV) agricultural land (Grades 1–3a), which the NPPF requires to be protected unless fully justified. No such justification is provided. Conclusion: The Green Belt release is not justified, and Duty to Cooperate evidence appears incomplete. Transport and infrastructure are not adequately addressed. Junction 19 of the M5 already experiences acute congestion. National Highways raised concerns in relation to the Court Hay application (25/P/1413/OUT) and required cumulative transport modelling. There is no evidence in the Plan that these concerns have been addressed. There appears to be an over-reliance on the proposed railway station without showing that rail and bus services can realistically absorb demand from up to 600 homes at Pill Green plus other sites. The Parish Council has stated that no cumulative transport modelling has been published for Pill Green, Pill Road, Court Hay, Portbury Wharf, and other nearby sites. Without a cumulative assessment, the transport evidence is not reliable or robust. The constrained local network (A369, Pill Centre, Martcombe Road, Pill/E-in-G lanes) has very limited capacity. I live on the A368, which already experiences high traffic volumes, noise, air pollution and strong loud vibrations that rattle windows. The development is likely to increase traffic, worsen noise and vibrations, and create a "noise tunnel" effect, as fields that currently absorb sound are removed. The removal of open fields is likely to amplify road noise due to reflective surfaces and the loss of natural sound-dampening landform, yet no acoustic assessment has been carried out at allocation stage. This is inconsistent with NPPF requirements for assessing environmental impacts before allocating land. These impacts will combine with additional traffic from other allocations, including Pill Road and Court Hay, compounding congestion, noise, and vibration across the local road network. The Plan also fails to demonstrate how increased traffic from Pill Green and other allocations would avoid or mitigate adverse impacts on air quality, contrary to the Local Plan's sustainable development and environmental protection objectives (SP1, SP11, DP37). The proposed Green Belt sites also lie within a civil			

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					aerodrome safeguarding area, which imposes restrictions on building heights, layout, and lighting. The Plan does not assess how these constraints would affect the deliverability of the proposed allocation. These impacts are not assessed or mitigated in the Plan. LP4 and Schedule 1 propose school and active travel links, but no funded or deliverable plan. The proposed allocation at Pill Green should be considered in combination with other nearby sites, including Pill Road, Court Hay, Portbury Wharf, and Ham Green. The Plan provides no cumulative assessment of the impacts on traffic, noise, air quality, infrastructure capacity (including schools, healthcare, drainage, and utilities), or local biodiversity. Without this assessment, the transport and infrastructure evidence is not robust, environmental impacts are not mitigated, and the Plan cannot be considered effective, justified, or consistent with national policy. Conclusion: The allocation is not effective, lacking a deliverable transport strategy; and not consistent with national policy, which requires sustainable, well-connected development. Biodiversity and environmental impacts are inadequately addressed. Sites lie within bat SAC consultation zones and near the Severn Estuary SSSI. Pill and Easton-in-Gordano lie within sensitive ecological zones, including: • consultation zones for the North Somerset & Mendip Bats SAC • proximity to the Severn Estuary SSSI • wildlife corridors identified in the Wild Service Ecology Review (2019) The Wild Service Ecology Review (2019) identifies the Pill Green area as part of an important ecological corridor. Development would sever habitat connectivity unless significant mitigation is provided, which the Plan does not set out. The proposed release of Pill Green from the Green Belt (SP7) directly affects sensitive ecological areas identified under SP11 and DP35–DP37. The Plan does not provide site-specific mitigation measures, buffers, or enforceable biodiversity net gain to ensure that protected habitats, ancient and veteran trees, and ecological corridors are safeguarded. Without such measures, the release of this Green Belt land undermines the objectives of SP11 and DP37 and fails to meet NPPF requirements for biodiversity protection. Concerns: • It is unclear whether the Plan has fully assessed impacts on protected species and habitats when proposing the release of Green Belt land (SP7). • Policies SP11, DP35–DP37 lack site-specific mitigation measures, and there is no clear, funded strategy for habitat			

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					protection around Pill Green. • The Plan does not demonstrate how measurable biodiversity net gain will be secured or how ecological buffers will be enforced. • High-quality agricultural land near the village does not appear to have been protected, contrary to NPPF Section 15. • The site also contains several ancient and veteran oak trees and lies near sensitive ecological zones, which should be protected under DP37 and the NPPF. The Plan provides no site-specific measures, buffers or measurable biodiversity net gain to comply with NPPF requirements and ensure their long-term protection. Conclusion: The Plan is not consistent with NPPF requirements for protecting designated habitats and ensuring biodiversity gain. Land around Markham Brook and Pill Green includes areas within Flood Zone 3 with both fluvial and tidal risk. There is insufficient evidence that sequential testing was properly applied, as required by the NPPF (NPPF, pp. 49–52) to ensure that lower-risk areas were considered before higher-risk sites. The Parish Council notes that the flood modelling used for this allocation is not suitable for allocation-level decision-making and does not reflect the interactions between tidal and fluvial flows in the Pill/Easton-in-Gordano area. It is also unclear whether LP4 and Schedule 1 provide adequate assurance that future development at Pill Green will avoid high-risk areas or include robust, enforceable mitigation. Sequential testing is unclear, and high-risk areas may be included in the allocation. Lower-risk sites exist elsewhere in the district, meaning Pill Green should have been screened out at an early stage of the sequential test, yet no evidence demonstrates this happened. Policies DP9 and DP11 do not guarantee that flood risk will be avoided or mitigated. Conclusion: The allocation does not meet NPPF requirements on managing flood risk. Without proper sequential testing and mitigation, the allocation fails to meet the NPPF requirements for safe development in areas at risk of flooding. The Pill Green site also forms part of the rural setting separating Pill from Easton-in-Gordano. Its development would visually merge the settlements and erode their landscape character, contrary to NPPF guidance on protecting valued landscapes and settlement identity. No landscape-led assessment appears to have informed this allocation.			
Land at Pill Road	No	• Justified • Effective	No	No	I consider the Pill Road allocation to be unsound for the following reasons: 1. Traffic capacity and congestion -	The Pill Road allocation should be removed from the Local Plan. If it is retained, the Council must provide robust evidence of cumulative transport impacts, demonstrate that noise and vibration effects on existing residents (particularly along Pill Road and the A368) will be		

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		• Consistent with national policy			Pill Road already carries significant levels of through-traffic and is used as a key route for residents, commuters, delivery vehicles, and agricultural vehicles. Sections of the road are narrow, with limited pavements, restricted visibility, and no dedicated cycling infrastructure. The Local Plan does not provide evidence that the road network can accommodate additional housing without severe residual impacts. The Parish Council has highlighted that these conditions make the site particularly sensitive to extra traffic, increasing risks for pedestrians, schoolchildren, and cyclists. 2. Noise, air pollution and vibration impacts on existing residents - Homes along Pill Road already experience noticeable noise and traffic vibration. Additional housing will increase traffic and intensify these impacts. Removing the surrounding open fields will also reduce natural sound absorption, potentially creating a “noise tunnel” effect, as well as exacerbating noise and vibration impacts already experienced along the A368, worsening residential amenity. The Parish Council has emphasised that older properties along Pill Road and the A368 are particularly vulnerable to these impacts. The Plan contains no evidence of noise assessment or mitigation. The Plan also fails to demonstrate how increased traffic from Pill Green and other allocations would avoid or mitigate adverse impacts on air quality, contrary to the Local Plan’s sustainable development and environmental protection objectives (SP1, SP11, DP37) 3. Cumulative transport impacts not assessed - The Pill Road site sits in combination with Pill Green, Court Hay, and other proposed allocations. National Highways has raised concerns about cumulative traffic impacts at Junction 19 of the M5. The Local Plan does not include cumulative transport modelling for Pill Road or other nearby sites. The Parish Council stresses that cumulative impacts on traffic, safety, and local infrastructure have not been properly considered, undermining the effectiveness of the allocation. 4. Lack of realistic mitigation - Policy wording refers to “active travel improvements” but provides no detail on funding, timetable, or deliverability. Without clear, evidence-backed mitigation, the allocation cannot be considered effective. 5. Conflict with Neighbourhood Plan - The proposed development at Pill Road directly conflicts with the Pill & Easton-in-Gordano Neighbourhood Plan, which was supported by 81% of voters and limits growth on principle. No evidence is provided to justify overriding this local policy. Conclusion	properly assessed and mitigated, confirm that road safety risks are addressed for pedestrians, cyclists, and schoolchildren, and provide a deliverable, funded strategy for active travel and transport improvements. Without this evidence, the allocation remains unsound.		

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					For these reasons, the Pill Road allocation is not justified, not effective, and not consistent with national policy.			

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SP7: Green Belt	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	I object to the proposed removal of Green Belt for housing at Pill Green, Lodway Farm, Land East of Gordano Services and Pill Road because these allocations do not meet the government's Golden Rules for Green Belt release and therefore cannot be justified as "exceptional circumstances" under the NPPF. 1. Golden Rule 1 – 50% Affordable Housing Is Not Proven Deliverable The Golden Rules require Green Belt release sites to deliver at least 50% affordable housing, unless a robust viability case demonstrates otherwise. No viability evidence has been published for any of the Pill/Easton sites. This means: The Council has not shown that 50% affordable housing is financially deliverable. Significant abnormal costs (Markham Brook crossings, major road upgrades, M5 noise mitigation, ancient woodland buffers, biodiversity mitigation, flood attenuation) make 50% affordable housing highly unlikely. Without viability testing, the Golden Rule requirement is unmet. Conclusion: This criterion is not satisfied. 2. Golden Rule 2 – Infrastructure Delivery Is Not Evidenced or Feasible Green Belt release requires clear, costed, and deliverable infrastructure, yet the Plan provides no evidence to support delivery of: A new 420-place primary school, A central transport hub, Multiple active-travel bridges over Markham Brook, Widening and upgrading Pill Road, Lodway, Ham Green and Anchor Way, Large-scale noise and pollution buffers for M5-side sites. Strategic active-travel routes linking all four sites. None of these items are supported by: Costed feasibility studies, Transport modelling, Flood or hydraulic modelling, Delivery plans or phasing. Critical parts of the strategy also rely on the unconfirmed Portishead Railway, contrary to Golden Rule requirements for certain, not speculative, infrastructure. Conclusion: Infrastructure delivery is not demonstrated. 3. Golden Rule 3 – The Sites Do Not Protect or Enhance Genuine Green Space The Golden Rules require the protection and enhancement of real, high-value green space, not its loss. The Pill/ Easton sites fail this because the land is: Best and Most Versatile (Grade 1–2) agricultural land, Species-rich grassland and ancient woodland edge habitat, Part of a key bat corridor (Markham Brook and woodland margins), Habitat to several red-listed bird species (BTO BOCC list) A landscape gap that preserves the separate identity of Pill, Easton-in-Gordano and Ham Green, Functionally important flood-attenuation land The Local Plan provides no evidence of: Green infrastructure mapping, Biodiversity baseline surveys, Woodland buffer assessments, Nature-recovery alignment High-quality replacement green space, The proposals would remove, not enhance, genuine green space and would reduce openness—contrary to core Green Belt purposes. This Golden Rule is clearly not met. Overall Conclusion: The Pill & Easton-in-Gordano Sites Fail All Three Golden Rules. Because the Council has not demonstrated: 50% affordable housing is viable, Required infrastructure is deliverable, and Genuine green space is protected or enhanced, these allocations do not meet the Golden Rules, do not satisfy the NPPF tests for exceptional circumstances, and should not be removed from the Green Belt.	I request that these allocations be withdrawn or reassessed with full evidence before the Local Plan proceeds to examination.		
Policy LP4: Strategic location: Pill and Easton-	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent	No	No	1. Community Involvement and Consultation Methods I am deeply concerned about the adequacy and inclusiveness of the consultation process for Pill and Easton-in-Gordano. Despite five sites being proposed in our area with potential for 1,100 new homes, no public exhibition was held locally. Exhibitions took place in Long Ashton, Weston-super-Mare, Nailsea, and Backwell, but residents of Pill and Easton-in-Gordano were expected to travel elsewhere to engage with proposals that would fundamentally transform our community.			

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in-Gordano		with national policy			The consultation response figures reveal a troubling disparity. Pill and Easton-in-Gordano generated only 125 responses from 29 individual respondents across five sites, compared to 689 responses for five sites in Portishead, 591 responses for ten sites in Long Ashton, 484 responses for five sites in Wrington, and 1,049 responses for 26 sites in Nailsea and Backwell. Given the scale of proposed change in our area—including 600 homes at Pill Green alone—this low response rate suggests significant under-representation of local voices rather than lack of concern. Over 1,800 residents from our community of approximately 4,500 people have now signed a petition objecting to these proposals and challenging the inadequate initial consultation. This demonstrates the level of concern that was not captured during the formal consultation period. I question whether the Council has complied with its own Statement of Community Involvement and whether it has met its legal obligations under the Equality Act 2010, including the Public Sector Equality Duty, to ensure all communities have equal opportunity to participate meaningfully in decisions affecting them. I submit that this aspect of the Local Plan is not legally compliant. 2. Green Belt Release and Exceptional Circumstances I challenge the Council's justification for removing land around Pill and Easton-in-Gordano from the Green Belt under Strategic Policy SP7. The Council asserts that it cannot meet identified housing needs at sustainable locations outside the Green Belt, thereby constituting "exceptional circumstances" under Section 13 of the National Planning Policy Framework 2024. However, I question whether the Council has adequately demonstrated that it has exhausted all reasonable alternatives before resorting to Green Belt release. Has the Council fully examined options including maximising brownfield capacity across North Somerset, applying minimum density standards to optimise land use in existing urban areas, and working collaboratively with neighbouring authorities to accommodate housing needs? Without comprehensive evidence that these alternatives have been thoroughly explored and found insufficient, the claim of "exceptional circumstances" appears premature and potentially unsound. Furthermore, where Green Belt land is released, the NPPF requires adherence to the "Golden Rules" concerning affordable housing provision, infrastructure delivery, and publicly accessible green spaces. The Council's own 'additional sites viability addendum' suggests that the 50% affordable housing target may be "challenging" for proposed sites around Pill and Easton-in-Gordano. This raises serious doubts about whether development on these sites can meet the Golden Rules requirements. I also question whether the Council has properly considered all available sites across North Somerset that might accommodate development without Green Belt release. I submit that this aspect of the Plan is unsound and that the Council has not adequately demonstrated compliance with the Duty to Co-operate. 3. Traffic, Transport and Infrastructure Policy LP4 and Schedule 1 reference infrastructure improvements including a new primary school and active travel routes connecting development sites to local services and the proposed railway station. However, I have significant concerns about whether the Plan adequately addresses the transport implications of large-scale development in Pill and Easton-in-Gordano. Junction 19 of the M5 already experiences congestion, and National Highways has raised concerns about development impacts in this area. In relation to the Court Hay development near the service station (NSC planning portal ref 25/P/1413/OUT), National Highways stated that transport modelling is required to assess cumulative impacts on Junction 19. I cannot find clear evidence that the Local Plan incorporates such cumulative impact assessment or demonstrates that the Council has adequately co-operated with National Highways in addressing these concerns. The Plan appears to place considerable reliance on the proposed railway link, but I question whether this is realistic given the uncertainties around delivery timescales and funding. Is there robust evidence that bus and train services will be sufficient, frequent, and reliable enough to serve the proposed number of new homes and reduce car dependency as anticipated? I submit that this aspect of the Plan is unsound and that the Council has not adequately demonstrated compliance with the Duty to Co-operate. 4. Natural Environment and Wildlife Protection The proposed development sites around Pill lie within consultation zones for the North Somerset & Mendip Bats Special Area of Conservation (SAC) and in proximity to the Severn Estuary Site of Special Scientific Interest (SSSI). The NPPF requires plans to take full account of environmental impacts, avoid or mitigate adverse effects, and undertake Habitats Regulations Assessments where necessary. The Wild Service Ecology Review (2019), undertaken on behalf of the Neighbourhood Plan Steering Group, documents the presence of protected species and habitats in this area. Development proposals adjacent to or			

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					affecting SSSI, SAC, or other protected habitats must avoid significant harm, apply appropriate buffers, and secure measurable net gains for biodiversity. I question whether the Council has given sufficient weight to wildlife and habitat protection when assessing sites around Pill and Easton-in-Gordano for Green Belt release under SP7. I cannot identify clear, funded strategies and mitigation policies in LP4 and Schedule 1 to ensure adequate protection of wildlife and habitats in these areas. Additionally, I am concerned about whether the best and most versatile agricultural land around our village is being adequately protected in accordance with Section 15 of the National Planning Policy Framework. I submit that policies SP7, SP11, DP35, DP36, and DP37 are unsound and may not be legally compliant in respect of environmental protection requirements. 5. Flood Risk The area around Markham Brook in Pill is within the Environment Agency's Flood Zone 3, indicating a high probability of flooding from both rivers and tidal sources. The NPPF (pages 49-52) requires sequential testing to ensure that development is directed to areas of lowest flood risk. Some of the sites identified in LP4 and Schedule 1 may be affected by flood risk, yet I cannot find clear evidence that the Local Plan demonstrates a sequential approach to site selection, prioritising lower flood risk areas across North Somerset before considering sites in higher flood risk zones. I question whether policies DP9 and DP11 provide adequate safeguards to ensure thorough flood risk assessments for any development close to Markham Brook and to restrict inappropriate development in flood risk areas. I submit that the Plan's approach to flood risk is unsound and may not be legally compliant with NPPF requirements. In summary, I object to the Local Plan on grounds of both legal compliance and soundness, particularly regarding the proposed large-scale development at Pill and Easton-in-Gordano.			
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	I am writing to object to the proposed housing allocations at Pill, Ham Green and Easton-in-Gordano within the Local Plan 2041. My concern is not with the principle of providing new homes, but with the lack of published evidence supporting the suitability and deliverability of these particular sites. For the Local Plan to be sound, the Council must demonstrate due diligence — and at present, the evidence base does not do so. No published Agricultural Land Classification (ALC) surveys The Council's own Best & Most Versatile Agricultural Land paper highlights that these fields are highly likely to be Grade 1 or Grade 2, yet no ALC surveys have been published for any of the five allocations. Policy DP53 requires surveys where high-quality land is suspected, so the omission is significant. Without ALC evidence, consultees and inspectors cannot judge whether development here is appropriate. No ecological baseline or ancient woodland buffer assessment Several allocations lie close to ancient woodland and species-rich habitats around Markham Bottom and Markham Brook. Natural England guidance requires minimum 15-metre buffers, increased where slopes or sparse canopy increase vulnerability. The Local Plan does not publish any woodland buffer mapping, bat surveys, breeding bird surveys, or soil biodiversity assessments for these sites. The area falls within important bat zones, yet no ecological survey data is provided. No flood risk or hydraulic modelling for the Pill catchment Both Pill Green and Pill Road allocations sit on sloping land draining into Markham Brook, which already contributes to flooding in the village. The Schedule asks developers to "ensure no increased flood risk downstream", but NSC has not published any FRA, hydraulic modelling or climate-change testing showing the indicative capacities (e.g., 600 homes at Pill Green) can be delivered without worsening flood risk. No recorded engagement with local ecological expertise The Local Plan does not show any contact with local naturalists, local records centres, or knowledgeable ecological groups. Given known records of multiple bat species, and high local biodiversity, meaningful local engagement is essential. Final Note – Important for Soundness Policy wording that defers all technical work to later planning applications is not enough at the plan-making stage. For the Plan to be found sound at examination, the evidence base must clearly demonstrate that NSC has already tested these allocations against key constraints — ancient woodland protection, protected species, best and most versatile soils, and flood risk. Much of that site-specific testing is missing from the published documents. Without this evidence, the Pill & Easton-in-Gordano allocations simply cannot be considered justified or effective.	I request that the Council either: Publish the missing ALC surveys, ecological baselines, woodland buffer mapping and flood modelling now, before submitting the Plan for examination, or Pause or remove these allocations until the required evidence is available and publicly consulted upon.		
Policy LP4: Strategic location:	No	‣ Positively prepared	No	No	Formal Consultation Response – Objection to Policy LP4 (Strategic Location: Pill & Easton-in-Gordano) North Somerset Local Plan 2041 – Regulation 19 Consultation	I respectfully request that the Council: 1. Withdraw or revise		

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Pill and Easton-in-Gordano		‣ Justified ‣ Effective ‣ Consistent with national policy			Dear North Somerset Council, I am submitting this representation to object to Policy LP4: Strategic Location – Pill and Easton-in-Gordano on the grounds that the policy, and the supporting evidence base for the four proposed housing allocations, fails the tests of soundness set out in NPPF paragraph 36 and is not legally compliant. My concerns relate directly to the absence of proportionate evidence, inconsistency with national policy, and the lack of demonstrated deliverability. 1. The Policy Is Not Sound (NPPF ¶36) 1.1 Not Justified – No Proportionate Evidence Base Policy LP4 proposes large-scale development at Pill and Easton-in-Gordano without publishing the evidence necessary to demonstrate that these sites have been appropriately assessed. Specifically: *No agricultural land classification (ALC) surveys have been published, despite strong indications that the allocated sites are predominantly Grade 1 and 2 Best and Most Versatile (BMV) agricultural land. *No ecological baseline surveys or species assessments have been provided, despite the allocations lying adjacent to ancient woodland and within established bat consultation zones, including areas known locally for horseshoe bat activity. *No ancient woodland buffer analysis is provided, despite Natural England's requirement for a minimum 15-metre buffer, increased where slopes or canopy gaps increase sensitivity. *No flood risk or cumulative hydraulic modelling is presented, despite three allocations draining into Markham Brook, a watercourse with a known history of contributing to flooding in Pill. Without this evidence, the strategy at LP4 cannot be said to be justified. 1.2 Not Effective – No Demonstration of Deliverability LP4 relies on extensive, unproven infrastructure assumptions, including: * A new 420-place primary school * A central transport hub * Multiple major active-travel bridges over Markham Brook * Major highway mitigations along Pill Road, Ham Green and Lodway * Strategic noise and pollution buffers for M5-adjacent sites * Connectivity upgrades based on the Portishead Rail Line No viability information, delivery phasing, costings, or partnership agreements are presented. This fails the requirement for plans to be realistically deliverable. 1.3 Not Consistent with National Policy LP4 conflicts with several core NPPF principles: *Protection of ancient woodland and irreplaceable habitats (NPPF ¶180(c)) – no buffer mapping or woodland impact analysis is provided. *Protection of BMV agricultural land (NPPF ¶174(b) and ¶175) – the Plan allocates BMV land without justification or assessment of alternatives. *Managing and reducing flood risk (NPPF ¶159–169) – no evidence is presented showing that large-scale development will not worsen downstream flooding in Pill. *Conserving and enhancing biodiversity (NPPF ¶179–182) – no species surveys, habitat corridor assessments or ecological justifications accompany the allocations. 1.4 Not Positively Prepared – Does Not Balance Need and Environmental Constraints A positively prepared plan must meet needs in a sustainable way. LP4 does not show that:	Policy LP4 until the required technical evidence is completed and published; or 2. Reassess the allocation strategy with proper ecological, agricultural, flood risk and infrastructure evidence; and 3. Re-consult once a compliant evidence base is available. Thank you for considering this representation. I ask that it be fully taken into account during the examination of the Local Plan.		

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					* Less environmentally constrained options were assessed; * Development can proceed without harming irreplaceable woodland or wildlife corridors; * Infrastructure can keep pace with growth; * Transport assumptions (especially those relying on future rail capacity) are realistic. Policy LP4 is therefore not positively prepared. 2. The Policy Is Not Legally Compliant 2.1 Strategic Environmental Assessment (SEA) Non-Compliance The SEA Regulations require that environmental effects of allocations be assessed using proportionate and up-to-date evidence and that reasonable alternatives be considered. For the LP4 allocations, the Council has not published: * ALC surveys * Ecological baseline studies * Woodland buffer assessments * Flood risk modelling * A detailed alternatives assessment This means the SEA is incomplete, and the legal requirement has not been met. 2.2 Habitats Regulations Non-Compliance The allocations lie within known bat consultation zones and near ancient woodland corridors. The Habitats Regulations require a “likely significant effects” screening informed by actual survey data. No such survey data accompanies LP4. The Plan therefore risks breaching Regulation 105 of the Habitats Regulations. 2.3 Failure to Meet Consultation Requirements (Regulations 18 & 19) Legally compliant consultation requires the Council to publish sufficient evidence for the public to meaningfully comment. Key evidence necessary to understand LP4’s impacts is absent, including: * Ecology surveys * Flood assessments * ALC studies * Justification for Green Belt release * Deliverability and viability analysis Without this, the consultation cannot be considered fair, transparent, or compliant. 2.4 Duty to Cooperate – Insufficient Evidence of Strategic Engagement There is no record within LP4 or its supporting documents of: * Engagement with Natural England on ancient woodland * Engagement with the Environment Agency on cumulative catchment flood risk * Engagement with National Highways on A369 constraints * Engagement with local ecological groups or records centres The Duty to Cooperate requires evidenced, ongoing engagement. This is not demonstrated.			

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					Given the absence of essential evidence, the reliance on unconfirmed infrastructure, the conflict with national policy, and the procedural failures outlined above, Policy LP4 cannot be considered sound or legally compliant.			
Pill Green	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	1. Community Involvement and Consultation Methods I am deeply concerned about the adequacy and inclusiveness of the consultation process for Pill and Easton-in-Gordano. Despite five sites being proposed in our area with potential for 1,100 new homes, no public exhibition was held locally. Exhibitions took place in Long Ashton, Weston-super-Mare, Nailsea, and Backwell, but residents of Pill and Easton-in-Gordano were expected to travel elsewhere to engage with proposals that would fundamentally transform our community. The consultation response figures reveal a troubling disparity. Pill and Easton-in-Gordano generated only 125 responses from 29 individual respondents across five sites, compared to 689 responses for five sites in Portishead, 591 responses for ten sites in Long Ashton, 484 responses for five sites in Wrington, and 1,049 responses for 26 sites in Nailsea and Backwell. Given the scale of proposed change in our area—including 600 homes at Pill Green alone—this low response rate suggests significant under-representation of local voices rather than lack of concern. Over 1,800 residents from our community of approximately 4,500 people have now signed a petition objecting to these proposals and challenging the inadequate initial consultation. This demonstrates the level of concern that was not captured during the formal consultation period. I question whether the Council has complied with its own Statement of Community Involvement and whether it has met its legal obligations under the Equality Act 2010, including the Public Sector Equality Duty, to ensure all communities have equal opportunity to participate meaningfully in decisions affecting them. I submit that this aspect of the Local Plan is not legally compliant. 2. Green Belt Release and Exceptional Circumstances I challenge the Council's justification for removing land around Pill and Easton-in-Gordano from the Green Belt under Strategic Policy SP7. The Council asserts that it cannot meet identified housing needs at sustainable locations outside the Green Belt, thereby constituting "exceptional circumstances" under Section 13 of the National Planning Policy Framework 2024. However, I question whether the Council has adequately demonstrated that it has exhausted all reasonable alternatives before resorting to Green Belt release. Has the Council fully examined options including maximising brownfield capacity across North Somerset, applying minimum density standards to optimise land use in existing urban areas, and working collaboratively with neighbouring authorities to accommodate housing needs? Without comprehensive evidence that these alternatives have been thoroughly explored and found insufficient, the claim of "exceptional circumstances" appears premature and potentially unsound. Furthermore, where Green Belt land is released, the NPPF requires adherence to the "Golden Rules" concerning affordable housing provision, infrastructure delivery, and publicly accessible green spaces. The Council's own 'additional sites viability addendum' suggests that the 50% affordable housing target may be "challenging" for proposed sites around Pill and Easton-in-Gordano. This raises serious doubts about whether development on these sites can meet the Golden Rules requirements. I also question whether the Council has properly considered all available sites across North Somerset that might accommodate development without Green Belt release. I submit that this aspect of the Plan is unsound and that the Council has not adequately demonstrated compliance with the Duty to Co-operate. 3. Traffic, Transport and Infrastructure Policy LP4 and Schedule 1 reference infrastructure improvements including a new primary school and active travel routes connecting development sites to local services and the proposed railway station. However, I have significant concerns about whether the Plan adequately addresses the transport implications of large-scale development in Pill and Easton-in-Gordano. Junction 19 of the M5 already experiences congestion, and National Highways has raised concerns about development impacts in this area. In relation to the Court Hay development near the service station (NSC planning portal ref 25/P/1413/OUT), National Highways stated that transport modelling is required to assess cumulative impacts on Junction 19. I cannot find clear evidence that the Local Plan incorporates such cumulative impact assessment or demonstrates that the Council has adequately co-operated with National Highways in addressing these concerns. The Plan appears to place considerable reliance on the proposed railway link, but I question whether this is realistic given the uncertainties around delivery timescales and funding. Is there robust evidence that bus and train services will be sufficient, frequent, and reliable enough to serve the proposed number of new homes and reduce car dependency as anticipated? I submit that this aspect of the Plan is unsound and that the Council has not adequately demonstrated compliance			

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					with the Duty to Co-operate. 4. Natural Environment and Wildlife Protection The proposed development sites around Pill lie within consultation zones for the North Somerset & Mendip Bats Special Area of Conservation (SAC) and in proximity to the Severn Estuary Site of Special Scientific Interest (SSSI). The NPPF requires plans to take full account of environmental impacts, avoid or mitigate adverse effects, and undertake Habitats Regulations Assessments where necessary. The Wild Service Ecology Review (2019), undertaken on behalf of the Neighbourhood Plan Steering Group, documents the presence of protected species and habitats in this area. Development proposals adjacent to or affecting SSSI, SAC, or other protected habitats must avoid significant harm, apply appropriate buffers, and secure measurable net gains for biodiversity. I question whether the Council has given sufficient weight to wildlife and habitat protection when assessing sites around Pill and Easton-in-Gordano for Green Belt release under SP7. I cannot identify clear, funded strategies and mitigation policies in LP4 and Schedule 1 to ensure adequate protection of wildlife and habitats in these areas. Additionally, I am concerned about whether the best and most versatile agricultural land around our village is being adequately protected in accordance with Section 15 of the National Planning Policy Framework. I submit that policies SP7, SP11, DP35, DP36, and DP37 are unsound and may not be legally compliant in respect of environmental protection requirements. 5. Flood Risk The area around Markham Brook in Pill is within the Environment Agency's Flood Zone 3, indicating a high probability of flooding from both rivers and tidal sources. The NPPF (pages 49-52) requires sequential testing to ensure that development is directed to areas of lowest flood risk. Some of the sites identified in LP4 and Schedule 1 may be affected by flood risk, yet I cannot find clear evidence that the Local Plan demonstrates a sequential approach to site selection, prioritising lower flood risk areas across North Somerset before considering sites in higher flood risk zones. I question whether policies DP9 and DP11 provide adequate safeguards to ensure thorough flood risk assessments for any development close to Markham Brook and to restrict inappropriate development in flood risk areas. I submit that the Plan's approach to flood risk is unsound and may not be legally compliant with NPPF requirements. In summary, I object to the Local Plan on grounds of both legal compliance and soundness, particularly regarding the proposed large-scale development at Pill and Easton-in-Gordano.			

Name: Kirstie Wilkins **I.D:** 62840705

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Land at Lodway Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	The Council held four public exhibitions (Long Ashton, Weston-super-Mare, Nailsea, Backwell), but none in Pill/E-in-G, despite five sites being consulted on in this area. Response volumes were markedly lower for Pill/E-in-G (125 responses from only 29 individual respondents across 5 sites) than for comparable locations: Portishead: 689 responses for 5 sites, Long Ashton: 591 responses for 10 sites, Wrington: 484 responses for 5 sites, Nailsea and Backwell: 1,049 responses for 26 sites. Given the scale of potential change in Pill/E-in-G (e.g., 600 homes at Pill Green alone, plus other sites), the absence of a local event and the relatively small response volume could indicate under-representation of local voices and a lack of proportionate engagement. Has the Council complied with its own Statement of Community Involvement? Was this consultation sufficiently inclusive? Has there been legal compliance with duties under the Equality Act 2010, including the Public Sector Equality Duty?			
Land east of Gordano	No	‣ Positively prepared	No	No	The Council held four public exhibitions (Long Ashton, Weston-super-Mare, Nailsea, Backwell), but none in Pill/E-in-G, despite five sites being consulted on in this area.			

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Services		• Justified • Effective • Consistent with national policy			Response volumes were markedly lower for Pill/E-in-G (125 responses from only 29 individual respondents across 5 sites) than for comparable locations: Portishead: 689 responses for 5 sites, Long Ashton: 591 responses for 10 sites, Wrington: 484 responses for 5 sites, Nailsea and Backwell: 1,049 responses for 26 sites. Given the scale of potential change in Pill/E-in-G (e.g., 600 homes at Pill Green alone, plus other sites), the absence of a local event and the relatively small response volume could indicate under-representation of local voices and a lack of proportionate engagement. Has the Council complied with its own Statement of Community Involvement? Was this consultation sufficiently inclusive? Has there been legal compliance with duties under the Equality Act 2010, including the Public Sector Equality Duty?			
Pill Green	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The Council held four public exhibitions (Long Ashton, Weston-super-Mare, Nailsea, Backwell), but none in Pill/E-in-G, despite five sites being consulted on in this area. Response volumes were markedly lower for Pill/E-in-G (125 responses from only 29 individual respondents across 5 sites) than for comparable locations: Portishead: 689 responses for 5 sites, Long Ashton: 591 responses for 10 sites, Wrington: 484 responses for 5 sites, Nailsea and Backwell: 1,049 responses for 26 sites. Given the scale of potential change in Pill/E-in-G (e.g., 600 homes at Pill Green alone, plus other sites), the absence of a local event and the relatively small response volume could indicate under-representation of local voices and a lack of proportionate engagement. Has the Council complied with its own Statement of Community Involvement? Was this consultation sufficiently inclusive? Has there been legal compliance with duties under the Equality Act 2010, including the Public Sector Equality Duty?			
Land at Pill Road	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The Council held four public exhibitions (Long Ashton, Weston-super-Mare, Nailsea, Backwell), but none in Pill/E-in-G, despite five sites being consulted on in this area. Response volumes were markedly lower for Pill/E-in-G (125 responses from only 29 individual respondents across 5 sites) than for comparable locations: Portishead: 689 responses for 5 sites, Long Ashton: 591 responses for 10 sites, Wrington: 484 responses for 5 sites, Nailsea and Backwell: 1,049 responses for 26 sites. Given the scale of potential change in Pill/E-in-G (e.g., 600 homes at Pill Green alone, plus other sites), the absence of a local event and the relatively small response volume could indicate under-representation of local voices and a lack of proportionate engagement. Has the Council complied with its own Statement of Community Involvement? Was this consultation sufficiently inclusive? Has there been legal compliance with duties under the Equality Act 2010, including the Public Sector Equality Duty?			
Land at Ham Green	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The Council held four public exhibitions (Long Ashton, Weston-super-Mare, Nailsea, Backwell), but none in Pill/E-in-G, despite five sites being consulted on in this area. Response volumes were markedly lower for Pill/E-in-G (125 responses from only 29 individual respondents across 5 sites) than for comparable locations: Portishead: 689 responses for 5 sites, Long Ashton: 591 responses for 10 sites, Wrington: 484 responses for 5 sites, Nailsea and Backwell: 1,049 responses for 26 sites. Given the scale of potential change in Pill/E-in-G (e.g., 600 homes at Pill Green alone, plus other sites), the absence of a local event and the relatively small response volume could indicate under-representation of local voices and a lack of proportionate engagement. Has the Council complied with its own Statement of Community Involvement? Was this consultation sufficiently inclusive? Has there been legal compliance with duties under the Equality Act 2010, including the Public Sector Equality Duty?			

Name: Kit Stokes **I.D:** 18477217

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SP7: Green Belt	Yes	• Effective • Consistent with national policy	No	Unsure	Objection to Policy LP9 – Insetting Villages We object to Policy LP9 because the approach of insetting villages within tightly drawn boundaries removes any potential for growth. This rigid policy fails to recognise the need for flexibility and proportionate development that supports rural communities. It also fails to recognise caselaw (Julian Wood) which allows infilling inside settlements (regardless of insets). Rather than imposing absolute limits, the Local Plan should consider rounding off villages to allow them to grow in a sustainable and sensitive manner. This would enable modest development that meets local housing needs, supports community vitality, and provides opportunities for younger and older generations to remain in their villages. The following villages are particularly affected by this restrictive approach: • Abbots Leigh • Clapton-in-Gordano • Cleeve • Dundry • Failand • Flax Bourton • Felton • Leigh Woods • Portbury • Redhill • Tickenham • Weston-in-Gordano • Winford These settlements have capacity for small-scale, well-designed growth without compromising their character or landscape setting. A more balanced policy would allow organic expansion while safeguarding key environmental and heritage assets.	We request that LP9 be revised to permit rounding off and proportionate growth in these villages, ensuring rural communities remain vibrant and adaptable to future needs especially where land meets grey belt definitions. .		
SP8: Housing	No	• Effective • Consistent with national policy	Yes	Unsure		Objection to SP8: Housing Clevedon is the district's second largest town, yet only a small percentage of growth is allocated. With new flood risk strategies and Green Belt considerations in 2025, why isn't more development planned here?	The modifications proposed within the context of the North Somerset Local Plan 2041 focus on distributing housing growth more evenly across the district, rather than concentrating development within a few large strategic sites such as Woodspring (southwest of Bristol). These changes recommend allocating additional, more sustainable sites like Sandford (HE201022) and Wrington (HE20198), which better align with local needs and Green Belt policies. Furthermore, it is suggested that the settlement hierarchy and restrictive village boundaries be relaxed, enabling proportional growth in already sustainable villages through new allocations or by allowing modest infilling and rounding off at their edges. Additional modifications call for revising restrictive policies	

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							such as LP7 and LP9, which currently impose tight settlement boundaries and insetting approaches that limit village growth. The proposals advocate for a more flexible approach, allowing for well-designed, proportionate development beyond current boundaries. This would support rural vitality, encourage local SME builders, and enable both younger and older residents to remain within their communities. Overall, the modifications aim to diversify housing delivery, support local services, and ensure the principles of sustainable development are more thoroughly reflected in planning policy.	
Policy LP5: Housing, employment and mixed use allocations	No	• Effective • Consistent with national policy	No	Unsure	Small Site Allocation Requirement and NPPF Compliance National planning policy, as set out in NPPF paragraphs 68 and 69, requires that at least 10% of the housing requirement be allocated to sites no larger than 1 hectare to support SME developers and accelerate delivery. The current Local Plan does not comply with this guidance, lacking a meaningful small site allocation and failing to facilitate diversified supply.	Modification Allocating HE201068 and other medium and small sites rather than large master planned settlements would directly address this deficiency, support faster completions and enhancing the resilience of the five-year housing land supply. Evidence from the SHLAA (October 2025) and Reg 19 representations confirms that smaller, non-strategic sites are capable of early delivery and do not depend on major up-front infrastructure, making them essential to a sound and effective plan.		
Policy LP9: Extent of the Green Belt	Yes		Yes	No		We object to Policy LP9 because the approach of insetting villages within tightly drawn boundaries removes any potential for growth. This rigid policy fails to recognise the need for flexibility and proportionate development that supports rural communities. Rather than imposing absolute limits, the Local Plan should consider rounding off villages to allow them to grow in a sustainable and sensitive manner. This would enable modest development that meets local housing needs, supports community vitality, and provides opportunities for younger and older generations to remain in their villages. The following villages are particularly affected by this restrictive approach: • Abbots Leigh • Clapton-in-Gordano • Cleeve • Dundry • Failand • Flax Bourton • Felton • Leigh Woods • Portbury • Redhill • Tickenham • Weston-in-Gordano	We request that LP9 be revised to permit rounding off and proportionate growth in these villages, ensuring rural communities remain vibrant and adaptable to future needs. Also to reflect NPPF para 154(e).	

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						• Winford These settlements have capacity for small-scale, well-designed growth without compromising their character or landscape setting. A more balanced policy would allow organic expansion while safeguarding key environmental and heritage assets. In Julian Wood v. Secretary of State for Communities and Local Government [2015] EWHC 1173 (Admin), the court clarified that limited infilling in villages is appropriate regardless of whether the settlement has an identified HDB.		
Policy DP6: Net zero construction	Yes	◦ Effective ◦ Consistent with national policy	No	Unsure	I do not understand why the requirements need to go above and beyond Building Regulations. There are clear implications for viability of building and purchase costs which impact affordable housing delivery.	Delete Net Zero requirements		
Policy DP12: Development in the Green Belt	Yes	◦ Effective ◦ Consistent with national policy	No	Unsure	Objection to Policy DP12 – Redevelopment and infilling on previously developed sites in the Green Belt outside settlement boundaries We object to the provision in DP12 which states: “An extension will not normally be regarded as disproportionate provided it does not exceed 50% of the gross external floor area of the original building and does not impact openness by virtue of its bulk, height and location.” This approach does not reflect the NPPF, which adopts a more pragmatic and flexible interpretation of proportionality. The NPPF does not impose a rigid percentage threshold; instead, it requires consideration of context and impact on openness, applying a balanced judgment rather than an arbitrary numerical limit. Furthermore, paragraph 154 of the NPPF sets out eight criteria for assessing development in the Green Belt, one of which applies to extensions. DP12’s blanket 50% rule fails to align with this guidance and risks unjustly restricting reasonable extensions that could be acceptable under national policy. We request that DP12 be revised to adopt a context-based approach consistent with the NPPF, allowing proportionate	DP12 should be rewritten to reflect the NPPF.		

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					extensions assessed on their individual merits rather than an inflexible percentage cap.			
Policy DP14: Highway safety, traffic and provision of infrastructure associated with development	Yes	• Effective • Consistent with national policy			Objection to Policy DP14 – Transport Solutions for Rural Development We object to Policy DP14 because it fails to reflect the need for different transport solutions for small-scale rural developments that are not significant, as required by the National Planning Policy Framework (NPPF). The NPPF (paragraph 110) emphasises that development should provide safe and suitable access for all users, but it also recognises that the scale and nature of development should determine the transport requirements. DP14, as currently drafted, applies a one-size-fits-all approach that is disproportionate for modest rural schemes. Small-scale developments in rural areas should not be burdened with unrealistic transport obligations. Instead, DP14 should be modified to reflect NPPF guidance by allowing flexible, proportionate solutions, such as improved walking and cycling links, shared transport options, and consideration of modern trends like home deliveries, remote working, and electric vehicles powered by renewable energy.	Modification We request that DP14 be revised to align with NPPF paragraph 110.		
Policy DP35: Nature conservation	No	• Effective • Consistent with national policy	No	No	We object to Policy DP35 because it requires developers to produce their own 'shadow' Habitats Regulations Assessment (HRA) reports for the council to assess. This requirement is inconsistent with the legal framework and the National Planning Policy Framework (NPPF), as the responsibility for screening and undertaking an HRA lies with the competent authority (the decision maker), not the applicant. The Habitats Regulations place the duty on the decision maker to ensure compliance, including screening and appropriate assessment where necessary. While applicants may provide supporting information, mandating a full shadow HRA shifts a statutory responsibility away from the authority and creates unnecessary burden and cost for developers. Additionally, if worst-case mitigation is	Remove onerous survey requirements where worst case mitigation is designed into scheme.		

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					incorporated into a scheme (such as lighting assessments, HEP calculations, and addressing dark corridors on the boundary), we maintain that it should not be necessary to require a full season of Horseshoe bat surveys, which often force developers to wait up to 12 months to complete. This would save a small scheme upto £10,000 and delays for surveys when the worst case mitigation is provided in any event. We object to the reference to North Somerset Nature Parks Strategic Mitigation Sites because these sites do not exist at present. The Local Plan relies on a mitigation strategy that is not deliverable in practice, as there is no evidence of designated or functioning strategic mitigation sites within North Somerset. This raises serious concerns about the soundness and effectiveness of the plan under the tests set out in the NPPF. Without identified and operational mitigation sites, the policy cannot be implemented and therefore fails to meet the requirement for plans to be justified, effective, and consistent with national policy.			
Policy DP48: Residential annexes	No	Consistent with national policy	Unsure	Unsure	Objection to Policy DP48: Residential Annexes We object to the first criterion of Policy DP48, which restricts annexes from being standalone buildings – requiring sharing of facilities. This approach is unnecessarily rigid and does not reflect modern family needs or national policy objectives. It is out of date, why shouldn't a grandparent live in an outbuilding and be allowed some sense of independence including cooking a meal. Restrictive conditions and 10 year lawfulness periods (now mandatory) can prevent isolated C3 dwellings. Key Points: National Planning Policy Framework (NPPF): Paragraphs 60 and 62 highlight the importance of offering diverse housing options to address the needs of various groups, such as older adults and families. The inclusion of small, self-contained annexes encourages intergenerational living and decreases	Revise DP48 to allow standalone annexes where they remain ancillary to the main dwelling, subject to size limits, occupancy conditions, and prohibition on separate sale. This pragmatic approach meets housing needs while preventing inappropriate development.		

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					dependence on institutional care facilities. Planning Practice Guidance (PPG): Housing for Older and Disabled People: Supports adaptable housing that fosters independence and maintains family support networks. Independent annexes located within the boundaries of the primary residence help strengthen family bonds, minimize travel, and utilize land efficiently, in line with NPPF sustainability objectives. Flexible living setups are crucial for building resilience and supporting wellbeing, especially for elderly family members and younger relatives who require assistance (Post-COVID Lessons). The policy restricts annexes in residential gardens when they are a positive addition to the housing stock.			
Policy DP57: Replacement dwellings in the countryside	Yes	• Effective • Consistent with national policy	No		Objection to Policy DP57 I object to Policy DP57 as it is unnecessarily onerous and out of step with broader Green Belt policy for house extensions. The proposed restrictions discourage reasonable investment in existing homes, which has several negative implications: Key Points: • Economic Benefits: Home improvement projects stimulate the local economy by employing builders, tradespeople, and suppliers. Restrictive policies risk reducing this activity and harming local businesses. • Community Stability: Allowing homeowners to extend or adapt their properties enables families to remain in their communities rather than being forced to relocate. This supports social cohesion and reduces pressure on housing supply. • Policy Alignment: DP57 appears more restrictive than national Green Belt policy, which allows for limited extensions and alterations provided they do not result in disproportionate additions. Local policy should align with national guidance to ensure fairness and consistency.	Recommendation: Revise DP57 to adopt a balanced approach that permits reasonable extensions and alterations, subject to scale and design controls, rather than imposing overly rigid restrictions. This will support economic activity, family stability, and compliance with national policy.		
Policy DP59: Previously developed land in the countryside	No	• Effective • Consistent with	No	Unsure	Objection to Policy DP59: Previously Developed Land in the Countryside We object to Policy DP59 because it is more onerous than national Green Belt	We recommend aligning DP59 with NPPF guidance to ensure consistency, fairness, and support for sustainable rural development.		

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		national policy			policy set out in the National Planning Policy Framework (NPPF). The NPPF allows for the redevelopment of previously developed land in the Green Belt provided it does not have a substantial impact on openness than the existing development. DP59 imposes stricter limitations that go beyond this principle, creating unnecessary barriers to sustainable redevelopment. This approach risks stifling opportunities for rural regeneration and adaptive reuse of land, contrary to national objectives for making effective use of previously developed sites.			

Name: Kitty Stuart-Hunt **I.D:** 62777569

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	As a younger resident of Backwell, I want to share how this proposed development will affect not just the village now, but the future that my generation will grow up in. I've lived here most of my life and the fields around Backwell are where I've grown up. These places have shaped my childhood. They are where my friends and I walk to school, where we clear our heads, where we feel connected to nature. During the lockdowns, these fields and the Common became essential for everyone's mental health. People rediscovered how healing green space can be. That connection hasn't faded — if anything, it has become even more important. And now, the idea that all of this could be dug up, flattened, and covered in houses and tarmac — it's heartbreaking. We keep being told that my generation must care about the environment, about climate change, about protecting nature. We are constantly told that green spaces matter. But if plans like this go ahead, what green spaces will actually be left for us when we're adults? Once this countryside is built on, it's gone forever. No second chances. No way back. I don't want to grow up in a world where precious land is treated as disposable. Below are the planning reasons why this proposal is unsound, alongside the emotional reality of what this loss means for young people who will live with these decisions for decades. Planning Reasons for Objection 1. Massive Overdevelopment Backwell already has around 800 new houses approved — a 40% increase. Adding another 1,000 would overwhelm the village and destroy the rural character that generations of young people have enjoyed. 2. Road Proposal Not Deliverable The proposed new road won't fix traffic or congestion and may not even be technically feasible due to the railway line. Without this road, the whole plan collapses. 3. No Infrastructure for the Extra Population			

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					There are already too few school places and no investment in health or leisure facilities. My generation will be the one dealing with the consequences of poor planning. 4. Disproportionate Burden on Backwell Backwell is being asked to take 7% of the district's entire housing allocation, more than any other village and more than some towns. It's unfair and unrealistic. 5. No Needs or Viability Analysis There is no evidence that Backwell needs or could support these extra 1,000 homes. 6. Increased Car Use and Unsustainable Location Backwell is not a jobs centre. Most people commute by car, making this proposal the opposite of climate-friendly. 7. No Social Impact Assessment Almost doubling the population of a village — especially one with strong community identity — requires careful analysis. None has been provided. 8–9. Loss of Grade 1 Agricultural Land The site includes Grade 1 agricultural land, which is essential for UK food security. Only 7% remains in North Somerset. Government policy says we must protect this land — yet this plan destroys it. 10–11. Damage to Wildlife and Protected Species Nature is already struggling in the UK. These fields support deer, owls, bats, hedgehogs, and countless species. The development threatens the Brockley Maternity Roost and SSSI, relied on by rare Lesser and Greater Horseshoe Bats. Losing this habitat is unacceptable. 12. No Funding Guarantees The Infrastructure Delivery Plan lacks detail, costings, and firm funding. A plan of this scale cannot proceed without guaranteed infrastructure. 13–15. Flooding Risks The proposed housing and new road are on a floodplain that already floods regularly. Climate change is only making this worse. 16. Green Belt Affordable Housing Conflict The requirement for 50% affordable housing on Green Belt reduces developer contributions, making the whole scheme even less viable. 17. Unsustainable Pace of Growth This level of development over such a short period is undeliverable and damaging for existing and future residents. 18. Backwell Station Not Fit for Purpose The station remains inaccessible and unsuitable as a transport hub for major new development. Conclusion These fields are part of Backwell's identity and part of my generation's future. Losing them would mean losing a rare piece of countryside that supports our mental health, our wildlife, our climate goals, and our community.			

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					Backwell is at risk of being changed beyond recognition. Please do not let this development — which is unsound, unjustified, and undeliverable — take away the green spaces that young people depend on and will need even more in the future. Please protect our countryside and our future.			

Name: L Abbott **I.D:** 58632193

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective	Unsure	Unsure	Backwell has had vast number of houses approved of the which some yet to be built and therefore true impact is not known, further development would lead to complete overdevelopment. There is no infrastructure to support additional housing, including leisure facilities health care and schooling.Backwell is not an employment hub and therefore most residents will be commuting on roads already very congested at peak times. The proposed new road has no guaranteed funding and engineering a road over or under the railway across a flood plain would be highly expensive. The development would lead to The loss of grade 1 agricultural and destruction of the biodiversity in one of the world's most nature depleted countries. There is no needs or viability analysis for housing in this village or social impact assessment which should be crucial for an 80% increase in housing numbers. In conclusion I am not I agreement with these proposals.			

Name: L Brown **I.D:** 62864993

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Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	No	There has not been an adequate level of community engagement in creating this plan. Since the initial online consultation in February 2025, Pill and EiG have now become a site of strategic importance. The villagers in Pill and EiG have not been given the same level of consultation as other areas, all of whom had access to a public exhibition. I believe the this has been discriminatory towards those residents who are not computer literate. If Pill is to be a strategic site then the villagers should be given access to the same level of consultation as everyone else.	Pill and EiG need an opportunity to contribute towards developing a well rounded, appropriate plan. They need a forum to enable this to happen eg a public meeting/exhibition		
Land east of Gordano Services	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	There has not been an adequate level of consultation for the residents of Pill and EiG. For all 5 developments to go ahead this will significantly alter the character of the villages and will lead to increased traffic and flooding risks. Much of this development is on green belt land and this can only be developed where there is no alternative. I do not believe that North Somerset has demonstrated that all brown field sites have been developed as yet. They should not consider building on green belt until this is done.	Wait for the Highways Agency assessment of Junction 19 to determine how much more capacity this junction has. Locate remaining brown field sites throughout the county Consider whether the villages of Pill and EiG should really be a strategic site, there seems to be a flawed methodology for changing their status.		

Name: L Cox **I.D:** 62840545

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Recent building of new houses in Backwell has increased the number of homes by 40% Despite the increase there is no investment in education facilities and health services Most residents commute to work so increasing number of homes will compound traffic problems. Hardly a day goes past without roadworks and temporary traffic lights on the A370. It is also now a frequent occurrence for either the M5 or M4 to be closed. This causes gridlock regularly on the route from Backwell to Bristol. Extra housing will make this worse. Grade 1 agricultural land in North Somerset is at a premium and needed for grazing and food crops.Building on this type of land is in direct contradiction of Government policy to protect our best and most versatile land in order to safeguard food security. More house building will put strain on rich wildlife habitats locally particularly with regard to colonies of rare bat species.Biodiversity will be at risk Backwell lake and the surrounding land where new housing and roads are planned, are on a flood plain. Further paving and road surfaces will reduce green areas where potentially this flood water would be able to drain away			

Name: L Cresswell **I.D:** 58630433

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Land at Tower Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	Failure to properly consider reasonable alternatives The Council has not demonstrated that it has fully assessed reasonable alternative sites, either within Portishead or across the wider district, that would have significantly lower ecological impact. National planning policy is clear that all suitable alternatives must be examined before Green Belt land is released. At present, there is no clear evidence that this has been done. Insufficient consideration of higher density on brownfield sites The plan does not meaningfully explore opportunities to increase density on the proposed brownfield allocations. Even modest uplifts in density could materially reduce housing pressure and remove the need to release Tower Farm and Black Rock from the Green Belt, avoiding unnecessary harm to sensitive landscapes and habitats. Strategic ecological importance of the sites Tower Farm and Black Rock form a critical part of the wider ecological network associated with Weston Big Wood (SSSI) and the Gordano Valley green corridor. They provide habitat connectivity, biodiversity protection and an important buffer to the SSSI. Development on these sites would result in irreversible ecological harm and would conflict with national policy objectives for nature recovery. Green Belt purpose and original justification Both sites were incorporated into the Green Belt in the late 1980s specifically because of their ecological and	Remove Tower Farm and Black Rock from the allocations Neither site meets the high bar required for Green Belt release. They should remain within the Green Belt unless genuinely exceptional circumstances can be demonstrated — which has not been done. Properly re-examine alternatives The Council should undertake a robust review of alternative sites, including brownfield land and lower-impact greenfield locations. This must also include a serious assessment of increased densities on already-identified brownfield sites. Without this work, the plan cannot be considered justified. Revisit and strengthen the ecological evidence An updated and clearer assessment is needed to fully recognise the importance of these sites to Weston Big Wood (SSSI) and the wider Gordano Valley ecological network. This evidence should then directly inform site selection decisions. Retain existing Green Belt boundaries The current Green Belt boundaries were set for sound and defensible reasons in	There are aspects of the North Somerset Local Plan 2041 that I support. The overarching strategy to focus development in sustainable locations, make better use of brownfield land, and protect important natural environments is broadly the right direction for the district. I also support the plan’s emphasis on improving walking, cycling and public transport, and on reducing reliance on the private car. These priorities will deliver clear benefits for both residents and the environment. However, to remain consistent with these principles, the Green Belt should not be altered. Protecting the Green Belt is essential for safeguarding biodiversity, maintaining green corridors and preventing unnecessary loss of valued landscapes. While the plan’s overall approach aligns with national policy, it should follow through fully by retaining existing Green Belt boundaries. My supportive comments reflect the fact that the overall strategy is sound — but it must be applied consistently, and that means no release of Green Belt land.	

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					landscape value. There is no evidence in the plan to suggest that these characteristics have diminished. National policy allows Green Belt boundaries to be altered only in exceptional circumstances, and no such circumstances have been demonstrated here. Transport and access constraints Neither site has been shown to deliver safe, suitable or viable access. Significant highways and transport constraints remain unresolved, and development would result in unacceptable transport impacts. This directly conflicts with the National Planning Policy Framework requirement that plans be effective and deliverable, meaning the plan fails key tests of soundness in respect of these allocations.	the late 1980s. Nothing has changed to undermine those reasons, and without compelling new evidence, the boundaries should remain unchanged. Resolve access and transport issues before allocating sites At present, neither site has safe or workable access, and the transport impacts appear unacceptable. If these issues cannot be properly resolved, the sites should not be allocated. Ensure the plan meets the national tests of soundness For the plan to be credible, it must clearly demonstrate that: the most suitable and least harmful sites have been selected; Green Belt release is a last resort, not a starting point; access and transport issues have deliverable solutions; and ecological evidence has been fully and properly taken into account.		

Name: L Donadel **I.D:** 62862849

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Land at Tower Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	There are two main areas of concern 1) access to the site both during construction and when the development has be completed. 2) The damage that will occur to the Weston Big Wood Nature reserve and biological site of special interest. Access to the site is through a residential housing estate, in close proximity to a school, where there are existing issues with parent parking restricting access with other road users. The additional vehicle traffic will cause issues of safety. The roads are congested especially from Down Road onto West Hill and perhaps Avon Way. Where buses and other traffic are a hazard to pedestrians and cyclists. The Weston Big Wood Nature reserve managed by Avon Wild life Trust is a site that we all made a small donation to preserve and protect. We have been on a talk organised by the Trust which pointed out the significance of the woodland with regard to the Iron age and medieval period. The rare plants such as ancient White beam trees and Herb Paris. Also the abundance of rare butterflies in the woods. It has been an area where you can relax and enjoy nature away from the built environment.	Suggest using old mill road as set out on the Portishead town council Web Site. Maintaining the green belt between Clevedon and Portishead.		

Name: L Ellis **I.D:** 62831521

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I am writing to express my deep concern and strong objection to the proposed development in Backwell. Our village has already absorbed around 800 new homes—a 40% increase—which has pushed our infrastructure to breaking point, and the idea of adding another 1,000 houses feels completely disproportionate and unsustainable. Backwell is being asked to take a far higher number of new homes than any other village in North Somerset, even exceeding some towns, and yet there has been no proper needs assessment, viability study, or social cohesion analysis to justify such a dramatic expansion. The proposed road, which is supposedly central to the plan, would do nothing to ease congestion on Station Road, Backwell Common, or Chapel Hill, and in reality may not even be deliverable given the enormous cost and engineering difficulties of crossing the railway, let alone the flooding frequently experienced in these areas. Our local services—schools, healthcare, and leisure facilities—are already overstretched, and no tangible investment is being offered in return. I am also deeply concerned that this development would destroy precious Green Belt land, including Grade 1 agricultural land that is vital for food production and now extremely rare in North Somerset and nationally. Government policy explicitly states that our “best and most versatile land” should be protected to safeguard food security, yet this proposal directly contradicts that principle. The environmental consequences are also severe: wildlife habitats would be lost, biodiversity further damaged, and the protected Brockley Maternity Roost and SSSI—home to rare Lesser and Greater Horseshoe Bats—put at real risk. Flooding is already a serious issue around Backwell Common and particularly near Backwell Lake, where much of the development is planned on a known floodplain that regularly floods; adding large areas of hard surfacing and additional drainage pressures would only worsen this. The Infrastructure Delivery Plan provides no reliable costings or guaranteed funding for the new road or other essential services, and the requirement for 50% affordable housing on Green Belt sites raises further questions about whether any meaningful infrastructure can be delivered at all. Backwell is not an employment hub, so almost all new residents would need to commute, meaning more traffic, more pollution, and even greater pressure on a railway station that is already inaccessible for many people, including those with mobility issues or young children and closed due to flooding. Overall, the sheer scale and speed of the proposed growth would fundamentally and permanently change our village in a way that feels both destabilising and unmanageable. I care deeply about Backwell’s character, its community, its wildlife, and its landscape, and I strongly believe this development represents an unacceptable threat to all of these. For these reasons, I urge the planning authority to reject the proposal.			

Name: L Fearnside **I.D:** 62657857

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Land at Tower Farm	No	• Justified • Effective • Consistent with national policy	No	No	Both the Tower Hill and Black Rock sites were added to the Green Belt in the late 1980s due to their high ecological value. The strategic ecological importance of these sites in protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor has not been properly addressed . National planning policy allows Green Belt changes only in exceptional circumstances — and these have not been demonstrated. In addition, these developments would cause unacceptable transport impacts and are too far away from the proposed rail link. The town is congested with cars as it is. A reality would be 500 plus cars extra on those roads daily. People taking their children to school and extracurricular activities in the local area. This is not sustainable. As a result, failing national soundness tests. Tower Farm and Black Rock should be removed from the Local Plan. Find more alternative brownfield sites CLOSER to the rail link.			

Name: L Harrisis **I.D:** 58279457

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Vision, Strategic Priorities and Sustainability Objectives	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	Unsure	North Somerset Council has failed to clearly demonstrate compliance with the Public Sector Equality Duty (Equality Act 2010, s.149) because no evidence that an Equality Impact Assessment has been undertaken on the consultation process itself. Without an EqIA, the Council cannot show that the consultation was designed or delivered in a way that ensured fair and accessible participation for all protected groups, including disabled residents, older people, those with limited mobility, digitally excluded households, and individuals with caring responsibilities. This omission undermines the inclusivity and proportionality required by the NPPF and the Council's own Statement of Community Involvement, and raises a clear risk that significant groups within the community were disadvantaged or unable to engage meaningfully. Furthermore, the EqIA undertaken on the plan is flawed as there are no guarantees that the developers will meet the affordable housing requirements as stated in the Local Plan. Allocated sites are poorly served by public transport and infrastructure plans are not funded or proven to be deliverable. Therefore creating inclusive communities and reducing inequality will not be achieved as per NSC's own policies. As a result, the Local Plan fails the tests of legal compliance and soundness, as the consultation process cannot be considered effective, justified, or consistent with national policy requirements for fair and accessible plan-making.	1) Modify NSC's 'evidence base' by providing more accessible documentation, supporting reports are lengthy and overly complex. 2) Provide evidence to state that screen readers and other accessible software could be used on the supporting documents. 3) Provide evidence that those consultees who do not have English as a first language have been given the same opportunities to engage with the consultation as native speakers. 4) Reduce the level of complexity for participation; remove reliance to digital access and competence. Provide other opportunities for engagement such recording verbal testimonies from residents who have limited or no digital access, may be older and unfamiliar with digital consultations or socially isolated and unable to respond by letter. 5) Ensure Active Travel plans are including disability groups, older residents and car dependent residents to ensure 'no development for us, without us' approaches. Provide realistic and deliverable active travel plans which definitively reduce car dependency and create inclusive communities, rather than 'possible' plans.		
Poplar Farm, Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The Local Plan is unsound because it fails the tests of justification and consistency with national policy. The evidence base underpinning the plan is incomplete and, in places, misleading. Sustainability Appraisals have overstated benefits while underplaying constraints such as flood risk, infrastructure capacity, and reliance on unsustainable transport. This means the plan is not the most appropriate strategy when considered against reasonable alternatives (details of which have not been made transparent for specific sites for residential development), nor is it consistent with national policy requirements to direct development away from areas of highest environmental risk (such as SSSIs) and towards locations that can be supported by infrastructure. By relying on flawed evidence and failing to demonstrate that allocations are deliverable (fully costed and in line with housing growth) and resilient, the Local Plan cannot be considered justified or consistent with national policy, and is therefore unsound.	Greater clarity as to exactly which brownfield sites have been explored and disregarded in favour of those greenfield sites with grade 1 agricultural land and within a Flood Zone 3. Fully costed commitments for the delivery of improved transport infrastructure and schools in line with the proposed residential housing plans. Full environmental impact assessments for land with highly sensitive ecology considerations.		
Poplar Farm, Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	Unsure	Failure of Legal Compliance North Somerset Council's (NSC) own Sustainability Appraisal shows Poplar Farm scores negatively on flood risk, biodiversity, and climate change. The site lies next to and partially in a Flood Zone 3 and a nationally important SSSI. The Council has not demonstrated which safer, reasonable alternatives (i.e. suitable, available and achievable) in Flood Zone 1 were properly considered. Allocating Poplar Farm therefore fails the legal duty under Section 19(5) of the Planning and Compulsory Purchase Act 2004 and the SEA	Correct misleading information in the SA proformas to reflect Poplar Farm's proximity and location within a Flood Zone 3. Correct information within the SA proforma to better reflect the fact that the nearest primary school is close to capacity and does not therefore meet the objective 2.3 'achieve reasonable access to a wide range of community, education and health care facilities' as access will be reduced or denied to prospective residents. Conduct an Environmental Impact assessment to fully understand the potential impacts of the removal of and interruption of habitats on the Lesser and Greater Horseshoe bats and other protected species such as herons, owls and badgers within the site. Produce definitive actions to mitigate the		

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					Regulations 2004, and makes the Local Plan unsound. Furthermore, the Habitats Regulations Assessment is inadequate: Regulation 63 of the Conservation of Habitats and Species Regulations 2017 requires a full Appropriate Assessment (AA) where significant effects cannot be excluded, yet NSC relied only on strategic screening and deferred mitigation to later stages. This breaches the precautionary principle and statutory duties under Section 28G of the Wildlife and Countryside Act 1981 to protect SSSIs, exposing the plan to judicial review. Failure of Soundness The allocation at Poplar Farm fails all four NPPF soundness tests. • It is not positively prepared: NSC Habitat Regulations Assessment produced by AECOM notes that Poplar Farm is functionally linked to North Somerset and Mendip Bats SAC and development has potential for adverse impact on the site. The report suggests that mitigation 'may' be required and suggests deferring this to after the Local Plan has been finalised. The plan therefore does not adequately address all the necessary environmental needs from the outset. The site is also adjacent to an SSSI, Paragraph 179, Chapter 15 of the NPPF states LPA's would 'not normally permit development on land within or outside an SSI which is likely to have an adverse affect on it. The SSSI supports the corridors for the Lesser and Greater Horse Shoe Bat, development on Poplar Farm would have an adverse effect and therefore breached the NPPF guidance. The cumulative impact on bat habitats and corridors of surrounding development will only exacerbate the issues at Poplar Farm. • It is not justified: The Council's Sustainability Appraisal scores Poplar Farm positively for accessibility to services because of its proximity to Nailsea town centre and existing facilities. However, this conclusion is misleading and not based on proportionate evidence. The appraisal ignores critical capacity issues in local schools and healthcare, underestimates the distance to Nailsea & Backwell railway station, and fails to account for the site's reliance on private car travel. By overstating accessibility and omitting these constraints, the Council has not demonstrated that Poplar Farm is the most appropriate strategy when considered against reasonable alternatives. There are also safer, more appropriate alternative locations in Flood Zone 1 (e.g. Weston and Clevedon allocations) which score better than Poplar Farm on key sustainability objectives. NSC's SA proforma misclassifies Poplar Farm as 'a site that is not within an area identified as being at risk of flooding from fluvial or tidal sources or surface water yet it is within a Flood Zone 3. This evidence is flawed as it is not accurate. For the above reasons, the allocation therefore fails the "Justified" test of soundness under the National Planning Policy Framework. • It is not effective: Delivery depends on unfunded and uncertain infrastructure including a strategic rail crossing and new schools, with no binding funding commitments or plans aligned to housing development phases. The site is not well served by public transport and lacks proximity to key services, undermining its ability to create an inclusive and accessible neighbourhood. Poplar Farm's location makes	impact where necessary. Detail why a breach of the NPPF policy is being allowed regarding development adjacent to an SSSI with exact details of alternative reasonable sites and the rationale for why they had been discounted. Provide detailed and definitive transport improvements which outline safety measures for pedestrians using North and Silver street from Poplar Farm i.e. account for measures to mitigate against missing pavements and single lane traffic increases along a proposed new bus route. Provide evidence of an Active Travel Plan that has been assessed against an Equality Impact Assessment to demonstrate safety for wheelchair users.		

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					complying with NSC Active travel policy unfeasible and car dependency will increase. Insufficient pavements and unsuitable footpaths make walking or wheelchair use dangerous given the additional traffic from this site and existing additional sites in the surrounding area. Access from outside of Nailsea to the site will increase pressure on rural roads insufficient to cope with additional traffic and the Causeway, already under pressure and close to capacity with daily use. NSC has not provided definitive deliverable actions, only 'possible actions' and therefore fails the legal requirement for proportionate evidence under Section 19 of the Planning and Compulsory Purchase Act 2004 and the NPPF. • It is not consistent with national policy: the site would harm biodiversity, conflict with statutory duties under the Natural Environment and Rural Communities Act 2006, and lacks a credible transport strategy to reduce car dependency. Furthermore, the NPPF requires Local Plans to promote mixed communities and sustainable development (paras 62–65). Without clear evidence of housing diversity, service access, and integration, the allocation is not the most appropriate strategy and fails to deliver sustainable development. Collectively, these deficiencies mean the allocation is unsound and should be removed in favour of more sustainable alternatives.			

Name: L Hazzard **I.D:** 58492289

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Leighton Crescent	No	Justified	Unsure		A direct quote from the Plan: "The objective of the liveable neighbourhood concept is to ensure that as far as possible there is a diverse mix of different types of housing to meet the needs of the community as a whole and that there is easy access by walking cycling and public transport to a wide range of facilities such as shops, education, health services, jobs, recreation and entertainment. By encouraging this type of development with a range of facilities and good transport infrastructure this will make it easier for people to walk with the health, community and environmental benefits that brings." This particular site cannot fulfil these objectives due to the fact that it is situated at the top of a steep hill and along a narrow road. This has, and always will be, a big deterrent to making journeys by walking, cycling or public transport. The majority of existing properties here have at least one vehicle, with this number added to when children in households become old enough to drive and own their own cars. This happened in my own family, with four cars required when our sons were needing to get to college and then to their workplaces. The provision of a bus service has been tried, then cancelled, then trialled again, with poor uptake due to the infrequency of the service, and the long journey times to get to key commuting locations. Another unfortunate outcome of a bus service was the traffic chaos these vehicles caused on the many narrow points on the local roads. There are only so many vehicles that the roads on Bleadon Hill can SAFELY accommodate. All routes onto and off the hill have their own particular difficulties and limitations; they were never designed for the amount of traffic that we now get. With recent housing developments in two locations on the hill (Wentwood Drive and Devil's Bridge) this has added approximately 110 new properties, all with their extra demands on our roads. As well as extra housing, there has also been a huge increase in commercial vehicles using our roads, due to the explosion in online shopping and deliveries.			

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					There must be many other more suitable sites for development in and around Weston-super-Mare that don't involve steep narrow roads without pavements. Please consider this comment from a local resident who has lived here for nearly 30 years and witnessed the increasing travel problems first-hand. Remove this proposed development site from the plan. Reduce the total number of proposed properties from 6084 to 6003.			

Name: L Johnston **I.D:** 24296225

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Policy LP9: Extent of the Green Belt	No	• Justified • Effective • Consistent with national policy	No	Unsure	Please refer to comments submitted by Portishead Town Council and Avon Wildlife Trust, which I fully support. Both give specific details of Local and National Policy regulations that are not met by NSLP 2041, with specific regard to Tower Farm and Black Rock sites.	Please refer to comments submitted by Portishead Town Council and Avon Wildlife Trust, which I fully support. Both give specific details of Local and National Policy regulations that are not met by NSLP 2041, with specific regard to Tower Farm and Black Rock sites.		
Land at Tower Farm	No	• Justified • Effective • Consistent with national policy	No	Unsure	Please refer to the comments submitted by Portishead Town Council and Avon Wildlife Trust; both of which I fully support.			Tower Farm Black Rock Comments.pdf
Black Rock, north of Clevedon Road	No	• Justified • Effective • Consistent with national policy	No	Unsure	Please refer to comments submitted by Portishead Town Council and Avon Wildlife Trust, both of which I fully support.			Tower Farm Black Rock Comments.pdf

Name: L Power **I.D:** 62836257

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP8: Housing	No	• Positively prepared • Justified • Effective	No	No	North Somerset Council are REPEATEDLY consulting on the same thing. Over and over again, until they get the answer they want. You keep consulting on 'Land north of Churchill Avenue, Clevedon' and have used several different names to describe this land. Please just leave this land alone!! This	Remove Penny Field (Land north of Churchill Avenue, Clevedon) from your consultation. Give it permanent protection from development. Stop picking on one of the poorest areas of the town (do you do this because you think you can push us around?) and simply leave this field to the people, as was originally intended.		

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					is green space enjoyed by local residents and is the ONLY green space that the council flats have along Churchill Avenue. Just STOP trying to ruin the environment. This proposal will also have an impact on flood risk for all of the surrounding properties. There are also BATS in this area (I see them most nights).			
SP11: Historic and natural environment	No	• Positively prepared • Justified • Effective	No	No	You state "Proposals should aim to avoid, then minimise adverse impacts on biodiversity by retaining habitat as far as possible and compensate for any loss or habitat or biodiversity feature to ensure no net loss." If you truly support this, you would REMOVE Land off Churchill Avenue, Clevedon from your consultations (of which there have been multiple over recent years). Bats, river etc - protect this green space and never consult on it again!	You state "Proposals should aim to avoid, then minimise adverse impacts on biodiversity by retaining habitat as far as possible and compensate for any loss or habitat or biodiversity feature to ensure no net loss." If you truly support this, you would REMOVE Land off Churchill Avenue, Clevedon from your consultations (of which there have been multiple over recent years).	How were local residents informed of this consultation? What ecological surveys have been carried out? Why have there been multiple consultations about the same site, and why have different names been used throughout these consultations? Why are you picking on one if the poorest parts of the town, taking away this green space from the flats on Churchill Avenue?	
Land north of Churchill Avenue	No	• Positively prepared • Justified • Effective	Unsure	Unsure	North Somerset Council are REPEATEDLY consulting on the same thing. Over and over again, until they get the answer they want. You keep consulting on 'Land north of Churchill Avenue, Clevedon' and have used several different names to describe this land. Please just leave this land alone!! This is green space enjoyed by local residents and is the ONLY green space that the council flats have along Churchill Avenue. Just STOP trying to ruin the environment. This proposal will also have an impact on flood risk for all of the surrounding properties. There are also BATS in this area (I see them most nights).	Stop consulting on the same thing over and over and over again. It feels nefarious so just stop it.		
Land north of Churchill Avenue	No	• Positively prepared • Justified • Effective	Unsure	Unsure	North Somerset Council are REPEATEDLY consulting on the same thing. Over and over again, until they get the answer they want. You keep consulting on 'Land north of Churchill Avenue, Clevedon' and have used several different names to describe this land. Please just leave this land alone!! This is green space enjoyed by local residents and is the ONLY green	Remove 'Land north of Churchill Avenue, Clevedon' from this consultation and give this space permanent green space protection.		

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					space that the council flats have along Churchill Avenue. Just STOP trying to ruin the environment. This proposal will also have an impact on flood risk for all of the surrounding properties. There are also BATS in this area (I see them most nights).			
Land north of Churchill Avenue	No	‣ Positively prepared ‣ Justified ‣ Effective	No	No	North Somerset Council are REPEATEDLY consulting on the same thing. Over and over again, until they get the answer they want. You keep consulting on 'Land north of Churchill Avenue, Clevedon' and have used several different names to describe this land. Please just leave this land alone!! This is green space enjoyed by local residents and is the ONLY green space that the council flats have along Churchill Avenue. Just STOP trying to ruin the environment. This proposal will also have an impact on flood risk for all of the surrounding properties. There are also BATS in this area (I see them most nights).	GIVE ALL THIS LAND PERMANENT GREEN SPACE PROTECTION. Never consult on it again.	You keep asking about this land - over and over and over again in multiple consultations. You're picking on an area of green space next to large council flats. Just leave them this land to enjoy. You're picking on one of the poorest areas of the town - just stop it! The land soaks up much water and you will increase the risk of flooding if you build anything here.	
Land north of Churchill Avenue	No	‣ Positively prepared ‣ Justified ‣ Effective	No	No	How has the development proposal for Land off Churchill Avenue (AKA Penny Field) in Clevedon been properly considered? You are impacting biodiversity and nature in this site, including bats which are here every night. Have you done a bat survey? And if not, why not?	Remove Land off Churchill Avenue, Clevedon from the consultation and give it permanent protection from development.	What Ecology Surveys have been conducted. In which newspaper did you advertise this consultation? How did you inform local residents in the land surrounding Penny Field about this consultation? Why didn't you write to us?	

Name: L Robinson **I.D:** 62860321

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	‣ Consistent with national policy	Unsure	Unsure	I object to the inclusion of Tower Farm, Portishead in the proposed local plan on the basis of the insufficient Transport Sustainability and Access Strategy. There are many sites more suitable in Portishead in terms of transport links, bus access and active travel opportunities. Claims made in support of the active travel potential of the site do not match the Local Walking and Cycling Infrastructure Plan or the requirements of Local Transport Note 1/20. Transport Sustainability and Access Strategy There is some crucial information not discussed in the report: • The site itself is steep with approximately 25 metres elevation difference between highest and lowest points. This means that anyone living in a property at the bottom of the proposed site next to the wood will need to first walk uphill towards Down Road prior to walking downhill to go anywhere they wish to. This is highly likely to deter	Remove proposed Tower Farm Development from local plan or produce an alternative proposal for the site which addresses the significant transport and environmental issues it poses, by significantly reducing the size of the proposals.		

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					active travel. It suggests that even internal active travel may be difficult to achieve. • The report talks of connecting to existing links. There are no existing cycle links. The closest cycle routes are over one mile away. The West of England Local Cycling and Walking Infrastructure Plan 2020 to 2036 (LCWIP) includes some cycling improvements for Portishead but none of these will be closer to the site than existing facilities and will all be in the lower areas of Portishead. In order to cycle to the site from existing cycle facilities (and the proposed), it is necessary to travel along a road with a 30mph limit (the 85th percentile speed is likely to be higher than 30) which has gradients in excess of 7%. In accordance with Local Transport Note 1/20 'Cycle Infrastructure Design' fig 4.1, these routes are unlikely to be suitable for any but the most confident cyclist. In order to comply with the requirements of LTN 1/20 significant new cycle infrastructure is required to connect the site to separate cyclists from motor vehicles, access to electric bikes is completely insufficient to overcome these issues. • Effect on existing footpaths A large number of secondary school pupils/students (in the hundreds) walk daily to and from Gordano School from the vicinity of the site. In drier weather they can and do use footpaths crossing the site to both shorten their walks and to keep them safer from road traffic. At other times, only much longer routes, along roads where they are in potential conflict with road traffic, some sections do not have footways, are possible. The proposal for the site would appear to include diversions of existing footpaths, extending their length and in some cases routing them through proposed attenuation basins. Basins that are designed to hold water rather than provide amenity. The proposed development will increase the number of 11 to 18 year olds living on the site needing to make the daily journey to Gordano and the number of under 11s going to primary schools. There are no proposals to improve the daily walking journey either in the LCWIP or the plans for the site, on the contrary the proposals may make journeys worse. • Runoff and Topography The existing site is steep and irregular at around 5%. The existing footpath running along the edge of Weston Big Wood is often waterlogged making it inaccessible. The proposed development will exacerbate the situation as the speed of runoff will increase. • Increased car journeys The proposed sports pitches and allotments in Merlin Park will also increase the number of car journeys into the Merlin Park estate and cause parking issues. No mitigation measures are proposed as part of this new development. No measures are proposed to improve active travel to this location. To make them usable with the topography involved, the sports pitches will require expensive reprofiling. This will put the land out of us for significant time and reduce the recreational opportunities for existing residents. This development will not achieve sustainable transport objectives and will significantly increase car journeys to the local area.			

Name: L Yensen **I.D:** 62778081

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I am a Backwell resident and I am very concerned about the proposals for the village set out in the proposed plan. North Somerset Council want to put too many houses in the village. We would nearly double in size. I know that we need housing, but it should be built where there are the schools, doctors and dentists, wide roads and where the proposed new houses won't sink into the mud! I have to travel to Bristol to work, so I know how bad the A370 is at peak times. There simply won't be enough road for all the extra cars. Many homes have at least 2 cars, so that's another 1600 vehicles. The other roads are just as bad; there's only one road to Nailsea where the supermarkets are. The idea of the proposed new road is simply ridiculous. It won't relieve any problems, just displace them. However, that's immaterial as I simply cannot see how it could be built. To start with, the cost would be HUGE! I don't know where the money would come from. You are talking tens of millions of pounds. The ground is too wet, the railway embankment too unstable, and I can't see Network Rail agreeing to any part of the plan. The railway station is not fit for purpose. The platform is too short, so CrossCountry train passengers have to use the			

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					middle carriages if they want to get off at Backwell. The platform on one side is inaccessible to anyone with mobility problems. There is no engineering solution to this. I've mentioned the houses sinking into the mud. The area towards the railway line is almost a marsh and is impassable when there's been a lot of rain. You can't walk under the railway line much of the time in the winter as it is flooded or inches deep in mud. The land at east Backwell is farmland. There are cereal crops there every year. If we lose our farmland how will we feed ourselves? And what about the wildlife that live and forage there? Anyone visiting Backwell would immediately understand and agree with our concerns. This site is not viable and I cannot understand why North Somerset Council have even considered putting it in this plan.			

Name: Lands Improvement Holdings Ltd **I.D:** 48743361

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Effective	Unsure	Unsure	Please refer to representation letter Strategic Location: Pill and Easton-in-Gordano LIH are pleased to see that the North Somerset Local Plan has recognised Pill and Easton-in-Gordano as a strategic development location and fully support the proposed allocation of the Site under policy LP4. The Local Plan has recognised four large housing allocations at Pill and Easton-in-Gordano as set out in in Policy LP4, one of these housing allocations being the Site (Land east of Gordano Services). Since the allocated sites throughout Pill and Easton-in Gordano are proposed for Green Belt release, it is required that the sites are brought forward as Grey Belt Land and therefore must meet the 'Golden Rules' as set out in NPPF Paragraph 156. This includes enhanced affordable housing on each site, as per Policy DP43; improvements to local infrastructure; and provision of high-quality green space. While LIH do support the provision of necessary services and delivery of new infrastructure throughout Pill and Easton-in-Gordano as set out in Policy LP4, it is considered that, as drafted, this element of the policy is too ambiguous and ineffective. The policy states that new infrastructure 'will be achieved through a co-ordinated approach' between the four large housing allocations. The policy then goes on to state that 'all new development will be required to contribute to the delivery of necessary infrastructure through either direct delivery as part of the scheme or through development contributions' and then lists facilities that should be provided throughout the plan period in Pill and Easton-in-Gordano. Throughout this Policy, it is not specified how the co-ordination of all local infrastructure and facilities will be achieved, with no further details as to what is expected from each site in terms of on-site provision and necessary financial contributions. The Policy to be precise, effective and found sound, there needs to be further direction regarding the interaction of the allocated sites and how they will be expected to co-ordinate in order to deliver the policy aspirations. It is set out in Policy LP4 that throughout the plan period, the four strategic sites in Pill and Easton-in-Gordano will be expected to provide improvements to the local infrastructure with a particular emphasis on a new primary school, the creation of improved active travel routes and a new transport hub. The nature of the four different sites means that it is likely they will all be brought forward and built at different points of time throughout the plan period. This could result in an increased financial burden on the sites brought forward earlier. Without clarity and proper justification, this increased burden is not justified. Policy LP4 should therefore provide much greater clarity on the anticipated requirements for each proposed allocation site.	Please refer to representation letter. Policy LP4 should provide much greater clarity on the anticipated requirements for each proposed allocation site.	Strategic Location: Pill and Easton-in-Gordano LIH are pleased to see that the North Somerset Local Plan has recognised Pill and Easton-in Gordano as a strategic development location and fully support the proposed allocation of the Site under policy LP4. LIH strongly support the removal of the Site from the Green Belt, as set out in Policy SP7, since it is largely recognised throughout the PreApplication Feedback, the Stage 2 Green Belt Assessment and the Green Belt	640_L01-Site Location Plan.pdf 640_P01_Illustrative Masterplan.pdf 24398_December25_Court-House-Farm_Reps_Issue.pdf

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							Assessment submitted as part of application 25/P/1413/OUT that 'Land east of Gordano Services' could be considered Grey Belt Land.	
Policy DP53: Best and most versatile land	No	• Effective	Unsure	Unsure	Best and Most Versatile Land LIH query the evidence supporting the introduction of Policy DP53, Best and Most Versatile (BMV) Land. The Policy seeks that BMV land should be protected from significant, inappropriate and unsustainable development. The policy sets out that Grade 1 and 2 BMV land should be safeguarded from development, save for open space, community uses, affordable housing or forestry uses. It is widely acknowledged throughout the Pre-submission Plan that North Somerset is already a very constrained local authority, which has meant that it has been difficult previously to find appropriate sites for housing allocations, which has ultimately resulted in the local authority using exceptional circumstances to release Green Belt for development. Policy DP53 places an additional spatial burden, restricting the possible land opportunities for housing development in sustainable locations. LIH would support Policy DP53 if the Policy wording incorporated the exception set out in the supporting text that 'only where it can be demonstrated the sustainability benefits of the proposal outweigh the loss of this best and most versatile agricultural land will permission be granted'.	LIH would support Policy DP53 if the Policy wording incorporated the exception set out in the supporting text that 'only where it can be demonstrated the sustainability benefits of the proposal outweigh the loss of this best and most versatile agricultural land will permission be granted'.		640_L01-Site Location Plan.pdf 640_P01_Illustrative Masterplan.pdf 24398_December25_Court-House-Farm_Reps_Issue.pdf

Name: Latimer Developments Limited **I.D:** 51242689

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP3: Spatial strategy	No	• Positively prepared • Justified • Effective	Yes	No	Draft Policy SP3 identifies Weston-super-Mare as the principal location for new development. New development will also be prioritised in the following four strategic locations: • Wolvershill (north of Banwell) – 3,300 homes; • Woodspring (south west of Bristol) – 3,500 homes; • Nailsea and Backwell – 3,728 homes; and, • Pill and Easton in Gordano – 1,100 homes. Draft Policy SP5 also states that development will be prioritised within the four town centres of North Somerset, those being Weston-super-Mare, Clevedon, Nailsea and Portishead owing to their sustainability credentials. Draft Policy SP6 seeks to limit new residential development outside of the settlement boundaries of villages and rural areas. The supporting text states that: 'development in the rural areas is relatively less sustainable given the absence of services, facilities and job opportunities'. This fails to acknowledge that the form, nature, size and sustainability credentials of Villages	We consider that the settlement hierarchy should be amended to give status to the more sustainable settlements, as evidenced by the Council's own supporting documents. We also request that additional small sites are allocated within these sustainable settlement including Clarion's site at land north of High Street, Claverham (120 affordable homses) to ensure that the plan delivers over the plan period.		LF62683-01 Claverham - Vision Document (update) - Apr25 v6 (HR)(33693312.1).pdf

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					within the authority varies considerably, and is a step change from the adopted Core Strategy approach and the Council's own evidence base. It is incorrect to state that there is an absence of services, facilities and job opportunities in settlements outside the towns. This has essentially created a two-tier settlement strategy that does not reflect the nature and function of the settlements of North Somerset with all settlements apart from Weston -Super-Mare, Nailsea, Clevedon and Portishead (as well as the strategic development locations) considered in the 'Villages and rural areas' category. As set out in draft Policy SP8 the 'villages', account for 2,948 dwellings (12% of the housing supply) in the Regulation 19 plan with the remainder coming from the towns and the strategic allocations. We consider that the settlement strategy does not reflect the function and form of the settlements of North Somerset and as a result, the distribution of housing, set out in policy SP8 is not effective in ensuring delivery over the plan period. As it stands, we consider that draft Policy SP8 is not justified and is therefore unsound. The proposed settlement strategy does not reflect the existing settlement hierarchy as evidenced by the Council's own work. In order to be considered sound, a third tier should be added which should consist of the more sustainable villages, as evidenced by the Council's own work to assess the sustainability of villages. Policy SP6 (Villages and Rural Areas) is too restrictive to allow meaningful development to take place in villages that could suitably meet the needs of the area and to assist in supporting their viability. Policy SP6 as it stands appears to be drafted in order to protect rural areas from any development regardless of the characteristics of the rural settlements – some of which are large, sustainable and thriving communities. This appears to be an even stricter form of policy than that of the adopted Core Strategy that allowed sites of up to 25 dwellings outside of settlement boundaries for service villages subject to criteria. It appears that Yatton has been demoted from a Service Village in the new Local Plan to fall within the 'Villages and Rural Area' category even though it is a highly sustainable settlement that serves a wider catchment as evidenced through the recent residential permissions. As it stands, we consider that draft Policy SP6 is not justified and is therefore unsound. Policy SP6 should be amended to make it clear that sustainable housing developments adjacent to the settlement boundary of villages are acceptable subject to criteria. Whilst the Council has opted to allocate 1100 dwellings in the village of Pill and Easton in Gordano, we consider that other villages such as Yatton/Claverham also boast considerable sustainability credentials and would be suitable to accommodate further meaningful growth. The Council's own evidence recognises the sustainability credentials of Yatton/Claverham, with the 'Consultation paper on additional sites for the Regulation 19 plan' (February 2025) identifying Yatton/Claverham as a 'larger, most sustainable village'. From a functional perspective Claverham forms an important node along an arc of settlements in this quadrant of North Somerset that operate in unity. These comprise Yatton, Claverham, Cleeve and Congresbury. Claverham forms a natural extension to Yatton. Within the current adopted Core Strategy Yatton is designated as a 'Service Village' whilst Claverham is classified as an Infill Village. The Core Strategy supports development within or adjacent to existing settlement boundaries of Service Villages, subject to proposals enhancing the overall sustainability of the settlement. We consider that additional growth could be directed to other sustainable villages by either amending the settlement hierarchy under Policy SP3 to promote sustainable villages such as Yatton/Claverham (similar to the adopted Core Strategy where it is identified as a Service Village) or by re-drafting Policy SP6. The supporting text to Policy SP8 states that: "Across the villages and rural areas sites to accommodate 1,830 dwellings have been identified, predominantly at the larger more sustainable villages that have a range of services and facilities to support an appropriate amount of new development over the plan period."			

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					However, we query why no new allocations are proposed in Yatton/Claverham given its positive classification as part of the Rural Settlements Paper (March 2022) and the Consultation Paper on additional sites for the Regulation 19 Plan (February 2025). Only 300 dwellings have been allocated within Yatton/ Claverham, with all but one allocation (Oxford Plasma – 58 units) having extant planning permission . It's worth noting that the Oxford Plasma allocation is not a new allocation as it has been rolled forward from the Site Allocations Plan (April 2018). Therefore, there are no new allocations proposed for Yatton/ Claverham which is surprising and at odds with the Council's own evidence base. The combined area of Yatton/Claverham is therefore proposed to accommodate a very limited quantum of growth compared to its evidenced strong sustainability credentials. We support the Council's assertion that Yatton/Claverham is considered as a single settlement due to their interdependency. We consider that the conjoined settlement should be considered a higher order settlement in the settlement hierarchy. The plan therefore fails to meet the tests of soundness as it is not justified, with Policy SP8 conflicting with the council's own evidence base. Whilst future opportunities for growth in Yatton are more limited (due to constraints such as flood risk), there remains opportunities for sustainable development within Claverham which forms a natural extension to Yatton; as recognised by NSC in the 'Consultation paper on additional sites for the Regulation 19 plan' and the Pre-submission Plan. We consider that Claverham in itself is a suitable location for development as it includes a primary school (including preschool), a Village Hall, a Community Church, a Scouts HQ as well as areas of functional open space. However, there is an opportunity to boost the facilities and services in Claverham itself through well planned developments such as that proposed for land north of High Street, Claverham. Although we support NSC's sequential approach, which prioritises the most sustainable locations for growth, we question its application within the plan. The plan has overlooked deliverable sites in lower order settlements, including the land north of High Street, Claverham, which are suitable, sustainable and deliverable, in favour of very large strategic sites and sites located within the Green Belt. Whilst the NPPF (paragraphs 145 and 146) states that Green Belt boundaries can be altered where there are exceptional circumstances, including in instances where an authority cannot meet its identified need for homes, we do not believe that NSC has fully considered suitable and deliverable housing sites outside of the Green Belt that could also aid in meeting this need. Having the other smaller sites alongside the larger strategic sites provides North Somerset with the best opportunity to meet the housing target. The Plan is not sound because it is not positively prepared (test of soundness 36.a), justified (test of soundness 36.b) or effective (test of soundness 36.c). The strategy to meet the housing needs of the authority is not effective because of the reasons outlined above. We consider that the settlement hierarchy should be amended to give status to the more sustainable settlements, as evidenced by the Council's own supporting documents. We also request that additional small sites are allocated within these sustainable settlement including Clarion's site at land north of High Street, Claverham (120 affordable homses) to ensure that the plan delivers over the plan period.			
SP5: Towns	No	• Positively prepared • Justified • Effective	Yes	No	Draft Policy SP3 identifies Weston-super-Mare as the principal location for new development. New development will also be prioritised in the following four strategic locations: • Wolvershill (north of Banwell) – 3,300 homes; • Woodspring (south west of Bristol) – 3,500 homes; • Nailsea and Backwell – 3,728 homes; and, • Pill and Easton in Gordano – 1,100 homes. Draft Policy SP5 also states that development will be prioritised within the four town centres of North Somerset, those being Weston-super-Mare, Clevedon, Nailsea and Portishead owing to their sustainability credentials.	We consider that the settlement hierarchy should be amended to give status to the more sustainable settlements, as evidenced by the Council's own supporting documents. We also request that additional small sites are allocated within these sustainable settlement including Clarion's site at land north of High Street, Claverham (120		LF62683-01 Claverham - Vision Document (update) - Apr25 v6 (HR)(33693312.1).pdf

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					Draft Policy SP6 seeks to limit new residential development outside of the settlement boundaries of villages and rural areas. The supporting text states that: 'development in the rural areas is relatively less sustainable given the absence of services, facilities and job opportunities'. This fails to acknowledge that the form, nature, size and sustainability credentials of Villages within the authority varies considerably, and is a step change from the adopted Core Strategy approach and the Council's own evidence base. It is incorrect to state that there is an absence of services, facilities and job opportunities in settlements outside the towns. This has essentially created a two-tier settlement strategy that does not reflect the nature and function of the settlements of North Somerset with all settlements apart from Weston -Super-Mare, Nailsea, Clevedon and Portishead (as well as the strategic development locations) considered in the 'Villages and rural areas' category. As set out in draft Policy SP8 the 'villages', account for 2,948 dwellings (12% of the housing supply) in the Regulation 19 plan with the remainder coming from the towns and the strategic allocations. We consider that the settlement strategy does not reflect the function and form of the settlements of North Somerset and as a result, the distribution of housing, set out in policy SP8 is not effective in ensuring delivery over the plan period. As it stands, we consider that draft Policy SP8 is not justified and is therefore unsound. The proposed settlement strategy does not reflect the existing settlement hierarchy as evidenced by the Council's own work. In order to be considered sound, a third tier should be added which should consist of the more sustainable villages, as evidenced by the Council's own work to assess the sustainability of villages. Policy SP6 (Villages and Rural Areas) is too restrictive to allow meaningful development to take place in villages that could suitably meet the needs of the area and to assist in supporting their viability. Policy SP6 as it stands appears to be drafted in order to protect rural areas from any development regardless of the characteristics of the rural settlements – some of which are large, sustainable and thriving communities. This appears to be an even stricter form of policy than that of the adopted Core Strategy that allowed sites of up to 25 dwellings outside of settlement boundaries for service villages subject to criteria. It appears that Yatton has been demoted from a Service Village in the new Local Plan to fall within the 'Villages and Rural Area' category even though it is a highly sustainable settlement that serves a wider catchment as evidenced through the recent residential permissions. As it stands, we consider that draft Policy SP6 is not justified and is therefore unsound. Policy SP6 should be amended to make it clear that sustainable housing developments adjacent to the settlement boundary of villages are acceptable subject to criteria. Whilst the Council has opted to allocate 1100 dwellings in the village of Pill and Easton in Gordano, we consider that other villages such as Yatton/Claverham also boast considerable sustainability credentials and would be suitable to accommodate further meaningful growth. The Council's own evidence recognises the sustainability credentials of Yatton/Claverham, with the 'Consultation paper on additional sites for the Regulation 19 plan' (February 2025) identifying Yatton/Claverham as a 'larger, most sustainable village'. From a functional perspective Claverham forms an important node along an arc of settlements in this quadrant of North Somerset that operate in unity. These comprise Yatton, Claverham, Cleeve and Congresbury. Claverham forms a natural extension to Yatton. Within the current adopted Core Strategy Yatton is designated as a 'Service Village' whilst Claverham is classified as an Infill Village. The Core Strategy supports development within or adjacent to existing settlement boundaries of Service Villages, subject to proposals enhancing the overall sustainability of the settlement. We consider that additional growth could be directed to other sustainable villages by either	affordable homses) to ensure that the plan delivers over the plan period.		

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					amending the settlement hierarchy under Policy SP3 to promote sustainable villages such as Yatton/Claverham (similar to the adopted Core Strategy where it is identified as a Service Village) or by re-drafting Policy SP6. The supporting text to Policy SP8 states that: “Across the villages and rural areas sites to accommodate 1,830 dwellings have been identified, predominantly at the larger more sustainable villages that have a range of services and facilities to support an appropriate amount of new development over the plan period.” However, we query why no new allocations are proposed in Yatton/Claverham given its positive classification as part of the Rural Settlements Paper (March 2022) and the Consultation Paper on additional sites for the Regulation 19 Plan (February 2025). Only 300 dwellings have been allocated within Yatton/ Claverham, with all but one allocation (Oxford Plasma – 58 units) having extant planning permission . It’s worth noting that the Oxford Plasma allocation is not a new allocation as it has been rolled forward from the Site Allocations Plan (April 2018). Therefore, there are no new allocations proposed for Yatton/ Claverham which is surprising and at odds with the Council’s own evidence base. The combined area of Yatton/Claverham is therefore proposed to accommodate a very limited quantum of growth compared to its evidenced strong sustainability credentials. We support the Council’s assertion that Yatton/Claverham is considered as a single settlement due to their interdependency. We consider that the conjoined settlement should be considered a higher order settlement in the settlement hierarchy. The plan therefore fails to meet the tests of soundness as it is not justified, with Policy SP8 conflicting with the council’s own evidence base. Whilst future opportunities for growth in Yatton are more limited (due to constraints such as flood risk), there remains opportunities for sustainable development within Claverham which forms a natural extension to Yatton; as recognised by NSC in the ‘Consultation paper on additional sites for the Regulation 19 plan’ and the Pre-submission Plan. We consider that Claverham in itself is a suitable location for development as it includes a primary school (including preschool), a Village Hall, a Community Church, a Scouts HQ as well as areas of functional open space. However, there is an opportunity to boost the facilities and services in Claverham itself through well planned developments such as that proposed for land north of High Street, Claverham. Although we support NSC’s sequential approach, which prioritises the most sustainable locations for growth, we question its application within the plan. The plan has overlooked deliverable sites in lower order settlements, including the land north of High Street, Claverham, which are suitable, sustainable and deliverable, in favour of very large strategic sites and sites located within the Green Belt. Whilst the NPPF (paragraphs 145 and 146) states that Green Belt boundaries can be altered where there are exceptional circumstances, including in instances where an authority cannot meet its identified need for homes, we do not believe that NSC has fully considered suitable and deliverable housing sites outside of the Green Belt that could also aid in meeting this need. Having the other smaller sites alongside the larger strategic sites provides North Somerset with the best opportunity to meet the housing target. The Plan is not sound because it is not positively prepared (test of soundness 36.a), justified (test of soundness 36.b) or effective (test of soundness 36.c). The strategy to meet the housing needs of the authority is not effective because of the reasons outlined above. We consider that the settlement hierarchy should be amended to give status to the more sustainable settlements, as evidenced by the Council’s own supporting documents. We also request that additional small sites are allocated within these sustainable settlement including Clarion’s site at land north of High Street, Claverham (120 affordable homses) to ensure that the plan delivers over the plan period.			
SP6: Villages and rural areas	No	Positively	Yes	No	Draft Policy SP3 identifies Weston-super-Mare as the principal location for new development. New development will also be prioritised in the following four strategic locations:	We consider that the settlement hierarchy should be amended to give status to the more		LF62683-01 Claverham - Vision Document (update) -

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		prepared • Justified • Effective			• Wolvershill (north of Banwell) – 3,300 homes; • Woodspring (south west of Bristol) – 3,500 homes; • Nailsea and Backwell – 3,728 homes; and, • Pill and Easton in Gordano – 1,100 homes. Draft Policy SP5 also states that development will be prioritised within the four town centres of North Somerset, those being Weston-super-Mare, Clevedon, Nailsea and Portishead owing to their sustainability credentials. Draft Policy SP6 seeks to limit new residential development outside of the settlement boundaries of villages and rural areas. The supporting text states that: 'development in the rural areas is relatively less sustainable given the absence of services, facilities and job opportunities'. This fails to acknowledge that the form, nature, size and sustainability credentials of Villages within the authority varies considerably, and is a step change from the adopted Core Strategy approach and the Council's own evidence base. It is incorrect to state that there is an absence of services, facilities and job opportunities in settlements outside the towns. This has essentially created a two-tier settlement strategy that does not reflect the nature and function of the settlements of North Somerset with all settlements apart from Weston -Super-Mare, Nailsea, Clevedon and Portishead (as well as the strategic development locations) considered in the 'Villages and rural areas' category. As set out in draft Policy SP8 the 'villages', account for 2,948 dwellings (12% of the housing supply) in the Regulation 19 plan with the remainder coming from the towns and the strategic allocations. We consider that the settlement strategy does not reflect the function and form of the settlements of North Somerset and as a result, the distribution of housing, set out in policy SP8 is not effective in ensuring delivery over the plan period. As it stands, we consider that draft Policy SP8 is not justified and is therefore unsound. The proposed settlement strategy does not reflect the existing settlement hierarchy as evidenced by the Council's own work. In order to be considered sound, a third tier should be added which should consist of the more sustainable villages, as evidenced by the Council's own work to assess the sustainability of villages. Policy SP6 (Villages and Rural Areas) is too restrictive to allow meaningful development to take place in villages that could suitably meet the needs of the area and to assist in supporting their viability. Policy SP6 as it stands appears to be drafted in order to protect rural areas from any development regardless of the characteristics of the rural settlements – some of which are large, sustainable and thriving communities. This appears to be an even stricter form of policy than that of the adopted Core Strategy that allowed sites of up to 25 dwellings outside of settlement boundaries for service villages subject to criteria. It appears that Yatton has been demoted from a Service Village in the new Local Plan to fall within the 'Villages and Rural Area' category even though it is a highly sustainable settlement that serves a wider catchment as evidenced through the recent residential permissions. As it stands, we consider that draft Policy SP6 is not justified and is therefore unsound. Policy SP6 should be amended to make it clear that sustainable housing developments adjacent to the settlement boundary of villages are acceptable subject to criteria. Whilst the Council has opted to allocate 1100 dwellings in the village of Pill and Easton in Gordano, we consider that other villages such as Yatton/Claverham also boast considerable sustainability credentials and would be suitable to accommodate further meaningful growth. The Council's own evidence recognises the sustainability credentials of Yatton/Claverham, with the 'Consultation paper on additional sites for the Regulation 19 plan' (February 2025) identifying Yatton/Claverham as a 'larger, most sustainable village'. From a functional perspective Claverham forms an important node along an arc of settlements	sustainable settlements, as evidenced by the Council's own supporting documents. We also request that additional small sites are allocated within these sustainable settlement including Clarion's site at land north of High Street, Claverham (120 affordable homses) to ensure that the plan delivers over the plan period.		Apr25 v6 (HR)(33693312.1).pdf

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					in this quadrant of North Somerset that operate in unity. These comprise Yatton, Claverham, Cleeve and Congresbury. Claverham forms a natural extension to Yatton. Within the current adopted Core Strategy Yatton is designated as a 'Service Village' whilst Claverham is classified as an Infill Village. The Core Strategy supports development within or adjacent to existing settlement boundaries of Service Villages, subject to proposals enhancing the overall sustainability of the settlement. We consider that additional growth could be directed to other sustainable villages by either amending the settlement hierarchy under Policy SP3 to promote sustainable villages such as Yatton/Claverham (similar to the adopted Core Strategy where it is identified as a Service Village) or by re-drafting Policy SP6. The supporting text to Policy SP8 states that: "Across the villages and rural areas sites to accommodate 1,830 dwellings have been identified, predominantly at the larger more sustainable villages that have a range of services and facilities to support an appropriate amount of new development over the plan period." However, we query why no new allocations are proposed in Yatton/Claverham given its positive classification as part of the Rural Settlements Paper (March 2022) and the Consultation Paper on additional sites for the Regulation 19 Plan (February 2025). Only 300 dwellings have been allocated within Yatton/ Claverham, with all but one allocation (Oxford Plasma – 58 units) having extant planning permission . It's worth noting that the Oxford Plasma allocation is not a new allocation as it has been rolled forward from the Site Allocations Plan (April 2018). Therefore, there are no new allocations proposed for Yatton/ Claverham which is surprising and at odds with the Council's own evidence base. The combined area of Yatton/Claverham is therefore proposed to accommodate a very limited quantum of growth compared to its evidenced strong sustainability credentials. We support the Council's assertion that Yatton/Claverham is considered as a single settlement due to their interdependency. We consider that the conjoined settlement should be considered a higher order settlement in the settlement hierarchy. The plan therefore fails to meet the tests of soundness as it is not justified, with Policy SP8 conflicting with the council's own evidence base. Whilst future opportunities for growth in Yatton are more limited (due to constraints such as flood risk), there remains opportunities for sustainable development within Claverham which forms a natural extension to Yatton; as recognised by NSC in the 'Consultation paper on additional sites for the Regulation 19 plan' and the Pre-submission Plan. We consider that Claverham in itself is a suitable location for development as it includes a primary school (including preschool), a Village Hall, a Community Church, a Scouts HQ as well as areas of functional open space. However, there is an opportunity to boost the facilities and services in Claverham itself through well planned developments such as that proposed for land north of High Street, Claverham. Although we support NSC's sequential approach, which prioritises the most sustainable locations for growth, we question its application within the plan. The plan has overlooked deliverable sites in lower order settlements, including the land north of High Street, Claverham, which are suitable, sustainable and deliverable, in favour of very large strategic sites and sites located within the Green Belt. Whilst the NPPF (paragraphs 145 and 146) states that Green Belt boundaries can be altered where there are exceptional circumstances, including in instances where an authority cannot meet its identified need for homes, we do not believe that NSC has fully considered suitable and deliverable housing sites outside of the Green Belt that could also aid in meeting this need. Having the other smaller sites alongside the larger strategic sites provides North Somerset with the best opportunity to meet the housing target. The Plan is not sound because it is not positively prepared (test of soundness 36.a), justified (test of soundness 36.b) or effective (test of soundness 36.c). The strategy to meet the housing needs of the authority is not effective because of the reasons outlined above. We consider that the settlement hierarchy should be amended to give status to the more sustainable			

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					settlements, as evidenced by the Council's own supporting documents. We also request that additional small sites are allocated within these sustainable settlement including Clarion's site at land north of High Street, Claverham (120 affordable homses) to ensure that the plan delivers over the plan period.			
SP7: Green Belt	No	• Justified • Consistent with national policy	Yes	No	In relation to Policy SP7, we consider that the Plan has overlooked deliverable sites in lower order settlements, most notably land north of High Street, Claverham, which are suitable, sustainable and deliverable, in favour of large strategic sites, many of which are located within the Green Belt. Whilst the NPPF (paragraphs 145 and 146) states that Green Belt boundaries can be altered where there are exceptional circumstances, including in instances where an authority cannot meet its identified need for homes, we do not believe that NSC has fully considered suitable and deliverable housing sites outside of the greenbelt that could help NSC meet its housing need. It therefore cannot be said that the Plan is justified as it has not taken into account reasonable, alternative and deliverable sites. We acknowledge that North Somerset is highly constrained, including large areas of flooding and the Mendip Hills National Landscape, however, deliverable and unconstrained sites are readily available, this includes Clarion's site at land north of High Street, Claverham that can provide a 100% affordable development. The land north of High Street can be delivered without having any impact on hard constraints and because it is not within the green belt it should be given priority in line with the NPPF (para 147). NSC's Consultation Paper on additional sites for the Regulation 19 plan (February 2025) utilised the following sequential approach to identify additional sites: 1 Sites outside of the Green Belt, but well related to the towns. 2 Sites outside the Green Belt, but well related to the larger villages. 3 Sites in the Green Belt well related to the towns, including Bristol. 4 Sites in the Green Belt well located to the larger villages. 5 Elsewhere. The Council's own evidence base (Consultation paper on additional sites for the Regulation 19 Plan – February 2025) states that land north of North of High Street falls within category 2 with Yatton/Claverham being considered a 'larger more sustainable village' located outside of the Green Belt. Paragraph 147 of the NPPF states that local authorities 'should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development' before making changes to Green Belt boundaries. Despite this, the Council has prioritised Green Belt sites ahead of sustainable sites outside the Green Belt. This contradicts the NPPF and the Council's own agreed search sequence. This is contrary to the NPPF and for these reasons we consider that the plan is unsound as it is not consistent with national policy. The Council appears to have diverted from the sequential approach utilised for the additional sites Regulation 19 Consultation and against its established evidence base. The land north of High Street presents an opportunity to aid NSC in meeting its housing needs without the need to change green belt boundaries. It would seem that allocating this site would fall squarely into the NPPF wording of "examining fully all other reasonable options for meeting its identified need for development" as is required (para 147). Latimer considers that Policy SP7 is unsound because it is inconsistent with national policy (test of soundness 36.d). The Council has not examined fully all other reasonable options for meeting its identified need for development. There are other sites in sustainable locations such as the Clarion site in Claverham that area available and deliverable and are not within the Green Belt. These should be fully explored. As a result, the strategy is not justified (test of soundness 36.b).	The Council should examine fully all other reasonable options for meeting its identified need for development. There are other sites in sustainable locations such as the Clarion site in Claverham that area available and deliverable and are not within the Green Belt. These should be fully explored and allocated where suitable.		LF62683-01 Claverham - Vision Document (update) - Apr25 v6 (HR)(33693312.1).pdf
SP8: Housing	No	• Positively	Yes	No	Draft Policy SP3 identifies Weston-super-Mare as the principal location for new development. New development will also be prioritised in the following four strategic locations:	We consider that the settlement hierarchy should be amended to give status to the more		LF62683-01 Claverham - Vision Document (update) -

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		prepared • Justified • Effective			• Wolvershill (north of Banwell) – 3,300 homes; • Woodspring (south west of Bristol) – 3,500 homes; • Nailsea and Backwell – 3,728 homes; and, • Pill and Easton in Gordano – 1,100 homes. Draft Policy SP5 also states that development will be prioritised within the four town centres of North Somerset, those being Weston-super-Mare, Clevedon, Nailsea and Portishead owing to their sustainability credentials. Draft Policy SP6 seeks to limit new residential development outside of the settlement boundaries of villages and rural areas. The supporting text states that: 'development in the rural areas is relatively less sustainable given the absence of services, facilities and job opportunities'. This fails to acknowledge that the form, nature, size and sustainability credentials of Villages within the authority varies considerably, and is a step change from the adopted Core Strategy approach and the Council's own evidence base. It is incorrect to state that there is an absence of services, facilities and job opportunities in settlements outside the towns. This has essentially created a two-tier settlement strategy that does not reflect the nature and function of the settlements of North Somerset with all settlements apart from Weston -Super-Mare, Nailsea, Clevedon and Portishead (as well as the strategic development locations) considered in the 'Villages and rural areas' category. As set out in draft Policy SP8 the 'villages', account for 2,948 dwellings (12% of the housing supply) in the Regulation 19 plan with the remainder coming from the towns and the strategic allocations. We consider that the settlement strategy does not reflect the function and form of the settlements of North Somerset and as a result, the distribution of housing, set out in policy SP8 is not effective in ensuring delivery over the plan period. As it stands, we consider that draft Policy SP8 is not justified and is therefore unsound. The proposed settlement strategy does not reflect the existing settlement hierarchy as evidenced by the Council's own work. In order to be considered sound, a third tier should be added which should consist of the more sustainable villages, as evidenced by the Council's own work to assess the sustainability of villages. Policy SP6 (Villages and Rural Areas) is too restrictive to allow meaningful development to take place in villages that could suitably meet the needs of the area and to assist in supporting their viability. Policy SP6 as it stands appears to be drafted in order to protect rural areas from any development regardless of the characteristics of the rural settlements – some of which are large, sustainable and thriving communities. This appears to be an even stricter form of policy than that of the adopted Core Strategy that allowed sites of up to 25 dwellings outside of settlement boundaries for service villages subject to criteria. It appears that Yatton has been demoted from a Service Village in the new Local Plan to fall within the 'Villages and Rural Area' category even though it is a highly sustainable settlement that serves a wider catchment as evidenced through the recent residential permissions. As it stands, we consider that draft Policy SP6 is not justified and is therefore unsound. Policy SP6 should be amended to make it clear that sustainable housing developments adjacent to the settlement boundary of villages are acceptable subject to criteria. Whilst the Council has opted to allocate 1100 dwellings in the village of Pill and Easton in Gordano, we consider that other villages such as Yatton/Claverham also boast considerable sustainability credentials and would be suitable to accommodate further meaningful growth. The Council's own evidence recognises the sustainability credentials of Yatton/Claverham, with the 'Consultation paper on additional sites for the Regulation 19 plan' (February 2025) identifying Yatton/Claverham as a 'larger, most sustainable village'. From a functional perspective Claverham forms an important node along an arc of settlements	sustainable settlements, as evidenced by the Council's own supporting documents. We also request that additional small sites are allocated within these sustainable settlement including Clarion's site at land north of High Street, Claverham (120 affordable homses) to ensure that the plan delivers over the plan period.		Apr25 v6 (HR)(33693312.1).pdf

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					in this quadrant of North Somerset that operate in unity. These comprise Yatton, Claverham, Cleeve and Congresbury. Claverham forms a natural extension to Yatton. Within the current adopted Core Strategy Yatton is designated as a 'Service Village' whilst Claverham is classified as an Infill Village. The Core Strategy supports development within or adjacent to existing settlement boundaries of Service Villages, subject to proposals enhancing the overall sustainability of the settlement. We consider that additional growth could be directed to other sustainable villages by either amending the settlement hierarchy under Policy SP3 to promote sustainable villages such as Yatton/Claverham (similar to the adopted Core Strategy where it is identified as a Service Village) or by re-drafting Policy SP6. The supporting text to Policy SP8 states that: "Across the villages and rural areas sites to accommodate 1,830 dwellings have been identified, predominantly at the larger more sustainable villages that have a range of services and facilities to support an appropriate amount of new development over the plan period." However, we query why no new allocations are proposed in Yatton/Claverham given its positive classification as part of the Rural Settlements Paper (March 2022) and the Consultation Paper on additional sites for the Regulation 19 Plan (February 2025). Only 300 dwellings have been allocated within Yatton/ Claverham, with all but one allocation (Oxford Plasma – 58 units) having extant planning permission . It's worth noting that the Oxford Plasma allocation is not a new allocation as it has been rolled forward from the Site Allocations Plan (April 2018). Therefore, there are no new allocations proposed for Yatton/ Claverham which is surprising and at odds with the Council's own evidence base. The combined area of Yatton/Claverham is therefore proposed to accommodate a very limited quantum of growth compared to its evidenced strong sustainability credentials. We support the Council's assertion that Yatton/Claverham is considered as a single settlement due to their interdependency. We consider that the conjoined settlement should be considered a higher order settlement in the settlement hierarchy. The plan therefore fails to meet the tests of soundness as it is not justified, with Policy SP8 conflicting with the council's own evidence base. Whilst future opportunities for growth in Yatton are more limited (due to constraints such as flood risk), there remains opportunities for sustainable development within Claverham which forms a natural extension to Yatton; as recognised by NSC in the 'Consultation paper on additional sites for the Regulation 19 plan' and the Pre-submission Plan. We consider that Claverham in itself is a suitable location for development as it includes a primary school (including preschool), a Village Hall, a Community Church, a Scouts HQ as well as areas of functional open space. However, there is an opportunity to boost the facilities and services in Claverham itself through well planned developments such as that proposed for land north of High Street, Claverham. Although we support NSC's sequential approach, which prioritises the most sustainable locations for growth, we question its application within the plan. The plan has overlooked deliverable sites in lower order settlements, including the land north of High Street, Claverham, which are suitable, sustainable and deliverable, in favour of very large strategic sites and sites located within the Green Belt. Whilst the NPPF (paragraphs 145 and 146) states that Green Belt boundaries can be altered where there are exceptional circumstances, including in instances where an authority cannot meet its identified need for homes, we do not believe that NSC has fully considered suitable and deliverable housing sites outside of the Green Belt that could also aid in meeting this need. Having the other smaller sites alongside the larger strategic sites provides North Somerset with the best opportunity to meet the housing target. The Plan is not sound because it is not positively prepared (test of soundness 36.a), justified (test of soundness 36.b) or effective (test of soundness 36.c). The strategy to meet the housing needs of the authority is not effective because of the reasons outlined above. We consider that the settlement hierarchy should be amended to give status to the more sustainable			

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					settlements, as evidenced by the Council's own supporting documents. We also request that additional small sites are allocated within these sustainable settlement including Clarion's site at land north of High Street, Claverham (120 affordable homses) to ensure that the plan delivers over the plan period.			
SP8: Housing	No	• Positively prepared • Justified • Effective	Yes	No	We consider that the plan is overly reliant on the large strategic allocations including Woodspring (3,500 homes) which will be essentially creating a new settlement from scratch. Sustainable villages offer the potential to provide deliverable housing sites at a smaller and manageable scale over a shorter timeframe. Whilst we do not object to the strategic allocation at Woodspring (as well as other large strategic sites), we question the deliverability of the whole site over the plan period and as a result the effectiveness of the plan (test of soundness 36.c). Lichfields Start to Finish (Third Edition, March 2024) research (enclosed), found that sites of 2000+ dwellings take on average 5.1 years to obtain detailed planning permission, then a further 1.6 years to deliver the first dwelling. Whereas sites of 100-499 dwellings take on average 2.8 years to obtain planning permission, with the delivery of the first dwelling taking on average 3.2 years. Strategic sites also require a significant amount of infrastructure that can elongate the development process. This is the case for the Woodspring Allocation, which requires the provision of a local centre, 10 hectares of new employment land, one new secondary school and three primary schools. It is clear therefore that the proposed new settlement Woodspring would take a significant amount of time to deliver especially given that a planning application is yet to be submitted for this site. An over reliance on large strategic sites will not make up for current and pressing shortfalls. It is clear therefore that the proposed new settlements would take a significant amount of time to deliver; meaning an over reliance on large strategic sites may not be an effective way to meet the housing requirement. North Somerset Council has not provided evidence to show the proposed trajectory of the large strategic sites and how long they will take to start delivering. This is critical in order to evidence the deliverability of the sites and therefore the plan. In the absence of this evidence, we consider that the Plan is not justified as it is not based on proportionate evidence as required by the 36b) test of soundness (justified). The Start to Finish evidence also notes that the median build out rates for sites of over 2,000 units is 138 dwellings per annum. Taking the lead in time into account this means that Woodspring for example would only be able to deliver 1,380 dwellings within the plan period (approximately 40% of the housing anticipated from this site). It is clear that additional smaller sites are required to support the plan so that it can meet the housing requirement. The Clarion site at Claverham is ideally placed to be one of these additional sites. Latimer are committed developers who are dedicated to delivering a 100% affordable housing scheme at the land north of High Street, Claverham - this is evidenced through the recent pre-application submission and the numerous representations submitted. The developer intends to submit a planning application in the near future. The allocation of this site will provide additional certainty to the developer, ensuring its deliverability. Clarion consider that SP8 is unsound as it is not positively prepared (test of soundness a)) – it does not provide a strategy to meet the area's objectively assessed needs as a minimum. It is clear that the supply identified through the emerging Plan will not deliver the required number of houses during the Plan period. The strategy also fails the 'effective' test of soundness as the strategy put forward is not effective in delivering the growth that is required. The Clarion/Latimer site at Claverham should be included as an allocation to assist in boosting the supply so that the strategy to meet the area's objectively assessed needs is more robust. Flexibility Allowance Policy SP8 explains that the Local Plan is to provide 24,495 homes to meet the requirement of 23,700 homes. This only provides a flexibility allowance of 795 homes (3.35%). This is a very	To make SP8 sound we request that the total supply number is increased to 26,945 to provide sufficient flexibility, that the deliverability of the large strategic sites should be robustly evidenced and that additional sites in sustainable locations are made to ensure that SP8 can deliver the housing that is required.		start-to-finish-3_how-quickly-do-large-scale-housing-sites-deliver.pdf LF62683-01 Claverham - Vision Document (update) - Apr25 v6 (HR)(33693312.1).pdf

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					low percentage and does not provide sufficient flexibility to meet the local housing need figure of 23,700 should any of the allocations run into delivery issues or if the windfall allowance is lower than anticipated. By way of comparison, the emerging South Gloucestershire Local Plan includes a flexibility allowance of 10.5%. In our view this is a much more sensible figure that will assist the Council in meeting its local housing need figure as calculated by the standard method. There is a longstanding issue of poor housing delivery in North Somerset and it is therefore vital that there is a sufficient number of sites to meet the requirement figure taking account that some sites will deliver slower or not at all. Clarion's site at Claverham could assist in providing additional certainty that the housing requirement can be met. The total supply number should be increased to at least 26,945 to provide a 10% flexibility allowance. Additional sites should be added to Schedule 1 to make up this increased supply. The Clarion site at Claverham should be one of these additional sites. Bristol's Unmet Need It is important to note Bristol's unmet housing needs in the context of NSC's approach to meeting housing need in the draft Plan. NSC's Duty to Co-operate Statement of Compliance recognises unmet need from neighbouring authorities to be important strategic matters. It, however, concludes that Bristol's request for neighbouring authorities (including North Somerset) to accommodate some of its unmet need cannot be addressed as "…the evidence supporting the local plan demonstrates that North Somerset does not have capacity to meet some of Bristol's needs at this time" (pg. 20). Bristol City Council's (BCC) draft Local Plan is currently at Examination; the hearings have concluded and the 'Final Advice and Actions' letter from the Inspectors was issued on 21 November 2025. This includes some key conclusions on housing: " We acknowledge that there is insufficient capacity to meet the Council's objectively assessed housing need, as calculated by the standard method. Nevertheless, we do not consider the figure of 34,650 dwellings over the Plan period to be positively prepared or justified. Given the significant shortfall in meeting overall needs, and the current lack of agreement between Bristol and any neighbouring authorities to provide assistance, we consider it imperative that the Council seeks to maximise housing delivery. Inherent uncertainties in housing delivery in the longer period do not justify setting a housing requirement substantially below the overall housing capacity figure identified at submission; The Council should draft MMs which set the housing requirement to be the 39,915 dwellings' capacity that was identified at submission [we note this is an additional 5,265 homes, adding to unmet need]; and The Council must also set out what the level of unmet housing need is. While the objectively assessed housing need may change over time, we consider it necessary for this Plan to be clear about the situation at the time of adoption. This may, for example, be important in continuing work being done on other Plans." This is highly relevant, as Bristol has a significant remaining unmet need and this must be accounted for by neighbouring authorities including North Somerset, South Gloucestershire and Bath & North East Somerset, who are all preparing new local plans. To date no other local authority has positively responded to BCC's request confirming their inability to accommodate any unmet need, which further amplifies the issue. The various plans are deferring their obligations to deal with these important cross boundary issues which will only serve to increase affordability pressures within North Somerset and Bristol. NSC's availability of other sustainable opportunities to accommodate some additional growth for BCC's unmet need will require further consideration at the Examination.			

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					The Clarion Offer The land north of Claverham presents an opportunity to deliver 120 100% affordable dwellings in an area that has no new allocations, has a high evidenced housing need and high house prices. The site also presents an excellent opportunity to aid NSC in meeting its high affordable housing need. Beyond the housing benefits, it provides an opportunity to provide a village shop which will further boost the sustainability of the area. The development of this site can also preserve and extend the proposed Local Green Space designation (North of Chestnut Drive), providing a valuable facility for local people. The masterplan that has been developed shows adjacent fields to Chestnut Drive being proposed for open space, forming a natural extension to this community area. Please see enclosed vision document that outlines the suitability and sustainability of the site. Clarion Housing Group is the UK's largest provider of affordable housing, with over 125,000 homes and more than 350,000 residents across the country. Latimer, the development arm of Clarion offers a unique proposition which sets it apart from traditional volume house builders: 1 A long-term commitment to the people who live in their homes 2 Latimer communities are both socially and environmentally sustainable 3 A consistent commitment to high quality and net zero carbon compatible properties 4 Latimer does not have shareholders, so it doesn't face short-term demands to make profit at any cost 5 Latimer is driven by its commitment to quality, community and places that succeed 6 Latimer is a dependable development partner. Latimer is fully committed to delivering a 100% affordable housing scheme at the land north of High Street and has recently received a positive pre-application response from NSC. The developer intends to submit a planning application in the near future. The allocation of this site would provide additional certainty to the developer, ensuring its deliverability. Policy SP8 is unsound as it is not based on proportionate evidence as required by the 36b) test of soundness (justified). Sufficient evidence has not been put forward to demonstrate the deliverability of the large strategic sites. In addition SP8 does not provide a strategy to meet the area's objectively assessed needs as a minimum. Effective joint working with neighbouring authorities (i.e. Bristol) has not been properly evidenced. It is clear that the supply identified through the emerging Plan will not deliver the required number of houses during the Plan period. The strategy also fails the 'effective' test of soundness as the strategy put forward is not effective in delivering the growth that is required. The Clarion/Latimer site at Claverham should be included as an allocation to assist in boosting the supply so that the strategy to meet the area's objectively assessed needs is more robust. To make SP8 sound we request that the total supply number is increased to provide sufficient flexibility, that the deliverability of the large strategic sites should be robustly evidenced and that additional sites in sustainable locations are made to ensure that SP8 can deliver the housing that is required.			
Policy LP5: Housing, employment and mixed use allocations	No	• Justified	Yes	No	The North Somerset SHLAA 2025 Appendix 2: Further Site Assessment (October 2025) The North Somerset SHLAA 2025 Appendix 2: Further Site Assessment (October 2025) identifies the known constraints of land north of Claverham (SHLAA Reference HE201072) as being: • High Value Landscape; • Potential Setting of Grade I or II star Listed Building; and, • PROW Lichfields question this assessment as there are no Grade I or Grade II* Listed Buildings	Site HE201072 should be properly assessed based on evidence. We feel that the site should be allocated in the Local Plan. We have enclosed a vision document to demonstrate the site's suitability and its merits as a 100% affordable housing scheme.		LF62683-01 Claverham - Vision Document (update) - Apr25 v6 (HR)(33693312.1).pdf

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					within the vicinity of the site. A review of the Historic England Search the List: Map Search highlights that there are only Grade II Listed Buildings nearby including: • Claverham House to the west of the site; • Claverham Dovecote 40 metres west and in grounds of Claverham Cottage to the west of the site; • Manor Farm House to the north west; • Church of St Barnabas which is located nearby the north eastern boundary of the site; and, • White Cottage to the north. In any case, these Grade II Listed Buildings are not located within the site and the layout can be designed to preserve the setting. It is also important to highlight that the masterplan has been designed to maintain and enhance the existing PROWs. We do not consider that the existing constraints identified in NSCs evidence base are correct and therefore should not afforded any weight.			
Policy DP43: Affordable housing (including rural exception schemes)	No	• Positively prepared • Justified • Effective	Yes	No	The North Somerset Local Housing Needs Assessment prepared by Opinion Research Services (ORS) (September 2025) considered 2 scenarios with the overall affordable housing need over the plan period ranging from 6,646 (scenario A) to 10,577 (scenario B). Policy DP43 fails to provide an affordable housing target, however, considers Scenario A and Scenario B as a range (28% - 45% of the housing requirement). Should either scenario be taken forward as an affordable housing target, this would constitute a step change compared to the Core Strategy affordable housing target of 150 dwellings per annum, with Scenario A equating to 443 affordable dwellings per annum and Scenario B equating to 705 dwellings per annum. As set out in draft Policy DP43, NSC has opted to release many sites from Green Belt (totalling 6,685 dwellings), which are subject to the Golden Rules which stipulate the need to provide 50% affordable housing on Green Belt sites (subject to viability). The Additional Sites Viability Addendum for North Somerset Local Plan (October 2025), prepared by Dixon Searle Partnership indicates that for all of the strategic locations allocated, a 50% affordable housing target may be challenging to achieve. Therefore, this suggests that meeting the affordable housing need set out in Scenario A or Scenario B will be challenging. In addition, there is an ongoing issue at the moment in the industry where housebuilders are struggling to sell affordable homes to registered providers that have been secured via s106. Some housebuilders are not getting any bids at all. Therefore the Clarion site has an unique opportunity to provide 120 affordable homes with certainty over their deliverability. This could assist the Council in meeting affordable housing needs when affordable housing from other sources (s106) is struggling to be delivered. The land north of Claverham presents an opportunity to deliver 120 100% affordable dwellings in an area that has very little new allocations, has a high housing need and high house prices. The site also presents an excellent opportunity to aid NSC in meeting its high affordable housing target given that other site such as green belt sites are unlikely to be able to deliver the required amount of affordable housing due to viability issues. Whilst Policy DP43 touches upon rural exception schemes for 100% affordable housing, we consider that the policy should go further and make specific allocations for 100% affordable developments which are of a larger scale than a rural exception site given that these sites exist. Given the challenges in relation to achieving the affordable housing target, we consider that it would be beneficial to provide a stand-alone section of the policy for 100% affordable housing schemes, which allocates sites for 100% affordable housing. This would provide greater clarity and certainty to affordable housing developers and provide NSC with a different source of affordable housing. 1 In order to provide greater clarity, we request that the affordable housing target be included within Policy DP43.	In order to provide greater clarity, we request that the affordable housing target be included within Policy DP43. We request that NSC provide a specific policy for 100% affordable schemes which includes allocations. Lichfields consider that this will aid in meeting the affordable housing need.		LF62683-01 Claverham - Vision Document (update) - Apr25 v6 (HR)(33693312.1).pdf

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					2 We request that NSC provide a specific policy for 100% affordable schemes which includes allocations. Lichfields consider that this will aid in meeting the affordable housing need. Without the above we consider that the plan is unsound because it is not (justified (36.b) or effective (36.c)) as there is no effective strategy to deliver the affordable housing target and the target has is not crystallised within the Policy.			
Policy DP46: Housing Type and Mix	No	• Effective	Yes	No	Lichfields consider that policy DP46 requires further clarification in relation to the requirements for 100% affordable housing schemes. It would be unfeasible for 100% affordable schemes to make appropriate provision for self-build and custom build plots for example. As a result we consider that the policy is not effective (test of soundness 36.c).	Further clarification required in relation to how this applies to 100% affordable schemes.		

Name: Laura Brasher **I.D:** 51425857

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	There is already a large number of houses planned in Backwell village. These plans have no investment in health/leisure facilities. The local scout group is already struggling to accommodate all the children who want to join. Grade 1 agricultural land should not be used for housing when there are other options. These proposals undermine food security. Will the promised new road actually be delivered? This should be done before houses are built.			

Name: Laura Mills **I.D:** 62855521

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Churchill Avenue	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The whole consultation process is not easy, and purposely full of jargon. Penny Field should be protected as a Local Green Space. It's one of Clevedon's last true greenspaces, a Nature Recovery priority site, and vital for wildlife, community wellbeing, and access to nature. Better brownfield and greyfield sites across the town exist for development.	Penny Field should be protected as a Local Green Space. It's one of Clevedon's last true greenspaces, a Nature Recovery priority site, and vital for wildlife, community wellbeing, and access to nature. Better brownfield and greyfield sites across the town exist for development.		

Name: Laura Norton **I.D:** 62847233

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Positively prepared • Justified • Effective • Consistent	No	No	Where land is removed from the Green Belt, development proposals must demonstrate how they meet the 'Golden Rules' as set out in the NPPF. These rules relate to the provision of affordable housing, infrastructure and publicly accessible green spaces. This does not appear to be adequately demonstrated in the Plan. The 'additional sites viability addendum' suggests that a target of 50% affordable housing may be 'challenging' for the proposed sites in existing Green Belt land around Pill and Easton-in-Gordano. The Council held four public exhibitions (Long Ashton, Weston-super-Mare, Nailsea, Backwell), but none in Pill/E-in-G,			

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		with national policy			despite five sites being consulted on in this area. Over 1800 residents from a total population (including children) of circa 4,500 have signed a petition objecting to the imposition of excessive housing in the area and challenging the lack of adequate initial consultation by North Somerset Council. Given the scale of potential change in Pill/E-in-G (e.g., 600 homes at Pill Green alone, plus other sites), the absence of a local event and the relatively small response volume could indicate under-representation of local voices and a lack of proportionate engagement. Has the Council complied with its own Statement of Community Involvement? Was this consultation sufficiently inclusive? I do not think so. Increasing our village population by 44% by building on green belt land contravenes sense, practicality, community, all the laws we ought to live by. The Local Plan does not address potential traffic congestion at Junction 19 of the M5? Concerns were raised by National Highways re development at Court Hay near the service station (see NSC planning portal, ref 25/P/1413/OUT). The National Highways report stated that transport modelling is required to assess the cumulative impact of developments on Junction 19 - it is not evident from the proposed Local Plan that NSC has co-operated sufficiently with National Highways and has taken its advice. The Council has not taken sufficient account of the protection of wildlife and habitats in Pill and Easton-in Gordano in its assessment of the release of land from the Green Belt. There are no clear strategies and mitigation policies in the Local Plan, with funding, to ensure protection of wildlife and habitats in the areas identified for potential development around Pill and Easton-in-Gordano? (see LP4 and Schedule 1). The best and most versatile agricultural land around the village is not being protected, in accordance with Section 15 of the National Planning Policy Framework. The area around Markham Brook in Pill has a recognised flood risk, as the valley bottom and parts of the surrounding land are within the Environment Agency's Flood Zone 3. This indicates a high probability of flooding from rivers (fluvial) and the sea (tidal). Does the Local Plan demonstrate that lower flood risk areas have been considered for development in preference to higher flood risk areas? No. It does not. Are there policies in the Local Plan which will ensure adequate flood assessments for any development close to Markham Brook and restrict potential development for housing in flood risk regions? No.			

Name: Lauren Walker **I.D:** 62863841

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	Justified			Both proposed sites have been poorly thought out - other sites have not been considered, there are major issues when building to close to Weston Big Wood (as identifies by local wildlife groups) and the infrastructure is already massively under pressure. There is inadequate access.	I understand that the council are under pressure from the national government - how much have you pushed back against the unrealistic targets? Other locations should be considered that have less impact on important areas for wildlife. Neither site has safe or suitable access. Traffic is already a nightmare - the lovely idea of a train link has yet to come into fruition and its effectiveness unproven. The greenbelt needs protecting - exceptional circumstances have not been proven.		
Black Rock, north of Clevedon Road	No	Justified			Both proposed sites have been poorly thought out - other sites have not been considered, there are major issues when building to close to Weston Big Wood (as identifies by local wildlife groups) and the infrastructure is already massively under pressure. There is inadequate access.	I understand that the council are under pressure from the national government - how much have you pushed back against the unrealistic targets? Other locations should be considered that have less impact on important areas for		

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						wildlife. Neither site has safe or suitable access. Traffic is already a nightmare - the lovely idea of a train link has yet to come into fruition and its effectiveness unproven. The greenbelt needs protecting - exceptional circumstances have not been proven.		

Name: Laurence Dixon **I.D:** 62814305

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Vision, Strategic Priorities and Sustainability Objectives	No	‣ Justified	Unsure	Unsure				

Name: Laurence Golding **I.D:** 21450529

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	with 800 houses proposed what is proposed for employment in this area? Backwell is prone to flood to put an underpass under railway line to take a double decker bus would hit the water table not sustainable more housing will aggravate the flooding when are there going to be new schools leisure facilities surely you need these facilities in place before any further housing what studies have been made to find out if there are the people to buy these houses we are in a Bat corridor what plans have you made and how will you re-house these creatures a farmer can be find for killing a badger how can you avoid killing the wild life what punishment will be in place for the developer? In my view this whole proposal is purely academic, it is green belt land with no infrastructure for the level of construction even to put the infrastructure in will cause catastrophic flooding, I have lived in the area for 23 years and sure the authorities have tried to remedy the flooding problem without any success, with climate change the situation will only get worse.			

Name: Lee Robertson **I.D:** 62865889

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Black Rock, north of Clevedon Road	No	‣ Justified ‣ Effective	No	No	Destroying greenbelt and wildlife losing their habitats when it’s a SSSI. Portishead does not have the infrastructure, the roads and the facilities and immunities to cover this level of new housing.			

Name: Leigh & Glennie Ltd **I.D:** 4601665

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP3: Spatial strategy	No	‣ Justified ‣ Consistent with national policy	Yes	Yes	Please see attached document Summary The SHLAA was fundamentally flawed in its preparation, going back to the February 2025 consultation and in the October 2025 document. The Council appear to have recognised there is no Government definition of ‘hard constraint’ but did not alter their spatial strategy or identification of allocated sites. The Council’s approach for Policies SP3 and SP8 is inconsistent with the NPPF and the PPG on how suitable sites should be allocated, and how constraints on sites should be considered. They failed to appraise sites put forward within such areas, including the site we promoted within the National Landscape; there was simply no appraisal of the site as the designation of National Landscape equalled a simple ‘no’ by the Council, contrary to national and local policy, and to the LURA. Policies SP3 and SP8 are therefore not sound and must be reappraised, along with all potential housing site allocations proposed to the Council.	Please see attached document Summary The SHLAA was fundamentally flawed in its preparation, going back to the February 2025 consultation and in the October 2025 document. The Council appear to have recognised there is no Government definition of ‘hard constraint’ but did not alter their spatial strategy or identification of allocated sites. The Council’s approach for Policies SP3 and SP8 is inconsistent with the NPPF and the PPG on how suitable sites should be allocated, and how constraints on sites should be considered. They failed to appraise sites put forward within such areas, including the site we promoted within the National Landscape; there was simply no appraisal of the site as the designation of National Landscape equalled a simple ‘no’ by the Council, contrary to national and local policy, and to the LURA. Policies SP3 and SP8 are therefore not sound and must be reappraised, along with all potential housing site allocations proposed to the Council.		N Somerset - SP3 and SP8 - December 25.pdf
SP8: Housing	No	‣ Justified ‣ Consistent with national policy	Yes	Yes	Please see attached document Summary The SHLAA was fundamentally flawed in its preparation, going back to the February 2025 consultation and in the October 2025 document. The Council appear to have recognised there is no Government definition of ‘hard constraint’ but did not alter their spatial strategy or identification of allocated sites. The Council’s approach for Policies SP3 and SP8 is inconsistent with the NPPF and the PPG on how suitable sites should be allocated, and how constraints on sites should be considered. They failed to appraise sites put forward within such areas, including the site we promoted within the National Landscape; there was simply no appraisal of the site as the designation of National Landscape equalled a simple ‘no’ by the Council, contrary to national and local policy, and to the LURA. Policies SP3 and SP8 are therefore not sound and must be reappraised, along with all potential housing site allocations proposed to the Council.	Please see attached document Summary The SHLAA was fundamentally flawed in its preparation, going back to the February 2025 consultation and in the October 2025 document. The Council appear to have recognised there is no Government definition of ‘hard constraint’ but did not alter their spatial strategy or identification of allocated sites. The Council’s approach for Policies SP3 and SP8 is inconsistent with the NPPF and the PPG on how suitable sites should be allocated, and how constraints on sites should be considered. They failed to appraise sites put forward within such areas, including the site we promoted within the National Landscape; there was simply no appraisal of the site as the designation of National Landscape equalled a simple ‘no’ by the Council, contrary to national and local policy, and to the LURA. Policies SP3 and SP8 are therefore not sound and must be reappraised, along with all potential housing site allocations proposed to the Council.		N Somerset - SP3 and SP8 - December 25.pdf
Policy DP59: Previously developed land in the countryside	No	‣ Justified ‣ Consistent with national policy	Yes	Yes	Policy DP59 This policy supports the redevelopment of previously developed land outside settlement boundaries, provided three requirements are met: • the physical impact of the development is commensurate with the previous development, • the type and scale of development does not harm the countryside setting • that access to the proposal does not comprise access or safety on rural roads. The policy is therefore a positive one: it supports the redevelopment of land where those requirements are met. Those requirements are concerned with the physical manifestation of any development	Policy DP59 should be modified by deleting the following paragraph: ----- Residential use will be permitted if: • It can be demonstrated that all attempts to secure an employment or alternative use have been unsuccessful; and • The location is close to an existing settlement with a good range of facilities and services.		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					scheme, character, and safety. The policy then states that any development that occurs under this policy should ensure: • The character and appearance of the countryside is not harmed • Existing structurally sound buildings on the site which contribute to the rural character of the area are maintained and converted • The materials, form, bulk and general design of new buildings are in keeping with their surroundings • The location has safe and convenient access to the highway network and would not result in a significant adverse impact • There are no significant adverse impacts on living conditions of adjoining occupiers or uses • Redevelopment would bring significant local environmental, economic or social benefits. The matters to be ensured are therefore, again, relating to physical manifestation of any development, character and design, amenity, and safety. There is also a positive aspiration to the policy of seeking environmental, economic OR social benefits (ie one or more of those benefits, not a requirement for ALL to be met). Given both the requirements and matters to be ensured relate to the purposes set out above, it is inappropriate for the Policy to state that residential use will only be permitted 'if it can be demonstrated that all attempts to secure an employment or alternative use have been unsuccessful'. That is a very different policy test: it is one that relates to use classes, rather than what the Policy says is its objective, ie physical layout, character, amenity and safety. This approach is also inconsistent with the rest of the draft Plan relating to protection of employment uses. Policy DP21 is entitled 'Safeguarding employment sites' and defines what the Council see as employment uses, by stating 'land with existing or proposed employment uses (Use Classes B2, B8 and E(g))'. There is no other definition of 'employment use' in the Plan (the Glossary refers to 'Economic development' but that, of course, is not the term used in either Policy DP21 or in Policy PD59). Thus, by definition with the Plan's wording at Policy DP21, any 'employment use' to be protected falls within Use Classes B2, B8 and E(g). It is therefore inappropriate and inconsistent for Policy DP59 to introduce some new wide-ranging, non-defined reference to 'employment use' that applies only to existing parts of the District and existing types of development, ie previously developed land outside settlements, and only when certain types of new development are proposed, ie residential. Policy DP59 sets out what must be achieved through any redevelopment of previously developed land. The two lists of requirements set out in the Policy are clear and should be kept, but it is inappropriate and inconsistent to seek to put a use class requirement to also be satisfied in order to satisfy those tests.			

Name: Leiza Alpass **I.D:** 51297633

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	‣ Positively prepared ‣ Consistent with national policy	Unsure	No	There was a lack of adequate, inclusive consultation which did not involve the affected residents of the area. There was no public exhibition in Pill/Easton in Gordano/Ham Green. I do not believe that NSCC has complied with its statement of community involvement here. In this regard, NSCC have failed to cooperate with the residents. Can NSCC demonstrate that alternative sites such as brownfield have been investigated. Green belts being saved for green spaces for the existing community and established wildlife. Can the NSCC be sure that the developers will provide 50% affordable homes in the development. The NPPF requires a full account of environmental impacts on natural habitats and to avoid loss of wildlife and ensure wildlife corridors. There are many priority wildlife habitats in the area including costal salt marsh, mudflats, floodplain grazing marsh, mixed deciduous woodland to name a few. This wide range of habitats supports an abundance of bird life. The skylarks in this area nest in one of the sites listed for development and this is an Avon BAP priority species. In the village we have been supporting wildlife with tree planting, supporting our green spaces, creating wildlife meadows, caring for our community orchard and much more. The NSCC must take sufficient account of the protection of wildlife habitats in Pill, Easton in Gordano and Ham Green Some of the sites along the A369 include versatile agriculture land which is limited in the Pill area. Has NSCC noted that the area around Markham brook in Pill has a recognised flood risk as noted by the Environment Agency food Zone 3 - highly probable of flood risk. The road through Easton in Gordano to Pill has many narrow sections and indeed the A369 through Abbots Leigh has a very narrow section. In addition, the J19 of the M5 has significant tailbacks during rush hour indicating that the junction is already at saturation point.	Recommend that there is thorough/exhaustive search for Brownfield sites before considering green belt. Ensure that the developers provide 50 % affordable homes. Choose sites where cars are not needed to get to and from facilities such as shops. A feasibility study of the new railway to carry sufficient passengers - a single track with 3 carriage trains will have limited passengers and if used by Portishead residents there will be no space at the Pill station during busy times (rush hour).		

Name: Lesley Brassington **I.D:** 38633505

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Adding 1,000 new houses to the 800 already approved is over development. This development is on Grade 1 Agricultural Green Belt land used for food production and is contrary to Government policy which states that "we must protect our best and most versatile land" to safeguard food security. There is no needs or viability analysis for these extra houses.No social cohesion impact assessment has been provided despite Backwell being a small village. There is alack of school places and there has been no investment in health services and the lack of infrastructure and services cannot support another 1,000 new house. the development will destroy valuable wildlife habitats and further harm biodiversity. It threatens the Brockley Maternity Roost and SSSI with rare bats relying on the land for food. The proposed road would not effectively relieve congestion in the area and given the engineering problems it would face would make it hugely expensive.The Infrastructure Delivery Plan lacks analysis and costings and there are no funding guarantees for the road or services. Backwell Common and surrounding areas are prone to flooding which would be aggravated by more housing. The sheer volume of growth with the required investment infrastructure and services over such a short period is unsustainable and undeliverable.			

Name: Lesley Carver **I.D:** 58524321

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	‣ Justified ‣ Effective ‣ Consistent with national policy	No	Unsure	I do not believe plans to build at Tower Farm, Portishead are in line with Sutstainable Development Objectives. Very little employment is available within walking distance at West Hill. The town centre is not within easy walking or cycling distance, being 330ft climb up Avon Way, as well as the climb up from the estate to The Downs. Electric bikes cost £2,000+ and it is not an easy or safe cycle to the town centre. Shuttle bus from estate would be expensive to run (doubtful that developer would fund) and the road from the site entrance to Down Road is too narrow for a bus. The Downs and Down Road are already dangerous for pedestrians and road users and development could add 500-600 extra cars. There are limited primary school places to sustain such a large development and a drop off point is not suitable for 4-11 year old children. This is one of the few green spaces and brownfield sites should be considered as the priority.	I do not believe that a development at Tower Farm is appropriate or sustainable and local brownfield sites should be developed.		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					There is very little infrastructure within walking/cycling distance. Main infrastructure is in the town centre. It seems unlikely that affordable housing would be high on the developer's priorities. There is only a primary school, community hall and pharmacist locally. The development would not provide extra cultural facilities. Healthy living opportunities would be reduced with the removal of green space currently used by many residents and destruction of miles of hedgerows (providing habitat for birds and wildlife) would be detrimental. The impact on Weston Big Wood (SSSI) would be immense, as it could have housing within 50m and be left in shade, affecting trees and sustained wildlife. Carbon emissions would be increased by large number of additional cars. The fields at Tower Farm currently get very waterlogged and water drains from the top of the hill. Building could provide less area for excess water to drain, forcing it down to housing below and increasing flood risk. The location is hilly and roads narrow. It is unlikely that many residents would walk or e-bike and much more likely that car usage would greatly increase. The new junction onto The Downs would struggle to cope and junction from The Downs to Down Road is already hazardous. The impact on diverse wildlife would be immense. Weston Big Wood is an important local asset and would be spoilt by a large development. According to UK Health Security Agency the area of Tower Farm has higher that average Radon levels and great care would need to be taken to ensure the safe health of residents.			

Name: Lesley Connock **I.D:** 62821249

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Poplar Farm, Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Poplar Farm Development Environment The proposal of this development will have significant impact. Crest Nicholson have said that if they develop this land they cannot guarantee there will be no pollution to the Parish Brook. This rhyne is a SSSI and supports wild life across the entire area and feeds in to the wider waterways across this low lying land. The farmers use the fields to the lower area for grazing and any contamination of the waterways would have profound impact on the farming community. All these fields are a feeding area for bats and are seen nightly feeding across the fields, they include Pippestrelle and possibly the Greater Horseshoe bat. No mention of a bat survey is made in Crest Nicholson’s report. I observed the dormice and wild flower survey being done in these fields and neither of them met recommendations for monitoring. Any reports on this should be ignored as unsafe and unreliable. This land has been farmed continuously for over a century until 2020 and is prime agricultural land. These fields sit on the edge of the flood plain and the lower margins of the fields flood yearly. Trying to build on these fields would have a major impact on the Parish Brook rhyne and the wildlife that it supports. Infrastructure The road that this proposed development leads onto is single track with passing places only and whilst the area around the development could be widened it will not solve the problem as the entire length of the road remains narrow. If this development goes ahead the traffic to Clevedon along a single track will significantly increase causing danger to walkers, cyclists and horse riders. NSC are promoting active travel, however by building this development they will be putting lives at risk. When there are issues on any of the major routes around the area, ie M5, this road is used as a short cut and can cause major problems for farmers and householders. The route to the nearest bus stop is 0.7 mile which is further than recommended. This is also the distance to the nearest small shop. The nearest supermarket is 1.2 miles, too far to walk on the existing pavements which cannot take mobility buggies or a double buggy, meaning families would have to drive increasing CO2 emissions. The nearest schools are all full and parents having to take children to school in Backwell or further and will increase CO2 omissions which NSC is trying to reduce. Should this development go ahead lorries to the site will have to travel along roads with no pavements which will endanger children walking to school and the general public. Accessing the development via Leighwood Drive will mean that a high volume of traffic will be trying to access West End Lane on a blind bend. Once traffic leaves North Street and heads to Tickenham or Bristol they will use the Causeway which already sees high volume of traffic and is crumbling at its edges. Any increase will cause damage to an ancient road and bridge.			

Name: Lesley Davey **I.D:** 63093697

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No		No	No	I write with regards to the proposed North Somerset Local Plan 2041, specifically regarding Policy LP4 and the proposed developments on 5 Green Field sites around Pill and Easton-in-Gordano. I am wholly opposed to the LP4 proposal, for the following reasons: The availability of brownfield sites has not properly been considered The proposed building of 1,100 new homes would nearly double the present population of Pill and Easton-in-Gordano, and increase the traffic movements correspondingly. The roads already struggle at peak times, but increasingly at any time of the day, especially around Junction 19 of the M5. The whole area becomes gridlocked. The five proposed LP4 sites were not included in the Local Plan 2041 until June 2025, and therefore did not allow for any local consultation. The primary schools in Pill and Portbury are already close to capacity. I do not believe that the doctor's surgery in Pill would be able to cope with such an influx. Some of the identified sites are liable to flooding, and much of it is good agricultural land, as well as rich in biodiversity, ancient woodland and important wildlife habitats. The proposed sites are important green spaces for the local community, and are essential for health and well-being. I do not believe that the Local Plan 2041, specifically policy LP4, is sound, legally compliant or followed a duty to cooperate and ask that you remove this.	I do not believe that the Local Plan 2041, specifically policy LP4, is sound, legally compliant or followed a duty to cooperate and ask that you remove this.		

Name: Lesley Gorringe **I.D:** 62268513

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No		Unsure	Unsure	I feel that the proposal is a bad one because: Portishead is already a very busy town with often gridlocked roads and to add another very large housing estate, with all the additional associated vehicles, to the mix would be unbearable to the community. The proposed development would have just one access road at The Downs/Down Road junction. How can this be justified especially when this junction is gridlocked at school run time on every single school day? Open spaces, available to all, should be treasured and protected. Once lost, lost forever not only to current but to future generations. The above open space creates a vital buffer zone to Weston Bigwood (an SSSI) encouraging floral and fauna to thrive. The survival of Weston Bigwood in such close proximity to a new population cannot be underestimated and could not be reversed if this new development proceeds. The joni Mitchell song 'they paved paradise and put up a (housing estate)' comes to mind! I cannot support any proposal to destroy the beautiful Portishead Down and Weston Bigwood area and feel there must be alternative less sensitive sites. I would urge all associated with any final decision to pause and be completely sure that it is the right decision for all the life in this area (wildlife, plant life and human life). Thank you.			

Name: Lesley Hudswell **I.D:** 21228289

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	It is neither sound nor sensible to increase the number of homes in Nailsea without making changes to the roads that feed Nailsea. The road through Tckenham is already unsuited to the level of traffic it is expected to bear. it is increasingly impossible to sustain a healthy and active community life in the village. the air is polluted, the roads are dangerous and it takes very little for the road to become gridlocked. All of the roads in/out of Nailsea are inadequate but the road through Tickenham is the worst because it provides access to the motorway.			

Name: Li **I.D:** 62853697

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Effective	Unsure	Unsure	It is not safe to build further housing in this area due to the sheer load of traffic and accidents that occur along the A370mat the point of the new proposed development. It already can take up to half an hour just to pull out of my road onto the A370. The M5 often has problems and this severely affects this major road between weston and Bristol. School traffic is a night mare and I have spent an hour getting out of my dad to turn right	Consider bigger towns and areas that have better infrastructure. stop polluting the villages. keep the village life don't make villages into cities		

Name: Liam Saunders **I.D:** 58097953

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared • Justified • Effective	Unsure	Unsure	- There is evidence to suggest that there hasn't been sufficient and significant research into the ecological impact on the wildlife and eco system within Weston Big Wood. - A significant green space and area of Green belt is being targeted, when there are other significant sites within Portishead, that can be used with less ecological impact. - There is going to be a significant increase in traffic risk, traffic flow, air pollution, strain on utilities and local resources, as a result of building on this site. - Residents of The Deans/The Downs will see a significant negative impact to their transport route around their homes, based on the proposed road structure. - Other sites available around Portishead are more viable, based on pre existing utilities, proximity of Portishead's main road infrastructure, local amentities that are reachable by foot. The land at Tower Farm doesnt offer this and will result in a significant amount of additional people having to use their cars locally as the public transport wont support or meet the needs of those in the area. - Providing one access and exit route to the site is highly dangerous and an increased risk in this particular area. The plan is proposing to divert hundreds of additional vehicles, within close proximity of a primary school and will only result in the potential danger to life.	I believe there are too many significant risks to health and safety, with regards to building on this proposed site. There is no evidence to suggest that modification to this proposed plan will remove the increased danger to life, with regards to increased traffic flow and air pollution. I believe overall, serious consideration into other available sites within the area needs to be taken. They will have less of an impact on health and wellbeing of local residents, as well as contribute to the overall protection of local wildlife and ecological systems.	I do not wish to support these plans.	

Name: Libby Donald **I.D:** 62829761

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Justified	No	No	The two proposed housing developments would destroy the biodiversity of Weston Big Wood (SSSI), endanger wildlife and disrupt the green corridor that is Gordano Valley. There is enough new housing in Portishead already. Black Rock and Tower Farm sites are green belt. Road traffic in and out of the sites would be atrocious.	No modification needed just cancel the plan.		
Black Rock, north of Clevedon Road	No	• Justified	No	No	The two proposed housing developments would destroy the biodiversity of Weston Big Wood (SSSI), endanger wildlife and disrupt the green corridor that is Gordano Valley. There is enough new housing in Portishead already. Black Rock and Tower Farm sites are green belt. Road traffic in and out of the sites would be atrocious.	No modification needed just cancel the plan.		

Name: Lilian Harper **I.D:** 62854529

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Churchill Avenue	No	• Justified	Unsure	Unsure	Penny Field should be protected as a Local Green Space. It is one of Clevedon's last true greenspaces, a Nature Recovery priority site, and vital for wildlife, community wellbeing, and access to nature. Better brownfield and greyfield sites across the town exist for development.	Penny Field should be protected as a Local Green Space. It is one of Clevedon's last true greenspaces, a Nature Recovery priority site, and vital for wildlife, community wellbeing, and access to nature. Better brownfield and greyfield sites across the town exist for development.		

Name: Lilianna Bakinowska **I.D:** 39305217

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The plan is not sound. Backwell has 800 aproved already, this is a huge 40% increase for our village. I consider the extra numbers of houses to be an overdevelopment. That will not be a village anymore. Rural becoming a si=uburb. When I move here, I did not wanted to move to subburs, but to the small village. The trafic on Station Road and Backwell common would be extremely impacted by this, that road, which I live by, it's already very busy and hyndred of children walk up and down to and fro school BJS and secondary school. This will be unsafe for children, if traffic will increase. Then, looking at the schools and other infrastructure, that is not proposed with the houses - where all those new to the village people will send their children to school? Doctors are already stretched. There is no infrastructure in Backwell for another 1000 houses. I do not understand, why Backwell became a spot to be located so many houses, more than any other village and any other town. Backwell is expected to take 7% of the local housing allocations compared to 2% Cleevedon. This does not make sense I my opinion, I am against it. Let’s not make our village a suburban town. The plan did not consider needs or variability analysis for the extra 1000 houses. Our village is not an employment hub, our residents commute mostly. No social cohesion impact assessment has been provided. I oppose from this beautiful Grade 1 Agricultural Land currently used for food crops and grazing to become a housing hub. We have only 7% of this high quality land left in the entity of the North Somerset. The Government states that we ‘’must protect our best and versatile land’’ for the purpose of food security. This plan is insane, and do not go with this statement. Grade 1 food growing agricultural land with its wildlife habitats will be destroyed and UK as a one of the most nature-depleted countries. This plan will contribute to those being destroyed even further. Bats which are protected (Grater and Lesser Horseshoe bats) will lose their habitats if this plan will go on, and this is unacceptable.		NO	

Name: Lin Lawrence **I.D:** 62819937

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	Here are my concerns, and why I feel that this plan is unsound: The proposed allocation of Land at Tower Farm (approx 400 homes) lies immediately beside Weston Big Wood — an ancient woodland and Site of Nature Conservation Interest (SNCI) managed by Woodland Trust and supported by Avon Wildlife Trust. The woodland forms part of the Gordano Valley ecological network. It is a nationally important habitat mosaic of open grassland, wetland and woodland. This plan is Not Justified There are no robust published alternative assessments demonstrating that this sensitive site is the only or most appropriate option for growth. The loss of best and most versatile farmland (Grade 2/3a by reference to the ALC dataset) and the risk of irreversible damage to the ancient woodland make this allocation unsuitable. This plan is Not Consistent with National Policy The allocation conflicts with the National Planning Policy Framework paragraphs 180–182, which require that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland) should be refused unless wholly exceptional reasons exist. The Council's reference to an "ecological buffer" is vague, unenforceable and insufficient to address indirect impacts such as root-zone damage, hydrological change or wildlife disturbance. The Woodland Trust and Avon Wildlife Trust state that ancient woodland is irrecoverable once damaged. Moreover the Framework requires delivering biodiversity net gain, yet the allocation offers no clear mechanism for ensuring that outcome. This plan is Not Positively Prepared The location intensifies existing pressures in Portishead: schools, healthcare and transport infrastructure are already under strain. In addition, this peripheral site will increase private vehicle usage and pollution rather than support sustainable travel patterns, contrary to NPPF paragraphs 104–106. This plan is Not Effective Delivery depends on multiple unresolved dependencies: new school provision, bus service contributions, off-site biodiversity management, and upgrades to rights-of-way/ buffer zones. No phasing plan, funding mechanism or legal agreement is published to secure these. Without such mechanisms the allocation cannot be considered deliverable within the plan period. The following also need to be highlighted: Landscape & Connectivity			

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					The farmland/woodland edge acts as a critical ecological and landscape transition zone. Development here would fragment habitat, diminish the Gordano Valley wildlife corridor and erode the rural fringe character. Even with a buffer the visual and ecological intrusion into the woodland and surrounding landscape would be significant. Drainage & Hydrology Construction and built development would alter surface-water run-off and soil compaction on the former farmland, potentially affecting the hydrological regime that sustains the adjacent ancient woodland. The risk of nutrient runoff, altered infiltration and woodland root zone damage is material. In addition, assessment has not been made of the impact of the run off onto the housing and roads below. The current urban drainage system is based on what is considered normal for now. Adding in the addition hard surfaces of such a massive new housing site will cause exceptional conditions leading to flooding. Cumulative Impact When considered alongside other allocations in the Portishead area (such as Black Rock north of Clevedon Road), the combined pressure on ecology, infrastructure and transport is significant and undermines the Council's commitments to nature recovery and sustainable growth. No modification short of removing the allocation entirely would make this site appropriate. Given its direct adjacency to ancient woodland, its loss would be irreversible and cannot be mitigated sufficiently. The land should instead be retained as undeveloped green space, managed to enhance biodiversity and provide sustainable public access, in line with the Avon Wildlife Trust's 2030 Strategy and national "30 by 30" nature-recovery goal. Why are construction firms, with no links to our area be allowed to build on greenfield sites? They never see the impact their works have had; instead, they move onto other areas where money can be made. Brownfield sites should always be prioritised above all else. I was born and grew up in Portishead. I appreciate the need for new housing in some areas, but this should never be at the expense of exceptional, ancient woodland and ecosystems that are part of the Gordon Valley that we all benefit from. I do not support the the North Somerset Local Plan 2041 for the Tower Hill Farm location.			
Black Rock, north of Clevedon Road		‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent	No	No	The plan is Not Justified – Unsuitable location requiring off-site ecological mitigation The allocation of approximately 100 dwellings at Black Rock is not justified because the Council itself acknowledges that key environmental and ecological requirements cannot be met on-site, and must instead be located "off-site on land to the south-	No modification would make this allocation acceptable. The need for off-site mitigation and multiple infrastructure dependencies shows the site is environmentally and logistically unsuitable for housing. The allocation should be removed entirely from Schedule 1. Instead, the land should remain	I do not support the the North Somerset Local Plan 2041 for the Black Rock location The proposed allocation of Land at Black Rock (north of Clevedon Road) is unsound and should be removed. It relies on off-	

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		with national policy			west". This approach directly conflicts with NPPF paragraph 180(a), which requires avoidance of impact before remediation or off-site compensation is considered. The need for offset land demonstrates the inherent unsuitability of the site for development. There is no published evidence of less sensitive alternative sites being considered and discounted. The plan is Not Consistent with National Policy – Failure to protect and enhance biodiversity The approach of relying on off-site mitigation and a "suitable ecological buffer" illustrates a reactive rather than preventative approach to biodiversity protection. NPPF paragraphs 180–182 require Local Plans to conserve habitats, prevent deterioration of irreplaceable habitat, and deliver net gains for biodiversity. The allocation fails this by offloading its ecological burden onto unspecified land, without securing long-term management or legal protection for compensatory habitats. It also conflicts with the Avon Wildlife Trust's 2030 Strategy, which emphasises restoration of 30 per cent of land for nature and enhancing landscape connectivity in the Gordano Valley. This plan is Not Positively Prepared – Unsustainable pattern of growth The site lies on the western approach to Portishead along Clevedon Road, where public transport is limited and local services are minimal. Residents would be heavily reliant on private vehicles to access schools, health care and employment. The fact that footways and new bus stop contributions are required underlines existing infrastructure inadequacy. This car-dependent pattern of development conflicts with the sustainable transport objectives of NPPF paragraphs 104–106. This plan is Not Effective – Unclear delivery and infrastructure dependencies The site depends on multiple off-site and third-party mitigations including ecological offset land, new footway construction, bus service contributions and delivery of a section of the Gordano Greenway. No clear funding mechanism, responsible delivery body, or phasing plan is identified in the Plan. Consequently, the allocation lacks deliverability and fails the effectiveness test under NPPF paragraph 35(c). Landscape & Setting The site lies within open countryside forming part of the rural setting of Portishead and the Gordano Valley. The expansion westwards into this part of the countryside would diminish the settlement edge, reduce landscape openness, and risk urbanising what should remain a transitional zone between town and countryside. Agriculture & Soils	open countryside, contributing to biodiversity and landscape value, in line with the Avon Wildlife Trust's 2030 Strategy, Woodland Trust guidance and national biodiversity objectives.	site ecological mitigation, cannot meet biodiversity standards on its own, and will increase car dependency and infrastructure pressure. No mitigation can make this site appropriate for new housing. The land should be retained as open countryside, maintaining its role in biodiversity, landscape character and community wellbeing.	

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					The farmland in question is likely to be of best and most versatile quality (Grade 2/3a) and its loss for housing is not justified when less sensitive land could be used. The Plan does not robustly demonstrate why this agricultural land must be released. Hydrology & Ecology Development on this edge farmland may affect surface-water drainage, soil compaction and wildlife connectivity into the adjoining woodlands and wetland systems associated with the Gordano Valley. The cumulative effect of development pressure in the area further stresses the ecological network. Cumulative Impact Combined with the Tower Farm allocation and other nearby proposals, the Black Rock site would add to cumulative ecological, transport and infrastructure burdens around Portishead – contrary to the Council's stated nature-recovery and sustainable growth objectives.			

Name: Linda O'Hara **I.D:** 62686785

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Positively prepared	No	No	Regarding Pill & Easton Gordano. Traffic issues woefully neglected - Active travel neglects the needs of our elderly and disabled and will lead to more difficult travel in the villages due to narrow roads. There does not appear to be any plans with the exception of active travel and the proposed railway. Just a handful of examples below: *M5 Avonmouth Bridge is already at a standstill for over 1-2 miles to A369 towards Clifton suspension bridge at night rush hour. *Dangerous driving already exists with drivers cutting in from Jctn 19 roundabout to avoid traffic mentioned above which will be exasperated. *Over-reliance on re-opening of railway. Village of Pill has serious parking issues and many blind exits/ entrances on roads which will be dramatically increased. Proposed train times are already restricted due to single track. There is also precedence for projects having funding removed. Consultation implies a regular bus service. The service is unreliable and is diverted past the villages any time there is roadworks. HGV access to the villages are restricted/difficult In addition There was no in-person consultation in the villages. Loss of green bank so close to a motorway and major city is unacceptable and may increase pollution in our villages. M5 can already be heard at night.	Significant reduction in the number of houses planned Improvements to access from M5 Junction		

Name: Lindsay smith **I.D:** 62853473

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP7: Green Belt	No	• Justified	Unsure	Unsure	Green belt is just that.. Provided to protect the well-being the people and the environment. Removing this essential piece of land from green belt status will only benifit those making a profit from the housing. The community will once again be voiceless and the wildlife whose home you are destroying will become extinct. Than the irony of it all the roads will be named after the wildlife that's once lived in the woodland. We have seen this time and time again in other developments.	Use brown field s		

Name: Lindsey Churchill **I.D:** 58507393

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP7: Green Belt	No	• Justified • Effective • Consistent with national policy	No	No	As a Portishead resident and frequent visitor to Weston Big Wood I feel it is vital we do everything possible to protect this vulnerable woodland, it would appear being in the green belt is no longer protection for ancient woodland or SSSi's. By removing the green belt and allowing development you are opening the door to development which on these two sites would damage the biodiversity to an irreparable point where we lose forever this delicate and wonderful location. In section DP35 of your draft plan you states "development within or in proximity to a Site of Special Scientific Interest (SSSI) or National Nature Reserve that is likely to have a direct or indirect adverse effect on its biodiversity or geological interest will not normally be permitted". I truly believe the impact would be felt not only here in Weston Big Wood with lose of rare endangered flora and fauna but as a vital wildlife corridor the impact will extend in both directions, north to the Severn estuary and south to the Mendips and Somerset Levels, as such your statement in DP35 would stop any development on these sites, so these sites should be removed from the list and replaced with sites which will not adversely effect Weston Big Wood. I would also like to bring to your attention the below list, which your plan breaches. Section 40 of Natural Environment and Rural Communities Act 2006. Para 124 of the National Planning Policy Framework. Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land Para 188 of the National Planning Policy Framework. Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework, take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries. Para 192 of the National Planning Policy Framework. To protect and enhance biodiversity and geodiversity, plans should: (a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation and (b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.	you should be looking into other area which would not impact the environment		

Name: Lisa Carey **I.D:** 62830049

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective	Unsure	Unsure	As a resident of Backwell with a young family I am particularly concerned with the lack of consideration given in the plan to the pressure that growth of this scale will put on local infrastructure. The road which is mentioned in the plan, does not include analysis or costing and is lacking in detail around who is responsible and when this will be built. It's design is also unlikely to relieve many of the current congestion issues on Station Road. As it stands at the moment an increase in homes on the existing roads would create huge issues for residents and could mean increased use of unsuitable country lanes for traffic, including those on chapel hill and backwell bow which includes local cycle routes, which is potentially dangerous. In			

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		• Consistent with national policy			addition the plan makes no mention of any of the other vital infrastructure such as schooling, health services or leisure facilities. The services we currently have will not support a further 1000 families and yet the plans do not specifically address this. Lack of consideration on these areas will seriously impact the way of life for existing residents. I can not see that there has been any needs or viability analysis for these extra homes. The volume of growth in Backwell seems disproporiate to the current size of the village in percentage terms. I think the increased homes built here will increase the size of Backwell by 80%. There are surely areas with a more robust infrasture already in place that could support the additional needs of any residents of new housing developments without the expense and disturbance to building these additional services in Backwell. Backwell has already been approved for an additional 800 homes which will increase the size of Backwell by 40%, without any consideration to infrastructure.			

Name: Lisa Crees **I.D:** 58513537

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	Unsure		Unsure		NSC has not properly considered: Alternative brownfield or greenfield sites with far lower ecological impact, both in Portishead and across North Somerset. Opportunities to increase housing density on proposed brownfield sites, which could remove the need to develop Tower Farm and Black Rock. The strategic ecological importance of these sites in protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor. The fact that both areas were added to the Green Belt in the late 1980s due to their high ecological value. National planning policy allows Green Belt changes only in exceptional circumstances — and these have not been demonstrated. In addition: Neither site can provide safe or suitable access. Development would create unacceptable transport impacts, failing national soundness tests. For these reasons, Tower Farm and Black Rock should be removed from the Local Plan.			

Name: Lisa Edwards **I.D:** 62852545

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Churchill Avenue	No	• Justified	No	No	Penny Field should be protected as a Local Green Space. It’s one of Clevedon’s last true greenspaces, a Nature Recovery priority site, and vital for wildlife, community wellbeing, and access to nature. Better brownfield and greyfield sites across the town exist for development.	Penny Field should be protected as a Local Green Space. It’s one of Clevedon’s last true greenspaces, a Nature Recovery priority site, and vital for wildlife, community wellbeing, and access to nature. Better brownfield and greyfield sites across the town exist for development.		

Name: Lisa Farrell **I.D:** 62860801

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Lodway Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	No public consultation regarding any of the proposed sites. Given the size of the proposal, there was a relatively low response at the time and the subsequent number of people who have now signed the petition, it would indicate that public engagement was not done properly, it wasn't sufficiently inclusive and therefore not legally compliant under the equalities act. Not enough clarity around transport and the effect of the increased number of cars that will result from the proposed number of houses and the increase in population. NPPF 109. States Transport issues should be considered from the earliest stages of plan-making and development proposals. There has been no public discussion and no clear evidence in the plan that they have been fully considered. The plans focus primarily on schemes to increase active transport and the development of the Portishead to Bristol railway as a solution to transport problems. The plans for the railway link (3 carriage trains, once an hour) will not support the number of people using them and will be full before they get to Pill. Pill station will also have no parking. The transport survey and the effect on the A369 and M5 junction 19 has not been completed as yet indicating that they have not fulfilled their duty to cooperate with other agencies. This site has poor access and an increase in car numbers will put excessive strain on the current village road system which is mainly residential with the need for many cars to be parked on the roads. The main road through the village, in parts, is not wide enough to accommodate two cars passing. The proposal to prevent the use of Marsh Lane as a route out of the village will affect the large number of people who live in the village and who work in the docks and surrounding businesses, putting further pressure on the village roads, the A369/Martcombe Road and the M5 junction. The population increase of 44% is disproportionate the current size of Pill and Easton in Gordano. There will be significant impact on local services which has not been considered in the plans. Loss of Green belt land with no evidence that possible Brown Field sites across the whole area have been considered Increased flooding risk due to the affect that housing will have on drainage.	To remove this location from the local plan		
Land east of Gordano Services	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	No public consultation regarding any of the proposed sites. Given the size of the proposal, there was a relatively low response at the time and the subsequent number of people who have now signed the petition, it would indicate that public engagement was not done properly, it wasn't sufficiently inclusive and therefore not legally compliant under the equalities act. Not enough clarity around transport and the effect of the increased number of cars that will result from the proposed number of houses and the increase in population. NPPF 109. States Transport issues should be considered from the earliest stages of plan-making and development proposals. There has been no public discussion and no clear evidence in the plan that they have been fully considered. The plans focus primarily on schemes to increase active transport and the development of the Portishead to Bristol railway as a solution to transport problems. The plans for the railway link (3 carriage trains, once an hour) will not support the number of people using them and will be full before they get to Pill. Pill station will also have no parking. The transport survey and the effect on the A369 and M5 junction 19 has not been completed as yet indicating that they have not fulfilled their duty to cooperate with other	The population increase The lack of evidence regarding the transport system		

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					agencies. This site has poor access and an increase in car numbers will put excessive strain on the current village road system which is mainly residential. The main road through the village, in parts, is not wide enough to accommodate two cars passing. The proposal to prevent the use of Marsh Lane as a route out of the village will affect the large number of people who live in the village and who work in the docks and surrounding businesses, putting further pressure on the village roads, the A369/Martcombe Road and the M5 junction. The total population increase of 44% (for all sites) is disproportionate the current size of Pill and Easton in Gordano and is well above the recommended increase of 5% for villages with a populations of less than 10,000. There will be significant impact on local services which has not been considered in the plans. Loss of Green belt which is identified as high-performing agricultural land with no evidence that Brown Field sites across the local area and within Bristol have been fully considered indicating no cooperation with other council areas. Increased flooding risk with the number of houses and associated road network			
Pill Green	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	No public consultation regarding any of the proposed sites. Given the size of the proposal, there was a relatively low response at the time and the subsequent number of people who have now signed the petition, it would indicate that public engagement was not done properly, it wasn't sufficiently inclusive and therefore not legally compliant under the equalities act. Not enough clarity around transport and the effect of the increased number of cars that will result from the proposed number of houses and the increase in population. NPPF 109. States Transport issues should be considered from the earliest stages of plan-making and development proposals. There has been no public discussion and no clear evidence in the plan that they have been fully considered. The plans focus primarily on schemes to increase active transport and the development of the Portishead to Bristol railway as a solution to transport problems. The plans for the railway link (3 carriage trains, once an hour) will not support the number of people using them and will be full before they get to Pill. Pill station will also have no parking. The transport survey and the effect on the A369 and M5 junction 19 has not been completed as yet indicating that they have not fulfilled their duty to cooperate with other agencies. The population increase of 44% is disproportionate the current size of Pill and Easton in Gordano. There will be significant impact on local services which has not been considered in the plans. Loss of Green belt which is identified as high-performing agricultural land with no evidence that Brown Field sites have been fully explored across the wider area including Bristol. Increased flooding risk - due to the increased number of houses and the affect on drainage and the brook that runs through that area which has not been considered	This submission needs to be fully explored and evidenced before it is considered. The number of houses and the size of the development needs to be reduced - allocations in villages with a population of less than 10,00- must not result in a population increase of more than 5%.		

Name: Lisa Gillingham **I.D:** 62849537

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	As a long-standing local resident, I feel compelled to express my deep concern about the proposal to build on this area of Grade 1 agricultural land. This is some of the highest quality land we have, currently supporting both food crops and grazing. With only around 7% of such land remaining across North Somerset, it feels short-sighted to sacrifice it when national policy is clear that we must protect our “best and most versatile land” to ensure future food security. Building here would run directly counter to that guidance and weaken our ability to produce food locally. I am equally worried about the serious ecological impact. This development would remove valuable wildlife habitats at a time when the UK is already one of the most nature-depleted countries in the world. The land plays an essential role in supporting biodiversity that is already under significant pressure. In particular, the proposals put at risk the Brockley Maternity Roost and the nearby SSSI. Rare Lesser and Greater Horseshoe Bats depend on this landscape for feeding, and any disruption could have long-lasting consequences for these protected species. For these reasons, I urge the council to reconsider and uphold the protection of this vital land.	n/a	n/a	

Name: Lisa Hiscocks **I.D:** 63005761

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm					I completely oppose to the proposed development of Tower Farm and Black Rock. These are areas where animals live, it’s their home. It will also be destroying all the beautiful wild flowers, insects etc. We will be unable to enjoy the outdoors and exploring these beautiful places. Please do NOT build on these beautiful areas.			
Black Rock, north of Clevedon Road					I completely oppose to the proposed development of Tower Farm and Black Rock. These are areas where animals live, it’s their home. It will also be destroying all the beautiful wild flowers, insects etc. We will be unable to enjoy the outdoors and exploring these beautiful places. Please do NOT build on these beautiful areas.			

Name: Lisa Hughes **I.D:** 58246657

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP7: Settlement boundaries	No	• Justified • Effective	Unsure	No	The people who live in the area adjacent to this proposed site are massively against it. The transport system in Portishead, is already struggling with the amount of people that have to use it and building on this field will cause substantial flooding on the main road. The damage it will cause to our precious ancient woodland (Weston Big Wood) and it's inhabitants, is catastrophic. The vibration caused by heavy plant machinery, will have a devastating effect on the root systems causing a massive decline in the health of the woodland.	Our governments have been urging us all to change our ways for years to help combat climate change and yet here they are destroying our greenbelt. It is a complete contradiction to what they have been saying. Once these areas have gone, we will never get them back.		
Land at Tower Farm	No	• Justified • Effective	Unsure	No	Building on this land will have a devastating impact on Weston Big Wood, which is one of our few remaining ancient woodlands. It will change the whole drainage system in the woods and is a massive loss of habitat for the wildlife that calls it home. Simply the vibration caused by heavy plant machinery, will have cause massive root disturbance and cause a huge decline in the health of the wood. Local people also need this space for their mental health. Our green spaces are crucial in this day and age. That aside, the infrastructure of Portishead, simply cannot cope with more housing. The			

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					town has tripled in size within 15 years. It cannot cope any more. Our governments have been urging us all to change our ways to combat climate change for years, but yet here they are saying it's fine to build on all our green spaces. It is in complete contradiction, to the massage they give us on a daily basis. Once these places have gone, we can never get them back.			

Name: LiveWest **I.D:** 63250785

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP3: Spatial strategy	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	No	As we have comprehensively set out in representations made on previous stages of the Emerging Local Plan, our clients have significant concerns regarding the overall strategy of the plan which appears to be aimed at providing the minimal amount of growth necessary, rather than consider matters of contingency or deliverability. Critically such an approach fails to recognise the historic and substantial undersupply of housing and its related affordability consequences both within North Somerset and Bristol, the latter being largely ignored by the Plan's approach. Despite the Revised NPPF (December 2024) providing LPAs with the tools to proactively maximise sustainable growth opportunities, including enabling a more pragmatic approach to Green Belt, the proposed spatial strategy (and the Plan's approach overall) significantly rule out the role of a number of settlements where sustainable growth can be achieved. Not only can such growth make an overall contribution to the Plan's housing challenge, it can provide critical resilience and capacity for existing services and facilities within those places in order to sustain their role and function to the benefit of their local communities. The alternative of not recognising growth opportunities in such places is stagnation and loss of services and facilities, increased affordability issues and over time the creation of inherent unsustainable settlements failing to meet the needs of their communities. Policy SP3 as proposed does not grapple with this issue at all, instead identifying only an urban focus with strategic growth at Weston Super Mare and four strategic development locations. Elsewhere development is either constrained by existing settlement boundaries or through specific allocations including in some larger villages but not in others. All other development opportunities at villages and rural areas are identified as 'relatively less sustainable' and development in such places will relate to "local community needs". We are concerned that Policy SP3 fails to clearly identify an appropriate settlement hierarchy below the town level with the role and function of the larger villages being less clear. Instead it should set out clearly which larger villages are considered more sustainable, instead of dealing with this only through where allocations have been identified or through infill. The policy as written lacks any distinction between a number of larger villages across the District, it is only the allocations set out in Schedule 1 which appear to define the preferred larger villages to accommodate growth, rather than Policy SP3. To this effect the additional sites consultation was much clearer in making a distinction between "most sustainable villages" and "less sustainable villages". Policy SP3 should similarly make this distinction. By identifying a	Policy SP3 should be amended to set out a clear settlement hierarchy (including identifying the individual settlements) and the relevance of each in terms of delivering growth. It should make clearer distinction between the identified places below the towns (i.e, the villages) in terms of being identified as more sustainable or less sustainable, with growth opportunities identified to reflect this. Policy SP3 should set out circumstances and mechanisms for supporting growth in these locations ensuring it is flexible enough to respond to needs, sustainable development opportunities and changing circumstances (including non-delivery of other sites). Wrington should be identified as a more sustainable settlement within the settlement hierarchy, reflecting its wide range of services and facilities and opportunities for accommodating sustainable growth. The Policy map should be amended accordingly.		Pre-submission Plan (Regulation 19) Representations - on behalf of LiveWest (Redacted).pdf 03-18-25 Livewest reps on Additional Sites Consultation_Redacted.pdf

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					clear hierarchy between Weston super Mare and the strategic growth locations followed by the towns and then the most sustainable villages and then less sustainable places, the policy provides greater clarity and support for the Plan's approach. In doing so the Policy will truly identify the most sustainable places for growth and can then clearly set out the expectations for growth and development at each level, which it currently does not. This will better ensure that the Plan seeks to accommodate growth in the most sustainable way, whilst maximising opportunities within all sustainable settlements. As identified in the Additional Sites Consultation and the adopted Core Strategy, Wrington must be identified as one such settlement. It continues to be a significant concern regarding the Plan's soundness as to how the continued omission of Wrington's role to deliver the sustainable development needed to sustain its role and function can be justified. Wrington has a wide range of services, including a primary school, nursery, post office, convenience store, independent shops and cafes, public houses, pharmacist, veterinary practice, memorial hall, sports and social club and places of worship. The village also includes opportunities for local employment within the existing Havyatt Road Business Park.There is a regular day time bus service from Wrington to Weston Super Mare which also provides links to national rail services to Bristol and elsewhere. It was because of this wide range of services that Wrington was identified in the previous Core Strategy as a Service Village but has been consistently downgraded throughout the Emerging Local Plan process, with the exception of the Additional Sites Consultation which clearly identified it as one of the more sustainable villages in the District. Yet seemingly on the basis of the level of objection to individual sites through that consultation, rather than any assessment of Wrington's actual sustainability credentials, it remains faced with minimal development opportunities solely focussed on infill within a constrained settlement boundary with little if any opportunity for development. As Policy SP3 acknowledges, Green Belt in itself should not be seen as a reason to not allocate sites or identified growth in more sustainable settlements. We would strongly contend that Wrington falls within such places given its wide range of services and facilities and opportunity to deliver sustainable development. We further discuss Green Belt implications in our representations made under SP7. Without Policy SP3 clearly establishing a hierarchy of identified sustainable settlements (which should include Wrington) and further identifying clear mechanisms for supporting growth in those locations the policy will be ineffective and instead constrain these places to the detriment of their local communities. This approach does not explicitly consider the implications of the level of need for affordable housing within the larger villages (including Wrington) and the risks of effectively a no growth approach. As we have raised on our client's behalf previously the Core Strategy approach, in clearly identifying sustainable places and providing positive policy support for the release of sites for appropriate development, provided a much more flexible approach to delivering sustainable development and was critical in supporting high levels of windfall development as well as affordable housing delivery. Unfortunately, Policy SP3 falls far short of this flexibility, clarity and deliverability. Instead, it appears to seek to set all parameters for growth in the larger villages now, based on the availability of sites currently			

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					and their degree of contention, rather than ensure the Plan is flexible enough to respond to needs and circumstances of the future. It is for the reasons set out above that we consider Policy SP3 significantly undermines the soundness of the Plan overall as it has not been positively prepared as it is not seeking to meet identified needs. Its strategy is not justified as it contradicts clear evidence of need and the contribution the larger villages (including Wrington) could make to delivering sustainable development and does not take into account reasonable alternatives in to address this. The Plan's approach will not be effective in that there is no clear evidence that supports the Plan being deliverable. It is not consistent with national policy in that its approach limits rather than maximises the opportunities for the Plan to deliver sustainable development in accordance with the Framework. Please see previous representations made on earlier versions of the Plan for completeness. These are appended to the covering email for these and other representations made on the Regulation 19 (Pre-Submission Plan).			
SP6: Villages and rural areas	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	No	These representations should be read in conjunction with the representations made on Policy SP3 and the concerns of our client regarding the overall strategy of the plan. As with Policy SP3, Policy SP6 fails to provide a distinction between the wide range of villages that exist across North Somerset. In the absence of any clear identification within a settlement hierarchy of what constitutes sustainable and less sustainable villages and a lack of recognition of the wide variety between the level of services and facilities offered in individual villages, Policy SP6 is relatively meaningless. It simply focusses on settlement boundaries without providing any additional guidance on potential sustainable development opportunities within these places, that offer (as in the case for Wrington) a wide range of facilities. Unless allocations have been identified, the settlement boundaries in these places will simply constrain all development opportunities. Particularly given in most of these settlements infill opportunities are very limited and would not provide the level of development that could support existing services, deliver affordable housing or other infrastructure needs. It is therefore difficult to understand how such a constrained approach can benefit the local communities in those places. The approach of SP6 fails to recognise the valued role that development in villages, where there are existing services (such as Wrington), can play in delivering a diverse mix of new homes, including affordable whilst still reflecting the scale and character of those places. Policy SP6 as proposed will increase the likelihood of the delivery of the plan being ineffective given the lack of contingency and flexibility it provides in the event of land supply issues arising. It also runs contrary to the Additional Sites Consultation, where the Council has sought to make a distinction between the villages, recognising some are more and some are less sustainable. Places like Wrington were identified through that process as being more sustainable, clearly recognising the wide level of services and facilities the village offers. Providing mechanisms to support sustainable growth beyond existing boundaries in places like Wrington where there are no allocations can provide critical resilience and capacity in order to sustain existing services and their role and function to the benefit of their local communities. The alternative of	Policy SP6 should better relate to Policy SP3 which itself should be much clearer in identifying a settlement hierarchy that identifies what are the more and less sustainable places below the towns. Policy SP6 should then reflect this in its approach, making distinction between the villages and recognising that some have a wider range of services and facilities and are therefore more sustainable and more suitable to accommodate growth. Policy SP6 should provide policy guidance to support the flexible release of sites above and beyond the allocations and the settlement boundaries to provide for sustainable options for growth where this responds to specific needs, sustainable development opportunities and changing circumstances (including non-delivery of other sites). Wrington should be identified as a more sustainable settlement and its relevance to Policy SP6 (and the opportunity for additional release of sustainable sites) clarified. Our client's site at Land at East of Wrington (reference HE2033) should form part of the Green Belt review undertaken as part of the Plan process and removed from it and be specifically allocated for housing to support the delivery of sustainable development and the wide benefits to the local community this would bring. The Policy map should be amended accordingly.		Pre-submission Plan (Regulation 19) Representations - on behalf of LiveWest (Redacted).pdf 03-18-25 Livewest reps on Additional Sites Consultation_Redacted.pdf

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					not recognising growth opportunities in such places is stagnation, increased affordability issues and over time the creation of inherent unsustainable settlements failing to meet the needs of their communities. The issue stems from not clearly identifying in Policy SP3 what are the sustainable settlements. With this identified Policy SP6 can then make the appropriate distinction between (1) a more flexible policy approach that supports sustainable development in appropriate circumstances within the more sustainable villages (without relying on solely on allocations and inflexible settlement boundaries); and (2) a more constrained approach for those less sustainable settlements. Wrington has a wide range of services, including a primary school, nursery, post office, convenience store, independent shops and cafes, public houses, pharmacist, veterinary practice, memorial hall, sports and social club and places of worship. The village also includes opportunities for local employment within the existing Havyatt Road Business Park and is served by regular bus services. Despite this Policy SP6 (and SP3) significantly reduces the opportunity for the village to sustainably grow compared to the approach of the Core Strategy (which identified Wrington as an important Service Village). It is also contrary to the Council's own assessment of Wrington as a more sustainable village within the Additional Sites Consultation. Despite the sustainability credentials of Wrington, the only 'growth' it faces over the Plan period is through infill within a tightly drawn settlement boundary with no obvious opportunity even for very minor levels of infill. Whilst Gatcombe Farm is identified as an allocation (solely based on an existing consent), it is so distant and unconnected to the village it will have no role at all in supporting and sustaining services and facilities within the village or provide any benefit to the local community. As a result of the Plan approach as set out in SP6 (and SP3) Wrington faces the prospect of no growth over the Plan period which will place services and facilities at significant risk, fail to address growing affordability issues and increase unmet need to the great detriment of the local community. There is no clear audit trail as to why Wrington continues to be overlooked by the Emerging Plan, particularly given its overall sustainability. Whilst it is noted that there was a degree of contention regarding the sites identified as potential allocations within the Additional Sites Consultation, this alone is not a reason for the Plan to turn its back on the village. Notwithstanding public objection, our client's site at Land to the East of Wrington (reference HE2033), as set out in previous representations is unconstrained in terms of landscape or ecological designation, has several suitable access options linking to existing residential areas and the core facilities of the village centre of which it is in close proximity. It is outside of the Conservation Area, there are no nearby heritage assets and the majority of the site lies within Flood Zone 1. It therefore represents a logical extension to the village to deliver sustainable development, providing wider benefits to the local community in respect of housing and supporting local services as well as opportunities to improve infrastructure and the setting of the village. We have previously confirmed that the site is available and deliverable. Whilst it lies within the margins of the Green Belt, the revised NPPF provides the tools to assess and evaluate the site's negligible role in serving Green Belt purposes. Particularly as the release of the site would provide greater longer			

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					term benefit in improving the landscape and visual context of the village as well as the wider sustainability benefits in respect of supporting the needs of the community. This would be consistent with the justification for other sites having been released from the Green Belt within the Plan. We further discuss Green Belt implications in our representations made under SP7. However it is clear that the continuing housing crisis requires a step change in planning for growth and a departure from traditional protectionism. It is for the reasons set out above that we consider Policy SP6 (alongside SP3) significantly undermines the soundness of the Plan overall as it has not been positively prepared as it is not seeking to meet identified needs. Its strategy is not justified as it contradicts clear evidence of need and the contribution the larger villages (including Wrington) could make to delivering sustainable development and does not take into account reasonable alternatives in to address this. The Plan's approach will not be effective in that there is no clear evidence that supports the Plan being deliverable. It is not consistent with national policy in that its approach limits rather than maximises the opportunities for the Plan to deliver sustainable development in accordance with the Framework. Please see previous representations made on earlier versions of the Plan for completeness. These are appended to the covering email for these and other representations made on the Reg 19 (Pre-Submission Plan).			
SP7: Green Belt	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	No	These representations should be read in conjunction with the representations made on Policy SP3 and SP6 and the concerns of our client regarding the overall strategy of the plan and role of Wrington. We agree with the principle of the Plan seeking to review Green Belt as this accords with the approach of the revised NPPF and supports the Council's efforts in meeting its housing challenges. However, it was apparent from the Additional Sites Consultation that location within Green Belt was still being prioritised as a constraint regardless of the overall sustainability of a settlement or site and the role it played in the purpose of the Green Belt. This has meant that opportunities to deliver sustainable development on sites in Green Belt that do not contribute to its purpose and would provide strong rationale for removal have not been fully considered. It is our view that all settlements should have first been considered on that basis of their contribution to sustainable development first and then all sites considered in respect of planning constraints, including whether the site continues to meet the purpose of Green Belt. This would have provided the greatest opportunity to meet identified needs across all sustainable settlements. An example of where this has hindered the Plan's strategy is Wrington which benefits from a wide range of services and facilities. Without growth opportunities it will become impossible to sustain these, invest in new infrastructure and provide much needed affordable housing, therefore creating an inherently unsustainable place to the detriment of the local community. Recognising that Wrington benefits from a such wide range of services, including employment opportunities should have led to the Plan identifying growth within the village to prevent the above negative outcomes. This appeared to be the case at the Additional Sites Consultation, with the village identified as 'more sustainable' and views on site options invited. This included our client's site at Land to the East of Wrington (reference	Our client's site at Land at East of Wrington (reference HE2033) should form part of the Green Belt review undertaken as part of the Plan process and removed from it and be specifically allocated for housing to support the delivery of sustainable development and the wider benefits to the local community this would bring. The Policy map should be amended accordingly.		Pre-submission Plan (Regulation 19) Representations - on behalf of LiveWest (Redacted).pdf 03-18-25 Livewest reps on Additional Sites Consultation_Redacted.pdf

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					HE2033). As we set out in previous representations, the site is well located to existing services and facilities, has good options for access, provides opportunities for enhancement of the village edge and can support the expansion of the adjacent recreational facilities. Whilst it is Green Belt, it is clearly on its margins and includes land of no specific merit or character nor does it contribute to any Green Belt purpose (i.e. preventing unrestricted sprawl, merging of neighbouring towns and preserving the setting and special character of historic towns). Importantly it does not raise the issues of flood risk and heritage impact that other non Green Belt site options put forward within the consultation at Wrington have. It our strong view that the site should have been considered sequentially preferable to the non Green Belt sites because of how it performs across a range of factors that would support its delivery as sustainable development and because it does not fulfil a strong Green Belt purpose. However, the Plan avoids any growth at Wrington on the basis of an assumption that no suitable sites exist, highlighting the concerns of the other sites and identifying our client's site as being in the Green Belt. Given the clear benefits of growth in the village, a more robust assessment of the potential for release of Green Belt should have been undertaken. The Plan's approach to Green Belt, embodied in Policy SP7 is therefore considered flawed and too limited in seeking to maximise opportunities for sustainable development. This approach is also inconsistent with the wording of Policy SP7 which identifies that "villages in the Green Belt which do not contribute to openness are inset from the Green belt". Wrington itself is inset from the Green Belt which should be an indication of its role in terms of Green Belt purpose and the marginal nature of our client's site. It clearly sets it apart from those other settlements where Green Belt washes entirely over them. As a result of this flawed approach in not reviewing Green Belt across all relevant settlements to understand fully the potential for sustainable development opportunities, Wrington faces very limited growth despite its clear sustainability credentials. Ironically the only growth identified is through the allocation of Gatcombe Farm which also lies within the Green Belt but is so distant and unconnected to the village it will have no role at all in supporting and sustaining services and facilities within the village or provide any benefit to the local community. The release of my client's site at Land to the East of Wrington would provide greater longer-term benefit in improving the landscape and visual context of the village as well as the wider sustainability benefits in respect of supporting the needs of the community. This would be consistent with the justification for other sites having been released from the Green Belt within the Plan. It is for the reasons set out above that we consider Policy SP7 (alongside other policies raised in our separate representations) significantly undermines the soundness of the Plan overall as it has not been positively prepared as it is not seeking to meet identified needs. Its strategy is not justified as it contradicts clear evidence of need and the contribution the larger villages (including Wrington) could make to delivering sustainable development and does not take into account reasonable alternatives in to address this. The Plan's approach will not be effective in that there is no clear evidence that supports the Plan being deliverable. It is not consistent with national policy in that its approach limits rather than maximises the opportunities for the Plan to			

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					deliver sustainable development in accordance with the Framework. Please see previous representations made on earlier versions of the Plan for completeness. These are appended to the covering email for these and other representations made on the Reg 19 (Pre-Submission Plan).			
SP8: Housing	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	No	As with Policy SP3 (Spatial Strategy), Policy SP8 fails to identify an appropriate settlement hierarchy below the town level with the broad distribution of housing being unclear in terms of the how the housing requirement identified within the villages and rural areas will be met, despite accounting for 12% of the overall housing requirement. Whilst the policy identifies the objective of creating mixed and balanced communities with a mix of housing to support identified housing needs, it is unclear how this will be achieved within the villages and rural areas, particularly given only very few villages have been given positive provision through allocation and revised settlement boundaries. Opportunities for any growth outside of only some of the largest villages is very constrained, despite the opportunity to provide sustainable and proportionate levels of growth. Instead, those villages where growth is identified is limited to Banwell, Bleadon, Churchill, Congresbury, Long Ashton, Sandford, Winscombe and Yatton where allocations are identified. Outside of those places despite in some cases offering a wide range of services and facilities, no provision for growth is made by the Plan despite the clear benefits in respect supporting services, infrastructure investment and providing opportunities for affordable housing. Without this there is a risk that places will stagnate and fail to meet the needs of its existing community leading to circle of unsustainability. Wrington is one example of this risk, despite being identified as more sustainable in the Additional Sites Consultation and benefiting from a wide range of services and facilities, no provision at all is made for additional housing. This is because no allocations have been identified and an already constrained settlement boundary has no proposed changes. It continues to be a significant concern regarding the Plan's soundness as to how the continued omission of Wrington's role to deliver sustainable development and meet identified housing needs, can be justified. It represents a significant downgrade for the village's role within the Core Strategy despite its still wide service offer. Policy SP8 relies on almost 3000 dwellings coming forward within the villages and rural areas, despite acknowledging sites have been identified to provide just 1,830 dwelling towards this, leaving around 1,200 to come forward on small (unidentified sites). It is unclear how this can be achieved given the very limited opportunity the Plan provides for accommodating additional growth beyond the allocations. For example Wrington, despite its clear sustainability credentials and wide level of facilities, in the absence of allocation and with a very constrained settlement boundary faces a clear no growth future. Whilst Policy SP8 identifies the role windfall might play in meeting overall housing requirements, the SHLAA suggests this is based on a mixture of past windfall rates and additional opportunities within the main towns and small scale Green Belt releases. Given the greater constraint on development within the villages and rural areas compared to the previous Core Strategy it must be of significant uncertainty as to the role windfall will play in meeting the overall proportion of housing identified in the villages and rural areas. Therefore, there must be significant doubt that the overall housing requirement of the Plan can be delivered.	Policy SP8 should be amended to reflect a clear settlement hierarchy and distribution of housing across the villages where sustainable growth can be accommodated, with individual indicative housing requirements identified . This will provide greater clarity on the overall distribution of housing as well as providing clarity on the Plan's Spatial Strategy. This will also provide greater recognition that the larger villages have a wider range of services and facilities that can support sustainable growth. Wrington should be identified as a more sustainable settlement within the settlement hierarchy, reflecting its wide range of services and facilities and opportunities for accommodating sustainable growth and its role in accommodating housing recognised in Policy SP8. Further evidence is required to clarify how the additional 1,200 dwellings in the villages and rural areas will be provided without identifying sites or revising constrained settlement boundaries. Growth at Wrington should be identified and a specific housing requirement identified for the village. Further clarity as to how the levels of anticipated windfall will support the housing requirements within the villages and rural areas should be provided, taking into account the more constrained nature of the Plan in respect of those areas than the previous Core Strategy. The Policy map should be amended accordingly.		Pre-submission Plan (Regulation 19) Representations - on behalf of LiveWest (Redacted).pdf 03-18-25 Livewest reps on Additional Sites Consultation_Redacted.pdf

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					As we have raised on our client's behalf previously, the Core Strategy approach in clearly identify sustainable places and providing positive policy support for the release of sites for appropriate development provided a much more flexible approach to delivering sustainable development and was critical in supporting the high levels of windfall development as well as affordable housing delivery. Without this the Plan is far more inflexible and unable to respond to future needs, opportunity and circumstances. It is for the reasons set out above that we consider Policy SP8 significantly undermines the soundness of the Plan overall as it has not been positively prepared as it is not seeking to meet identified needs. Its strategy is not justified as it contradicts clear evidence of need and the contribution the larger villages (including Wrington) could make to delivering sustainable development and does not take into account reasonable alternatives in to address this. The Plan's approach will not be effective in that there is no clear evidence that supports the Plan being deliverable. It is not consistent with national policy in that its approach limits rather than maximises the opportunities for the Plan to deliver sustainable development in accordance with the Framework. Please see previous representations made on earlier versions of the Plan for completeness. These are appended to the covering email for these and other representations made on the Reg 19 (Pre-Submission Plan).			
Policy LP5: Housing, employment and mixed use allocations	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	No	LAND TO THE EAST OF WRINGTON For the reasons outlined in representations made in respect of Policies SP3 (Spatial Strategy), Policy SP6 (Villages and Rural Areas), Policy SP7 (Green Belt) and Policy SP8 (Housing) we consider Wrington should be identified as a more sustainable settlement and it potential to accommodate sustainable growth should be accommodated. Furthermore we consider our client's site at Land to the East of Wrington (reference HE2033) should be allocated and added to the Schedule 1 of Policy LP5. The site has the potential for the phased delivery of residential development with the potential provision of enhanced recreational facilities and substantial provision of green infrastructure to support the enhancement of the existing village edge. Initial masterplanning indicated the site has capacity for between 150-180 dwellings across the whole site area. It would support appropriate policy compliant level of affordable housing and range of housing mix and types. The site is not subject to any landscape or ecological designation and is generally flat with limited landscape features. The site has several suitable access options linking to existing residential areas and the core facilities of the village centre of which it is in close proximity. It is outside of the Conservation Area and there are no nearby heritage assets. The vast majority of the site is within Flood zone 1 and whilst there is a small area of functional floodplain it is not an impediment to developing the remainder of the site. There is no known history of flooding. Although the site is within the Green Belt it is in its margins and currently forms the eastern edge to the village which lacks any clear definition and is not visually attractive. Whilst not previously developed land, we do contend that given its existing marginal context the site could be reasonably considered to meet the wider definition of Grey Belt in that it clearly does not strongly serve the listed purposes of Green Belt.	The site at Land to the East of Wrington (reference HE2033) should be allocated and included in Schedule 1 of Policy LP5. The Policy map should be amended accordingly.		Pre-submission Plan (Regulation 19) Representations - on behalf of LiveWest (Redacted).pdf 03-18-25 Livewest reps on Additional Sites Consultation_Redacted.pdf

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					The release of the site would provide an opportunity to significantly improve this situation through the provision of a softer landscaped edge or buffer to the village. This would provide longer term benefits in respect of improving the landscape and visual context of the village, more than the current Green Belt designation. Therefore, the site represents a logical extension to the village and provides the option to deliver sustainable development and support housing delivery within the plan period. It would provide wider benefits to the local community in respect of housing and supporting local services as well as opportunities to improve infrastructure and the setting of the village. The site is available with a landowner willing to release and a promotional agreement with a housing provider and builder with ambitious plans to invest £1bn to support the delivery of 5,000 new homes in the South West over the next 5 years. This is clearly in the favour of the deliverability of the site. In the absence of the allocation of the site at Land to the East of Wrington (reference HE2033), we consider Policy LP5 significantly undermines the soundness of the Plan overall as it has not been positively prepared as it is not seeking to meet identified needs. Its strategy is not justified as it contradicts clear evidence of need and the contribution the larger villages (including Wrington and our client's site) could make to delivering sustainable development and does not take into account reasonable alternatives in to address this. The Plan's approach will not be effective in that there is no clear evidence that supports the Plan being deliverable. It is not consistent with national policy in that its approach limits rather than maximises the opportunities for the Plan to deliver sustainable development in accordance with the Framework. Please see previous representations made on earlier versions of the Plan for completeness. These are appended to the covering email for these and other representations made on the Reg 19 (Pre-Submission Plan).			
Policy LP7: Settlement boundaries	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	No	For the reasons outlined in representations made in respect of Policies SP3 (Spatial Strategy), Policy SP6 (Villages and Rural Areas), Policy SP7 (Green Belt) and Policy SP8 (Housing) and LP5 (allocations) we consider Wrington should be identified as a more sustainable settlement and it potential to accommodate sustainable growth should be accommodated. Furthermore, we consider our client's site at Land to the East of Wrington (reference HE2033) should be allocated and the settlement boundary adjusted to include it and the Policy Map and Schedule 5 adjusted accordingly. The site has the potential for the phased delivery of residential development with the potential provision of enhanced recreational facilities and substantial provision of green infrastructure to support the enhancement of the existing village edge. Initial masterplanning indicated the site has capacity for between 150-180 dwellings across the whole site area. It would support appropriate policy compliant level of affordable housing and range of housing mix and types. The site represents a logical extension to the village and provides the option to deliver sustainable development and support housing delivery within the plan period. It would provide wider benefits to the local community in respect of housing and supporting local services as well as opportunities to improve infrastructure and the setting of the village. Without making provision for growth within the village and by constraining even infill by the tightly drawn settlement boundary proposed, these benefits	The site at Land to the East of Wrington (reference HE2033) should be allocated and the settlement boundary of Wrington should be adjusted accordingly. The Policy map and Schedule 5 should be amended accordingly.		Pre-submission Plan (Regulation 19) Representations - on behalf of LiveWest (Redacted).pdf 03-18-25 Livewest reps on Additional Sites Consultation_Redacted.pdf

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					will not be realised and instead it will lead to stagnation. This will result in a lack of investment in infrastructure, an inability to sustain services and increasing affordability challenges, all to the detriment of the local community. In the absence of any meaningful opportunity of growth within the village and the constrained nature of the settlement boundary, we consider Policy LP7 significantly undermines the soundness of the Plan overall as it has not been positively prepared as it is not seeking to meet identified needs. Its strategy is not justified as it contradicts clear evidence of need and the contribution the larger villages (including Wrington and our client's site) could make to delivering sustainable development and does not take into account reasonable alternatives in to address this. The Plan's approach will not be effective in that there is no clear evidence that supports the Plan being deliverable. It is not consistent with national policy in that its approach limits rather than maximises the opportunities for the Plan to deliver sustainable development in accordance with the Framework. Please see previous representations made on earlier versions of the Plan for completeness. These are appended to the covering email for these and other representations made on the Reg 19 (Pre-Submission Plan).			
Policy LP9: Extent of the Green Belt	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	No	These representations should be read in conjunction with the representations made on Policy SP7 (Green Belt) and other representations made regarding the overall strategy of the plan and role of Wrington. We consider that additional land at Wrington should be released from the Green Belt to accommodate residential development in this sustainable village. This is because Wrington benefits from a wide range of services and facilities. Without growth opportunities it will become impossible to sustain these, invest in new infrastructure and provide much needed affordable housing, therefore creating an inherently unsustainable place to the detriment of the local community. Despite the clear need for growth to sustain Wrington into the future, site options are limited outside of the adjacent Green Belt and constrained by flood risk and heritage constraints. However, our client's site at Land to the East of Wrington (reference HE2033) is unconstrained in terms of landscape or ecological designation, is well located to existing services and facilities, has good options for access, provides opportunities for enhancement of the village edge and can support the expansion of the adjacent recreational facilities. Furthermore, it is outside of the Conservation Area, there are no nearby heritage assets and the majority of the site lies within Flood Zone 1. It therefore represents a logical extension to the village to deliver sustainable development, providing wider benefits to the local community in respect of housing and supporting local services as well as opportunities to improve infrastructure and the setting of the village. We have previously confirmed that the site is available and deliverable. Whilst it is Green Belt, it is clearly on its margins and includes land of no specific merit or character nor does it contribute to any Green Belt purpose (i.e. preventing unrestricted sprawl, merging of neighbouring towns and preserving the setting and special character of historic towns). In order to facilitate growth at Wrington, compatible with the other larger villages, the site should have been considered sequentially preferable to the	Our client's site at Land at East of Wrington (reference HE2033) should form part of the Green Belt review undertaken as part of the Plan process and be released from it and be specifically allocated for housing to support the delivery of sustainable development and the wider benefits to the local community this would bring. The Policy map should be amended accordingly.		Pre-submission Plan (Regulation 19) Representations - on behalf of LiveWest (Redacted).pdf 03-18-25 Livewest reps on Additional Sites Consultation_Redacted.pdf

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					non Green Belt sites because of how it performs across a range of factors that would support its delivery as sustainable development and because it does not fulfil a strong Green Belt purpose. Such an assessment is consistent with how the Plan has sought to release sites within the Green Belt elsewhere. For reasons that remain unjustified and not fully explained, the Plan appears to avoid any growth at Wrington on the basis of an assumption that no suitable sites exist, highlighting the concerns of the other sites and identifying our client's site as being Green Belt. Given the clear benefits of growth in the village, we consider a more robust assessment of the potential for release of Green Belt at Wrington should have been undertaken. Given the attributes of our client's site and the clear benefits in delivering growth at Wrington, Land to the East of Wrington should have been included in the list of Green Belt releases set out in Policy LP9. The release of the site would provide greater longer-term benefit in improving the landscape and visual context of the village as well as the wider sustainability benefits in respect of supporting the needs of the community. Without this Wrington faces the prospect of no growth over the Plan period which will place services and facilities at significant risk, fail to address growing affordability issues and increase unmet need to the great detriment of the local community. It is for the reasons set out above that we consider Policy LP9 (alongside other policies raised in our separate representations) significantly undermines the soundness of the Plan overall as it has not been positively prepared as it is not seeking to meet identified needs. Its strategy is not justified as it contradicts clear evidence of need and the contribution the larger villages (including Wrington) could make to delivering sustainable development and does not take into account reasonable alternatives to address this. The Plan's approach will not be effective in that there is no clear evidence that supports the Plan being deliverable. It is not consistent with national policy in that its approach limits rather than maximises the opportunities for the Plan to deliver sustainable development in accordance with the Framework. Please see previous representations made on earlier versions of the Plan for completeness. These are appended to the covering email for these and other representations made on the Reg 19 (Pre-Submission Plan).			

Name: Liz Cook **I.D:** 62734433

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	Unsure		Unsure	Unsure	I am very concerned that the "sustainable" plans included in the North Somerset Local Plan 2041 are not doing enough to protect wild habitats. Specifically the risk of continued degradation of the wonderful Weston Big Wood SSSI and the surrounding areas. The Big Wood is a vitally important habitat of ancient woodland - one of the rarest and most precious habitats in the country. Sadly, planners don't appear to consider it worth protecting. All planners have a legal responsibility to protect the environment, I don't think the North Somerset Local Plan is following these laws closely enough.	Fewer houses and associated infrastructure, especially in and close to wildlife reserves, SSSI and other areas that contain important wildlife habitats.		
Black Rock, north of Clevedon	Unsure		Unsure	Unsure	I am very concerned that the "sustainable" plans included in the North Somerset Local Plan 2041 are not doing enough to protect wild habitats. Specifically the risk of continued degradation of the wonderful Weston Big Wood SSSI and the surrounding areas. The Big Wood is a vitally important habitat of ancient woodland - one of the rarest and most precious habitats in the country. Sadly, planners don't appear to consider it worth protecting. All	Fewer houses and associated infrastructure, especially in and close to wildlife reserves, SSSI and		

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Road					planners have a legal responsibility to protect the environment, I don't think the North Somerset Local Plan is following these laws closely enough.	other areas that contain important wildlife habitats.		

Name: Liz Gritten **I.D:** 62811169

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The proposed pans of the Nailsea and Backwell area, if all granted, will completely change a small town and charming village into one big, soulless satellite town, that is completely overdeveloped. The roads, that struggle already under the weight of traffic, will remain overused and roads such as the A370 through Backwell, Station rd in Backwell and into Nailsea will be even more congested as the new road will not offer any help to these sections of road and will merely add extra vehicles. The road will cut through beautiful green belt land that houses much flora and fauna. Many rare species' habitats are under threat as a result of the plan, including Horseshoe bats, which are a protected species. The whole plan will basically rip out so much precious green belt land. The link road under the railway will become expensive as the nature of the work and will be built in an area rich in wildlife. The local provisions like schools, healthcare and leisure will be put under additional strain - they are struggle to cope currently. The main roads that service the areas are already connected at certain point and are not built to take that much traffic.There is a huge risk of more accidents in areas such as Wraxall Hill, Stone Edge Batch and Portbury lane due to an increase in vehicles but there is no evidence of any plans to improve these areas. The small lanes will become congested and dangerous for cyclists and walkers.The whole area south of nails and north of Blackwell is a FLOOD PLAIN as it's I a low valley and is almost always flooded even in summer. These unbelievable proposals will not only be building housing on a flood plain (not very sound building sense) but will also add to the Huge environmental issues we have with flooding,lackof adequate drainage and excess water in the winter. Constructing more buildings in an already flooded area will contribute to more of a problem and be environmental suicide.	Don't build all of the houses. If building work has tp happen, really consider the suitability of the site and reduce the planning. 3728 more houses in a small town and village like Nailsea and Backwell is ridiculous.		

Name: Liz Howarth **I.D:** 62796289

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Consistent with national policy	No	No	Thank you for the opportunity to comment There has not been full consideration of brownfield sites in N Somerset before considering the erosion of green belt land. ie building on Tower Farm Both Tower Farm and Black rock are greenbelt land with massive strategic ecological importance protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor. Both areas were added to the Green Belt in the late 1980s due to their high ecological significance. Greenbelt land should only be built on in when other options to build on brownfield sites have been exhausted. Therefore this situation can not be considered as an exceptional circumstance. Other considerations of this site Unsafe access (800 cars via The Downs!!) . The road is exceptionally unsafe at school drop off and pick up time. The developers proposal included access via Merlin Park for emergency vehicles - this is very vague and land has not be secured.	Explore and build on brown land before green In exceptional circumstances, green belt land can be considered but this land should not be of ecological significance (as Tower Farm and Black Rock are) Access needs to be improved - all cars can not come via The Downs		

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Black Rock, north of Clevedon Road	No	• Consistent with national policy	No	No	Thank you for the opportunity to comment There has not been full consideration of brownfield sites in N Somerset before considering the erosion of green belt land. ie building on Tower Farm Both Tower Farm and Black rock are greenbelt land with massive strategic ecological importance protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor. Both areas were added to the Green Belt in the late 1980s due to their high ecological significance. Greenbelt land should only be built on in when other options to build on brownfield sites have been exhausted. Therefore this situation can not be considered as an exceptional circumstance.	Brown land to be built on before building on green land (and only in exceptional circumstances)		

Name: Lizzie George **I.D:** 62862977

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Churchill Avenue	No	• Justified	Unsure	Unsure	Penny Field must be protected and made a Local Green Space. Under local planning policy, Penny Field is the perfect candidate for Local Green Space designation because it'd be in the top 24% of sites based on policy alignment. Clevedon Town Council, two petitions (2022 and 2025) of 600+ signatures and the consultation for Clevedon's placemaking strategy all called to protect Penny Field. Penny Field is a prime candidate for Local Nature Recovery, as identified by WECA, due to the presence of three priority species. Penny Field is also located on a Green Infrastructure Corridor under NSC's own policy. Under any Equalities Impact Assessment the reduction of green space would adversely affect lower income households.			

Name: Lizzie Slocombe **I.D:** 62849409

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Strategic Priorities								
Sustainable development objectives	No	• Positively prepared • Justified	Unsure	Unsure	These comments are specific to the proposed development around Backwell: "1.3 Promote the optimal use of land which supports regeneration, maximise re-use of previously developed (brownfield) land and protects the rural economy." Building on Class 1 greenbelt is neither maximising the use of brownfield land or protecting the rural economy. "2.1 Boost delivery and meet the housing need identified within the plan period." How has this level of need (1000 houses) been decided upon? The additional traffic on the (already busy and over crowded) roads and impact on existing infrastructure do not appear to have been considered. "2.4 Enhancing community cohesion and community facilities provision including cultural facilities." Community cohesion already exists. Doubling the size of the village will destroy it. This is not something that can be 'fixed' by building a new community centre.	Vastly reduce the scale of the development.		

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					"3.2 Minimise vulnerability to all forms of flooding, now or in the future, without increasing flood risk elsewhere. Also minimise harm to water quality and availability." The bottom of Chapel Hill is regularly flooded and the A370 suffers from excess water runoff from Backwell Hill when it rains, rendering driving difficult and dangerous. If the village is doubled in size, the water table is going to be negatively impacted even more. "3.6 Protect and where possible enhance biodiversity, geodiversity and green infrastructure and allow its adaptation to climate change, particularly with respect to protected habitats and species." Building on these fields will destroy existing valuable and vital wildlife corridors, at a time when our biodiversity is in serious decline (State of Nature Reports, 2025). Protect and where possible enhance biodiversity, geodiversity and green infrastructure and allow its adaptation to climate change, particularly with respect to protected habitats and species.			
SP8: Housing	No	‣ Positively prepared ‣ Justified	Unsure	Unsure	I feel that the revised pre-submission plan has not considered the impact on specific localities in sufficient detail and that the scale of building in specific areas is not justified. The documentation is not convincing that the "assessed needs" include building 1000 houses on green belt land, or that "reasonable alternatives" have been accounted for.	Reducing the scale of the development. Ensuring any planned building includes infrastructure such as schools, doctors and dentists - and these are actually included on the plans, not just mentioned.		
Policy LP3: Strategic location: Nailsea and Backwell	No	‣ Positively prepared ‣ Justified	Unsure	Unsure	These comments relate specifically to the Backwell area development: 1) "To prioritise the location of new development close to places with a wide range of services, facilities and job opportunities." Backwell is a small village which does not have "a wide range of services, facilities and job opportunities." 2) "To increase the number and range of job opportunities across the district, particularly at the towns to give people the opportunity to work near to where they live." Similar to the above - there are very few jobs in Backwell to which people could walk to work (and even less with the additional population the proposed development would bring. 3) "To prioritise the importance and delivery of green spaces when considering new development, support priority habitats and species, and safeguard areas at risk of flooding." This area is already prone to flooding (see below) and no amount of green spaces will compensate for the loss of wildlife corridors if the fields are built on.	Vastly reduce the scale of the development.		

Name: Long Ashton Nature Conservation and Environment Trust **I.D:** 63143425

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SP7: Green Belt					The Trust is confused with the re-assessment of the Green Belt in 'strategic' areas of North Somerset for WECA by ARUP. Much of this affects Long Ashton and the Trust is surprised that areas not identified by NSC on its Policies Map in any way or labelled as less suitable are now identified as Grey Belt and, as such, may open the door to more unwelcome development that could, effectively turn Long Ashton into a suburb of South Bristol. The Trust is aware of the sterling work done by the Green Belt Working Party comprised of highly experienced town planners and architects that has taken the trouble to write three reports that have been submitted to North Somerset Council. The Trust endorses all three of these reports since they outline a sound strategy that should development go ahead on this site should ensure that it will be aspirational, positive, sustainable and future-proofed against the ongoing onslaught of climate change and biodiversity loss. None of the high volume house-builders should be entrusted in developing the masterplan for an invaluable site such as this. Instead, it's a great opportunity for highly experienced planning consultants to work with NSC in order to develop a master-plan that will tick all the boxes for a high quality, sustainable, green development that puts high-value green spaces and corridors at its heart. A truly ambitious project that NSC could be proud of. Appendix A submitted by the Green Belt Working Party on Biodiversity is so robust and thorough that the Trust will not repeat it here. Instead, the Trust reiterates that it is in total agreement with all that it contains.			
SP11:					It's useful to set the pre-submission plan into a more national context. The Office for Environment Protection warns that			

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Historic and natural environment					the 2030 national strategy to reverse biodiversity decline is failing. Yet the latest Office for National Statistics report published in December 2025 shows the total annual value of ecosystem service in the UK was £41 billion in 2013, we lose invaluable green spaces at our peril. At the same time, the health benefits from recreation ecosystem service provided the largest contribution to the total UK asset value, at £508 billion in 2023. However, Long Ashton stands to lose much of its ecosystem services if this plan goes ahead.			
Policy LP2: Strategic location: Woodspring (south west of Bristol)					"The LANCE Trust was formed in April 2021 and is dedicated to stopping and reversing the decline in wildlife habitats and species throughout the parish and beyond. Working with local residents and key stakeholders, we believe that, by working together, we can help species decline, restore habitats, improve the health of our soils, increase our wellbeing and help mitigate the effects of climate change and biodiversity loss. However the development proposals contained in North Somerset's Pre-Submission Local Plan 2041 gives the trustees much concern. Much of the 'green space' in Long Ashton is either farmed fairly intensively whilst public spaces such as Ashton Court, Leigh Woods and other areas are subjected to ever-increasing human pressure. The proposal to develop large areas in and around Woodspring Golf Course is of particular concern since the large rich, mixed mosaic habitat (ancient woodland, scrub, rough grassland, wetlands, water courses and veteran trees) offers food, shelter and homes to a variety of wildlife that is unparalleled in terms of density and richness compared to the rest of the parish. The Trust is aware of the sterling work done by the Green Belt Working Party comprised of highly experienced town planners and architects that has taken the trouble to write three reports that have been submitted to North Somerset Council. The Trust endorses all three of these reports since they outline a sound strategy that should development go ahead on this site should ensure that it will be aspirational, positive, sustainable and future-proofed against the ongoing onslaught of climate change and biodiversity loss. None of the high volume house-builders should be entrusted in developing the masterplan for an invaluable site such as this. Instead, it's a great opportunity for highly experienced planning consultants to work with NSC in order to develop a master-plan that will tick all the boxes for a high quality, sustainable, green development that puts high-value green spaces and corridors at its heart. A truly ambitious project that NSC could be proud of.			

Name: Long Ashton Parish Council **I.D:** 50316929

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SP7: Green Belt	No				INTRODUCTION Long Ashton Parish Council recently carried out a survey of its residents to assess what matters most to them. Of those that replied, the top three most important areas in order of priority ranking 1st to 3rd were green spaces, planning and development, road safety and transport. The top second focus area in answer to the question what is most important and needs most improvement was the climate crisis and in particular ways to retain/build biodiversity in the parish. In answer to the question ‘what do people most like about living in the parish?’ almost every response was a combination of three areas: access to green spaces and countryside; separation as village but with proximity to Bristol plus sense of community. The Parish Council is also aware that 96% of the responses to EPIC’s planning application in 2024 cited the importance of retaining the Green Belt whilst the majority cited the importance of visual separation from Bristol, and the importance of maintaining and increasing biodiversity. SUMAARY OF NSC DOCUMENTS & INFO In addition, LAPC would like to highlight the following points compiled from NSC’s documents associated with previous consultations or current information on the emerging Revised Local Plan 1. The consultation on Additional Sites as part of NSC’s revised Local Plan 2041 was held before anyone knew that WECA had commissioned ARUP to carry out a review of Green Belt status in North Somerset and other local authorities that includes much of Long Ashton			

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					2. Policy SP 7: “Green Belt” (p 29 & 30) does not mention this review either yet it is relevant to this policy in particular with reference the Woodspring development and other potential development in and around the parish and neighbouring areas. 3. Policy DP 12: “Development in the Green Belt” (pp139-143) doesn't mention this review or the terminology ‘Grey Belt’ until the concluding paragraph on p 143 4. With reference the Composite Map of the current Sites Overview only the potential ‘Woodspring” parcel of land was identified as ‘Most Suitable’. The majority of other sites within and adjacent to the parish were identified as ‘Hard Constraints’, ‘”Less Sustainable” or ‘’Other Potential” with several parcels of land not labelled at all The views of residents who responded to the Additional Sites Consultation was based on the information available as listed above. However in the current Consultation on the Pre-submission plan 2041, LAPC notes that the ARUP review of Green Belt status for WECA has huge implications for Long Ashton and this is likely to have escaped the notice of many of our residents. QUERY ON SOUNDNESS The Parish Council therefore feels obliged to query the ‘soundness’ of this consultation and pre-submission plan. After EPIC’s planning application was approved, many residents questioned the local democratic process and, indeed, the national planning process. This may have strengthened over the last year or due to a combination of factors and may be exacerbated by the ARUP review. GREEN BELT ASSESSMENT (ARUP for WECA) Thanks to the Green Belt Working Party drawn from professional expertise within Long Ashton and Dundry who have examined both the Strategic Green Belt Assessment interim report and the more fine-grained and detailed Stage 2 Green Belt Assessment report, the Parish Council would also like to know more and be able to understand more about the analysis by ARUP. Taking the ARUP assessment into account and matching it up to the Policies Map, there seems to be a series of contradictions. This gives rise to queries as to why some sites on the Policies Map have been included as Most Suitable, others identified as Less Sustainable; and why some parcels of land aren’t included at all. As said above, for the majority of LAPC’s residents, this may be baffling too. COMPLEXITY OF CONSULTATION Responding effectively to such a complex consultation is beyond the expertise of most parish councillors and money to spend on professional advice is hard to come by. However, this consultation will pave the way to a plan with consequences that will impact the parish until 2041 or beyond. The years to come will see dramatic changes in weather, biodiversity loss and much else including the political landscape that gives many people in the younger generations huge concern. GREEN BELT WORKING PARTY DOCUMENTS Luckily, as referred to above, LAPC has been able to draw on the considerable expertise shown within the Green Belt Working Party drawn from Long Ashton and Dundry whose existence came about after both Natalie Richards (Planning Policy Manager, NSC) and Cllr Annemieke Waite reached out to key residents. The Working Party has now submitted three documents and conclusions to NSC’s consultation process that have been endorsed by LAPC. CONCLUSIONS LAPC would also like to reinforce the Green Belt Working Party's suggestion for a collaborative governance arrangement and Area Action Plan SPDs prepared by NSC or suitably qualified, independent and experienced planning consultants to set out key parameters and sustainable aspirations for any large-scale development in Long Ashton including, primarily, the Woodspring area. Many of these aspirations are already expressed in relevant NSC policies within the Local Plan documents but the danger is that if the developers lead with their own masterplan these parameters and aspirations will be lost. The Council would also like to point out the following concerns: 1. Road safety and transport problems are at breaking point in both the village and beyond. Providence Lane is often unsafe for pedestrians, cyclists and residents as is Yanley Lane and Wild Country Lane. The EPIC site, Bristol Airport Expansion, planning developments already agreed and those included in this consultation will exacerbate this but there seems to be no resolution in sight. Instead the word ‘potential’ is used far too often and this does not inspire confidence.			

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					2. Pressure on Local Green Space is increasing and will increase exponentially – Ashton Court has an increasing number of public events such as Luminate, music festivals, the balloon festival plus an increasing number of cyclists, walkers and others. Leigh Woods, too, experiences additional problems of increasing road traffic and parking issues. 3. The Office for National Statistics details the financial benefits our current green spaces give in terms of cooling benefits and mopping up air pollution to the benefit of South Bristol. 4. To combat the increasing problems of climate change, biodiversity loss needs to be halted and reverse yet the Office for Environmental Protection and other data compiled for differing scientific sources shows biodiversity loss is increasing. The proposed developments in Long Ashton will exacerbate #2, #3, #4 yet there are solutions as proposed in the Green Belt Working Party's document labelled Appendix A: Environmental Impacts as already submitted to NSC so the Parish Council endorses these as well.			

Name: Lorna O'Sullivan **I.D:** 62818497

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell Common is on the flood plane and experiences flooding which is more frequent now because of the heavy downpours due to climate change. Building in this area will exacerbate this. The road across the Common to Chapel Hill has been closed several times already this winter because of flooding under the railway line. The proposed new road from Backwell Lake across the flood plain to join the A370 would also encounter this flooding problem. There are ancient hedges and footpaths across the proposed development site which support abundant wildlife from insects and butterflies to small mammals, birds and bats. In a nature depleted country we cannot afford to lose more of our wildlife. I frequently use Nailsea and Backwell Station but it is inaccessible for wheelchair users and difficult when I have luggage and for pushchairs.			

Name: Lorraine H-P **I.D:** 18214849

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Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Building next to Backwell Lake. which is on a flood plain is not feasible and would cause huge problems. Backwell Lake was built as a balancing pond between Backwell and Nailsea. It is now managed by Wessex Water and is a wildlife haven for birds, otters and wildlife and is now a designated "Reservoir". It is the jewel in the crown for Wessex Water and is a regular visitor attraction. Building next to this lake would impact the wild life massively and is completely unacceptable. The proposed road emerging onto an already overstretched Station Road is also completely inappropriate and unsustainable.			
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Having been a resident of Backwell for more than 20 years I am extremely alarmed at the proposals to build on Backwell East. Backwell has always welcomed new housing and indeed was one of the first villages in the country to consult and produce a neighbourhood plan, which identified proportionate, required and sustainable housing. Indeed all of the planned housing has now been built and integrated into the village. Due to current Governments arbitrary housing targets we now have a further 800 houses with planning permission on our mostly Grade 2 agricultural land, of which there is only 10% left in North Somerset. This represents a huge 40% increase for Backwell which is on the way. To date, no further infrastructure has been identified to support this increase. The fact that the North Somerset Local Plan now puts forward a FURTHER 1,000 houses on top of the 800 is alarming and would see the complete overdevelopment of our village. It is noted that the land identified at Backwell East is Grade 1 Agricultural Greenbelt land, which is also currently used for food, crops and grazing - this land has been farmed, I am told,			

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					for more than 1,000 years. I find it appalling that this land is even being considered for housing. I can only imagine that North Somerset Council are so fearful of any form of legal challenge from Government on the housing targets that any form of planning protections or considerations have been thrown out of the window. Indeed a million miles from Sir Keir Starmer's speech on Greenbelt Planning reforms, where he talked about a disused garage forecourt, NOT Grade 1 Agricultural Greenbelt currently used for food. There is only 7% of Grade 1 agricultural land left in the whole of North Somerset County and yet this precious, high yield land is being put forward for housing. Indeed this flies in the face of Governments own policy which states that our "Best and most versatile land must be protected". for our food security. This appears to have been completely ignored in these plans and I find no mention in any of these documents. I have summarized my objections to the inclusion of Backwell East in this Local Plan for ease of reference below. If this plan in its current form is agreed, I believe it would be catastrophic not just for Backwell but for our Farming, Agricultural and Food Security across North Somerset and would set a dangerous precedent for our current and future generations. Once this land is gone it is gone for good. Backwell already has an additional 800 new houses with planning permission coming its way, this represents a huge 40% increase for the village. Backwell has more than done its bit in providing new houses and these additional numbers would lead to complete overdevelopment. Despite Backwell already absorbing a 40% increase, there is a deficit in school places and no investment in our health services. The lack of infrastructure and services cannot support a further 1,000 houses and is completely unsustainable. Backwell is being given higher numbers than any other village in North Somerset and in fact the percentage growth is higher than the Towns. For context, Backwell is being asked to take 7% of housing for the whole of North Somerset, Clevedon is being asked to take 2%. There is no needs analysis for a further 1,000 houses for Backwell. There is no analysis on social cohesion impact The land being put forward is in our Greenbelt The land being put forward is Grade 1 Agricultural Land The land being put forward is currently used for the production of food and crops and used for grazing. Grade 1 Agricultural Land is included in Government Policy which states that “we must protect our best and most versatile land” in order to protect our food security – The proposals contradict this policy and negatively impacts our food security. The proposals would destroy valuable wildlife and negatively impact biodiversity – we are already one of the most bio-diversely depleted countries in the world. The proposals would negatively impact the Brockley Maternity Roost and the SSi. The rare Lesser and Greater Horseshoe Bats are reliant upon food generated (manure) by cattle currently grazed on this land. There is no analysis, plan, costings, funding or guarantees for the proposed new road. The proposed new road would not truly serve Nailsea’s traffic flow as most commuters travel North/North West towards Bristol. The proposed new road would not stop Station Road’s traffic accessing the A38 or A370 to Weston-Super-Mare or Bristol Airport (This route takes as much traffic as Brockley Coomb). The proposed new road would not relieve traffic on Backwell Common & Chapel Hill as that traffic will still come from the Elms down Lodge Lane. The engineering to go either under or over the Railway will be hugely expensive (no costings have been carried out) and likely prohibitive. Backwell Common frequently floods and additional housing will exacerbate this. We live on Backwell Common and have first hand experience of how often it floods!			

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					There is no funding for 2 new schools. There is no funding for increased health care. There is no funding for new leisure facilities. There are significant concerns regarding the proposed designation of Nailsea and Backwell as a strategic growth location, including: 1. The impact of 3,600 houses and 6 Hectares of employment land on the character of the area. 2. The loss of Greenbelt to development (including East Backwell). The loss of Grade 1 high quality agricultural land. The proposed road would have a significant landscape impact (if it bridges over the railway line) or flood risk issues (if the road passes under the railway line). Doubtful the road can be funded and delivered in time to accommodate the proposed housing. Doubtful the road would alleviate traffic on Backwell Crossroads and provide an effective transport route for new residents. Proposals would compromise the existing strategic gap between Backwell village and Nailsea Town.			

Name: Lotty Wills **I.D:** 51430561

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	A planning-soundness, policy-based and legally-supported objection Backwell has already taken a significant amount of new housing, and the proposal to allocate a further 1,000 homes at Backwell East is unsound, unjustified, and inconsistent with national policy. The allocation should be removed for the reasons below. ⬖ 1. The allocation fails multiple NPPF Tests of Soundness Under the National Planning Policy Framework (NPPF), Local Plans must be: • Justified • Effective • Consistent with national policy • Positively prepared The Backwell allocation fails all four. Not Justified • No viability assessment for the site • No evidence that 1,000 homes are required specifically in Backwell • No assessment of alternatives or less sensitive land • No justification for selecting Backwell ahead of lower-impact locations • No evidence of local employment capacity to absorb growth Not Effective • The proposed new road has no design, no feasibility study and no funding • No committed infrastructure for health, education, transport or services • Flooding concerns around Backwell Lake remain unaddressed • Ecological constraints (bat foraging areas, hedgerows, SSSI influence zone) undermine deliverability	Th allocation should be removed from the Local Plan. Does all this disagree with planning		

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					Not Consistent with National Policy • Major loss of Grade 1 Best and Most Versatile (BMV) agricultural land • Conflict with national food-security and soil-protection policies • Risk of biodiversity and habitat harm inconsistent with the Environmental Act 2021 • Failure to show a sustainable distribution of development in line with NPPF Not Positively Prepared • Backwell already has 800 homes approved — a 40% increase • Another 1,000 would force an 80%+ increase, far beyond capacity • No evidence that necessary infrastructure can be delivered to support this scale ⬖ 2. Loss of Grade 1 Agricultural Land is contrary to national policy Backwell East is Grade 1 agricultural land. NPPF (para 174/175 equivalents) requires: Local Plans to avoid development of BMV land unless there are no reasonable alternatives. North Somerset has: • Non-BMV land elsewhere • Brownfield opportunities • Lower-quality agricultural sites Therefore the allocation of Grade 1 land is not justified and does not meet national policy tests. Loss of this land is permanent and harms long-term food security. ⬖ 3. Environmental Act 2021 – Biodiversity Net Gain (BNG) The allocation affects: • SSSI influence zones • Protected bat habitats • Hedgerows covered by the Hedgerow Regulations • Floodplain and wetland ecology Without proven, deliverable BNG on or off site, the allocation is potentially non-compliant with statutory requirements. ⬖ 4. Flood-risk policy has not been met Parts of the site and the area near Backwell Lake experience recurring flooding. The NPPF requires: • Development to be directed to areas of lowest flood risk • No increase in risk elsewhere • Demonstrated long-term safety of residents These requirements are not evidenced. ⬖ 5. The proposed new road is undeliverable			

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					Strategic allocations must rely on deliverable infrastructure. However, the road has: • No feasibility study • No engineering solution for the railway crossing • No business case • No costings or funding • No delivery plan A major allocation cannot rely on infrastructure that may never materialise. ◈ 6. Housing distribution is disproportionate and unsustainable Backwell is being asked to take: • A far higher percentage of growth than many towns • 7% of the district's total allocation • Despite limited employment, limited services and a constrained road network This is inconsistent with NPPF principles for sustainable patterns of development. ◈ 7. The Inspector has the power to remove the allocation If an allocation is not justified, not deliverable, or not aligned with national policy, the Inspector can legally require the Council to modify or delete it. Backwell East meets multiple grounds for removal. ◈ Conclusion: The allocation at Backwell is unsound Due to: • BMV land loss • Lack of deliverable infrastructure • Environmental and flood constraints • Absence of justification • Failure of multiple soundness tests • Disproportionate scale …the allocation should be removed from the Local Plan.			

Name: Louise Chapman **I.D:** 62850433

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Grove Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with	Unsure	Unsure	Green Field East of West Leigh Primary School The field should not be included in the Grove Farm / Rodney Road housing allocation. For West Leigh families and many residents, the land has clear current and future value for children's play, wellbeing and informal learning and outdoor activities. It saddens me to see that my daughter has started school this year at a lovely village school and she is drowned out by the noise of the current building works. Housing numbers can be met through existing allocations, meaning the field is not required to deliver the Plan's overall			

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		national policy			housing target. Policy LP3 priorities the provision of new green infrastructure and open space. This field already fulfils that purpose and should be protected, not built on. The access to the Rodney Road development should not have been agreed to as the access is not viable and never was. The land functions as an important environment buffer between the school and surrounding housing, helping reduce noise, air pollution, overheating and loss of biodiversity affecting children. Development on this field would represent avoidable harm to children's outdoor provision, at a time when national policy strongly emphasises active travel, outdoor learning, physical activity and mental wellbeing. Don't take this green space away from our future generations!			
Land west of Rodney Road	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Green Field East of West Leigh Primary School The field should not be included in the Grove Farm / Rodney Road housing allocation. For West Leigh families and many residents, the land has clear current and future value for children's play, wellbeing and informal learning and outdoor activities. It saddens me to see that my daughter has started school this year at a lovely village school and she is drowned out by the noise of the current building works. Housing numbers can be met through existing allocations, meaning the field is not required to deliver the Plan's overall housing target. Policy LP3 priorities the provision of new green infrastructure and open space. This field already fulfils that purpose and should be protected, not built on. The access to the Rodney Road development should not have been agreed to as the access is not viable and never was. The land functions as an important environment buffer between the school and surrounding housing, helping reduce noise, air pollution, overheating and loss of biodiversity affecting children. Development on this field would represent avoidable harm to children's outdoor provision, at a time when national policy strongly emphasises active travel, outdoor learning, physical activity and mental wellbeing. Don't take this green space away from our future generations!			
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Summary grounds for opposing the proposal: Scale and overdevelopment: Backwell already has 800 new homes approved (circa 40% increase); adding a further 1,000 homes would constitute wholesale overdevelopment beyond the village’s capacity. Infrastructure shortfalls: There is already a deficit in school places and no corresponding investment in health or leisure facilities; existing services cannot support an additional 1,000 homes. Transport inadequacy: The proposed road would not effectively serve Nailsea’s traffic or relieve congestion on Station Road, Backwell Common or Chapel Hill; creating a crossing under/over the railway is likely prohibitively expensive and potentially unfeasible. Rail hub limitations: Backwell station is not fit for purpose as a transport hub, with significant accessibility failures (including no accessible ramp to the south platform), undermining sustainable travel objectives. Lack of evidence and assessments: No needs or viability analysis has been provided for the extra 1,000 homes; Backwell is not an employment hub and most residents commute; no social cohesion impact assessment is available. Conflict with agricultural land protection and food security: The site includes Grade 1 agricultural land used for food crops and grazing, of which only 7% remains in North Somerset; Government policy requires protecting the “best and most versatile land” to safeguard food security, and the proposals would contradict this policy.			

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					Funding and deliverability risks: The Infrastructure Delivery Plan lacks analysis and costings, and there are no funding guarantees for the new road or supporting services. Taken together, the scheme amounts to unsustainable, unjustified growth that lacks essential infrastructure, fails accessibility and transport objectives, and conflicts with national policy on protecting high-quality agricultural land.			

Name: Louise Fletcher **I.D:** 62620257

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP7: Green Belt	No	‣ Justified	No	No	The plan proposes to build on green belt land, ancient woodland, wildlife corridor and land that regularly floods/is water logged (Portishead). There seems to be no provision for additional infrastructure to support the new dwellings. It would cause a massive increase in traffic, destroy wildlife habitats, create flooding of roads and change what makes Portishead a desirable place to live.	I read that the land by Portbury Hundreds was considered - it seems more suitable as it's brown site, close to main roads out of Portishead for commuters so reducing the traffic pressure through the town, close to proposed new train station, reducing traffic.		

Name: Louise Hopkins **I.D:** 62719713

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Pill Green	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I consider the North Somerset Local Plan 2041 pre-submission Plan not sound and not legally compliant in the following specific respects: 1. The “additional sites” consultation of 7 Feb–21 Mar 2025 (which added five sites around Pill/E-in-G) appears to have been carried out without proportionate local engagement (no local exhibition in Pill/E-in-G and markedly lower response rates compared with other settlements). The Council must demonstrate compliance with its Statement of Community Involvement and its Public Sector Equality Duty (Equality Act 2010) and explain how the 1,800+ community petition was taken into account. 2. The Plan’s justification for Green Belt release (SP7) does not, in the published evidence, convincingly show that reasonable alternatives (maximising brownfield and higher density urban options) were fully exhausted, nor that the Duty to Cooperate has secured cross-boundary solutions. The Council should publish the alternatives appraisal, brownfield capacity work, viability statements (re affordable housing), and Duty to Cooperate records. 3. The transport evidence lacks clearly accessible, cumulative modelling and a funded mitigation strategy for M5 Junction 19. National Highways has requested cumulative modelling; the Plan must supply the modelling, agreement in principle with National Highways on mitigation, and contingency if the proposed rail interventions are delayed. 4. The Plan requires robust HRA / protected species surveys and measurable, funded biodiversity mitigation for sites in the Pill/E-in-G area adjacent to SAC/SSSI. The Council must publish the HRA, site surveys, buffer proposals and BNG delivery and monitoring arrangements. 5. Sites in/adjacent to Markham Brook (Flood Zone 3) require the sequential test, any necessary exception tests and site FRAs to be published. The Plan must show that lower-risk sites were preferred and demonstrate safe access/egress, compensation and long-term flood management funding.	To make the North Somerset Local Plan 2041 legally compliant and sound, the following modifications are necessary: 1. Consultation & Legal Compliance • Provide a full Statement of Community Involvement (SCI) compliance report for the 2025 Additional Sites consultation, including justification for the absence of a local event in Pill/Easton-in-Gordano and evidence of compliance with the Public Sector Equality Duty. • Re-consult locally on the Pill/E-in-G sites through a proportionate, accessible, site-specific engagement process, and publish how the 1,800+ petition responses have been formally considered. 2. Green Belt Release (SP7) & Duty to Cooperate • Publish a transparent alternatives appraisal demonstrating maximised brownfield capacity, higher-density urban options, and cross-boundary discussions under the Duty to Cooperate. • Amend SP7 to include clear, site-specific “exceptional circumstances” tests and demonstrate how each site meets NPPF “Golden Rules” on infrastructure, affordable housing (with realistic viability), and publicly accessible green space. 3. Transport & Infrastructure (LP4/Schedule 1)		

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						• Publish cumulative transport modelling for all allocations affecting M5 Junction 19, including agreement in principle with National Highways on mitigation and funding. • Include a deliverable transport mitigation plan with phasing, costs, and contingency measures if the proposed rail link is delayed or altered. 4. Environmental Protection, HRA & BNG (SP11, DP35–37) • Provide complete Habitats Regulations Assessment (HRA) and updated ecological surveys for the Pill/E-in-G sites, demonstrating no adverse effects on the North Somerset & Mendip Bats SAC and Severn Estuary SSSI. • Strengthen policies to secure measurable, funded Biodiversity Net Gain, ecological buffers, and long-term monitoring. 5. Flood Risk (DP9 / DP11) • Publish and apply a full sequential test for all sites near Markham Brook and provide site-specific Flood Risk Assessments where Flood Zones 2/3 are affected. • Amend policy wording to ensure safe access/ egress, flood storage compensation, and long-term maintenance arrangements for any development in higher-risk areas.		

Name: Louise Osment **I.D:** 58514049

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Merlin Park, Portishead	No	• Effective	No	Unsure	We want the council to consider building on Brown Belt land instead of building on Green Belt land on the Merlin Park and North Weston sites. The Gordano Valley is a beautiful area and to build on it especially near (or tear up parts of) Weston Big Wood which may I remind you, has rare plants and wildlife and to destroy their habitat is a travisty, (and is also an area of Special Scientific Intrest). Also the infer	Build on Brown Belt land, and leave green belt areas alone, also this planning application should be rejected because lack of inferstructure in Portishead, the roads in and out of Portishead get very congested and more houses and cars will add to that problem, (and the new railway, if it should ever be built) schools/ dentists/doctors are all ready struggling to cope with newcomers to the town, so no, I object strongly on the development on both these sites earmarked. Keep Gordano Valley free of houses, and cars and keep Weston Big Wood as it is, so more vegitation and animals can thrive.		

Name: Louise Power **I.D:** 62864289

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Nailsea	Unsure		Unsure	Unsure	The proposed development of land alongside Land Yeo will further eat into more local green belt land, reducing further our green space and local area of biodiversity. It will have a major effect on the flood plain area that already struggles to cope with anything other than small rain showers (photo attached). Clevedon road between Wraxall and Nailsea already floods significantly on a fast, partially sighted bend causing significant danger to road users and pedestrians alike and further flooding is inevitable with a development of this size pushing water towards its boundaries (video attached shows how			IMG_3781.jpeg IMG_1435.jpeg IMG_3897.jpeg IMG_7202.mov IMG_1436.jpeg

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					dangerous the current road can be when flooded). It will also result in significant additional traffic to the area: there are already large tailbacks into Nailsea from Wraxall at multiple times of day and this would be significantly worsened by the addition of a roundabout in the middle of that road and nearly 400 new homeowners using it. I have taken photos of the flooding over the last few years which are attached. Other photos show the flooded areas in the valley following rainfall and the steady flow of rainwater coming down from Tickenham Hill which gathers at the bottom of Tower House Lane, causing build up of silt and blocking drains.			IMG_4222.jpeg IMG_7757.jpeg

Name: Lucy Byrne **I.D:** 30921569

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Vision, Strategic Priorities and Sustainability Objectives	No		Unsure	No	The North Somerset Local Plan 2041 pre-submission plan is not sound because it is not justified: The evidence in the supporting documents has multiple flaws in it that those with sound local knowledge who were NOT consulted with would have been able to help explain to those carrying out the reports. It is not effective because for example: the transport assessments are flawed with multiple inaccuracies and assumptions so the claims of making travel more sustainable are completely without justification. As one example: the predictions and mitigations for additional traffic flow on the A369 and subsequently the M5 are woefully inaccurate and hugely underplay the impacts of congestion and road safety. Neither is it consistent with national policy, as one example: land at Markham brook is in flood risk zone 3!. Some areas of the plan are therefore not legally compliant. Nor does it comply with the duty to co-operate, as one example: the village of Pill was not sufficiently consulted with about being a new strategic location (5 sites being split up and not treated as one area which increases the local population by approximately 44%) and there is little supporting evidence of co-operative work with the closely related city of Bristol in particular referring to transport modelling and economic growth plans.	To make the plan legally compliant and sound in respect of the issues I have identified North somerset council would need to carry out an extended period of consultation, evidence gathering and locally informed research that considers reasonable alternatives that; utilize more brownfield sites, do not build on so much greenbelt (which has environmental designations and high amenity and visual value), avoid further contributing to flood risks to build safe and cohesive communities. Consultation that complies with their own policies in North Somerset's own ‘statement of community involvement’. Consultation that demonstrates well researched cross-county borders strategic planning in regard to transport and economic development plans that are sound. This would deliver a plan with more acceptable and fair compromises to benefit ALL in North Somerset not just developers whose profit driven proposals have evidently led the decision making process without consideration of alternative spacial, community led plans. This plan creates a high risk of residential discord it increases the risks of flooding, of loss of biodiversity of a breakdown in community cohesion and increases road safety risks. As one example: There is a wealth of evidence of need in Pill's community development project 'Power to Pill's phase 1 report that was not considered.		Power to Pill Report Phase One 2023-24 FINAL FULL VERSION.pdf Photos-3-001.zip
SP7: Green Belt	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The justification for this is in Strategic Policy SP7 of the Local Plan. It is based on the Council’s assertion that it cannot meet its identified need for homes at sustainable locations outside the Green Belt and this amounts to’ exceptional circumstances’ under the terms of Section 13 of the National Planning Policy Framework 2024 (NPPF). However the Council has not shown that it has fully examined reasonable alternatives, such as maximising brownfield capacity, optimising land in towns and cities with higher-density developments (for example there are two sites in Portishead which could take more higher density housing) and working with neighbouring authorities to better accommodate housing needs in relation to existing areas of employment. Supporting evidence is weak, in some cases absent and incomplete. I therefore believe it is not possible to argue that the ‘exceptional circumstances’ justification is valid.	To re-consult with residents and properly consider reasonable alternatives, to make a plan that better serves ALL the residents of NSC.		What Does Pill Want.pdf

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					Where land is removed from the Green Belt, development proposals must demonstrate how they meet the ‘Golden Rules’ as set out in the NPPF relating to the provision of affordable housing, infrastructure and publicly accessible green spaces. The affordable housing target is demonstrated however as almost all of the 1,100 dwellings proposed in and around Pill are on green belt this would mean over 500 would need to be affordable. To provide this number of affordable homes close to Bristol is clearly on paper a good thing. However the reality on the ground IN PILL! which is already struggling with a high proportion of residents who are underserved, on benefits, out of work, suffering with poor health and wellbeing (see summary of what pill residents want from Power to pill community development report attached) is that this approach would carry a high risk of creating ghetto communities sitting adjacent to more expensive housing that developers would argue would need to be built to hit their high profit margins and cover the costs of the affordable housing. These more expensive dwellings would no doubt be used by wealthy newcomers to the village, many of whom would treat this accommodation as a convenient way to live close to work, treating the village as a ‘dormitory town’ in the way that a large proportion of the residents of the St. Katherine’s estate are locally perceived to do. This added burden to the already over stretched voluntary sector in Pill would be an impossible mountain to climb, even with additional investments from section 106 money (of which in the plan the majority would seem to go towards high cost transport mitigations at J19 on the M5 and a new primary school) Additional evidence in North Somerset's own ‘additional sites viability addendum’ (a document in the evidence base) suggests that a target of 50% affordable housing may be ‘challenging’ for the proposed sites in existing Green Belt land around Pill and Easton-in-Gordano. There are other sites in North Somerset which could be considered for housing development, which are not mentioned in the Local Plan. There are areas of land owned by North Somerset that have not been proposed. Logic tells us that if 100% of the 3rd tier allocations went to the 5 sites around Pill (resulting in 1,100 dwellings) that this would mean a large number of other 3rd tier suggested sites must have been awarded ZERO allocation or less than 10%. Hundreds of rural communities in North Somerset are hugely underserved by public transport connections. Busses that only connect to Bristol once a week mean that residents in rural communities HAVE to own cars to get to work. By dispersing the housing allocations a little more evenly around the county rural communities will feel invested in for the future. Their children will be able to afford places to live locally, local primary schools will remain open and much needed rural bus services will continue to run. Following a strategy to over supply places like Pill with more dwellings than the existing communities can comfortably integrate and support massively underserves rural communities. It puts unnecessary strains on particular transport arteries eg. along the A369 and J19 of the M5. The back ground paper assessment for grey belt status is woefully inaccurate! It ignores the SSSI status of the foreshore, and other significant biodiversity markers and ancient woodland status’. It down plays the visual and amenity value of each area as it splits the land into 8 areas around the village and doesn’t consider the impact of ALL 5 sites being built on to 100% capacity! Pill is geographically PHYSICALLY cut off from accessing green spaces due to the Avon to the north, the Port and the M5 to the west and the A369 to the south east and private land ownership without public access to the east. To build on all of the proposed sites around Pill would			

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					have a devastating impact on the health and wellbeing of residents. Not only due to the reduction in safely accessible green spaces, but also in the higher pollution levels due to increased car ownership and numbers of residents forced to live adjacent to the M5 and a heavily congested A369. To take quotes from the above text from North somerset in this consultation 'In doing so it will protect rural settlements maintaining their character and separate identities' This is 100% NOT the case in Pill! and to list all the sites SEPERATELY as if they are not all connected is deliberately misleading! 'Woodspring, south west of Bristol – 3,500 dwellings Land at Lodway Farm, Pill and Easton-in-Gordano – 160 dwellings Land east of Gordano Services, Pill and Easton-in-Gordano – 200 dwellings Pill Green, Easton-in-Gordano – 600 dwellings Land at Pill Road, Pill and Easton-in-Gordano – 100 dwellings Land at Ham Green, Pill and Easton-in-Gordano – 40 dwellings Tower Farm, Portishead – 400 dwellings Black Rock, Portishead – 100 dwellings Land north of Nailsea – 381 dwellings Land off Pound Lane, Nailsea – 100 dwellings Land East of Backwell – 889 dwellings Land north of Colliter's Way – 215 dwellings' The TOTAL FOR PILL IS 1,100! I therefore conclude that this Plan is not sound and does not demonstrate that the Council has complied with the Duty to Co-operate.			
SP7: Green Belt	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	Unsure	It does not ''protect and enhance valued landscapes and biodiversity'' around Pill. see Gov. letter attached as evidence.	use less of the green belt around Pill for housing. Delete LP4 and go back to the drawing board and properly consult with local people and businesses about Green/grey belt status and level of use of either that is desired in Pill.		MHCLG Response 24497 (1).pdf
SP9: Employment	No	• Positively prepared • Justified • Effective	Unsure	Unsure	Why is there no allocation for more employment in Pill? The plan sets to increase the population by around 44% however the roads can't take any more cars. The railway only has very limited capacity to serve the existing population let alone one with so much growth. Employment opportunities must therefore be a priority for this efffectively new town that is being created.	It would be better to make some of the allocations of land around Pill for ecconomic developments that make use of the high grade agricultural land for farming related diversification businesses such as cider orchards, market gardens or flower farms to supply Bristol.		
SP10: Transport	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The Local Plan does not address potential traffic congestion at Junction 19 of the M5. Concerns have been raised by National Highways re: development at Court Hay near the service station (see NSC planning portal, ref 25/P/1413/OUT). The National Highways report stated that transport modelling is required to assess the cumulative impact of developments on Junction 19. It is not evident from the proposed Local Plan that NSC has co-operated sufficiently with National Highways and taken its advice. There is a clear over-reliance in this Local Plan on the impact of the proposed railway in Pill. There is no evidence in the Local Plan that transport links, including buses and trains, will be sufficient for the proposed number of new homes. See attached supporting doc of evidence found by my neighbour who has	It is clear that the transport planning for Pill was a late addition to the plan. supporting evidence needs to be more detailed and based on accurate data. This plan cannot proceed until this transport plan is sound.		Transport evidence analysis.pdf

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					done some deep diving into the evidence base and found it to be lacking and inaccurate in several important areas.			
SP11: Historic and natural environment	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	Unsure	The Council hasn't taken sufficient account of the protection of wildlife and habitats in Pill and Easton-in Gordano in its assessment of the release of land from the Green Belt (SP7) There is a lack of clear strategies and mitigation policies in the Local Plan, without sufficient funding plans to ensure sufficient protection of wildlife and habitats in the potential development areas around Pill (see LP4 and Schedule 1) The best grade 2 agricultural land around the village is not being protected, in accordance with Section 15 of the National Planning Policy Framework.	Proper local consultations with ecology experts who know the locations well should be undertaken. refer to the reccomendations in the wild service ecology review that was a supporting document for the Pill neighbourhood plan https://pillanddistrictplan.org/environment-and-landscape/wild-service-ecology-review/		
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	Unsure	The North Somerset council local plan consultation on additional sites ran from 7 February 2025 to the 21 March 2025. It showed 5 additional sites in and around Pill with potential for 1,100 new homes. All 5 sites were presented in yellow on the maps, showing they were ‘3rd tier’ in the priority pecking order, (Brown were already agreed / underway, and Blue were 2nd tier - the most favoured locations) It was possible to estimate that assuming the majority of the brown and blue sites would be agreed that only about 10-15% of the remaining 3rd tier ‘yellow’ sites would be necessary to include. It was within this context, that the residents, businesses and organisations not only of Pill, Easton in Gordano & Ham Green (which together are regarded in practical terms as one village, with its central green & precinct as the village of ‘Pill’) but also of the surrounding villages of Portbury, Abbots leigh and Failand and to some degree the town of Portishead (basically all settlements in the North west of the county that use junction 19 of the M5) responded. The announcement that the Portishead to Bristol Railway would still be getting funding to go ahead came during the consultation period, however it has been making progress for the last 15 plus years, so this decision was not unexpected and research attached demonstrates that it will barely provide enough capacity for existing residents. The 5 sites in and around Pill were never presented as ONE strategic location to be consulted on. Our neighbourhood plan reflects that our residents are broadly in favour of a SMALL amount of development as there is a need for more affordable housing. A recommendation of 200-250 dwellings in small clusters around the village was generally agreed necessary. One of the 5 sites is clearly a brown field site and most residents would like to see it developed, however it was not presented as ‘2nd tier / blue’? Instead all 5 sites were each consulted about individually, which split local opinions. Understandably people were not too concerned that there was a risk that all would be given 100% allocation as there were so many other more suitable ‘blue / 2nd tier locations’ in the county. Pill is cut off by the Port to the west and the Avon to the North, it only has limited access to open green spaces which all have high amenity and visual value and many are grade 2 agricultural land with protected species. The largest 4 of which are located in the green belt. To allocate all at 100% would increase the local population by around 44%! It was therefore INCONCIEVABLE to build on ALL 5 sites at 100% of the allocation. There was no public drop in organised in Pill (which has significant social deprivation markers - see evidence in the Power to PIll phase 1 report) with many people without transport or funds to easily get to other drop in sessions) North Somerset Council held four public drop ins (Long Ashton, Weston-super-Mare, Nailsea, Backwell), but none in Pill/E-in-G, despite five sites being consulted on in this area.	North somerset needs to reconsider the plan to make Pill a 4th strategic location. They need to carry out a propper community consultation and consider reasonable alternatives. This plan is unacceptable in it's current form.		Power to Pill Report Phase One 2023-24 FINAL FULL VERSION.pdf

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					Response volumes were markedly lower for Pill (125 responses from a maximum of just 29 individual respondents across 5 sites) than for other locations: Portishead: 689 responses for 5 sites, Long Ashton: 591 responses for 10 sites, Wrington: 484 responses for 5 sites, Nailsea and Backwell: 1,049 responses for 26 sites. North Somerset's consultation summary report demonstrated that there had been a clear misunderstanding /miss-representation (at worst disregard?) of the opinions of the residents of Pill. Instead the summary was closely aligned to the proposals put forward by developers and land holdings companies who have invested significant funds in preparing the cases for developing these areas of land who over state the role of the railway line and it's capacity to support sustainable travel. As a result Pill was categorised as a Strategic Location for large residential development. Over 1900 residents from a total population (including children) of circa 4,500 have signed a petition objecting to the proposed excessive housing in the area and challenging the lack of adequate consultation by North Somerset Council. The scale of potential change in Pill (approx 44% increase in dwellings), the absence of a local event and the relatively small response volumes clearly demonstrates under-representation of local voices and a lack of proportionate engagement. It is evident that North Somerset council have not complied with their own Statement of Community Involvement. Their consultation was not sufficiently inclusive and as a result does not comply with legal duties under the Equality Act 2010, including the Public Sector Equality Duty. In this consultation North Somerset council state: 'Regeneration will transform and breathe new life into existing towns and valued areas will be protected. People's well-being, a strong sense of community, opportunity and fairness will be at the heart of all development in North Somerset.' I would argue this is simply not true in the case of the decision to make Pill a 4th strategic location. Adding 50% affordable homes to an area that already has a significantly high % of 'deprived neighbourhoods' is not a good strategy for creating healthy communities. The social strains on the village to support residents with high needs will cripple the village's currently over stretched resources. New developments of such scale carry a high risk of creating larger areas of social deprevation especially in the least desirable locations right next to the M5.			
Policy LP11: Transport infrastructure, allocations and safeguarding	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	Unsure	There is no mention of capacity improvements for J19 on the M5 which NSC own evidence states will be essential as the junction is already at or nearing capacity!! nor of any solutions to the gridlock or provision for safe crossing points on the A369. The proposed railway will not have capacity to solve these traffic issues. The A369 will be at capacity with pinch points where no busses can get through.	Delete SP4, there's no evidence of sufficient transport infrastucture mittigations that can cope with this volume of dwelligns in this location.		
Policy DP14: Highway safety, traffic and provision of infrastructure associated	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent	No	Unsure	This statement is wholely untrue for the development proposals for Pill: 'Development will be permitted provided it would not prejudice highway safety or inhibit necessary access for emergency, public transport, service or waste collection vehicles. Development likely to have a severe residual cumulative impact on	Propper local vision-led coimmunity engagement needs to happen in Pill around all the transport and active travel plans before deciding to increase the size of the village by 44%! It is unclear how the local roads, busses, trains and active travel routes can cope with the extra demands for travel.		MC2025_24892.pdf

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with development		with national policy			transport routes, traffic congestion or on the character and function of the surrounding area, will only be permitted where acceptable mitigation measures are delivered. All mitigating infrastructure will need to be delivered within an agreed specific timeframe and prior to the aforementioned impact becoming severe. In some circumstances planning permission may be granted subject to the applicant entering into an appropriate legal agreement to deliver or fund the improvements required' Evidence and mittigations for the M5 J19 are not sufficient with innaccuracies. Active travel, bus and trains will not be able to mittigate for the increase in cars on the roads. The A369 will become more frequently grid locked and dangerous to cross. Local roads in Pill will become grid locked and unsafe to cyle and walk beside. There has been no evidence of a 'Vision led' or 'well designed' transport or active travel plan for Pill. walking and cycling will not become more attractive with these insufficient plans. The RDG referred to in the attached letter from Barrones Taylor has not yet been published and should be followed. This plan shows not enough thought has gone into transport planning around the developments for Pill.			
Policy DP24: Town Centres	No	• Positively prepared • Justified • Effective	Yes	No	This outline for town centre's fails to include for the effectlively 'new towns' the local plan will be creating by adding so much housing to areas like Nailsea and Backwell and Pill. In the case of the village of Pill in particular it is currently barely able to sustain it's existing population with the limmited shops and resources it has, depending in many ways on a currently over stretched and aging volunteer network to run most of it's local activities. In this Local Plan the size of Pill settlement is set to increase by 44%!!!! changing it from a village into a small TOWN. This local plan does not clearly outline the need for more investment in these new towns it is effectively creating. There are no clear references in the economic plans either. The cost of such investments in an area like Pill which has several woefully under resourced services already will be exceptionally high compared to planning a strategy with less housing around Pill and instead locating it closer to the larger towns that already have the infrastructure and services. The residents and local businesses and charitable organisations of Pill have not been consulted with about economic development.	The residents and local businesses and charitable organisations of Pill have should be consulted with about economic development and priorities and strategic plans need to be made with their input. Ideally the unsustainable levels of houing allocated for Pill need to be re-considered. Local communities need to be properly consulted with (a max of 29 respondants of whome around a 3rd had vested interests is not in any way fair or representative to base such impactful decisions on. There need to be several widely advertised local public meetings in Pill where buisnesses, local organisations and residents all share their views. There by highlighting several costly areas of concern which this plan has missed.		
Policy DP53: Best and most versatile land	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I understood that the land next to the A369 by Pill was grade 2 agricultural land? it is next to Markham brook with ancient woodland either side. I don't understand why this land is allowed to be allocated with housing when there are suitable brown feild sites in the county such as in Portishead and Weston supermare that have not been proposed to be built on to maximum capacity?	re-consult about all brown feild sites and utilize all to maximum density before proposing to build on green belt grade 2 argicultural land. The land by the A369 in Pill could be used as an area of economic growth if developed as productive cider orchards or flower growing for example, providing new ares of employment for the additional residents. To build on such valuable agricultural land does not make sense.		
Easton-in-Gordano/Pill: Marsh Lane to A369 Motorway Service Area	Unsure	• Positively prepared • Justified • Effective	Unsure	Unsure	There is insufficient detail about this active travel route. It is currently a very poorly maintained foot path. Will it be up graded to a paved dual use cycle route and if so is there any commitment to maintain it? current cyle routes in and around Pill are very poorly maintained with deep pot holes / encroaching vegetation / poor entrance & exits / narrow gaps / over hanging vegetation making them un usable and unattractive . Will there be lighting? to make this safe to walk on at night? It doesn't go the most efficient route to the crossing point on the A369 which is never a good way to plan active travel routes.	More efforts should be made to engage with local residents about the local active travel needs /best routes and more detail needs to be provided about the routes (surtfaces / maintainance / lighting / width etc.)		

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Royal Portbury Dock access under M5	No	‣ Positively prepared ‣ Justified ‣ Effective	Unsure	Unsure	How is this an active travel route? it's a path to nowhere with no clear detail about were it goes once it hits the M5?	much more detail is required to show the active travel plans for all areas in and around the settlement of Pill. Proper community consultation needs to take place.		
Pill to Bristol Link along River Avon	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	No	I can see no evidence of collaboration with Bristol city council about the necessary improvements to this highly important active travel route connecting not only Pill but the whole of North somerset to Bristol's active travel net work. This path is un surfaced and often impassible in the winter months due to mud and flooding. There are safety issues around steep un fenced in edges and lack of lighting at night. it is very narrow in places and crosses an SSSI I can't find sufficiet details about this Key active travel route that is being overstated in this local plan for it's capcity to deliver residents to and from Bristol. see photos There is no additional economic plan for more employment in Pill. The working age residents of the 44% increase in population will need to leave the village to find work. There will not be enough capacity in this plan for them to do this with public transport and active travel.	Proper local active travel consultations and plans need to be drawn up with proper engaement from local people. Consideration of the hard constraints along this path need to be made and if suitable mittigations cannot be found the housing allocation numbers need to be reconsidered.		Photos-3-001.zip

Name: Lucy MacDonald **I.D:** 62845985

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Land west of Rodney Road	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure		I request the removal of the field to the east of West Leigh Primary School from the Grove Farm / Rodney Road housing allocation. The field should not be included in the Grove Farm / Rodney Road housing allocation. For West Leigh families and many residents, this land has clear current and future value for children’s play, wellbeing, informal learning and outdoor activities Policy LP3 prioritises the provision of new green infrastructure and open space. This field already fulfils that purpose and should be protected, not built on The site has strong potential for designation as Local Green Space, as it is: - demonstrably special to the local community, - local in character, - and offers clear recreational, educational, health and ecological benefits. Development here would represent avoidable harm to children’s outdoor provision, at a time when national policy strongly emphasises active travel, outdoor learning, physical activity and mental wellbeing.			
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with	Unsure	Unsure	I strongly object to the Local Plan’s proposed developments in Backwell. My reasons are as follows: 1. Excessive scale of development: Backwell already has approval for 800 new homes—an unprecedented 40% increase in the size of the village. Any further allocation would constitute severe and unacceptable overdevelopment. 2. Unrealistic and ineffective transport proposals: The proposed new road would not meaningfully alleviate traffic in Nailsea or congestion on Station Road, Backwell Common, or Chapel Hill. Delivering a road under or over the railway would be extremely costly, technically challenging, and may ultimately prove unfeasible.			

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		national policy			3. Insufficient infrastructure and services: Despite the substantial growth already approved, local schools are oversubscribed, and there has been no corresponding commitment to expand health, education, or leisure facilities. The existing infrastructure cannot accommodate an additional 1,000 dwellings. 4. Railway station not fit for purpose: Backwell's railway station is not suitable as a transport hub. It remains inaccessible for people with mobility issues and presents significant challenges for those travelling with young children. Relying on it to support large-scale development is unrealistic. 5. Unfair and disproportionate housing allocation: Backwell has been allocated more new homes than any other village in North Somerset, and a higher proportional increase than several towns. The village is expected to absorb 7% of the district's total housing allocation, compared with Clevedon's 2%. No evidence has been provided to justify the need or viability of such a disproportionate increase. 6. Lack of local employment opportunities: Backwell is not an employment centre. Most residents commute elsewhere for work, meaning further housing would increase rather than reduce travel demand. 7. No assessment of social impacts: The Plan includes no social cohesion or community impact assessment, despite the significant scale and pace of change proposed. 8. Loss of high-quality agricultural land: The site includes Grade 1 agricultural land currently used for food production and grazing. Only 7% of North Somerset's land falls into this highest category. Its loss would be irreversible. 9. Conflict with national policy on food security: Government policy requires the protection of our "best and most versatile" farmland to safeguard food security. These proposals directly contradict that principle. 10. Threat to biodiversity: Development on this scale would remove important wildlife habitats and further degrade biodiversity in what is already one of the most nature-depleted countries in the world. In summary, the scale of growth proposed for Backwell—combined with the lack of supporting infrastructure, the loss of high-quality agricultural land, and the environmental impacts—is destabilising, unsustainable, and undeliverable. The Local Plan should be revised to reflect a fairer, evidence-based, and environmentally responsible approach to development.			

Name: Luke Samuel Charles Evans **I.D:** 62858913

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Land at Lodway Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No		I object to the allocation of Green Belt land around Pill & Easton-in-Gordano (LP4 / Schedule 1) on the grounds that the Council has not demonstrated exceptional circumstances in accordance with Chapter 13 of the NPPF (2024). The Additional Sites consultation (7 Feb–21 Mar 2025) had a very low local response for Pill (c.125 responses across 5 sites; only 29 individuals), no local exhibition in Pill, and the Consultation Statement does not show proportionate engagement as required by the Council's Statement of Community Involvement. There is inadequate published evidence that reasonable alternatives (maximising brownfield, optimising density, or cross-authority options) were fully tested; transport modelling does not adequately demonstrate that Junction 19 or cumulative impacts have been mitigated; HRA and biodiversity mitigation for SAC/SSSI impacts are not demonstrated; and the Plan fails to show robust sequential flood-risk testing for sites near Markham Brook. For these reasons the allocation is unsound and should be withdrawn until further evidence, proper local consultation, and statutory assessments (HRA, SFRA/FRAs, full transport modelling) are completed and published.		

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						Short summary of the case against the allocations 1. The February–March 2025 “additional sites” consultation appears to have been insufficiently local and proportionate for a change of this scale in Pill/E-in-G — contrary to the Council’s own Statement of Community Involvement and public sector equality duties; the consultation statement confirms low local response numbers for Pill compared with other settlements. n-somerset.gov.uk+1 2. The Plan’s justification for removing land from the Green Belt relies on “exceptional circumstances” under the NPPF (Chapter 13). The evidence must show exhaustive examination of reasonable alternatives (brownfield use, higher densities, cross-boundary cooperation). If that evidence is absent, the Green Belt release is vulnerable. GOV.UK Assets+1 3. Transport evidence is incomplete on cumulative effects (particularly M5 Junction 19). National Highways’ responses make clear further transport modelling / co-operation is needed. Reliance on a future rail link and unproven bus/active travel measures is risky. n-somerset.gov.uk+1 4. Ecology / Habitats — the sites lie close to bat SAC consultation zones and the Severn Estuary SSSI and will require robust HRA and measurable net biodiversity gains; the Plan must show credible mitigation and funding. Existing local ecology reports identify constraints. abbotsleigh.org.uk+1 5. Flood risk — parts of the area (Markham Brook valley) fall within Flood Zone 3; the Plan must apply sequential testing and show mitigation/avoidance for housing. The council’s SFRA and national flood mapping are relevant. Detailed points (with the legal/planning basis) 1) Procedural fairness & adequacy of consultation For a proposal that would re-categorise Pill/E-in-G as a Strategic Location and potentially release multiple Green Belt sites, the council’s consultation was not sufficiently local or proportionate. The Consultation Statement records only ~125 responses relating to the Pill area (29 respondents across 5 sites) versus much larger numbers elsewhere; no consultation events were held in Pill despite this being one of the most affected areas. That under-representation raises a realistic procedural unfairness concern and possible failure to follow the Council’s Statement of Community Involvement (SCI). n-somerset.gov.uk+1 • Why it matters legally: The SCI sets out how plans should be prepared and consulted on. If the council did not comply with its own SCI, the Plan could be open to challenge at examination or by judicial review for procedural illegality or irrationality. Also consider whether the Council carried out equality screening and complied with the Public Sector Equality Duty (PSED) — e.g. were groups with protected characteristics properly engaged and were reasonable adjustments made? (If there’s no evidence of PSED consideration, raise that.) n-somerset.gov.uk 2) Green Belt: “exceptional circumstances” and alternatives Chapter 13 of the NPPF says Green Belt boundaries should only change where “exceptional circumstances” are demonstrated and		

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						where reasonable alternatives have been fully considered (brownfield land, higher densities, cross-boundary options). The Plan must show exhaustive, transparent evidence that other options were examined and why they are not sufficient. If the council's evidence base (SHLAA, brownfield capacity work, density appraisals, Duty to Co-operate statements) does not demonstrate that, the justification for removing Green Belt is unsound. GOV.UK Assets+1 • Particular local point: The Additional Sites Viability Addendum reportedly flags that 50% affordable housing would be "challenging" on these Green Belt sites — that undermines any claim that the release will secure clear public benefits (an important part of "exceptional circumstances"). Ask for the viability evidence and sensitivity testing. n-somerset.gov.uk 3) Duty to Co-operate and alternatives across borders The Duty to Co-operate requires strategic engagement with neighbouring authorities where housing needs cross boundaries. The Plan should show what cross-authority options were explored (e.g., maximising higher-density urban sites or brownfield in nearby towns). If the council did not properly evidence co-operation, that is a soundness issue. n-somerset.gov.uk+1 4) Transport and cumulative impacts (Junction 19 / modelling) National Highways has queried cumulative impacts and asked for modelling for Junction 19; the council's own documentation shows National Highways expect to work with NSC and that modelling is required. The Plan appears to rely heavily on a future rail link and new active travel routes — but the timings, funding, and deliverability of these measures must be explicit and evidenced. Without robust cumulative transport modelling (and clear mitigation and funding commitments), the Plan is not sound. n-somerset.gov.uk+1 5) Ecology / Habitats Regulations Assessment (HRA) Sites are within bat SAC consultation zones and close to the Severn Estuary SSSI; HRA may be required and must show no adverse effect on integrity or, if effects are likely, provide lawful mitigation/ compensation and secure funding. The Plan must demonstrate measurable biodiversity net gain and appropriate buffers. Local ecological reports (neighbourhood plan evidence, Wild Service reviews) highlight important habitat corridors which must be protected. If the Plan simply allocates sites without clear HRA outcomes, it is unsound and may be unlawful. abbotsleigh.org.uk+1 6) Flood risk and sequential/exception tests Markham Brook valley and other low-lying land are in Flood Zone 3 (high risk). NPPF requires sequential testing (prefer lower-risk sites first) and, where necessary, the exception test with demonstrable mitigation. The Plan must show that lower-risk sites were prioritised or that any allocated sites in Flood Zone 3 are justified by the exception test and will be safe in the long term. If the Plan lacks a clear sequential test and site-by-site flood risk assessment, it is unsound. n-somerset.gov.uk+1		
Land east of Gordano Services	No	• Positively prepared • Justified	No	No		I object to the allocation of Green Belt land around Pill & Easton-in-Gordano (LP4 / Schedule 1) on the grounds that the Council has not demonstrated exceptional circumstances in accordance with Chapter 13 of the NPPF (2024). The Additional Sites consultation (7 Feb–21 Mar 2025) had a very low local response for Pill (c.125 responses		

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		• Effective • Consistent with national policy				across 5 sites; only 29 individuals), no local exhibition in Pill, and the Consultation Statement does not show proportionate engagement as required by the Council's Statement of Community Involvement. There is inadequate published evidence that reasonable alternatives (maximising brownfield, optimising density, or cross-authority options) were fully tested; transport modelling does not adequately demonstrate that Junction 19 or cumulative impacts have been mitigated; HRA and biodiversity mitigation for SAC/SSSI impacts are not demonstrated; and the Plan fails to show robust sequential flood-risk testing for sites near Markham Brook. For these reasons the allocation is unsound and should be withdrawn until further evidence, proper local consultation, and statutory assessments (HRA, SFRA/FRAs, full transport modelling) are completed and published. Short summary of the case against the allocations 1. The February–March 2025 "additional sites" consultation appears to have been insufficiently local and proportionate for a change of this scale in Pill/E-in-G — contrary to the Council's own Statement of Community Involvement and public sector equality duties; the consultation statement confirms low local response numbers for Pill compared with other settlements. n-somerset.gov.uk+1 2. The Plan's justification for removing land from the Green Belt relies on "exceptional circumstances" under the NPPF (Chapter 13). The evidence must show exhaustive examination of reasonable alternatives (brownfield use, higher densities, cross-boundary cooperation). If that evidence is absent, the Green Belt release is vulnerable. GOV.UK Assets+1 3. Transport evidence is incomplete on cumulative effects (particularly M5 Junction 19). National Highways' responses make clear further transport modelling / co-operation is needed. Reliance on a future rail link and unproven bus/active travel measures is risky. n-somerset.gov.uk+1 4. Ecology / Habitats — the sites lie close to bat SAC consultation zones and the Severn Estuary SSSI and will require robust HRA and measurable net biodiversity gains; the Plan must show credible mitigation and funding. Existing local ecology reports identify constraints. abbotsleigh.org.uk+1 5. Flood risk — parts of the area (Markham Brook valley) fall within Flood Zone 3; the Plan must apply sequential testing and show mitigation/avoidance for housing. The council's SFRA and national flood mapping are relevant. Detailed points (with the legal/planning basis) 1) Procedural fairness & adequacy of consultation For a proposal that would re-categorise Pill/E-in-G as a Strategic Location and potentially release multiple Green Belt sites, the council's consultation was not sufficiently local or proportionate. The Consultation Statement records only ~125 responses relating to the Pill area (29 respondents across 5 sites) versus much larger numbers elsewhere; no consultation events were held in Pill despite this being one of the most affected areas. That under-representation raises a realistic procedural unfairness concern and possible failure to follow the Council's Statement of Community Involvement (SCI). n-			

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						somerset.gov.uk+1 • Why it matters legally: The SCI sets out how plans should be prepared and consulted on. If the council did not comply with its own SCI, the Plan could be open to challenge at examination or by judicial review for procedural illegality or irrationality. Also consider whether the Council carried out equality screening and complied with the Public Sector Equality Duty (PSED) — e.g. were groups with protected characteristics properly engaged and were reasonable adjustments made? (If there's no evidence of PSED consideration, raise that.) n-somerset.gov.uk 2) Green Belt: "exceptional circumstances" and alternatives Chapter 13 of the NPPF says Green Belt boundaries should only change where "exceptional circumstances" are demonstrated and where reasonable alternatives have been fully considered (brownfield land, higher densities, cross-boundary options). The Plan must show exhaustive, transparent evidence that other options were examined and why they are not sufficient. If the council's evidence base (SHLAA, brownfield capacity work, density appraisals, Duty to Co-operate statements) does not demonstrate that, the justification for removing Green Belt is unsound. GOV.UK Assets+1 • Particular local point: The Additional Sites Viability Addendum reportedly flags that 50% affordable housing would be "challenging" on these Green Belt sites — that undermines any claim that the release will secure clear public benefits (an important part of "exceptional circumstances"). Ask for the viability evidence and sensitivity testing. n-somerset.gov.uk 3) Duty to Co-operate and alternatives across borders The Duty to Co-operate requires strategic engagement with neighbouring authorities where housing needs cross boundaries. The Plan should show what cross-authority options were explored (e.g., maximising higher-density urban sites or brownfield in nearby towns). If the council did not properly evidence co-operation, that is a soundness issue. n-somerset.gov.uk+1 4) Transport and cumulative impacts (Junction 19 / modelling) National Highways has queried cumulative impacts and asked for modelling for Junction 19; the council's own documentation shows National Highways expect to work with NSC and that modelling is required. The Plan appears to rely heavily on a future rail link and new active travel routes — but the timings, funding, and deliverability of these measures must be explicit and evidenced. Without robust cumulative transport modelling (and clear mitigation and funding commitments), the Plan is not sound. n-somerset.gov.uk+1 5) Ecology / Habitats Regulations Assessment (HRA) Sites are within bat SAC consultation zones and close to the Severn Estuary SSSI; HRA may be required and must show no adverse effect on integrity or, if effects are likely, provide lawful mitigation/ compensation and secure funding. The Plan must demonstrate measurable biodiversity net gain and appropriate buffers. Local ecological reports (neighbourhood plan evidence, Wild Service reviews) highlight important habitat corridors which must be protected. If the Plan simply allocates sites without clear HRA outcomes, it is unsound and may be unlawful. abbotsleigh.org.uk+1 6) Flood risk and sequential/exception tests		

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						Markham Brook valley and other low-lying land are in Flood Zone 3 (high risk). NPPF requires sequential testing (prefer lower-risk sites first) and, where necessary, the exception test with demonstrable mitigation. The Plan must show that lower-risk sites were prioritised or that any allocated sites in Flood Zone 3 are justified by the exception test and will be safe in the long term. If the Plan lacks a clear sequential test and site-by-site flood risk assessment, it is unsound. n-somerset.gov.uk+1		
Pill Green	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	I object to the allocation of Green Belt land around Pill & Easton-in-Gordano (LP4 / Schedule 1) on the grounds that the Council has not demonstrated exceptional circumstances in accordance with Chapter 13 of the NPPF (2024). The Additional Sites consultation (7 Feb–21 Mar 2025) had a very low local response for Pill (c.125 responses across 5 sites; only 29 individuals), no local exhibition in Pill, and the Consultation Statement does not show proportionate engagement as required by the Council's Statement of Community Involvement. There is inadequate published evidence that reasonable alternatives (maximising brownfield, optimising density, or cross-authority options) were fully tested; transport modelling does not adequately demonstrate that Junction 19 or cumulative impacts have been mitigated; HRA and biodiversity mitigation for SAC/SSSI impacts are not demonstrated; and the Plan fails to show robust sequential flood-risk testing for sites near Markham Brook. For these reasons the allocation is unsound and should be withdrawn until further evidence, proper local consultation, and statutory assessments (HRA, SFRA/FRAs, full transport modelling) are completed and published. Short summary of the case against the allocations 1. The February–March 2025 "additional sites" consultation appears to have been insufficiently local and proportionate for a change of this scale in Pill/E-in-G — contrary to the Council's own Statement of Community Involvement and public sector equality duties; the consultation statement confirms low local response numbers for Pill compared with other settlements. n-somerset.gov.uk+1 2. The Plan's justification for removing land from the Green Belt relies on "exceptional circumstances" under the NPPF (Chapter 13). The evidence must show exhaustive examination of reasonable alternatives (brownfield use, higher densities, cross-boundary cooperation). If that evidence is absent, the Green Belt release is vulnerable. GOV.UK Assets+1 3. Transport evidence is incomplete on cumulative effects (particularly M5 Junction 19). National Highways' responses make clear further transport modelling / co-operation is needed. Reliance on a future rail link and unproven bus/active travel measures is risky. n-somerset.gov.uk+1 4. Ecology / Habitats — the sites lie close to bat SAC consultation zones and the Severn Estuary SSSI and will require robust HRA and measurable net biodiversity gains; the Plan must show credible mitigation and funding. Existing local ecology reports identify constraints. abbotsleigh.org.uk+1 5. Flood risk — parts of the area (Markham Brook valley) fall within Flood Zone 3; the Plan must apply sequential testing and show mitigation/avoidance for housing. The council's SFRA and national			

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Land at Ham Green	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	I object to the allocation of Green Belt land around Pill & Easton-in-Gordano (LP4 / Schedule 1) on the grounds that the Council has not demonstrated exceptional circumstances in accordance with Chapter 13 of the NPPF (2024). The Additional Sites consultation (7 Feb–21 Mar 2025) had a very low local response for Pill (c.125 responses across 5 sites; only 29 individuals), no local exhibition in Pill, and the Consultation Statement does not show proportionate engagement as required by the Council's Statement of Community Involvement. There is inadequate published evidence that reasonable alternatives (maximising brownfield, optimising density, or cross-authority options) were fully tested; transport modelling does not adequately demonstrate that Junction 19 or cumulative impacts have been mitigated; HRA and biodiversity mitigation for SAC/SSSI impacts are not demonstrated; and the Plan fails to show robust sequential flood-risk testing for sites near Markham Brook. For these reasons the allocation is unsound and should be withdrawn until further evidence, proper local consultation, and statutory assessments (HRA, SFRA/FRAs, full transport modelling) are completed and published. Short summary of the case against the allocations 1. The February–March 2025 "additional sites" consultation appears to have been insufficiently local and proportionate for a change of this scale in Pill/E-in-G — contrary to the Council's own Statement of Community Involvement and public sector equality duties; the consultation statement confirms low local response numbers for Pill compared with other settlements. n-somerset.gov.uk+1 2. The Plan's justification for removing land from the Green Belt relies on "exceptional circumstances" under the NPPF (Chapter 13). The evidence must show exhaustive examination of reasonable alternatives (brownfield use, higher densities, cross-boundary cooperation). If that evidence is absent, the Green Belt release is vulnerable. GOV.UK Assets+1 3. Transport evidence is incomplete on cumulative effects			lukeevans.txt

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Name: Luke Smith **I.D:** 47564609

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Land north of Churchill Avenue	Yes		Yes	Yes	Penny Field must be protected and made a Local Green Space. Under local planning policy, Penny Field is the perfect candidate for Local Green Space designation because it'd be in the top 24% of sites based on policy alignment. The site demonstrates: beauty, tranquillity, richness			PF Consultation.docx

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					in wildlife, recreational and local value. Clevedon Town Council, two petitions (2022 and 2025) of 600+ signatures and the consultation for Clevedon's placemaking strategy all call to protect Penny Field. Penny Field is a prime candidate for Local Nature Recovery, as identified by WECA, due to the presence of three priority species. Penny Field is also located on a Green Infrastructure Corridor under NSC's own policy. Under any Equalities Impact Assessment the reduction of green space would adversely affect lower income households.			

Name: Lynne Cooper **I.D:** 62220641

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Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The Plan is NOT SOUND because: 1. The proposed figure of 1,817 new homes in Nailsea is: a. disproportionately high (in terms of population impact) compared to elsewhere in North Somerset; and b. will lead to a total over development of the town. 2. The proposed new road will not serve Nailsea's traffic or relieve congestion on Station Road, nor will it help travelling from Backwell towards the M5. 3. To the contrary, the proposed new road will become a new congestion hotspot where it joins Station Road, due to its proximity to the current traffic light controlled arch though which Station Road passes under the railway station. 4. The new link road, under a rail crossing, is likely to be extremely expensive and problematic in engineering terms due to the proximity to the River Kenn. 5. Development is proposed west and south of Backwell Lake/Reservoir. The new roads and housing will be in the floodplain, which actually does flood regularly. 6. The Nailsea and Backwell railway station is not fit for purpose as a transport hub. It remains inaccessible for people with mobility issues and presents serious challenges to those travelling with young children. 7. Transport modelling shows that there will be notable increases in vehicle movements on the network of rural lanes around Nailsea. There are no clear, workable plans to mitigate against this. The lanes will become congested and unsafe for pedestrians, walkers, cyclists and horse riders. 8. There are no plans in place to improve the accident blackspots at Stone Edge Batch, Wraxall Hill or Portbury Lane: all of which will see a marked increase in vehicle movements as a consequence of this plan. 9. Although three new primary schools are proposed for Nailsea and Backwell, they will be funded through developer contributions and will be phased, with no locations identified as yet. 10. Additional development will place immense pressure on the town's existing health and leisure provision. There is no direct investment included within the current proposal to combat that pressure. 11. Grade 2 agricultural land which is high yielding and of very good quality will be lost permanently through housing development to the south of Nailsea. 12. Land to the north of Nailsea is proposed to be removed from the Green Belt and replaced with that to the south. What guarantee is there that this will actually happen and that the new Green Belt designated land will not then be subject to future attack and removal to the detriment of the environmental and amenity value of the locale? 13. Greenfield Crescent Playing Field is not protected under Local Green Space Policy LP15. 14. All proposed development sites in Nailsea have been assessed to be the foraging locations for the rare Greater and Lesser Horseshoe Bats, which are Protected Species. 15. One hundred homes are proposed adjacent to Moor End Spout Nature Reserve, a site hosting many Protected Species. Development will destroy valuable wildlife habitats and further harm biodiversity on our area.			

Name: M Barmes **I.D:** 62774465

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Land south of Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	1. Introduction: I've been a resident on the B3130 for over 35 years. Volume, speed and mix of traffic, has always been a significant issue. Planning consents have previously been given which impact on the traffic. Proper consideration for residents occupying houses on this road have not been adequately addressed. 2. Lorries, Wagons, Articulated lorries, Large lorries with attached trailers and Buses: The road has for some time and certainly now, been inadequate for these vehicles. Vehicles in this class that attempt to pass, going in opposite directions, present a danger to themselves, other road traffic and are a danger to pedestrians. They mount the pavement to get past at certain pinch points. Pedestrian priority is rarely honoured - exterior mirrors overhang the pedestrian footpath (where there is a path) . The approval of a significant development in Nailsea will require the road to be used during the building process to carry spoil wagons, building materials lorries etc., the road is inadequate to take on this extra burden. On completion, the extra volume from new occupiers in Nailsea, using the B3130 as their route to and from Clevedon and the M5, will increase significantly. It is bad now. We have cracked boundary walls adjacent to the road, and problems with sewer and gas main collapse. Vibration and noise levels are escalating. These issues have been ignored in the past by planners and steps need to be taken to prevent it escalating to levels where residents' health and safety is under further significant threat. 3. Inconsiderate Speeding Traffic: This is a regular problem even at current volumes, which are excessive. More traffic - more issues. We have difficulty gaining access to the road because there are few gaps in traffic at peak times. Turning off the road onto our property is hazardous because of close queuing traffic disinclined to take account of residents' needs. The plan that will give rise to more traffic will lead to the problem getting worse. 4. Using the B3130 as a Motorway Diversion: This is incomprehensible, to add Motorway traffic to the background level of traffic on this road. If traffic volumes are increased due to this development then this issue will become significantly worse. 5. Pedestrian impact: No continuous pavement. Volume speed and weight of traffic prompts cyclists to mount the pavements where they exist. Crossing the road is hazardous. Some drivers find closing up gaps to make it more difficult to cross and soak pedestrians when they can’t avoid puddles, due to the width of the road and volume of traffic. 6. Bus services: For example: Bramley Rise bus stop is one foot from the road edge with no pavement or refuge for those waiting, even though land offered to NSC for the construction of a refuge was ignored. There are other stops that present significant risk to bus users. With the acceptance of this proposal, causing increased traffic on this road, the problem will get worse. 7. Conclusion: I cannot comprehend how a plan can be proposed that will knowingly add to the problems detailed above. I appeal to the planning authority to take account of the concerns expressed and develop a plan that will mitigate these issues.			

Name: M Beavis **I.D:** 58590753

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Land at Tower Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No		Regarding provisional site HE2068 Land at Tower Farm The developer's website has a "Vision" for Tower Farm fields which North Somerset Council (NSC) has evidently endorsed by inclusion in their latest version of the Local Plan. Planning officers and Councillors at NSC have failed in their statutary responsibilities to adequately consider the legal compliance and soundness of that Plan, as thoroughly demonstrated by the well argued objections from Portishead Town Council (PTC). NSC are clearly dancing to the developer's tune. This is not a "nimby" response and does not address concerns that might be common to other areas under consideration. It argues that the fields around Weston Big Wood have a unique claim for protection from any development, such that they should be excluded from the areas identified for potential development in the final version of the Local Plan. Tower Farm fields are within the designated Green Belt, for which national planning policy allows changes only in exceptional circumstances. It is pertinent to note that the currently designated Green Belt land was refused planning consent by t2 NPPF 19PFhe Secretary of State in the late 1980s following a Planning Inspectorate decision to actually extend a previous Green			

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					Belt border around the wood on environmental grounds. At that time ownership and conservation of Weston Big Wood were transferred to Avon Wildlife Trust (AWT) who have now presented robust objections to the adverse environmental aspects of the present plan, advising that protections are even more relevant today than in the 1980s. PTC has presented very detailed objections describing the present Plan fails the requirements of NPPF 187, NPPF 192 and NPPF 193(a-c). PTC concludes that it is impossible to mitigate the loss of an ancient woodland. Once it is gone it is gone. Specifically, NSC has not properly explored the available capacities of alternative brownfield sites and other greenfield sites within North Somerset, as evidenced by PTC. Just two such examples are a higher density at Wyndam Way/Old Mill Road/ vacant land in Portishead and at Castlewood which NSC owns in Clevedon. PTC has identified over 20 brownfield sites where the proposed density could be increased, and has identified previously removed Land South of Clevedon Road (HE20488) with a capacity of 250-500 dwellings that should be reinstated. That neglect by NSC, coupled with the exceptional ecological and strategic importance of Weston Big Wood, certainly fails to demonstrate any exceptional circumstance for removing Tower Farm from the present Green Belt. In this and other respects, NSC fails the test set out in NPPF S147 which requires exhausting all reasonable non Green Belt options before altering Green Belt boundaries, such that Tower Farm should be removed from the Local Plan. Our other main objection is that the Plan is not Sound because Tower Farm is not a sustainable location for residential development, for all the reasons presented by PTC, with which we agree. We note that the developer's "vision" extols the virtues of a rental e-bike rank to facilitate travel to the rail station and other parts of the town, which realistically is never going to happen, but says nothing about any adequate provision for car/van parking within their proposed development - no mention of how many car spaces per dwelling, nor on-street parking, nor EV charging points. And no assurance that they will avoid thae absurdity of 1.5 cars per house that continues to plagus the Marina development. From Martin and Linda Beavis Provisional site HE2068 Land at Tower Farm should be removed from the Local Plan.			

Name: M Best **I.D:** 51818881

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Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	A development of this size would destroy the village and its sense of community. We are already taking more than our fair share of development; it would be better to build reasonable amounts in most villages, eg Wrington, or more in urban areas where there are the facilities. Our schools and medical facilities will not cope. This is Grade 1 agricultural land.We need to keep all our land in this category to provide food security in these uncertain times, as government policy clearly states. Our roads are barely coping now; Station Road is too narrow for modern vehicles, and the pavements are dangerously narrow for the children using them at the start and finish of school. Backwell Common has always been liable to flooding in places. There is very little employment in Backwell or around; residents in any new housing will be likely to be commuting to Bristol or beyond. The local railway station is not fully accessible, and all attempts to make it so have failed.	More housing in urban areas, and a fair share in most villages.		

Name: M Birchenough **I.D:** 62850337

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared	Unsure	Unsure	Backwell is a relatively small but growing community. It has seen significant additional housing approved in recent years adding nearly 50% to the current population. The proposal to add over 800 more houses could have a severely detrimental impact on the village and lead to overdevelopment.	No modification the proposal for an	I do not support this.	

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
		• Justified • Effective • Consistent with national policy			It is not clear if there is anything in the proposal to support this development with investment in local infrastructure such as school places or health services. Traffic would naturally increase significantly, and additional vehicles will cause issues in local roads and further afield. The A370 approaching the Gurney Roundabout, for example, is already showing strain from additional commuters from the local area and more traffic will only increase the queues. The transport links are currently inadequate for large scale expansion and cannot easily be improved – the railway station would need a complete redevelopment to be inclusive and properly useful. The development is proposed to be built on prime agricultural land which would be lost forever. What is the justification for destroying local habitats when there are numerous brown field sites across the county and over one million empty homes across the country? The homes to be built are likely to be large family homes which is not what the county needs. We are desperately short of affordable smaller housing, so this development does not fit with what is actually required. Overall, the proposed development lacks justification, lacks supporting infrastructure and will destroy the local environment. It does not appear to fit with what we need as a county or a country and will have a destabilising impact on a community which is already feeling the pressure from existing developments.	additional 889 houses should not go ahead.		

Name: M Boyd **I.D:** 62657633

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell already has 800 new houses approved, a 40% increase. Proposed road is not adequate for Nailsea's traffic nor to relieve Backwell Common, Chapel Hill. Engineering - the road will be expensive and/or unfeasible. There is already a deficit in school places. The lack of infrastructure and services will not support 1k more houses. Where is the needs analysis? Where is the social cohesion analysis? For example, how will young people be supported? For example, where is the plan for youth clubs etc? Contradiction of government policy - food security; destruction of wildlife habitats in our nature-depleted country. Threat to Brockley Maternity Roost and SSSI and lesser/greater horse shoe bats. Flood risk increased through unsuitable housing development on a flood plain. Developers contribution to infrastructure and services is inadequate. The 40% increase + 1k more houses in the proposed timescale is unsustainable and dangerous - to wildlife, nature and people. Railway station is not fit for purpose as a transport hub. It is not accessible. Backwell lake threatened.			

Name: M Broomfield **I.D:** 62659297

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Pill Green	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	It is unjustified and disproportionate to increase a village the size of Pill by an additional 44% with this site alone contributing to an increase of 24%. I do not believe that there is evidence that the Green Belt exceptional circumstances has been evidenced sufficiently (NPPF147) when there are still brownfield sites which should be built on first. Brownfield first policy has been ignored with 2500 units still available in Weston, Portishead and Bristol fringe. Furthermore sustainable transport makes urban/brownfield sites more viable. This breaches NPPF159. Traffic on the A369 is already extremely busy at peak hours with long	There should be no development on Pill Green until the exceptional circumstances have been independently verified and it has been shown that no viable non-Green Belt alternatives are available. Brownfield sites in WSM, Portishead and Bristol should be prioritized. There should be funding for A369 and J19 upgrades as well as additional school and GP places along with communal infrastructure BEFORE granting outline permission.		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					delays to get into the city centre (usually taking at least 45 minutes or sometimes up to an hour at 8am for what is normally a 20 minute journey). I see no deliverable plan for the A369, J19 on the M5. Bus service is not currently frequent or reliable enough. The trainline is unlikely to be in place for several years. Therefore full infrastructure delivery has not been secured upfront via s106/CIL According to NPPF 11 and 130 (f) plans must avoid adverse impacts on local character and services, yet examinations have found >10% growth population to be unsound unless supported by exceptional infrastructure, as outlined above this is absent here.			

Name: M Chamberlain **I.D:** 21231201

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	• Effective	Unsure	Yes	Despite a huge amount of analysis and discussion in the plan and its supporting documents there is not enough detail, scope or certainty to ensure that the plan's admirable objectives will actually happen. A good example is Farleigh Farm in Backwell currently being built with no cycle-friendly links to anywhere within or beyond the village and the only pedestrian link is the footway adjacent to the main A370 which has been permanently narrowed to provide for traffic turning to and from the development. There is a major bus route on the A370 yet the development does not include improvements to bus stops and crossing facilities other than a narrow central refuge leading to the narrowed footway. The pressure for development is so great that the active travel and public transport obligations disappear unless they are "baked in" at the Local Plan stage. Too much of the plan appears as a wish list.	I am only considering transport issues in Nailsea and Backwell here. The construction of a new rail crossing to take buses, pedestrians and cyclists as well as traffic is seen as the key to resolve development constraints and existing problems yet the documents state that a fuller engineering assessment is required before it is even clear whether the crossing can be constructed or how reliable is the £30m cost estimate. Even if it can be built there must be considerable doubts that it will achieve issues such as the rural lanes traffic reductions west of the town. In the meantime consents are being given for sites around both Nailsea and Backwell adding to the pressures on existing facilities. The travel infrastructure must be resolved with more certainty before the local plan housing and employment proposals are agreed.		
Policy LP3: Strategic location: Nailsea and Backwell	No		Unsure	Yes	The Plan does not address the significant problems at the low narrow bridge under the railway. I have suggested how this could be improved in the next section. A new cross rail bridge/tunnel is proposed to resolve problems in Station Road and at the Backwell crossroads. As the Plan's support data suggests the proportion of traffic using Station Road and the A370 south of Backwell is growing relative to the proportion using Station Road and the A370 towards Bristol. The proposed location of the rail crossing will not be attractive to drivers from Nailsea wishing to go south as it is not only a longer route it takes them back through the Backwell Crossroads that the new road is meant to relieve. Even with traffic calming in the rural lanes through Brockley many drivers will continue to use them rather than the new road. Similarly drivers will continue to use Station Road and avoid the Backwell crossroads by using the local "bypass" through Rodney Road. The best way to overcome these problems and achieve the Plan's objectives is by selecting one rural lane through Brockley for limited improvement and calming to enable it's safe use and minimise traffic using the Backwell crossroads and Rodney Road. This would be in addition to providing a crossing of the railway on the Bristol side (nearer Bristol to relieve Backwell Farleigh and Flax Bourton?). The northern limit of the new road is shown as a junction with Station Road which would mean all the traffic would use the unsuitable Bucklands Batch (Station Road) - there would be increased traffic because the new road would draw traffic off the B3130 through Wraxall.	The Plan identifies the problems caused by the low narrow bridge under the railway at Nailsea & Backwell Station but does not adequately address their resolution. Even if the new Cross Rail bridge/tunnel is built the plan only refers to how this would enable traffic reduction and footway improvement along the general length of Station Road. The wholly inadequate underbridge at the station would still be shared by pedestrians, cyclists, buses and general traffic. There is scope for including in the Plan a proposal for a pedestrian tunnel under the railway beside the existing underbridge to separate pedestrians from traffic. This could be combined with improvements to the station. The Plan says very little about the railway station except that it needs to be improved and Network Rail are responsible. The Local Plan is the place to identify such an essential element fully compliant with the Plan's vision. If the new road crossing of the railway is to be built it will be a major scheme to which this associated element could very justifiably be added.		

Name: M Chambers **I.D:** 58310305

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Justified	Unsure	Unsure	Therr are alternative brownfield or greenfield sites with far lower ecological impact, both in Portishead and across North Somerset. Opportunities to increase housing density on proposed brownfield sites, which could remove the need to develop Tower Farm. The strategic ecological importance of this site in protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor has not been considered. This site had been added to the Green Belt in the late 1980s due to its high ecological value - this has not been considered. National planning policy allows Green Belt changes only in exceptional circumstances — and these have not been demonstrated. This site cannot provide safe or suitable access. Development would create unacceptable transport impacts, failing national soundness tests. Need to consider other brownfield sites first, such as Old Mill business park.			
Black Rock, north of Clevedon Road	No	• Justified	Unsure	Unsure	There are alternative brownfield or greenfield sites with far lower ecological impact, both in Portishead and across North Somerset. There are more opportunities to increase housing density on proposed brownfield sites, which could remove the need to develop on Black Rock, such as Old Mill business park. The strategic ecological importance of these sites in protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor has not been considered and the fact that this are was added to the Green Belt in the late 1980s due to the high ecological value. National planning policy allows Green Belt changes only in exceptional circumstances — and these have not been demonstrated. There is no safe or suitable access and development would create unacceptable transport impacts, failing national soundness tests.			

Name: M Cherchi **I.D:** 58599457

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The proposed allocation of land at Tower Farm, which encompasses approximately 400 homes, is situated directly adjacent to Weston Big Wood, an ancient woodland and Site of Nature Conservation Interest (SNCI) managed by the Woodland Trust and supported by the Avon Wildlife Trust. This woodland is integral to the Gordano Valley ecological network and constitutes a nationally significant habitat mosaic comprising open grassland, wetland, and woodland. Not Justified: There exists a lack of robust, published alternatives assessment that demonstrates that this sensitive site is the sole or most suitable option for further development. The potential loss of the best and most versatile (BMV) farmland (designated as Grade 2/3a according to the Agricultural Land Classification dataset) and the imminent risk of irreversible damage to the ancient woodland render this allocation inappropriate. Not Consistent with National Policy: The allocation contravenes the National Planning Policy Framework (NPPF) paragraphs 180–182, which stipulate that			10-year strategy 2020-2030.pdf

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					development leading to the loss or deterioration of irreplaceable habitats, such as ancient woodland, should be refused unless there are wholly exceptional circumstances. The reference to an "ecological buffer" by the Council is ambiguous, unenforceable, and inadequate to mitigate indirect impacts such as root-zone damage, hydrological alterations, or wildlife disturbance. The Woodland Trust and the Avon Wildlife Trust assert that ancient woodland is irretrievable once damaged. Furthermore, the Framework mandates the delivery of biodiversity net gain, yet the allocation provides no clear mechanism to ensure this outcome. Not Positively Prepared: The location exacerbates existing pressures in Portishead; schools, healthcare, and transport infrastructure are already under stress (for instance, the A369 corridor). This peripheral site would likely lead to increased private vehicle usage and pollution, contravening NPPF paragraphs 104–106 which advocate for support of sustainable travel patterns. Not Effective: The feasibility of delivery hinges on multiple unresolved dependencies, including new school provisions, contributions to bus services, off-site biodiversity management, and enhancements to rights-of-way and buffer zones. No phasing plan, funding mechanism, or legal agreement has been disclosed to secure these aspects. In the absence of such mechanisms, the allocation cannot be regarded as deliverable within the plan period, as stipulated in NPPF paragraph 35(c). Landscape and Connectivity: The edge between farmland and woodland serves as an essential ecological and landscape transition zone. Development in this area would fragment habitats, diminish the Gordano Valley wildlife corridor, and erode the rural fringe character. Even with the inclusion of a buffer, the visual and ecological impact on the woodland and surrounding landscape would be substantial. Drainage and Hydrology: Construction and development activities would alter surface water runoff and induce soil compaction on the former farmland, potentially disrupting the hydrological regime that supports the adjacent ancient woodland. The associated risks of nutrient runoff, altered infiltration, and damage to the woodland root zone are significant. Cumulative Impact: When evaluated alongside other allocations in the Portishead area, such as Black Rock north of Clevedon Road, the cumulative pressure on ecology, infrastructure, and transport is considerable and undermines the Council’s commitments to nature recovery and sustainable growth. No modification, short of completely withdrawing the allocation, would render this site appropriate for development. Given its immediate proximity to ancient woodland, any loss would be irreversible and cannot be sufficiently mitigated. The land should be preserved as undeveloped green space, managed to enhance biodiversity and facilitate sustainable public access, in accordance with the Avon Wildlife Trust’s 2030 Strategy and the national “30 by 30” nature-recovery goals. I do not endorse the North Somerset Local Plan 2041 for the Tower Hill Farm location.			

Name: M Clarke **I.D:** 58381761

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Vision, Strategic Priorities and Sustainability Objectives	No	Justified	Unsure	Unsure	We have to protect green space and the ecology, we cannot destroy our space for badly built homes that are not needed. Just being lazy and not looking at brownfield sites because it is harder work is pathetic.	Stop building rubbish badly built houses that are not needed.		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Sustainable development objectives	No	• Justified	Unsure	Unsure	The the points above, the plan does not ahere to any of them. You try to hoodwink people into thinking that you are doing this for the best, you are not.			

Name: M Davis **I.D:** 62577217

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Youngwood Lane	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Unsuitable for level of expansion planned owing to lack of adequate road access There is no direct access to motorway (Unlike Weston, Clevedon, Portishead) Access outbound involves a right turn at the top of Wraxall Hill (accident blackspot) Inbound involves a right turn at the top of Portbury Lane (long delays in rush hour) All three main routes out of Nailsea have problems Station Road towards A370 has a restricted bridge at the station plus speed bumps on the Backwell side and traffic lights at the Backwell Junction Clevedon Road has a major ‘pinch point’ just before it meets Tickenham Hill. Large vehicles such as lorries and buses cannot pass each other. This causes significant delays at busy times. Bristol Road through Wraxall is narrow with limited visibility in places. In addition to the above all the lanes around Nailsea are totally unsuited to any increase in traffic. The Causeway is likely to be particularly badly affected as it will be the shortest way from many of the proposed housing to the motorway.			
Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure		Proposed road from Backwell This is likely to be very expensive to build and will not ease traffic from Nailsea to Bristol or Backwell to the motorway. Building a tunnel under the railway will be particularly difficult and expensive. Without an engineering review and without funding allocated, this road can be little but a planning daydream.			
Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Lack of Community Facilities There are no firm plans to improve or expand any of the existing community facilities such as schools or healthcare. It is already difficult to obtain GP appointments. The nearest primary school to most of the planned development south of the town is already almost full. This could mean children being driven to schools outside Nailsea. This is not good for the children or for council finances.			

Name: M Evans **I.D:** 29291361

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Justified	Unsure	Unsure	As Backwell already has 800 new houses approved (40% increase), the proposed increase should be considered to be overdevelopment. This is higher than any other village in North Somerset. Furthermore, the lack of infrastructure/services and the fact that Backwell Station is not suitable as a transport hub, due to its inaccessibility for those with mobility issues/ young children mean that the addition of an extra 1000 house is not viable. The Government says 'we must protect our best and most versatile land' to safeguard food security and protect our wildlife,			

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					and yesterday a large swathe of this land proposed for building is high quality agricultural or greenbelt.			

Name: M Excell **I.D:** 58563489

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Justified	No	Unsure	Strongly believe that before including the Tower Farm and Black Rock sites in the Local plan, NSC have not properly considered alternative brown and green field sites with much less ecological impact both in Portishead and across North Somerset There is opportunity to build housing on proposed brown field sites in Portishead which would mean these precious green belt sites would not be required to meet local housing targets. These sites were added specifically to the Green Belt in the late 1980s because of their high ecological value These sites are situated where they contribute to protecting the ancient and unique environment of Weston Big Wood (SSSI) and the Gordano Valley strategic green corridor essential to wildlife and for the physical and mental well being of humans. National Planning policy states that sites can only be removed from Green Belt for development under exceptional circumstances and these exceptional circumstances are not proven. Neither site is sustainable or capable of safe and suitable access and would give rise to unacceptable transport impacts which fails the soundness tests set out in the National Planning policy Therefore the Tower Farm and Black Rock sites should both be removed from the Local Plan			

Name: M G West **I.D:** 6011425

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at North West Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The town has already taken on new housing estates. It will not cope with this huge additional increase in population. Where will the new primary schools be sited? Will they serve the existing new estates? The existing doctors and dental surgeries will not cope with the increase in population. They will need additional qualified staff, buildings and facilities. NB No mention of NHS dental surgeries. The taking of land from the South Nailsea is removing from use valuable farming land. Plus, there will be a loss of wild life from all the sites. Already we have lost wild birds and badgers from the building of recent estates. How will the back lanes cope with the additional traffic which are regularly used by pedestrians, cyclists and horse riders? Is there a realistic transport plan? It does not look sensible to build on flood plains. Elsewhere in the country there have been regrets when this has happened. Also the houses may uninsurable.			

Name: M Hall **I.D:** 30797697

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP7: Green Belt	Yes		Yes	Yes			I support the North Somerset local plan for Wrington. Wrington is unsuitable for further large - scale development, for the following reasons:- Development would cause harm to the setting of heritage assets around the village. Lack of public transport would necessitate the use of cars to access jobs and shopping centres. Potential sites are on valuable greenfield agricultural land. Available jobs are more than five miles away in places like Bristol, Weston Super Mare, Portishead, Nailsea - too far for most people to walk or cycle. Narrow approach roads would need to be upgraded. Local infrastructure has already reached saturation point.	

Name: M Hathway **I.D:** 62817057

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	1) Backwell already has a 40% increase in housing development anymore increase in development would lead to excess and unacceptable development. 2) The sheer volume of growth with the required investment infrastructure and services over such a short period is destabilising, unsustainable and undeliverable. 3) Backwell Lake (Reservoir) and adjacent fields, where the new roads and housing are planned are on a floodplain which has for as long as we can remember floods regularly. 4) In addition, Backwell Common and surrounding farm land after heavy rain regularly are under water. 5) Where we live in Brockley Lane these developments threaten the Brockley Maternity Roost and SSSI, with rare Lesser and Greater Horseshoe Bats relying on land for food. 6) Grade 1 Agricultural Land currently used for food crops and grazing. There is only 7% of this high quality land left in the whole of North Somerset which we need to maintain if this Government is to encourage increased home produce. 7) Backwell is allocated a higher number of houses than any other village in North Somerset even higher growth percentage than teens. Backwell is expected to take 7% of the district's housing allocation , compared to Clevedon's 2%. 8) Local Infrastructure is totally inadequate to accommodate these developments.			

Name: M Hayes **I.D:** 58452257

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	NSC has not adequately given due consideration to the following. Alternatively brown and green field sites exist with far less damage to the ecology both on Portishead and across North Somerset. Availability to increase the density of housing on the proposed brown sites across North Somerset which would mean these sites are not required to meet local housing targets. The strategic ecological contribution of these specific sites in protecting the unique environment of Weston Big Wood (SSSI) and the Gordano Valley Strategic green corridor. The fact that these sites were only added to the Green Belt recently and specifically in recognition of their extremely high ecological value. Traffic volumes on St Marys Rd where I live is already too high and presents a danger to over 2000 children at Gordano School. This will be greatly incresed by this proposal.			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					For the above reasons the Local Plan is unsound because National Planning policy states that sites can only be removed from the Green Belt for development under exceptional circumstances and these exceptional circumstances have not been proven. There can be none except removing this allocation completely for this site.The land should be retained intact as green space to be used to preserve and increase biodiversity purposes. NSC should insead increase housing density on already known and new brown field sites in Portishead and North Somerset and look to develop on other green field sites in Portishead and the rest of the district which will have much less ecological impact.			
Black Rock, north of Clevedon Road	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	NSC has not adequately given due consideration to the following. Alternatively brown and green field sites exist with far less damage to the ecology both on Portishead and across North Somerset. Availability to increase the density of housing on the proposed brown sites across North Somerset which would mean these sites are not required to meet local housing targets. The strategic ecological contribution of these specific sites in protecting the unique environment of Weston Big Wood (SSSI) and the Gordano Valley Strategic green corridor. The fact that these sites were only added to the Green Belt recently and specifically in recognition of their extremely high ecological value. Traffic volumes on St Marys Rd where I live is already too high and presents a danger to over 2000 children at Gordano School. This will be greatly incresed by this proposal. The proposed site regularly floods. For the above reasons the Local Plan is unsound because National Planning policy states that sites can only be removed from the Green Belt for development under exceptional circumstances and these exceptional circumstances have not been proven.	There can be none except removing this allocation completely for this site. The land should be retained intact as green space to be used to preserve and increase biodiversity purposes. NSC should instead increase housing density on already known and new brown field sites in Portishead and North Somerset and look to develop on other green field sites in Portishead and the rest of the district which will have much less ecological impact.		

Name: M Herbert-Guest **I.D:** 62849729

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of	No	‣ Positively	Unsure	Unsure	North Somerset’s plan places an excessive burden on Backwell, far beyond what a village of its scale can reasonably absorb. Hundreds of new homes have already been approved, representing a dramatic expansion, and the additional			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Backwell		prepared • Justified • Effective • Consistent with national policy			allocation would push the settlement far past any sustainable level of growth. Backwell is being asked to accommodate a larger share of the district's housing than any other rural community—indeed, a higher proportional increase than many towns—without any credible justification or accompanying needs assessment. The infrastructure expected to support this expansion is neither planned nor funded in a convincing way. Schools in the area already struggle to provide sufficient places, and there is no clear commitment to expanding healthcare provision or leisure facilities. The proposed new road, intended to relieve existing traffic pressures, does not appear capable of addressing the long-standing congestion issues in Nailsea or Backwell. The engineering challenges of crossing the railway, combined with the lack of detailed costings or guaranteed funding, cast serious doubt on its deliverability. Meanwhile, Backwell's railway station remains outdated and inaccessible, making it ill-equipped to serve as the transport hub the plan assumes it can become. Environmental concerns also weigh heavily against the proposals. The development footprint includes some of the district's most productive agricultural land, a resource that is already scarce and explicitly protected in national policy due to its importance for food security. The loss of this land would also disrupt valuable habitats, threatening local biodiversity and putting rare bat species—dependent on these landscapes for feeding—at heightened risk. Flooding is another significant issue: Backwell Common, nearby fields, and the areas surrounding Backwell Lake already flood regularly, and further development would likely exacerbate this vulnerability. Beyond physical impacts, the plan lacks consideration of the social and economic consequences for the village. Backwell is not a significant employment centre, meaning most new residents would be reliant on commuting, further straining local transport routes. No assessment has been provided on how such rapid and concentrated growth might affect community cohesion or the character of the area. When combined with the uncertainty surrounding infrastructure funding, the scale and speed of the proposed development feel both destabilising and unrealistic. Taken together, these concerns paint a picture of a proposal that is disproportionate, environmentally damaging, inadequately supported by infrastructure planning, and out of alignment with national policy. The strategy for Backwell is neither sustainable nor deliverable, and a more balanced, evidence-based approach is urgently needed.			

Name: M J Bennett **I.D:** 62802401

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure				
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The area is in GREENBELT. This area seperates Backwell from Nailsea and is the single most important green space area for Backwell residents. This plan is not sound as there are other areas to the west of Nailsea which is not greenbelt and other sites which could be developed eg dissused Fairfield school site etc. It is an area of beauty and the land is farmed for local produce. Government policy states ' We must protect our best and most versatile land' It attracts recreation in the form of walkers, dog walking, horse riding, cycling. It is the main attraction for wildlife including rare species of bats with thousands of meters of hedgerow and trees hundreds of years old and needs to be preserved. Allocation for Backwell is hugelly disproportionate for its size nearly doubling the size of the village and is completely unsustainable turning it into a town with little to none employment opportunities. The justification is completely unsound as the cycle track is used for recreation not commuting as Backwell is situated too far away from Bristol and other employment cities to cycle and the small train station which is not fit for purpose and is increasingly too expensive to use			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					especially for half of the proposed residents allocation of affordable housing, social housing etc. With already nearly 1000 houses approved over the last couple of years there is absolutely no need for even more housing in Backwell. Then new proposed road is far too close to Backwell lights so will not ease congestion as cars are already queued way beyond this to Flax Bourton sometimes. These proposals bottleneck huge amounts of extra traffic on A370 which is already at breaking point.			

Name: M Joyner **I.D:** 62545505

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Pill Green	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	1. Sustainability appraisal fails SEA directive, no assessment of brownfield alternative to pill green. (Quote reg 12/2024 brownfield register 2,800 units 2. No duty to cooperate on Bristol's 8,000 unmet need. (No statement of common ground, unilateral 1,100 home dump in PIEG) 3. green belt exceptional circumstances not evidenced (NPPF 147) parcel identified as high performing agricultural land, no sequential test. 4. 44% population bomb on pill and Easton in gordano - disproportionate and unjustified, 600 homes =24% from one site alone. 5. No delivery ability plan for A369, M5 j19, schools, to access or drainage by 2041.(Pill green undeliverable= ineffective) 6. Brownfield first policy ignored - 2,500 + viable urban units still available (Weston,portishead, Bristol fringe) 7. Pill green breaches NPPF-159- No sequential test for non - green -belt sites (excellent sustainable transport links make urban/ brownfield viable) 8. Request independent verification of " exceptional circumstances" before any pill green consent. 9. cap village growth at < 5% per site. reference 1.2017 JSP and	Delete the pill green site (600 homes) from the north Somerset plan schedule of sites or amend policy as follows: "no development on pill green until exceptional circumstances are independently verified (NPPF para 147) and sequential testing confirms no viable non - green belt alternatives are available, prioritizing brownfield sites in Weston - super -mare , portishead and Bristol fringe. Cap total allocation across all sites, require full funding (via s 106 / CIL agreements) for flood defences to 1- in 1000 year standard + 45% climate change allowance, A369 and M5 J19 capacity upgrades, and additional school and GP places alongside associated additional communal infrastructure before granting outline permission. insert new para 6.79: ' allocations must demonstrate no disproportionate impact on village populations, defined as< 5 % increase per site without evidence need. Allocations in villages with a population under 10.000 must not result in a population increase of more than 5% from any single site unless exceptional circumstances are independently verified and full infrastructure delivery (transport, education, health, drainage) is secured upfront via s106/ CIL . Cumulative impacts across all sites within a settlement must not exceed 20% without a master planned, funded delivery strategy. "	N/A	

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					previous local plan allocations, 2.NPPF 11& 130 (F) : plans must be deliverable and avoid adverse impacts on local character and services. 3. Inspector decisions: local plan examinations have found allocations causing> 10 % population increase to be unsound unless supported by exceptional infrastructure evidence, which is absent here)			

Name: M Lynch **I.D:** 62800833

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land south of Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	The traffic generated by these developments will exceed the capacity of all the roads serving Nailsea and Backwell, especially at junctions. There are no suitable roads for any increase in HGV & PSV traffic. Also all routes to and from Nailsea have several accident “black Spots”. Consequently, the plan is UNSOUND as it cannot support economic growth, job creation and it does not include or allow for any capacity or safety improvements to the highway network. The area is crossed by many public footpaths that are extensively and frequently utilised for recreation and access to and from Nailsea to Backwell Swimming Pool. Any loss of these routes during or after the proposed developments will increase pedestrian traffic on Station Road, which currently has substandard unsafe footways, which are already extremely busy at the start and end of the school day. The plan seems to be largely developer led who do not have compulsory purchase powers and consequently many of the highways improvements needed to support this plan are not deliverable. Consequently, the plan is strategically UNSOUND.	Any new railway crossing, part of the East Backwell New Road (EBNR), will require a corridor about 40 meters wide for cuttings or embankments (which will significantly reduce the plan area designated for dwellings) to facilitate either an underline or overline bridge, which will also require a pumped drainage system. There appears to have been no consultation with National Rail on their requirements for an underline or overline bridge. Any underline bridge, which will require a pumped drainage system, would be a very high cost significant infrastructure provision and probably need to be constructed off line and slid into place with an overnight or weekend track closure. The plan is UNSOUND because, in the absence of any preliminary requirements of the track authority, it is very unlikely that the economics of developing the Site 1 is viable. A preliminary design for the EBNR would need to be developed to accurately identify the area of this site that could be developed for dwellings so that: a highway and bridge can be designed and built (with 5.3metres maintained headroom) that has sufficient traffic capacity and which can accommodate HGV and PSV vehicles. This will also be required to accurately assess any developer contributions towards these highway improvements.		

Name: M Martin **I.D:** 62776513

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Lodway Farm	No	• Effective	No	No	The Council held four public exhibitions (Long Ashton, Weston-super-Mare, Nailsea, Backwell), but none in Pill/E-in-G, despite five sites being consulted on in this area. Given the scale of potential change in Pill/E-in-G, the absence of a local event and the relatively small response volume could indicate under-representation of local voices and a lack of proportionate engagement.			

Name: M Mogford **I.D:** 39304577

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I believe this plan is not sound as Backwell already has a huge number (800) of new houses approved and this development would lead to a completely over development of the area. The new houses already approved will mean there is a 40% increase for the village. It won't be able to cope with this as it is, as there has been no investment in new doctor surgeries or other services, anymore housing will make the bad situation even worse and Backwell won't be a village anymore, it would be turned into a soulless town. There is little employment in Backwell so the majority of people commute, largely by car from the significant traffic I witness daily. The new houses will make this even worse and any additional housing would cause an already overloaded road system to completely block up. There is a railway station between Backwell and Nailsea, but it is a small station and it is not fit to be used as a transport hub for a town due to its size and inaccessibility for disabled people. The area being considered in this consultation is prone to flooding and is therefore a very poor place for houses to be built. Backwell lake and the fields around the area are on a floodplain, building houses and roads here is a terrible idea.			

Name: M Phillis **I.D:** 14401217

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell already has 800 new houses approved, representing a 40% increase in units for the village. These additional numbers would lead to complete overdevelopment and a 24/7 nightmare for all inhabitants trying to live what would otherwise be a "normal" standard of life The proposed new road would not effectively serve Nailsea's traffic or relieve congestion on Station Road, Backwell Common or Chapel Hill. Engineering the road over or under the railway line would be highly expensive and possibly unfeasible Despite the proposed increase in house numbers and therefore family occupiers there is a deficit in school places and no investment in health services or leisure facilities. The lack of infra structure and services cannot support another 1000 houses Backwell is allocated a higher number of houses than any other village in North Somerset, and incredibly an even greater growth percentage than the area towns. Backwell is expected to take 7% of the districts housing allocation compared to say Clevedon at 2 % which is totally inappropriate and very much a grave error of judgement. There is no needs or viability analysis for the extra 1000 houses Backwell is not an employment hub as most existing inhabitants have to commute so the proposal do not meet sustainable needs No social cohesion impact assessment has been provided In the whole of North Somerset there is only 7% of Grade 1 Agriculture Land currently left producing food and grazing use			

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					Government policy states that "we must protect our best and most versatile land" to safeguard food security. These proposals contradict this policy and undermine food security. Development would destroy valuable wild life habitats and further harm biodiversity in one of the world's nature depleted countries. The proposals threaten the Brockley Maternity Roost and SSSI, with Lesser and Greater Horseshoe Bats relying on the land for food. The Infrastructure Delivery Plan lacks analysis and costings and there are no funding guarantees for the new road or services Backwell Common and the surrounding areas are prone to flooding which would be aggravated by more housing. Concerns regarding the strategic growth location designation include the impact on the area's character, the loss of Greenbelt and high quality agricultural land, the risk of flooding, and uncertainty over whether the road can be funded and delivered on time to support the proposed housing Backwell Lake and adjacent fields where the new roads and housing is planned are on a flood plain, which already floods regularly Government policy requires 50% affordable housing on Greenbelt land, but this reduces the funds developers contribute towards infrastructure. The sheer volume of growth with the required investment infrastructure and services over such a short period is destabilising, unsustainable, and undeliverable. It follows that where numbers of new units to be built is the overriding objective in a particularly impractical short period of time there is a very high risk that whatever is actually built will be of the wrong size and spec and in the wrong place. Such errors will be extremely costly to the way of life in this country for generations to come. The railway station is not fit for purpose as a transport hub. It remains inaccessible for people with mobility issues and presents serious challenges when travelling with young children			

Name: M Reardon **I.D:** 62775905

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	‣ Justified ‣ Consistent with national policy	Unsure	Unsure	The area is green belt and exceptional circumstances have not been evidenced. Alternative brown field sites exist that should be developed ahead of Tower Farm. In addition the single point access would cause significant congestion and would be unsafe due to the location of the junior school.			

Name: M Senior **I.D:** 62852161

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-	No	‣ Positively	No	No	The existing settlements are old, historic in places. The infrastructure does not successfully support the residents who are already there without routine and costly intervention.	Delete LP4, it is utterly unsound and ill conceived. It's presentation has so far been deceitful in its manner.		

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Gordano		• prepared • Consistent with national policy			The area is a known flood risk, there is no successful mitigation that can be put in place for the impact of more housing. The motorway network around between Avonmouth and clevedon is already high risk due to congestion. Increasing demand on it in this manner will have a very simple, very serious impact. It will result in avoidable deaths.	Be serious about the risks to public health, public safety and very serious, very obvious environmental impacts. There would be marginally less risk in dumping a landfill site at the top of ham Green. That's how ridiculous these proposals appear.		

Name: M Slade **I.D:** 50493793

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP1: Sustainable Development	No	• Justified	Unsure	No	Climate change is now being challenged in scientific circles as an exaggeration and alarmism completely over emphasised for political and financial gain. The climate always changes and goes through cycles depending on many complex factors that are not fully understood including the affect of the solar cycles amongst many. Yes there appears to be an element of anthropogenic carbon dioxide release in the atmosphere but this is not the major driver of climate change. It is important that we consider sustainable approaches to urban development and advancement of society but this needs to be recognised rather than blindly following crass headlines perpetrated by interested parties for gain. Net Zero is far too ambitious costing billions of pounds while councils and its residents go without with solutions that are just not sound. Wind energy is not net zero in the life time of the turbines and creates toxic waste that cannot be removed and solar in the UK is ineffective in the darker and short days of the year and also creates toxic waste that cannot me managed. NSC need to start to challenge these assumptions and make better more sound decisions in this regard.	If you must use solar for energy security and to replace oil and gas, put solar panels on building roofs and other abundant surfaces rather than prime agriculture and green belt land that threaten food security.		
SP2: Climate Change	No	• Justified	Unsure	No	Climate change is now being challenged in scientific circles as an exaggeration and alarmism completely over emphasised for political and financial gain. The climate always changes and goes through cycles depending on many complex factors that are not fully understood including the affect of the solar cycles amongst many. Yes there appears to be an element of anthropogenic carbon dioxide release in the atmosphere but this is not the major driver of climate change. It is important that we consider sustainable approaches to urban development and advancement of society but this needs to be recognised rather than blindly following crass headlines perpetrated by interested parties for gain. Net Zero is far too ambitious costing billions of pounds while councils and its residents go without with solutions that are just not sound. Wind energy is not net zero in the life time of the turbines and creates toxic waste that cannot be removed and solar in the UK is ineffective in the darker and short days of the year and also creates toxic waste that cannot me managed. NSC need to start to challenge these assumptions and make better more sound decisions in this regard.	If you must use solar for energy security and to replace oil and gas, put solar panels on building roofs and other abundant surfaces rather than prime agriculture and green belt land that threaten food security.		
SP7: Green Belt	No	• Justified	No	No	Green belt and high grade agricultural land should be protected for future generations and to maintain food security which si estimated to only stand at about 65%. This has been achieved and protected throughout recent history so why are we allowing this draconian and chaotic government to tear up these sound custodial protections rather than standing up to these unreasonable demands? Food security is one the government's own 13 Critical Infrastructure Sectors and therefore must be protected at all costs. Housing and building solar farms is not.	Ring-fence and protect any farmland that can support a yield relating to food supply and construct plans to support this activity as a matter of urgency.		
SP8: Housing	No	• Consistent with	No	No	The UK government through the NPPF has "imposed" these massively increased housing targets on NSC but do not have the jurisdiction to do so as they have already stated they would need a court order. NSC need to stand up to the government and these draconian measures that are being imposed on it. Courts only become involved if a council challenges the legality of government action but this has not been tested and needs to be.	Revert back to the housing targets in the initial Local Plan that was		

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		national policy				based on sound analysis rather than this chaotic governments whim.		
Policy DP53: Best and most versatile land	No	• Justified	No	No	Green belt and high grade agricultural land should be protected for future generations and to maintain food security which si estimated to only stand at about 65%. This has been achieved and protected throughout recent history so why are we allowing this draconian and chaotic government to tear up these sound custodial protections rather than standing up to these unreasonable demands? Food security is one the government's own 13 Critical Infrastructure Sectors and therefore must be protected at all costs. Housing and building solar farms is not.	Ring-fence and protect any farmland that can support a yield relating to food supply and construct plans to support this activity as a matter of urgency.		

Name: M Spencer **I.D:** 62853601

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Lodway Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	No	The plan does not sufficiently address the issues that this development would cause in terms of traffic congestion, both in Pill/Easton-in-Gordano and at J19 of the M5. Previously concerns have been raised by National Highways regarding development at Court Hay (see ref 25/P/1413/OUT). The proposed local plan does not show that NSC has co-operated sufficiently with National Highways and taken on its advice, which stated that transport modelling is required in order to fully understand the impact of such developments on J19. The plan relies heavily on transport links such as buses and trains. As things stand the bus service is already very busy at peak times, particularly taking commuters from Portishead to Bristol. The plan does not evidence that the bus service has the capacity to accommodate such a proposed increase in the population of Pill and Easton-in-Gordano, many of whom will be commuting into Bristol. The forthcoming train link from Portishead/ Pill to Bristol is relied on heavily in the Local Plan, however it is likely that the capacity of this rail link will be largely filled by commuters from Portishead, especially at peak times. These plans would require the release of land from the green below, however the plans do not evidence that North Somerset Council has fully examined reasonable alternatives. There is a lack of consideration to maximising brownfield capacity, using minimum density standards and working with neighbouring authorities to accommodate housing needs. The lack of evidence here points towards the 'exceptional circumstances' justification being invalid.	The plan should evidence consultation with National Highways, and detail how their advice will be taken on board re. J19 congestion. Evidence should be included to show how NSC has examined reasonable alternatives to the release of green belt, such as looking at brownfield capacity. Detailed modelling of the capacity of public transport (bus/train) and whether this would adequately serve the increased population, especially at peak commuting times.		

Name: M Stagg **I.D:** 38936641

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with	Unsure	Unsure	I strongly object to the proposed development on Backwell East greenbelt land. While the current government guidelines state that greenbelt land can be built on in exceptional circumstances this land fails to fall into that category in every way. This is grade 1listed land currently used to produce food. It is not set aside land. Building on it would irreversibly harm the landscape and biodiversity existing there. This land is home to nesting skylarks, a nationally endangered species. It is also a feeding ground for ravens, again a nationally rare bird and the lesser and greater horseshoe bats. Backwell common and surrounding areas are already prone to flooding and by covering 50 hectares of nearby land with concrete this will only aggravate the situation. With climate change seeming to bring torrential rainstorms, green field areas are even more necessary to cope with run off. Backwell has already got 800 new houses approved. It cannot support an additional 1000. It			

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		national policy			already lacks the infrastructure to support these 800 approved houses. New health services ,schools, leisure centres would be needed. The plan fails to say who will fund these or where they will be built. Will more greenfield sites be required? No social cohesion assessment has been provided. There is a proposed new road but who would fund this? And when would it be built. Backwell has very little employment opportunities most people need to commute. Are we to become a mere dormitory for Bristol. Is North Somerset having to fund road construction that will in reality only be needed to solve Bristol's housing problems. Much is made of the railway station but in reality it is barely fit for purpose. There is no access for the disabled. A partially sighted friend travels on to Yatton unable to cope with the platform height or stairs down to the road at Nailsea/Backwell. It is mainly unmanned and with no shelter, No access other than stairs on one side and an excessive drop from train to platform height Plus only a short platform so some carriages are inaccessible. Increased traffic from commuters will impact on neighbouring villages and road particularly at Long Ashton and roads into Bristol. The A370 the crossroad and Station Road are already stated as being at capacity. There is no space to increase the size of these roads. There are plans for increased housing in Nailsea and it is disingenuous to treat these are separate issues. Shoppers rely on the two big supermarkets in Nailsea and use Station Road to access them. I requested that the local plan be revised so these houses are built nearer to local employment and that North Somerset's Green Belt and natural environment is protected.			

Name: M Staines **I.D:** 62685569

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Vision, Strategic Priorities and Sustainability Objectives	No	• Justified	Unsure	No	Does not address the concerns of safety fully nor the infrastructure surrounding it.	Green belt being used again for building purposes to enhance the income for the local authority with no regard to the present residents, turning the countryside into a concrete world.		

Name: M Thomas **I.D:** 51737185

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell is already fully developed these additional houses will lead to complete overdevelopment The proposed road would not be effective or relieve congestion on Station Road, Backwell common, or chapel Hill. The lack of infrastructure and services cannot support a fur5her 1000 houses Backwell is not an employment hub. The additional % of the districts housing allocation is out of proportion at 7% when Clevedons is 2%, it is the highest in North Somerset and greater than towns. Grade 1 Agricultural land is used for crops and grazing, these proposals undermine food security. No social cohesion impact assessment has been provided. The proposals threaten the Brockley Maternity Roost and SSSI with the rare Lesser and Greater Horseshoe Bats relying on the land for food. The infrastructure Delivery Plan lacks analysis and costings, there is no funding guarantees for the new road or service. Backwell common and surrounding areas are prone to flooding as are the fields of Grove Farm!!! The railway station is not fit for purpose as a transport hub.			

Name: M Wynn **I.D:** 62773665

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Deficit in school places and no investment in health services Destroy valuable wildlife habitats including rare bats Grade 1 agricultural land Greater risk of flooding Overdevelopment of a small village like no other nearby.			

Name: M. Porwal **I.D:** 62794241

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Despite approximately 1200 objections to a recent planning application, Backwell finds itself with plans for some 800 new houses approved, and plans anticipated for another 1000 or so houses within Backwell and 250 within Nailsea adjacent to the boundary of Backwell. The rapid increase in the size of Backwell would be insensitive and unsustainable overdevelopment. An increase in population of some 80% would permanently change the character of Backwell and the surrounding area. Plans to build on Grade 1 Agricultural Land are misconceived, as this would take land out of use for food production, and the land itself is eminently unsuitable for building as it covers a large area of flood plain. Long time residents of Backwell are all too used to encountering floodwater on roads and large areas of waterlogged ground when out on walks. Any notion of constructing a road running underneath the railway line is frankly laughable, it would quickly turn into a mud filled canal. North Somerset Council have never managed to solve the problem of water collecting under the railway bridge on Chapel Hill. It is an all too frequent occurrence for cars to be written off after being driven into floodwater at night. The idea of tunnelling beneath the railway line approximately half a mile away at Backwell Common is folly at its best. https://www.bbc.co.uk/news/av/uk-england-bristol-67378670 (If the link does not work, please search "car left stranded in high floodwater in Backwell 10th November 2023") The impact on wildlife would be irreversible. Promises of wildlife corridors are often made in these situations, without any realistic prospect of wildlife adjusting to the sudden loss of habitat and feeding grounds.			

Name: M7 Planning Ltd **I.D:** 29337633

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP5: Housing, employment and mixed use allocations	No	• Justified	Yes	No	On behalf of our client, M7 Planning Ltd (“M7”), we wish to comment on the Yatton – Congresbury Strategic Gap and in particular the site referred to as “Land adjacent B3133, Congresbury”, which was given the site reference HE20502 in the Reg.19 Additional Sites consultation in March 2025 and is shown on the attached site location plan. The site, being promoted by M7, has not been identified as a proposed allocation and it is assumed this is because of the comment made in the March 2025 consultation about: “Conflict with proposed Strategic Gap between Congresbury and Yatton.” It is considered that the retention of the M7 site within the Yatton – Congresbury Strategic Gap is erroneous and can no longer be justified as an appropriate restriction for this site. This is stated in the light of the Council’s decision to allocate a significant portion of the Strategic Gap (south of Yatton and immediately west of the M7 site) as the location for a new secondary school in this Draft Local Plan (Policy LP6 and Schedule 4 – Land off Smallway,	Remove land from Strategic Gap between Congresbury and Yatton (see attached location plan)		20374_1001A_Site Location Plan.pdf

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					Yatton). Development of a large school here will significantly erode the gap in this location, essentially leaving the M7 site as an “island” of undeveloped land between built-up areas, which will no longer serve any meaningful purpose as a strategic gap between the settlements. Therefore, the Yatton – Congresbury Strategic Gap should be amended to exclude both the M7 site and the secondary school site. Land adj. B3133, Congresbury: With its exclusion from the Strategic Gap, the M7 site then becomes appropriate for development. As the local planning authority is aware, a planning application was submitted for development of this site for 47no. dwellings, a two-storey medical centre, formation of a vehicular and pedestrian access from Smallway, landscaping, parking, drainage and other associated infrastructure works. The application (ref no: 22/P/1142/FUL) was refused by the local planning authority on 14 February 2025, on the following grounds: 1. The development will result in a less than substantial level of harm to Cadbury Hillfort, a Scheduled Ancient Monument. The identified public benefits are limited and therefore do not outweigh the harm to the significance of Cadbury Hillfort. The proposal therefore conflicts with paragraphs 213 and 215 of the NPPF. 2. The proposal is not on a site allocated for development in the North Somerset Sites and Policies Plan Part 2 - Site Allocations and is contrary to Policy CS33 of the North Somerset Core Strategy and Policy E1 of the Congresbury Neighbourhood Plan where development is strictly controlled in order to protect the character of the rural area and prevent unsustainable development. 3. The proposed development, by reason of its scale, height, and the proportion of the site to be developed, will transform the appearance of the 'Strategic Gap', giving it a built-up appearance which will contribute to a joining up of outlying development in Congresbury and Yatton, removing any sense of separation between these villages on the east side of Smallway. This conflicts with policy CS19 of the Core Strategy and policy SA7 of the Sites and Policies Plan; Part 2. In addition, one of the wider community benefits of the refused scheme was the inclusion of a new Medical Centre; indeed comments from Yatton Parish Council at the time indicated that they were fully aware of the need for a new surgery to serve Yatton and Congresbury. Viability concerns and lack of specific support from the CCG or NHS meant that delivery of this scheme could not be guaranteed. However, the Draft Local Plan includes significant additional development allocations and extant planning permissions at Yatton and Congresbury, amounting to c. 483 dwellings. This means that the need for a new Medical Centre in the areas has only increased. The M7 site represents the ideal location for such a facility, lying in a central and accessible location between the two settlements. M7 intends to look again at potential development of the site for various uses, including residential, elderly care and community uses (e.g. Medical Centre). M7 considers that there is a design solution available that will overcome the issues raised with the previously refused scheme, particularly with regard to ensuring that development will reduce the level of harm to the Cadbury Hillfort SAM. Removal of the land from the Strategic Gap will take away a significant barrier to development, thus allowing these potential important community facilities to come forward in a timely manner.			

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Policy LP10: Strategic gaps	No	• Justified	Yes	No	On behalf of our client, M7 Planning Ltd (“M7”), we wish to comment on the Yatton – Congresbury Strategic Gap and in particular the site referred to as “Land adjacent B3133, Congresbury”, which was given the site reference HE20502 in the Reg.19 Additional Sites consultation in March 2025 and is shown on the attached site location plan. The site, being promoted by M7, has not been identified as a proposed allocation and it is assumed this is because of the comment made in the March 2025 consultation about: “Conflict with proposed Strategic Gap between Congresbury and Yatton.” It is considered that the retention of the M7 site within the Yatton – Congresbury Strategic Gap is erroneous and can no longer be justified as an appropriate restriction for this site. This is stated in the light of the Council’s decision to allocate a significant portion of the Strategic Gap (south of Yatton and immediately west of the M7 site) as the location for a new secondary school in this Draft Local Plan (Policy LP6 and Schedule 4 – Land off Smallway, Yatton). Development of a large school here will significantly erode the gap in this location, essentially leaving the M7 site as an “island” of undeveloped land between built-up areas, which will no longer serve any meaningful purpose as a strategic gap between the settlements. Therefore, the Yatton – Congresbury Strategic Gap should be amended to exclude both the M7 site and the secondary school site. Land adj. B3133, Congresbury: With its exclusion from the Strategic Gap, the M7 site then becomes appropriate for development. As the local planning authority is aware, a planning application was submitted for development of this site for 47no. dwellings, a two-storey medical centre, formation of a vehicular and pedestrian access from Smallway, landscaping, parking, drainage and other associated infrastructure works. The application (ref no: 22/P/1142/FUL) was refused by the local planning authority on 14 February 2025, on the following grounds: 1. The development will result in a less than substantial level of harm to Cadbury Hillfort, a Scheduled Ancient Monument. The identified public benefits are limited and therefore do not outweigh the harm to the significance of Cadbury Hillfort. The proposal therefore conflicts with paragraphs 213 and 215 of the NPPF. 2. The proposal is not on a site allocated for development in the North Somerset Sites and Policies Plan Part 2 - Site Allocations and is contrary to Policy CS33 of the North Somerset Core Strategy and Policy E1 of the Congresbury Neighbourhood Plan where development is strictly controlled in order to protect the character of the rural area and prevent unsustainable development. 3. The proposed development, by reason of its scale, height, and the proportion of the site to be developed, will transform the appearance of the 'Strategic Gap', giving it a built-up appearance which will contribute to a joining up of outlying development in Congresbury and Yatton, removing any sense of separation between these villages on the east side of Smallway. This conflicts with policy CS19 of the Core Strategy and policy SA7 of the Sites and Policies Plan; Part 2. In addition, one of the wider community benefits of the refused scheme was the inclusion of a new Medical Centre; indeed comments from Yatton Parish Council at the time indicated that they were fully aware of the need for a new surgery to serve Yatton and Congresbury. Viability concerns and lack of specific support from the CCG or NHS meant that delivery of this scheme could not be guaranteed.	The alteration to the Yatton – Congresbury Strategic Gap, through removal of the secondary school site and the M7 site indicated on the attached site location plan.		20374_1001A_Site Location Plan.pdf

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					However, the Draft Local Plan includes significant additional development allocations and extant planning permissions at Yatton and Congresbury, amounting to c. 483 dwellings. This means that the need for a new Medical Centre in the areas has only increased. The M7 site represents the ideal location for such a facility, lying in a central and accessible location between the two settlements. M7 intends to look again at potential development of the site for various uses, including residential, elderly care and community uses (e.g. Medical Centre). M7 considers that there is a design solution available that will overcome the issues raised with the previously refused scheme, particularly with regard to ensuring that development will reduce the level of harm to the Cadbury Hillfort SAM. Removal of the land from the Strategic Gap will take away a significant barrier to development, thus allowing these potential important community facilities to come forward in a timely manner.			
Woodhill Nurseries	No	• Justified	Yes	No	On behalf of our client, M7 Planning Ltd (“M7”), we wish to fully support the proposed allocation at Woodhill Nurseries, Congresbury. However, reference is made within the “site requirements” list to the following: “Wider setting of Cadbury Hill Fort scheduled monument to be considered, and mitigations agreed, including green spaces to ensure views of the development are softened.” We have commissioned Landgage consultants to consider this issue in more detail; they have produced a Heritage Technical Note (HTN) that relates primarily to the undeveloped plot immediately adjoining Wood Hill. The note is attached with these representations. Landgage recommends that the northern area of this site specifically (as indicated on Plate 4, page 10 of the HTN) be kept free of housing to maintain an open area across the northern area of the study site. Such a recommendation will be taken into account within a revised site layout, to be submitted with a planning application for development of the site in due course. With regard to archaeology, the HTN advises that, based on the available evidence, any archaeological remains on the study site would be of local significance only. Archaeological remains of local significance can be adequately mitigated by a staged programme of archaeological works, involving geophysical survey, trial trenching and excavation/recording of archaeological remains (if necessary).	Amend the criterion referred to above to read: “Wider setting of Cadbury Hill Fort scheduled monument to be considered, and mitigation agreed, primarily involving the provision of green spaces adjoining Wood Hill, to ensure views of the development are softened.”		Heritage Technical Note.pdf

Name: MR Michael Clareboets **I.D:** 62782369

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Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	1.Extra pressure on A370 2.1817 homes proposed is too much 3.Railway station is already in the wrong place.Not fit for purpose as a transport hub. 4.Loss of grade 2 agricultural land.South of Nailsea 5.River Kenn already floods new road and homes will be in a flood plain.(Station area)			

Name: Mac Mic Strategic Land (Backwell) **I.D:** 63298945

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Vision, Strategic	Yes		Yes	Yes	Mac Mic Strategic Land support the overall vision and strategic objectives of the Local Plan as set out in the	It is recommended that the vision is supplemented by the above contextual		North Somerset Local Plan Pre-

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Priorities and Sustainability Objectives					Regulation 19 Pre-Submission Draft. It is, however, suggested that this section of the Local Plan would benefit from being supported by background information, which sets a number of key facts about North Somerset, such as the current resident population, the number of existing homes, the anticipated population change over the plan period and levels of household growth for different sectors of the community. This information will provide for a clear understanding of the characteristics of the area and enable a positive vision for the future of the area to be prepared and set out. This information could include: Population growth forecasts over the Plan period. Whether certain demographic sectors of the community are forecast to grow in the period up to 2041 (for example, the number of residents aged 65 plus). Levels of household growth for different sectors of the community over the Plan period. Existing levels of employment within North Somerset and future employment growth forecasts. Key sustainable transport routes, corridors and other opportunities within North Somerset; and Levels of community facilities, open space (formal and informal) and education services. Recommendation: It is recommended that the vision is supplemented by the above contextual information and supporting text in order to establish clearly the existing position within North Somerset. The key themes that would result from this contextual analysis could then be used to inform a positive, but deliverable, geographically specific, long-term vision for the area.	information and supporting text in order to establish clearly the existing position within North Somerset. The key themes that would result from this contextual analysis could then be used to inform a positive, but deliverable, geographically specific, long-term vision for the area.		Submission Plan - Backwell Representations Final.pdf
Strategic Priorities	Yes		Yes	Yes			In terms of the strategic objectives, whilst Mac Mic Strategic Land does not wish to make comments on each of the objectives, they do wish to make representations on several that are most relevant to the proposed development to the East of Backwell. One of the objectives states that the Local Plan seeks to prioritise the location of new development close to places with a wide range of services, facilities and job opportunities. The development of the Land to the East of Backwell will enable these objectives to be met through the creation of sustainable transport links (including the new relief road), the provision of new facilities where there is currently a deficit and will provide better links to job opportunities through greater accessibility to centres of employment. This also means that another strategic	North Somerset Local Plan Pre-Submission Plan - Backwell Representations Final.pdf

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							objective can be met through the reduction of car use, encouragement of walking and cycling, and through the provision of high quality and effective public transport. Additionally, the site at Land to the East of Backwell will be able to deliver a diverse range of housing in a variety of tenures, sizes and forms, particularly genuine affordable housing, to meet future needs of North Somerset residents. The site will also provide for development at appropriate high densities at an accessible location. This is also true for the strategic objective that relates to the prioritisation of the importance and delivery of green spaces when considering new development. Such proposals should also support priority habitats and species, and safeguard areas at risk of flooding. This objective is supported by Mac Mic, and they note that the Land to the East of Backwell will provide for significant levels of green space that will help meet an existing deficit in this part of the Council area and ensuring any new development is not located within areas of food risk.	
SP2: Climate Change	No	• Effective • Consistent with national policy	No	Yes	The current wording of the policy states that development proposals must demonstrate how they will address the mitigation of climate change and adaptation to its effects, encourage the decarbonisation of energy and transport, and support the delivery of carbon neutrality in North Somerset by 2030. In order to reduce the overall environmental impact of development, proposals will be expected to demonstrate how they (inter alia): Reduce greenhouse gas emissions and provide carbon storage. Prevent and minimise waste, and encourage re-use, recycling, and resource recovery. Are designed to adapt and be resilient to the impacts of climate change as well as reduce the risk of flooding both now and in the future, taking account of predicted sea level rises and the impact on areas vulnerable to coastal change. Prioritise active travel and effective public transport over car use; and Deliver green infrastructure and provide a net gain in biodiversity. The criterion attached to Policy SP2 are supported. It is, however, important to ensure that suitable timeframes are in place for these targets as part of a transition to carbon neutrality by 2030. Whilst the	Policy SP2 should be redrafted to include flexibility to allow for the proposed requirements to be phased in over a suitable timeframe, to make reference to the relevant government standards and to abide by the timescale set by this guidance as well as to make provision for viability testing to ensure wider Local Plan targets can be secured (such as identifying residential development in appropriate and sustainable locations).		North Somerset Local Plan Pre-Submission Plan - Backwell Representations Final.pdf

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					development industry is moving at pace to become carbon neutral and meet net zero targets, significant advances in supply chains, build quality, and technologies are required to deliver climate change objectives. It is important that these challenges are recognised in Policy SP2, and the targets outlined are not introduced immediately on plan adoption but phased in over a suitable timeframe. Moreover, in terms of residential development, Government guidance notes any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards, which are set out in the PPG. They state that: 'The NPPF expects local planning authorities when setting any local requirement for a building's sustainability to do so in a way consistent with the government's zero carbon buildings policy and adopt nationally described standards. Local requirements should form part of a Local Plan following engagement with appropriate partners and will need to be based on robust and credible evidence and pay careful attention to viability. In this respect, planning authorities will need to take account of government decisions on the Housing Standards Review when considering a local requirement relating to new homes (Paragraph: 009 Reference ID: 6-009-20150327)." The PPG also confirms that locally set energy performance standards should not exceed the equivalent of Level 4 of the Code for Sustainable Homes and for policies to impose reasonable requirements for a proportion of energy used in development to be from renewable and/or low carbon energy sources (Paragraph: 0012 Reference ID: 6-012-20190315). There is also the Future Homes Standards, which establishes a clear road map for how residential development can address climate change. Given this, and whilst there is much to support in Policy SP2, it is critical that the criteria attached to the policy are consistent with national policy. Furthermore, national policy also expects any local requirements relating to such matters to be consulted upon, based on robust and credible evidence and be subject of viability testing. Recommendation: Policy SP2 should be redrafted to include flexibility to allow for the proposed requirements to be phased in over a suitable timeframe, to make reference to the relevant government standards and to abide by the timescale set by this guidance as well as to make provision for viability testing to ensure wider Local Plan targets can be secured (such as identifying residential development in appropriate and			

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					sustainable locations).			
SP3: Spatial strategy	No	• Effective • Consistent with national policy	No	Yes	Mac Mic Strategic Land supports the overarching objective of directing development to sustainable locations and acknowledges the importance of prioritising areas with access to services, facilities, and sustainable transport. This approach aligns with the principles of the National Planning Policy Framework (NPPF) to promote sustainable patterns of development. Separate representations are also made in respect of Mac Mic's land at Land East and West of Flax Bourton. The Land East of Backwell can provide important and wider benefits as part of a comprehensive development that is linked to the Land East and West of Flax Bourton. These benefits include the provision of additional housing land, and the creation of other facilities that will serve the wider Backwell area, such as a new country park, strategic bat habitat and mitigation, areas for wider biodiversity net gain and active travel routes. When considered alongside the Land East and West of Flax Bourton, this development will be consistent with the overall spatial strategy and the stated aim to give priority to "new residential and mixed use development in or close to urban areas where there is an existing or proposed wide range of facilities, services and jobs, and there are opportunities to encourage active travel, particularly at locations which are currently, or have the potential to be, well served by public transport.''. We do, however, wish to register an objection to certain elements of the policy that, in our view, are inconsistent with national guidance and risk reducing flexibility in meeting housing and employment needs across North Somerset. Our objection is made on the grounds of soundness, specifically that aspects of the policy are not fully justified, lack clarity, and may not be effective when assessed against NPPF requirements. The policy states that "residential development in areas at risk of flooding now or in the future will be minimised outside the towns." While flood risk management is essential, the phrase "in the future" is ambiguous and could lead to uncertainty in decision-making. The NPPF (paragraphs 159-161) sets out a clear framework for assessing flood risk through the sequential and exception tests. We recommend aligning the policy wording with this national guidance to ensure clarity and consistency. Recommendation: To ensure the policy is sound and consistent with national guidance, we recommend aligning the flood risk wording with the NPPF sequential and exception test framework. Mac Mic supports the overall	To ensure the policy is sound and consistent with national guidance, we recommend aligning the flood risk wording with the NPPF sequential and exception test framework. Mac Mic supports the overall objectives of this policy but considers that, without modification, certain elements risk being inconsistent with national guidance and could undermine the effectiveness and deliverability of the Local Plan. We therefore request that the Inspector recommends amendments to ensure the policy is justified, clear, and flexible.		North Somerset Local Plan Pre-Submission Plan - Backwell Representations Final.pdf

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					objectives of this policy but considers that, without modification, certain elements risk being inconsistent with national guidance and could undermine the effectiveness and deliverability of the Local Plan. We therefore request that the Inspector recommends amendments to ensure the policy is justified, clear, and flexible.			
SP7: Green Belt	Yes	• Positively prepared • Effective	No	Yes	Mac Mic supports the principles of the Green Belt set out in draft Policy SP7 and welcomes that the Council proposes to recognise the 'exceptional circumstances' that exist to justify the release of land from the Green Belt, particularly with regard to the identification of Land East of Backwell. Without the release of land from the Green Belt, it is clear that the Council would not be able to meet its own housing requirements in the period to 2041. This would result in a failure of the plan-led system and leave the Council vulnerable to speculative unplanned development elsewhere. Mac Mic does, however, consider that the wording of draft Policy SP7 (and draft Policy LP7) should be adjusted to provide a suitable level of flexibility and allow additional sites to be released from the Green Belt where they do not contribute to Green Belt objectives and meet the definitions of 'Grey Belt' land. This is to ensure that the Plan is positively prepared and sufficiently sound to allow alternative sites to come forward were, for example, housing delivery on allocated sites not to come forward in the timescale or scope (in terms of housing numbers) envisaged. To be 'positively prepared' the NPPF is clear that the Plan should provide a strategy that as a minimum seeks to meet the area's objectively assessed needs. Mac Mic therefore considers that the draft Policies SP7 and LP7 should be re-worded to ensure that other sites are capable of coming forward and to ensure that the Council's minimum housing targets are met. Without this amendment the Council risks its policy basis being too inflexible to respond to site-specific delivery characteristics or changes in the market and may lead to the Council being unable to demonstrate a five-year housing land supply in the future. Recommendation: To ensure that the Plan is sound, positively prepared and effective, draft Policy SP7 (and LP7) should be re-worded (and the Proposals Map amended) to also inset from the Green Belt other sites that do not contribute to the Green Belt objectives.	Recommendation To ensure that the Plan is sound, positively prepared and effective, draft Policy SP7 (and LP7) should be re-worded (and the Proposals Map amended) to also inset from the Green Belt other sites that do not contribute to the Green Belt objectives.		North Somerset Local Plan Pre-Submission Plan - Backwell Representations Final.pdf
SP8: Housing	No	• Positively prepared • Effective	No	Yes	Policy SP8 identifies the overall housing requirement of 23,700 dwellings within North Somerset during the plan period 2026 - 2041. This figure is a minimum with a broad distribution of new dwellings to be in accordance with a spatial strategy that indicates that a high proportion of the new dwellings are to be located towards Weston-super Mare and the other			North Somerset Local Plan Pre-Submission Plan - Backwell Representations Final.pdf

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					strategic development locations (including Backwell). The Council considers that this approach will seek to create mixed and balanced communities with a mix of house types and tenures to support a range of household sizes, ages and incomes to meet identified housing needs, including the provision of affordable and specialist housing. Mac Mic are supportive of the overall approach adopted in Policy SP8 (which supports the spatial strategy in Policy SP3). It is, however, critical that the housing requirement of 23,700 remains a minimum figure. There will be opportunities within, for example, allocated sites such as the land East of Backwell to increase site capacity through the detail design process. This will enable additional housing to be provided over and above that set out in the Local Plan and such design iteration should not be precluded by policy. It is therefore imperative that Policy SP8 allows for positive movement in site capacity. The need is therefore to retain a minimum figure for the overall housing requirement as set out in Policy SP8. Recommendation: There are no recommendations to change Policy SP8 but it is imperative that the overall housing requirement remains a minimum figure of 23,700 dwellings and that this is clearly and explicitly set out.		
Policy LP3: Strategic location: Nailsea and Backwell	No	‣ Justified ‣ Effective	No	Yes	Draft Policy LP3 deals with the proposed strategic developments at Nailsea and Backwell and helps the LPA to respond to the additional housing requirements (driven by the changes to the December 2024 NPPF) by supporting the expansion of Backwell with new high-quality development and an improved highway network. Mac Mic supports this policy objective and considers that the expansion of Backwell (in accordance with the sites listed in Schedule 1) is crucial to delivering the housing required in the period to 2041. Mac Mic also supports the proposed release of this land from the Green Belt to secure the required level of growth. Mac Mic does, however, consider that the Land East of Backwell B site has the potential to deliver a higher level of housing than indicated by draft Policy LP3 (and Schedule 1). Mac Mic's iterative design process has indicated a potential capacity of up to 500 units. The draft Policy and criteria set out in Schedule 1 provides a list of requirements that developments in Nailsea and Backwell will be required to deliver, including: ◈ an improved highway network/infrastructure ◈ business development ◈ schools ◈ investment in local services	Mac Mic are confident that the Land East of Backwell B site can deliver up to 500 dwellings. We question whether the Land East of Backwell A can deliver 400 dwellings and the Council should be satisfied that the Land East of Backwell site can deliver the required number of homes overall. Draft Policy LP3 and Schedule 1 should be amended to justify fully the additional requirements the Policy seeks to secure and refer to development costs and development viability when it comes to matters of development phasing and associated planning obligations.		North Somerset Local Plan Pre-Submission Plan - Backwell Representations Final.pdf

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					◈ affordable housing. Development proposed under draft Policy LP3 is also expected to deliver a specific package of measures, including: ◈ measures to alleviate traffic impacts on Station Road and congestion at the Backwell crossroads ◈ a strategic rail crossing ◈ improvements to active travel routes, bus priority and interchange infrastructure ◈ facilities and contributions to enhanced leisure facilities and a new nature park. The principle of these measures is supported by Mac Mic, but it is imperative that the need for these measures is robustly demonstrated. For example, nowhere in draft Policy LP3 is it acknowledged that these measures represent significant cost elements that will need to be considered and taken into account when assessing the viability of proposals. Mac Mic considers that it is essential for draft Policy LP3 to acknowledge these significant costs and to make reference to the consideration of viability when it comes to the application of specific planning conditions and/or obligations to be secured and delivered at the appropriate time. The real-world development costs associated with these measures must be acknowledged by both the policy and the LPA when it comes to applications delivered under this policy. Recommendation: Mac Mic are confident that the Land East of Backwell B site can deliver up to 500 dwellings. We question whether the Land East of Backwell A can deliver 400 dwellings and the Council should be satisfied that the Land East of Backwell site can deliver the required number of homes overall. Draft Policy LP3 and Schedule 1 should be amended to justify fully the additional requirements the Policy seeks to secure and refer to development costs and development viability when it comes to matters of development phasing and associated planning obligations.			
Policy LP5: Housing, employment and mixed use allocations	No	• Justified • Effective	No	Yes	Currently, this policy states that residential sites (of more than 10 units) and employment sites are identified in the Policies Map. These sites are shown in Schedule 1 and 2, with the schedules indicating the potential capacity and principles to be applied for each site. Land East of Backwell is identified in Schedule 1 as having an indicative capacity of 889 dwellings. Consistent with our representations to Policy LP3, although Mac Mic are confident that up to 500 homes can be delivered on the Land East of Backwell B site, the Council should examine carefully whether the Land East of Backwell A site can deliver the required	For these reasons, whilst Mac Mic supports the current draft of Policy LP5 and that Land East of Backwell is included in Schedule 1 , they consider that the Council should ensure that it is satisfied that the indicative capacity figure set out in Schedule 1 can be delivered and that the need for any additional school provision should be robustly justified and provided within the Land East of Backwell A site.		North Somerset Local Plan Pre-Submission Plan - Backwell Representations Final.pdf

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					number of homes for the site overall. The Schedule states that among other matters, development is required to: ◈ provide 5ha of employment land with uses appropriate to the location and maximising opportunities for office and light industrial development ◈ consider heritage sensitivity and follow a heritage-led masterplan ◈ provide a cross rail link road between Station Road and the A370 (designed as an Urban Neighbourhood Distributor) ◈ provide land for the delivery of a primary school (including early-years accommodation). Although the Land East of Backwell B site can provide up to 2 hectares of employment land, the need and suitability for the Land East of Backwell site to provide 5 hectares overall should be robustly justified. The need for a school to be provided within the allocation site needs to be fully justified. Mac Mic has already provided to officers evidence to demonstrate that when using the appropriate methodology there remains sufficient capacity within existing primary, early years and secondary school provision at Backwell to cater for the demand arising from the Mac Mic site, which is expected to come forward ahead of the Land East of Backwell A site. We are aware, however, that land has been identified within the Land East of Backwell A site, which could accommodate the provision of a school (if justified). Mac Mic supports the provision of any required school provision in this location. The outline planning application that is being prepared follows positive discussions with the Council since the summer of 2025. The proposed development will address each of the criteria set out in Schedule 1 (subject to our objection above). Nevertheless, the outline application that is being prepared for the Mac Mic site responds to the other requirements of draft Policy LP5 and represents a heritage and landscape-led masterplan approach that seeks to provide the appropriate form of both housing and mixed-use development. The proposed masterplan also sets out the route of the proposed relief road, which is intended to run from a new junction off the A370 in a north-west direction, where it will then link into a separate development parcel for the remaining Land East of Backwell site (which is currently being promoted by others). Land East of Backwell represents a suitable, available and viable option for residential development and Mac Mic supports its allocation in the Pre-Submission Draft. The evidence gathered to date and which will			

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					be presented with the application shows that the site can successfully address all technical matters such as flooding, landscape and highways. It will be a highly sustainable, well-located residential development that provides for significant levels of green infrastructure, help address deficits in local services and facilities provision, and enable sustainable (non-car based) transport links to be created that will allow existing settlements better access to job provision, services and infrastructure. Recommendation For these reasons, whilst Mac Mic supports the current draft of Policy LP5 and that Land East of Backwell is included in Schedule 1 , they consider that the Council should ensure that it is satisfied that the indicative capacity figure set out in Schedule 1 can be delivered and that the need for any additional school provision should be robustly justified and provided within the Land East of Backwell A site.			
Policy LP7: Settlement boundaries	No	• Positively prepared • Effective	No	Yes	Mac Mic supports the principles of the Green Belt set out in draft Policy SP7 and welcomes that the Council proposes to recognise the 'exceptional circumstances' that exist to justify the release of land from the Green Belt, particularly with regard to the identification of Land East of Backwell. Without the release of land from the Green Belt, it is clear that the Council would not be able to meet its own housing requirements in the period to 2041. This would result in a failure of the plan-led system and leave the Council vulnerable to speculative unplanned development elsewhere. Mac Mic does, however, consider that the wording of draft Policy SP7 (and draft Policy LP7) should be adjusted to provide a suitable level of flexibility and allow additional sites to be released from the Green Belt where they do not contribute to Green Belt objectives and meet the definitions of 'Grey Belt' land. This is to ensure that the Plan is positively prepared and sufficiently sound to allow alternative sites to come forward were, for example, housing delivery on allocated sites not to come forward in the timescale or scope (in terms of housing numbers) envisaged. To be 'positively prepared' the NPPF is clear that the Plan should provide a strategy that as a minimum seeks to meet the area's objectively assessed needs. Mac Mic therefore considers that the draft Policies SP7 and LP7 should be re-worded to ensure that other sites are capable of coming forward and to ensure that the Council's minimum housing targets are met. Without this amendment the Council risks its policy basis being too inflexible to respond to site-specific delivery characteristics or changes in the market and may lead to the Council being unable to demonstrate a five-year housing land supply in the future.	Recommendation To ensure that the Plan is sound, positively prepared and effective, draft Policy SP7 (and LP7) should be re-worded (and the Proposals Map amended) to also inset from the Green Belt other sites that do not contribute to the Green Belt objectives.		North Somerset Local Plan Pre-Submission Plan - Backwell Representations Final.pdf

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					Recommendation: To ensure that the Plan is sound, positively prepared and effective, draft Policy SP7 (and LP7) should be re-worded (and the Proposals Map amended) to also inset from the Green Belt other sites that do not contribute to the Green Belt objectives.			
Policy DP1: High quality design	No	• Effective	No	Yes	Mac Mic are supportive of Policy DP1 in principle. It is, however, noted that the policy requires that management plans should be submitted for the long term maintenance of all shared public and private spaces and facilities including public art, private drainage installations and SuDS and services that the developer intends to provide instead of the Council. It is agreed that this information should be provided, however, the policy does not specify when this information is required. This should be made clear in the policy, as it is not considered appropriate to provide this level of detail at the outline planning application stage. This information should only be submitted once the principle of development has been approved, either when a full application or a Reserved Matter submission is made. Recommendation: It is considered that Policy DP1 should clearly specify when a management plan is required to be prepared and submitted in respect of the long term maintenance of shared public and private space, drainage infrastructure, SuDS and other services.	It is considered that Policy DP1 should clearly specify when a management plan is required to be prepared and submitted in respect of the long term maintenance of shared public and private space, drainage infrastructure, SuDS and other services.		North Somerset Local Plan Pre-Submission Plan - Backwell Representations Final.pdf
Policy DP5: Climate change adaptation and resilience	No	• Effective	No	Yes	This policy requires all major development to submit a climate change adaptation statement. The purpose of this statement is to provide evidence as to how climate related risks are to be addressed and reduced, through development proposals. The statement is to demonstrate how areas vulnerable to increased flooding have been avoided, how measures to mitigate high temperatures at building and site level have been incorporated, and to provide evidence to demonstrate how nature-based solutions, which enable carbon storage and provide flood resilience, have been integrated into proposals. Mac Mic supports the aims of the Council's approach in seeking to ensure that the effects of climate change has been fully taken into account in development proposals. They note, however, that such statements are likely to replicate much of the information that is required to be submitted with major developments such as within Environmental Statements. Mac Mic supports the need for climate change resilience and, as a company, their schemes will seek to ensure that consideration of the impact of climate change is built into proposed development from the	Recommendation Mac Mic therefore objects to this policy requirement for the submission of a climate change adaptation statement. It is not considered that this is justified and it will add extra expense and time to the planning application process. These matters can be adequately addressed in other supporting information and through negotiation and agreement with Officers during the pre-application/ application stages.		North Somerset Local Plan Pre-Submission Plan - Backwell Representations Final.pdf

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					start. Measures to address climate change are incorporated at the design stage. It is considered, however, that there are better mechanisms to achieve this goal than the provision of an additional statement or report. Rather, Mac Mic would wish to work closely with the Council during the application stages to agree and confirm the approach to be adopted. Recommendation: Mac Mic therefore objects to this policy requirement for the submission of a climate change adaptation statement. It is not considered that this is justified and it will add extra expense and time to the planning application process. These matters can be adequately addressed in other supporting information and through negotiation and agreement with Officers during the pre-application/application stages.			
Policy DP6: Net zero construction	No	• Consistent with national policy	No	Yes	This policy, in summary, requires all development to minimise its impact on the environment, ensure that the design of a building prioritises energy reduction and incorporates renewable energy technologies to meet residual energy demand. It states that all new buildings will be required to achieve net zero operational energy compliance in respect of both regulated and unregulated energy and minimise embodied carbon. All new development should seek to minimise embodied carbon in respect of both upfront (emissions associated with raw materials, transportation, manufacturing and construction) and whole life carbon. For development of more than 50 dwellings, or in excess of 5,000m2 non-residential floorspace, the policy recognises that proposals must be accompanied by an embodied carbon assessment that demonstrates that upfront embodied carbon emissions do not exceed 750kg CO2 e/m2 . Furthermore, all new residential buildings must demonstrate through an energy statement, that the following have been achieved, inter alia, no on-site use of fossil fuels, space heating demand of less than 15kWh/m2/year and overall operational energy use of less than 35kWh/m2/year. While the objectives and aims of the policy are supported and there is a need to move towards development that minimises its impact on the environment, the current wording of this policy is not consistent with the guidance contained in NPPF (December 2024). In particular, paragraph 164 of the Framework sets out that: "New development should be planned for in ways that:	Consequently, this policy should be amended to accord with the NPPF. The requirements of the Local Plan policy clearly go over and above those set out in the NPPF, particularly, in relation to new residential development. In order to ensure that the policy aligns with the NPPF, it is considered that this policy should be amended to accord with the Future Homes Standards, which will be mandatory from 2025. This will in time ensure that all new homes will become zero carbon. In our opinion, it would be more appropriate for this policy to align with the Future Home Standards and Building Regulations, as additional requirements will have an impact on the viability of applicable scheme and will increase the cost of development. This would make the policy justified and would not raise issues of soundness.		North Somerset Local Plan Pre-Submission Plan - Backwell Representations Final.pdf

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					a. avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through incorporating green infrastructure and sustainable drainage systems; and b. help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards." The Government has, for residential development, established a clear road map for achieving zero carbon ready homes. This is set out in the 'Future Homes Standards', which is due to be implemented in 2025. The Future Homes Standards will require carbon emissions produced by new homes to be 75-80% lower than those built to current standards. Any new homes built under these new Building Regulations standards will therefore need to be zero carbon ready, which means that they will immediately be able to benefit from the decarbonisation of the electricity grid. Recommendation Consequently, this policy should be amended to accord with the NPPF. The requirements of the Local Plan policy clearly go over and above those set out in the NPPF, particularly, in relation to new residential development. In order to ensure that the policy aligns with the NPPF, it is considered that this policy should be amended to accord with the Future Homes Standards, which will be mandatory from 2025. This will in time ensure that all new homes will become zero carbon. In our opinion, it would be more appropriate for this policy to align with the Future Home Standards and Building Regulations, as additional requirements will have an impact on the viability of applicable scheme and will increase the cost of development. This would make the policy justified and would not raise issues of soundness.		
Policy DP14: Highway safety, traffic and provision of infrastructure associated with development	No	• Positively prepared • Effective	No	Yes	Policy DP14 sets out that development likely to have a severe residual cumulative impact on transport links, traffic congestion, or on the character and function of the surrounding area, will only be permitted where acceptable mitigation measures are delivered. All mitigating infrastructure will need to be delivered within an agreed specific timeframe and prior to the aforementioned impact becoming severe. In some circumstances, planning permission may be granted subject to the applicant entering into an appropriate legal agreement to deliver or fund the improvements	The reasoned justification to Policy DP14 should be re-drafted to reflect the Vision and Validate model of highway safety and traffic management. The requirement for development to contribute to the improvement of rail freight facilities even when there is no direct benefit should be removed from the policy, as this requirement does not meet the tests of planning obligations. Reference to out commuting from North Somerset should also be deleted		North Somerset Local Plan Pre-Submission Plan - Backwell Representations Final.pdf

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					required The supporting text notes that developers will need to determine the transport needs arising from their proposals and the means by which any adverse impacts will be mitigated. It continues by stating that the Local Plan approach allows for developers to provide or contribute towards the cost of providing necessary infrastructure, which may be off-site. The supporting text also states that to accommodate the road traffic it unavoidably generates, a development will be required to deliver or fund improvements to boost the attractiveness of walking, cycling and public transport, or traffic management measures, in the relevant corridor(s) sufficient to maintain overall road traffic at the otherwise expected level. Mac Mic object to the approach put forward in Policy DP14 in terms of highway safety and traffic management. The approach adopted is based on out-dated models of assessment - it is very much a 'Predict and Provide' model rather than a 'Vision and Validate' approach. It is apparent that the application of this policy will lead to new development being required to provide for new road space and will lead to increases in commuting traffic. The Vision and Validate approach seeks to set a vision for the long-term goals, objectives, and aspirations for the future of a transportation system, with the validation confirming that the chosen strategies, methods, or technologies align with the defined vision and achieve the desired outcomes and can effectively address the evolving needs of the community This is the prevailing school of thought in term of transport planning and should be applied to this policy rather than the Provide and Predict model which is unlikely to withstand scrutiny at Examination. As such, the policy should be re-drafted to reflect the 'Vision and Validate' model. We would also comment on two points raised in the supporting text in that it notes that developments may be required to contribute to funding the improvement of rail freight facilities, even where they are no direct benefits. It is considered that this clearly does not meet the tests for planning obligations as set out in NPPF Paragraph 58. Finally, the supporting text notes that proposals that reduce out-commuting from North Somerset will have a beneficial effect on the overall level of congestion by reducing traffic on the M5, which will need to be balanced against any detrimental local effect. Mac Mic note that this can only be achieved in the context of the proposed policy wording if local roads are provided with more highway capacity to ensure no	from the policy as it implies that a Predict and Provide model should be put in place.		

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					detrimental local effect. This demonstrates the need to revise the policy as this follows the Provide and Predict rather than the Vision and Validate approach.			
Policy DP17: Public transport accessibility	No	• Positively prepared • Effective	No	Yes	Policy DP17 states that all residential development should be within a reasonable distance of a direct and frequent bus service providing access to a good range of facilities, services and jobs via a direct, safe and attractive pedestrian route while developments will be expected to encourage the use of public transport and deliver of effective and convenient services. This aspiration is supported by Mac Mic. Mac Mic are, however, concerned with the reference in the justification that in terms of locating development within a 'reasonable distance' this means a maximum of approximately 400 metre walking radius of a bus stop with a suitable service frequency, or 600m in rural areas. This is an out-of-date metric, as public transport accessibility should be based on the level of service and frequency of service sufficient to meet individual needs. It might be the case that greater distances can be applied.	The wording of this part of the supporting text should be amended accordingly and should also make reference to the prevailing topography as this will also have an impact on accessibility to public transport.		North Somerset Local Plan Pre-Submission Plan - Backwell Representations Final.pdf
Policy DP38: Landscape	No	• Positively prepared • Consistent with national policy	No	Yes	This policy seeks to protect the character, sense of place, distinctiveness, and diversity of North Somerset's landscape. It states that all development proposals should, inter alia, not have an unacceptable adverse impact on the landscape character of the district; be carefully integrated into the natural, built and historic environment, aiming to establish a strong sense of place, respond to local character, and reflect the identity of local surroundings, whilst minimising landscape impact; and respect the tranquillity of an area. It also notes that where some harm to the local landscape character is unavoidable, but a development is otherwise deemed beneficial, then positive mitigation measures should be secured by a landscape condition or planning agreement involving works on or off-site as necessary. The thrust and direction of this policy is supported by Mac Mic but they consider that it would benefit from re-drafting. The nature of development means that there will be an impact on the landscape and its character (in the wider sense). This should, therefore, be more clearly recognised within the policy and it should be drafted such that the Council and applicants should work together to achieving wider landscape aims and to ensuring that any impacts arising can be successfully mitigated and have a positive impact on the landscape. The policy therefore needs to be more positively worded. Indeed, the supporting text notes that: 'The policy is intended to ensure that development	Policy DP38 should be revised to ensure it is positively prepared and consistent with national policy by explicitly recognising that development will inevitably result in some landscape change. The policy should focus on achieving high-quality outcomes through collaboration between the Council and applicants, securing mitigation and enhancement measures that contribute to local character and sense of place. Wording should emphasise that proposals should integrate with the natural, built, and historic environment, and where impacts occur, they should be offset through proportionate and deliverable mitigation, agreed via planning conditions or obligations. This approach aligns with NPPF principles of sustainable development and effective implementation.		North Somerset Local Plan Pre-Submission Plan - Backwell Representations Final.pdf

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					does not adversely affect landscape character. Development should contribute to the creation of places and spaces which are attractive, respect and enhance the particular local character of the landscape and are designed with the needs of people in mind ' This sentiment should come through more clearly in the main policy. Recommendation: Policy DP38 should be revised to ensure it is positively prepared and consistent with national policy by explicitly recognising that development will inevitably result in some landscape change. The policy should focus on achieving high-quality outcomes through collaboration between the Council and applicants, securing mitigation and enhancement measures that contribute to local character and sense of place. Wording should emphasise that proposals should integrate with the natural, built, and historic environment, and where impacts occur, they should be offset through proportionate and deliverable mitigation, agreed via planning conditions or obligations. This approach aligns with NPPF principles of sustainable development and effective implementation.			
Policy DP46: Housing Type and Mix	No	• Effective • Consistent with national policy	No	Yes	Policy DP46 requires new residential development to provide a mix of housing tenures, types, and sizes appropriate to site characteristics and location, informed by the latest Local Housing Needs Assessment. For developments of 10 or more dwellings, the policy expects provision for a range of housing types, including bungalows, smaller homes for downsizing or first-time buyers, retirement accommodation, accessible homes, and self-build plots. It also mandates that all new dwellings meet Building Regulations M4(2) standards, with at least 5% meeting M4(3) standards for wheelchair accessibility. While the policy's objectives are understood, its current wording lacks flexibility and risks being inconsistent with national policy. The NPPF requires local plans to be positively prepared, justified, and effective. Policies should enable sustainable development and respond to changing market conditions and viability considerations. Policy DP46, as drafted, imposes prescriptive requirements that may not be appropriate for all sites, particularly strategic allocations or larger developments where design solutions and market dynamics vary significantly. The requirement to limit certain housing sizes where there is perceived over-provision could constrain the ability to respond to actual demand and market	Policy DP46 should be modified to introduce flexibility and ensure consistency with national policy. It should recognise that housing mix requirements must be informed by site-specific considerations, viability, and market demand. This means that provision should be made in the policy to allow for negotiation where prescriptive requirements would compromise deliverability and that all requirements will be subject to viability testing and proportionate to the scale and nature of development.		North Somerset Local Plan Pre-Submission Plan - Backwell Representations Final.pdf

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					signals. Similarly, the mandatory proportion of accessible homes and self-build plots, without clear viability safeguards or recognition of site-specific constraints, risks undermining deliverability. National policy emphasises that local requirements must be evidence based, proportionate, and not compromise housing delivery. DP46 does not currently provide sufficient flexibility to achieve these objectives. Recommendation: Policy DP46 should be modified to introduce flexibility and ensure consistency with national policy. It should recognise that housing mix requirements must be informed by site-specific considerations, viability, and market demand. This means that provision should be made in the policy to allow for negotiation where prescriptive requirements would compromise deliverability and that all requirements will be subject to viability testing and proportionate to the scale and nature of development.			
Land east of Backwell	No	‣ Justified ‣ Effective	No	Yes	Currently, this policy states that residential sites (of more than 10 units) and employment sites are identified in the Policies Map. These sites are shown in Schedule 1 and 2, with the schedules indicating the potential capacity and principles to be applied for each site. Land East of Backwell is identified in Schedule 1 as having an indicative capacity of 889 dwellings. Consistent with our representations to Policy LP3, although Mac Mic are confident that up to 500 homes can be delivered on the Land East of Backwell B site, the Council should examine carefully whether the Land East of Backwell A site can deliver the required number of homes for the site overall. The Schedule states that among other matters, development is required to: ◈ provide 5ha of employment land with uses appropriate to the location and maximising opportunities for office and light industrial development ◈ consider heritage sensitivity and follow a heritage-led masterplan ◈ provide a cross rail link road between Station Road and the A370 (designed as an Urban Neighbourhood Distributor) ◈ provide land for the delivery of a primary school (including early-years accommodation). Although the Land East of Backwell B site can provide up to 2 hectares of employment land, the need and suitability for the Land East of Backwell site to provide 5 hectares overall should be robustly justified. The need for a school to be provided within the allocation site needs to be fully justified. Mac Mic has	For these reasons, whilst Mac Mic supports the current draft of Policy LP5 and that Land East of Backwell is included in Schedule 1 , they consider that the Council should ensure that it is satisfied that the indicative capacity figure set out in Schedule 1 can be delivered and that the need for any additional school provision should be robustly justified and provided within the Land East of Backwell A site.		

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					already provided to officers evidence to demonstrate that when using the appropriate methodology there remains sufficient capacity within existing primary, early years and secondary school provision at Backwell to cater for the demand arising from the Mac Mic site, which is expected to come forward ahead of the Land East of Backwell A site. We are aware, however, that land has been identified within the Land East of Backwell A site, which could accommodate the provision of a school (if justified). Mac Mic supports the provision of any required school provision in this location. The outline planning application that is being prepared follows positive discussions with the Council since the summer of 2025. The proposed development will address each of the criteria set out in Schedule 1 (subject to our objection above). Nevertheless, the outline application that is being prepared for the Mac Mic site responds to the other requirements of draft Policy LP5 and represents a heritage and landscape-led masterplan approach that seeks to provide the appropriate form of both housing and mixed-use development. The proposed masterplan also sets out the route of the proposed relief road, which is intended to run from a new junction off the A370 in a north-west direction, where it will then link into a separate development parcel for the remaining Land East of Backwell site (which is currently being promoted by others). Land East of Backwell represents a suitable, available and viable option for residential development and Mac Mic supports its allocation in the Pre-Submission Draft. The evidence gathered to date and which will be presented with the application shows that the site can successfully address all technical matters such as flooding, landscape and highways. It will be a highly sustainable, well-located residential development that provides for significant levels of green infrastructure, help address deficits in local services and facilities provision, and enable sustainable (non-car based) transport links to be created that will allow existing settlements better access to job provision, services and infrastructure. Recommendation For these reasons, whilst Mac Mic supports the current draft of Policy LP5 and that Land East of Backwell is included in Schedule 1 , they consider that the Council should ensure that it is satisfied that the indicative capacity figure set out in Schedule 1 can be delivered and that the need for any additional school provision should be robustly justified and provided within the Land East of Backwell A site.			

Name: Mac Mic Strategic Land (Land north of Banwell Road) **I.D:** 63006177

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Vision, Strategic Priorities and Sustainability Objectives	No	• Effective	No	No	Vision Mac Mic support the overall vision and strategic objectives of the Local Plan as set out in the Regulation 19 Pre-Submission Draft. However, it is suggested that this section of the Local Plan would benefit from being supported by background information, which sets a number of key facts about North Somerset such as the current resident population, the number of existing homes, the anticipated population change over the plan period and levels of household growth for different sectors of the community over the Local Plan Review period. This information will provide for a clear understanding of the characteristics of the area and enable a positive vision for the future of the area to be prepared and set out. This information could include: Population growth forecasts over the Plan period. Whether certain demographic sectors of the community are forecast to grow in the period up to 2040. Levels of household growth for different sectors of the community over the Plan period. Existing levels of employment within North Somerset and future employment growth forecasts. Key sustainable transport routes, corridors and other opportunities within North Somerset; and Levels of community facilities, open space (formal and informal) and education services. Recommendation It is recommended that the Vision is supplemented by contextual information and supporting text in order to clearly establish the existing position within North Somerset. The key themes that would result from this contextual analysis could then be used to inform a positive, but deliverable, geographically specific, long-term vision for the area.			01 North Somerset Local Plan Pre-Submission Plan Consultation Representations.pdf
Strategic Priorities	Yes		Yes	Yes		In terms of the strategic objectives, whilst Mac Mic Strategic Land does not wish to make comments on each of the objectives, they would wish to make representations on several that are most relevant to the proposed development to the East and West of Flax Bourton. One of the objectives states that the Local Plan seeks to prioritise the location of new development close to places with a wide range of services, facilities and job opportunities. The development of the Land to the East and West of Flax Bourton will enable these objectives to be met through the creation of sustainable transport links, the provision of a new country park, public open space and strategic bat mitigation, and will provide better links to job opportunities through greater accessibility to centres of employment. This also means that another strategic objective can be met through the reduction of car use, encouragement of walking and cycling, and through the provision of high quality and effective public transport. Additionally, the site at Land to the East and West of Flax Bourton will be able to deliver a diverse range of housing in a variety of tenures, sizes and forms, particularly genuine		North Somerset Local Plan Pre-Submission Plan - Flax Bourton Representations Final.pdf

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						affordable housing, to meet future needs of North Somerset residents. The site will also provide for development at appropriate high densities at an accessible location. This is also true for the strategic objective that relates to the prioritisation of the importance and delivery of green spaces when considering new development. Such proposals should also support priority habitats and species, and safeguard areas at risk of flooding. This objective is supported by Mac Mic, and they note that the Land to the East and West of Flax Bourton would provide for significant levels of green space that will help meet an existing deficit in this part of the Council area and ensuring any new development is not located within areas of food risk. Recommendation Mac Mic supports the strategic objectives.		
SP2: Climate Change	No	• Effective • Consistent with national policy	No	Yes		The current wording of the policy states that development proposals must demonstrate how they will address the mitigation of climate change and adaptation to its effects, encourage the decarbonisation of energy and transport, and support the delivery of carbon neutrality in North Somerset by 2030. In order to reduce the overall environmental impact of development, proposals will be expected to demonstrate how they (inter alia) Reduce greenhouse gas emissions and provide carbon storage. Prevent and minimise waste, and encourage re-use, recycling, and resource recovery. Are designed to adapt and be resilient to the impacts of climate change as well as reduce the risk of flooding both now and in the future, taking account of predicted sea level rises and the impact on areas vulnerable to coastal change. Prioritise active travel and effective public transport over car use; and Deliver green infrastructure and provide a net gain in biodiversity. The criterion attached to Policy SP2 are supported. It is, however, important to ensure that suitable timeframes are in place for these targets as part of a transition to carbon neutrality by 2030. Whilst the development industry is moving at pace to become carbon neutral and meet net zero targets, significant advances in supply chains, build quality, and technologies are required to deliver climate change objectives. It is important that these challenges are recognised in Policy SP2, and the targets outlined are not introduced immediately on plan adoption but phased in over a suitable timeframe. Moreover, in terms of residential development, Government guidance notes any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards, which are set out in the PPG. They state that: 'The NPPF expects local planning authorities when setting any local requirement for a building's sustainability to do so in a way consistent with the government's zero carbon buildings policy and adopt nationally described standards. Local requirements should form part of a Local Plan following engagement with appropriate partners and will need to be based on robust and credible evidence and pay careful attention to viability. In this respect, planning authorities will need to take account of government decisions on the Housing Standards Review when considering a local requirement relating to new homes (Paragraph: 009 Reference ID: 6-009-20150327)."		North Somerset Local Plan Pre-Submission Plan - Flax Bourton Representations Final.pdf

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						The PPG also confirms that locally set energy performance standards should not exceed the equivalent of Level 4 of the Code for Sustainable Homes and for policies to impose reasonable requirements for a proportion of energy used in development to be from renewable and/or low carbon energy sources (Paragraph: 0012 Reference ID: 6-012-20190315). There is also the Future Homes Standards, which establishes a clear road map for how residential development can address climate change. Given this, and whilst there is much to support in Policy SP2, it is critical that the criteria attached to the policy are consistent with national policy. Furthermore, national policy also expects any local requirements relating to such matters to be consulted upon, based on robust and credible evidence and be subject of viability testing. Recommendation Policy SP2 should be redrafted to include flexibility to allow for the proposed requirements to be phased in over a suitable timeframe, to make reference to the relevant government standards and to abide by the timescale set by this guidance as well as to make provision for viability testing to ensure wider Local Plan targets can be secured (such as identifying residential development in appropriate and sustainable locations).		
SP2: Climate Change	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The current wording of the policy states that development proposals must demonstrate how they will address the mitigation of climate change and the adaptation to its effects, encourage the decarbonisation of energy and transport, and support the delivery of carbon neutrality in North Somerset by 2030. In order to reduce the overall environmental impact of development, proposals will be expected to demonstrate how they (inter alia): • Reduce greenhouse gas emissions and provide carbon storage. • Prevent and minimise waste, and encourage re-use, recycling, and resource recovery. • Are designed to adapt and be resilient to the impacts of climate change as well as reduce the risk of flooding both now and in the future, taking account of predicted sea level rises and the impact on areas vulnerable to coastal change. • Prioritise active travel and effective public transport over car use; and • Deliver green infrastructure and provide a net gain in biodiversity. The criterion attached to Policy SP2 are supported. However, it is important to ensure that suitable timeframes are in place for these targets as part of a transition to carbon neutrality by 2030. Whilst the development industry is moving at pace to become carbon neutral and meet net zero targets, significant advances in supply chains, build quality, and technologies are required to deliver climate change objectives. It is important that these challenges are recognised in Policy SP2, and the targets outlined are not introduced immediately on plan adoption but phased in over a suitable timeframe. Moreover, in terms of residential development, the	Policy SP2 should state that climate change mitigation and adaptation measures will be delivered in accordance with national standards (including the Future Homes Standard) and phased to reflect technological and supply chain readiness. Local requirements will be subject to viability testing and consultation to ensure consistency with national policy and deliverability of the wider Local Plan objectives.		01 North Somerset Local Plan Pre-Submission Plan Consultation Representations.pdf

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					government guidance notes any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards. They state that: "The NPPF expects local planning authorities when setting any local requirement for a building's sustainability to do so in a way consistent with the government's zero carbon buildings policy and adopt nationally described standards. Local requirements should form part of a Local Plan following engagement with appropriate partners and will need to be based on robust and credible evidence and pay careful attention to viability. In this respect, planning authorities will need to take account of government decisions on the Housing Standards Review when considering a local requirement relating to new homes (Paragraph: 009 Reference ID: 6-009-20150327)." The PPG also confirms that locally set energy performance standards should not exceed the equivalent of Level 4 of the Code for Sustainable Homes and for policies to impose reasonable requirements for a proportion of energy used in development to be from renewable and/or low carbon energy sources (Paragraph: 0012 Reference ID: 6-012-20190315) There is also the Future Homes Standards, which establishes a clear road map for how residential development can address climate change. Given this, and whilst there is much to support in Policy SP2, it is critical that the criteria attached to the policy are consistent with national policy. Furthermore, national policy also expects any local requirements relating to such matters to be consulted upon, based on robust and credible evidence and be the subject of viability testing. Recommendations Policy SP2 should state that climate change mitigation and adaptation measures will be delivered in accordance with national standards (including the Future Homes Standard) and phased to reflect technological and supply chain readiness. Local requirements will be subject to viability testing and consultation to ensure consistency with national policy and deliverability of the wider Local Plan objectives.			
SP3: Spatial strategy	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Mac Mic supports the overarching objective of directing development to sustainable locations and acknowledges the importance of prioritising areas with access to services, facilities, and sustainable transport. This approach aligns with the principles of the NPPF to promote sustainable patterns of development. However, we wish to register an objection to certain elements of the policy that, in our view, are inconsistent with national guidance and risk reducing flexibility in meeting housing and employment needs across North Somerset. Our objection is made on the grounds of soundness, specifically that aspects of the policy are not fully justified, lack clarity, and may not be effective when assessed against NPPF requirements. The policy states that "residential development in areas at risk of flooding now or in the future will be minimised outside	To ensure the policy is sound and consistent with national guidance, we recommend aligning the flood risk wording with the NPPF sequential and exception test framework. Mac Mic supports the overall objectives of this policy but considers that, without modification, certain elements risk being inconsistent with national guidance and could undermine the effectiveness and deliverability of the Local Plan. We therefore request that the policy is amended to ensure that it is justified, clear, and flexible.		01 North Somerset Local Plan Pre-Submission Plan Consultation Representations.pdf

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					the towns.” While flood risk management is essential, the phrase “in the future” is ambiguous and could lead to uncertainty in decision-making. The NPPF (paragraphs 152–164) sets out a clear framework for assessing flood risk through the sequential and exception tests. We recommend aligning the policy wording with national guidance to ensure clarity and consistency. Recommendation To ensure the policy is sound and consistent with national guidance, we recommend aligning the flood risk wording with the NPPF sequential and exception test framework. Mac Mic supports the overall objectives of this policy but considers that, without modification, certain elements risk being inconsistent with national guidance and could undermine the effectiveness and deliverability of the Local Plan. We therefore request that the policy is amended to ensure that it is justified, clear, and flexible.			
SP7: Green Belt	No					Mac Mic supports the principles of the Green Belt set out in draft Policy SP7 and welcomes that the Council proposes to recognise the 'exceptional circumstances' that exist to justify the release of land from the Green Belt. Without the release of land from the Green Belt, it is clear that the Council would not be able to meet its own housing requirements in the period to 2041 . This would result in a failure of the plan-led system and leave the Council vulnerable to speculative unplanned development elsewhere. Mac Mic does, however, consider that the wording of draft Policy SP7 (and draft Policy LP7) should be adjusted to provide a suitable level of flexibility and allow additional sites to be released from the Green Belt where they do not contribute to Green Belt objectives. Land that does not meet these objectives comprises 'Grey Belt' land, which is defined as sites comprising previously developed land and/or any other land that, in either case, does not strongly contribute to checking the unrestricted sprawl of large built-up areas, prevent neighbouring towns merging with one another or preserve the setting and special character of historic towns. This applies to Land to the East and West of Flax Bourton. The wording of draft Policy SP7 (and LP7) should be amended to ensure that the Plan is positively prepared and sufficiently sound to allow alternative sites to come forward were, for example, housing delivery on allocated sites not to come forward in the timescale or scope (in terms of housing numbers) envisaged. The Land at East and West of Flax Bourton is a clear example of this and Mac Mic considers that it should also be removed from the Green Belt. To be 'positively prepared' the NPPF is clear that the Plan should provide a strategy that as a minimum seeks to meet the area's objectively assessed needs. Mac Mic therefore considers that the draft Policies SP7 and LP7 should be re-worded to ensure that other sites can come forward and to ensure that the Council's minimum housing targets are met. Without this amendment the Council risks its policy basis being too inflexible to respond to site-specific delivery characteristics or changes in the market, and may lead to the Council being unable to demonstrate a five-year housing land supply in the future. The Land at East and West of Flax Bourton		North Somerset Local Plan Pre-Submission Plan - Flax Bourton Representations Final.pdf

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						would provide this flexibility and has an indicative capacity of 200-250 dwellings. In any event, we note that villages in the Green Belt that do not contribute to openness are 'inset' from the Green Belt. The boundaries of the Green Belt do, however, remain tightly drawn around the existing settlement boundaries. We do not agree with this approach and recommend that the wording of draft Policy SP7 (and LP7) is amended to refer to both villages and sites that do not contribute to the objectives of the Green Belt being 'inset' from the Green Belt. In relation to Flax Bourton, we consider that this should apply to the land shown on Figure 2.1. Recommendation To ensure that the Plan is sound, positively prepared and effective, draft Policy SP7 (and LP7) should be re-worded (and the Proposals Map amended) to also inset from the Green Belt other sites that do not contribute to the Green Belt objectives, and that therefore represent 'Grey Belt' land, specifically including Land to the East and West of Flax Bourton.		
SP8: Housing	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Policy SP8 identifies land to secure the delivery of 23,700 dwellings within North Somerset during the plan period 2026 – 2041, equivalent to 1,580 dwellings per annum. This figure is a minimum with a broad distribution of new dwellings to be in accordance with a spatial strategy that indicates that a high proportion of the new dwellings are to be located towards Weston-super-Mare and the other strategic development locations. The Council considers that this approach will seek to create mixed and balanced communities with a mix of house types and tenures to support a range of household sizes, ages and incomes to meet identified housing needs, including the provision of affordable and specialist housing. Mac Mic are supportive of the overall approach adopted in Policy SP8 (which supports the spatial strategy in Policy SP3). However, it is critical that the housing requirement of 23,700 remains a minimum figure. There will be opportunities within, for example, allocated sites such as the Land north of Banwell Road, Elborough/Locking to increase site capacity through the detail design process. This will enable additional housing to be provided over and above that set out in the Local Plan. Such design iteration should not be precluded by policy; therefore, it is imperative that Policy SP8 allows for positive movement in site capacity. The need is therefore to retain a minimum figure for the overall housing requirement as set out in Policy SP8. Recommendations There are no recommendations to change Policy SP8 but it is imperative that the overall housing requirement remains a minimum figure of 23,700 dwellings.			01 North Somerset Local Plan Pre-Submission Plan Consultation Representations.pdf
Policy LP5: Housing, employment and mixed use allocations	No	• Effective	Unsure	Unsure	Currently, this policy states that residential sites (or more than 10 units) and employment sites are identified in the Policies Map. These sites are shown in Schedule 1 and 2. These schedules indicate the potential capacity and principles to be applied for each site. Land north of Banwell Road, Elborough/Locking is identified as having an indicative	Whilst Mac Mic supports the current draft of Policy LP5 and that Land north of Banwell Road, Locking/Elborough is included in Schedule 1, they object to the suggested capacity of the site and consider that it should be increased to 415 homes.		01 North Somerset Local Plan Pre-Submission Plan Consultation Representations.pdf

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					capacity of 315 dwellings in Schedule 1: Large sites for residential development. The schedule states that development at the site is required to fund upgrades to Banwell Road junction with A371 (as identified on the Policies Map), make contributions to the expansion of primary, secondary and early years education in the local area and provide surface water attenuation together with demonstrating how this will drain the site. It also notes that any planning application must demonstrate that joined up safe active and sustainable travel provision can link this site (along with the allocation on Land to the west of Elborough) to Locking village and the A371 strategic cycleway. Proportionate contributions will also be required towards bus service provision and the existing Public Right of Way AX18/1/20 is to be upgraded. The text in Schedule 1 also notes that any proposed development must consider the approved skatepark facility to the north of the site, north of Old Banwell Road, and demonstrate that no new dwellings will be affected by that consented scheme. Mac Mic are in the process of preparing an outline planning application for Land north of Banwell Road, Locking/ Elborough. This followed positive pre-application discussions with the Council during the summer 2025. The proposed development will address each of the criteria set out in Schedule 1. Consideration has been given to off-site highway improvements to Banwell Road and these will be incorporated where it is proven that they are required following detailed highways analysis (which has informed the outline planning application submission). It is also proposed as part of the draft Heads of Terms to make contributions to local education provision within the vicinity of the site subject to viability considerations. The proposed site layout - which formed the basis of the Vision Document that was submitted with the representations to the Regulation 19 Pre-Submission Draft in 2024 - was cognisant of the potential flood concerns raised by development on this site and was designed and laid out to avoid areas of the site that had a higher potential to flood. This layout informed the site allocation, which was first put forward in the Additional Sites Paper, and is now the basis for the allocation in the Pre-submission Draft. However, whilst the rationale for the site boundary appears to have been driven by flood risk data and analysis, it is Mac Mic’s view that the site could accommodate additional development on site and that the site’s capacity should be increased to circa 415 dwellings. As part of the information to be submitted in support of the outline application, Mac Mic will prepare a sequential test that demonstrates that further development can be			

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					accommodated. Notwithstanding the outcome of the Sequential Test, Mac Mic consider that the Exception Test can be passed. The existing strategic flood defences means that the planning balance/benefits of the scheme when assessed against the real world flood risk should take precedence. As such, they consider that a slight expansion of the site boundary is appropriate to allow the proposed residential development to be optimised. Whilst being driven by addressing flood matters on site, Mac Mic see the design ethos of split development areas as being a key attribute of the site. It allows for the introduction of the country park in the centre of site. This area will also provide for on-site green infrastructure, the retention of a strategic gap and the delivery of biodiversity. One of the many benefits of the development of this site is that it will improve the accessibility and sustainability of the existing settlement of Elborough. It is proposed that community facilities will be built in close proximity to the village whilst the creation of the country park will allow for the provision of new cycleways and pedestrian footpaths linking the southern parts of the site (and Elborough) to the north and the facilities within Locking and Locking Parklands (as well as Weston-super-Mare). This will be supported by proportionate contributions to bus service provision and improvements to existing public right of ways. The outline planning application has been the subject of community consultation. This has involved meeting with local Parish Councils and undertaking on-line consultation. It is clear from the feedback that Mac Mic has received that significant resources have been spent on the community facilities north of Banwell Road, Locking including the new skate park. Accordingly, the proposals have been revised to ensure that they complement rather than compete with existing facilities, for instance, the proposed development will now provide for allotments, which was indicated as being in demand by local communities. The design and layout of the site will also consider that proximity of the skate park and will ensure that no residential amenity issues arise. Land to the north of Banwell Road, Elborough/Locking therefore represents a suitable, available and viable option for residential development and Mac Mic supports its allocation in the Pre-Submission Draft. The evidence gathered to date and which will be presented with the application shows that the site can successfully address all technical matters such as flooding, landscape and highways. It will be a highly sustainable, well-located residential development that provides for significant levels of green infrastructure, help address deficits in local services and facilities provision, and enable sustainable (non-car based) transport links to be created that will allow existing settlements better access to job provision, services and infrastructure.			

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					Recommendation For these reasons, whilst Mac Mic supports the current draft of Policy LP5 and that Land north of Banwell Road, Locking/ Elborough is included in Schedule 1, they object to the suggested capacity of the site and consider that it should be increased to 415 homes.			
Policy LP10: Strategic gaps	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	This policy addresses Strategic Gaps, and states that development will be restricted within the gaps subject to the proposals not adversely impacting on the open or undeveloped character of the gap, not affecting the separate identity and character of the settlements and not harming the landscape setting of the settlements. Strategic Gaps are identified around the following areas: • Weston-super-Mare, Locking and Hutton. • Yatton and Congresbury. • Banwell and Wolvershill (north west of Banwell); and • Sandford and Churchill. Mac Mic are supportive of this policy and agree with the current extent of the Strategic Gaps as shown in the Policies Map. It is their view that these gaps should be protected. The purpose and principle of the Strategic Gap should remain even in the face of increasing residential requirements. They play an important role in maintaining the local character and distinctiveness of the settlements, and the sense that they are separate places. The supporting justification notes that protection is particularly important where such erosion could potentially cause coalescence of the settlements such as ribbon development along main roads. Recommendation No change is recommended to the current draft of the policy.	No change is recommended to the current draft of the policy.		01 North Somerset Local Plan Pre-Submission Plan Consultation Representations.pdf
Policy DP1: High quality design	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Mac Mic are supportive of Policy DP1; however, it is noted that the policy requires that management plans should be submitted for the long term maintenance of all shared public and private spaces and facilities including public art, private drainage installations and SuDS, and services that the developer intends to provide instead of the Council. Accordingly, the proposals have been revised to ensure that they complement rather than compete with existing facilities, for instance, the proposed development will now provide for allotments, which was indicated as being in demand by local communities. The design and layout of the site will also consider that proximity of the skate park and will ensure that no residential amenity issues arise. Land to the north of Banwell Road, Elborough/Locking therefore represents a suitable, available and viable option for residential development and Mac Mic supports its allocation in the Pre-Submission Draft. The evidence gathered to date and which will be presented with the application shows that the site can successfully address all technical matters such as flooding, landscape and highways.	Recommendation For these reasons, whilst Mac Mic supports the current draft of Policy LP5 and that Land north of Banwell Road, Locking/ Elborough is included in Schedule 1, they object to the suggested capacity of the site and consider that it should be increased to 415 homes.		01 North Somerset Local Plan Pre-Submission Plan Consultation Representations.pdf

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					It will be a highly sustainable, well-located residential development that provides for significant levels of green infrastructure, help address deficits in local services and facilities provision, and enable sustainable (non-car based) transport links to be created that will allow existing settlements better access to job provision, services and infrastructure. Recommendation For these reasons, whilst Mac Mic supports the current draft of Policy LP5 and that Land north of Banwell Road, Locking/ Elborough is included in Schedule 1, they object to the suggested capacity of the site and consider that it should be increased to 415 homes.			
Policy DP5: Climate change adaptation and resilience	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	This policy requires all major development to submit a climate change adaption statement. The purpose of this statement is to provide evidence as to how climate-related risks are to be addressed and reduced, through development proposals. The statement is to demonstrate how areas vulnerable to increased flooding have been avoided, how measures to mitigate high temperatures at building and site level have been incorporated and to provide evidence to demonstrate how nature-based solutions, which enable carbon storage and provide flood resilience have been integrated into proposals Mac Mic supports the Council's approach in seeking to ensure that the effects of climate change has been fully taken into account in development proposals. However, they would note that such Statements are likely to replicate much of the information that is required to be submitted in support of application for major developments. This is not to say that Mac Mic does not wish to support the need for climate change resilience and, as a company, their schemes will seek to ensure that consideration of the impact of climate change is built into their proposals. Indeed, measures to address climate change are incorporated at the design stage. However, it is felt that there are better mechanisms to achieving this goal than the provision of an additional statement or report. Rather Mac Mic would wish to work closely with the Council during the application stage to agree and confirm the approach to be adopted. Recommendation Mac Mic object to this policy. It is not considered that an Climate Change Adaption Statement is needed and it will add extra expense and time to the planning application process. These matters can be adequately addressed in other supporting information and through negotiation and agreement with Officers during the application stages. It is not justified.			01 North Somerset Local Plan Pre-Submission Plan Consultation Representations.pdf
Policy DP6: Net zero construction	No	• Positively prepared • Justified • Effective	No	No	This policy, in summary, requires all development to minimise its impact on the environment, ensure that the design of a building prioritises energy reduction and incorporates renewable energy technologies to meet residual energy demand.	It would seem sensible for this policy to align with the Future Home Standards and Building Regulations, as additional requirements will have an impact on the viability of applicable scheme and will increase the cost of development. This would make the policy justified and would not raise issues of soundness.		01 North Somerset Local Plan Pre-Submission Plan Consultation Representations.pdf

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		• Consistent with national policy			It states that all new buildings will be required to achieve net zero operational energy compliance in respect of both regulated and unregulated energy and minimise embodied carbon. All new development should seek to minimise embodied carbon in respect of both upfront (emissions associated with raw materials, transportation, manufacturing and construction) and whole life carbon. For development of more than 50 dwellings, or in excess of 5,000m² non residential floorspace, proposals must be accompanied by an embodied carbon assessment which demonstrate that upfront embodied carbon emissions do not exceed 900kg CO2 e/m². Furthermore, all new residential buildings must demonstrate through an energy statement, that the following have been achieved, inter alia, no on-site use of fossil fuels, space heating demand of less than 15kWh/m²/year and overall operational energy use of less than 35kWh/m²/year. While the objectives and aims of the policy are supported and there is a need to move towards development that minimises its impact on the environment, the current wording of this policy is not consistent with the guidance contained in NPPF (December 2024). In particular, Paragraph 164 of the Framework sets out that: “New development should be planned for in ways that: a. avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through incorporating green infrastructure and sustainable drainage systems; and b. help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government’s policy for national technical standards.” The Government has, for residential development, established a clear road map for achieving zero carbon ready homes. This is set out in the ‘Future Homes Standards’ which is due to be implemented in 2026. The Future Homes Standards will require carbon emissions produced by new homes to be 75-80% lower than those built to current standards. Any new homes built under these new Building Regulations standards will therefore need to be zero carbon ready, which means that they will immediately be able to benefit from the decarbonisation of the electricity grid. While the objectives and aims of this policy are supported, there is a need for consistency with national guidance. Recommendation Consequently, this policy should be amended to accord with the NPPF. The requirements of the Local Plan policy clearly			

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					go over and above those set out in the NPPF, particularly, in relation to new residential development. In order to ensure that the policy aligns with the NPPF, it is felt that this policy should be amended to accord with the Future Homes Standards which will be mandatory from 2026. This in time will ensure that all new homes will become zero carbon. In the opinion of Mac Mic, it would seem sensible for this policy to align with the Future Home Standards and Building Regulations, as additional requirements will have an impact on the viability of applicable scheme and will increase the cost of development. This would make the policy justified and would not raise issues of soundness.			
DP11: Rivers, watercourses and springs	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	While Mac Mic support the principle of protecting rivers, watercourses, and springs, they believe the policy is unsound because it duplicates matters already addressed by other policies and introduces requirements that are inappropriate for a Local Plan policy. The policy requires development proposals to enhance the setting and views of rivers and contribute to preserving and enhancing the physical, natural, historical, and culturally distinctive landscape of the North Somerset Levels and Moors. These matters are already comprehensively addressed by other policies in the Local Plan, including those relating to landscape character, heritage, and design quality. Repeating these requirements in DP11 creates unnecessary duplication, which risks confusion and inconsistency in decision-making. Several criteria within DP11, such as requiring opportunities for re-naturalisation (for example, the removal of culverts) and promoting public access and tourism facilities, go beyond what is reasonable or deliverable through development management. Further, these terms are not defined and provide no measurable criteria for compliance. This lack of clarity risks inconsistent interpretation and creates uncertainty for applicants, contrary to the NPPF requirement for policies to be clear and effective. The policy is also contradictory to other policies within the Plan. Encouraging public access and tourism near sensitive watercourses may increase ecological disturbance and undermine biodiversity objectives. Similarly, promoting culvert removal could increase flood risk in low-lying areas, conflicting with Policy DP9 on flood risk management. Recommendations To make the policy sound, Mac Mic recommends removing requirements that duplicate other policies on landscape, heritage, and design, delete criteria relating to re-naturalisation and public access, as these are not appropriate for development management and limiting the policy to essential matters such as water quality, flood risk, and maintenance access, which are directly relevant to planning decisions.	To make the policy sound, Mac Mic recommends removing requirements that duplicate other policies on landscape, heritage, and design, delete criteria relating to re-naturalisation and public access, as these are not appropriate for development management and limiting the policy to essential matters such as water quality, flood risk, and maintenance access, which are directly relevant to planning decisions.		01 North Somerset Local Plan Pre-Submission Plan Consultation Representations.pdf

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Policy DP14: Highway safety, traffic and provision of infrastructure associated with development	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Policy DP14 sets out that development likely to have a severe residual cumulative impact on transport links, traffic congestion, or on the character and function of the surrounding area, will only be permitted where acceptable mitigation measures are delivered. All mitigating infrastructure will need to be delivered within an agreed specific timeframe and prior to the aforementioned impact becoming severe. In some circumstances, planning permission may be granted subject to the applicant entering into an appropriate legal agreement to deliver or fund the improvements required. The supporting text notes that developers will need to determine the transport needs arising from their proposals and the means by which any adverse impacts will be mitigated. It continues by stating that the Local Plan approach allows for developers to provide or contribute towards the cost of providing necessary infrastructure which may be off-site and to accommodate the road traffic it unavoidably generates, a development will be required to deliver or fund improvements to boost the attractiveness of walking, cycling and public transport, or traffic management measures, in the relevant corridor(s) sufficient to maintain overall road traffic at the otherwise expected level. Mac Mic object to the approach put forward in Policy DP14 in terms of highway safety and traffic management. The approach adopted is based on out-dated models of assessment, that is, it is very much a 'Predict and Provide' model rather than a 'Vision and Validate' approach. It is apparent that the application of this policy will lead to new development being required to provide for new road space and will lead to increases in commuting traffic. The Vision and Validate approach seeks to set a vision for the long-term goals, objectives, and aspirations for the future of a transportation system with the validation confirming that the chosen strategies, methods, or technologies align with the defined vision and achieve the desired outcomes and can effectively address the evolving needs of the community. This is the prevailing school of thought in term of transport planning and should be applied to this policy rather than the Provide and Predict model which is unlikely to withstand scrutiny at Examination. As such, the policy should be re-drafted to reflect the 'Vision and Validate' model. We would also comment on two points raised in the supporting text in that it notes that developments may be required to contribute to funding the improvement of rail freight facilities, even where they are no direct benefits. This raises the question as to how these contributions will be measured or policed, and the level of contributions that are to be made. Whilst this is a laudable aspiration, it is not considered that this can be practically implemented and does not meet the tests for planning obligations as set out in NPPF Paragraph	Policy DP14 should be re-drafted to reflect the Vision and Validate model of highway safety and traffic management. The requirement for development to contribute to the improvement of rail freight facilities even when there is no direct benefit should be removed from the policy, as this requirement does not meet the tests of planning obligations. Reference to out-commuting from North Somerset should also be deleted from the policy as it implies that a Predict and Provide model should be put in place.		01 North Somerset Local Plan Pre-Submission Plan Consultation Representations.pdf

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					58, which states obligation should be necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind to the development. Finally, the supporting text notes that proposals that reduce out-commuting from North Somerset, especially Weston-super-Mare, will have a beneficial effect on the overall level of congestion by reducing traffic on the M5, which will need to be balanced against any detrimental local effect. Mac Mic note that this can only be achieved in the context of the proposed policy wording if local roads are provided with more highway capacity to ensure no detrimental local effect. This demonstrates the need to revise the policy as this follows the Provide and Predict rather than the Vision and Validate approach.			
Policy DP17: Public transport accessibility	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Policy DP17 states that all residential development should be within a reasonable distance of a direct and frequent bus service providing access to a good range of facilities, services and jobs via a direct, safe and attractive pedestrian route while developments will be expected to encourage the use of public transport and deliver effective and convenient services. This aspiration is supported by Mac Mic. However, they are concerned with the reference in the justification that in terms of locating development within a ‘reasonable distance’ this means a maximum of approximately 400 metre walking radius of a bus stop with a service frequency or 600m in rural areas. This is an out-of-date metric, as public transport accessibility should be based on the level of service and frequency of service sufficient to meet individual needs. It might be the case that greater distances can be applied.	The wording of this part of the supporting text should be amended accordingly and should also make reference to the prevailing topography as this will also have an impact on accessibility to public transport.		01 North Somerset Local Plan Pre-Submission Plan Consultation Representations.pdf
Policy DP38: Landscape	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	This policy seeks to protects the character, sense of place, distinctiveness, and diversity of North Somerset’s landscape. It states that all development proposals should, inter alia, not have an unacceptable adverse impact on the landscape character of the district; be carefully integrated into the natural, built and historic environment, aiming to establish a strong sense of place, respond to local character, and reflect the identity of local surroundings, whilst minimising landscape impact; and respect the tranquillity of an area. It also notes that where some harm to the local landscape character is unavoidable, but a development is otherwise deemed beneficial, then positive mitigation measures should be secured by a landscape condition or planning agreement involving works on or off-site as necessary. The thrust and direction of this policy is supported by Mac Mic but they considered that it would benefit from re-drafting. The nature of development means that there will be an impact on the landscape and its character (in the wider sense). Therefore, this should be more clearly recognised within the policy and it should be re-drafted to recognise that the Council and applicants should work together to achieve wider landscape aims and to ensure that any impacts arising	Policy DP38 should be revised to ensure it is positively prepared and consistent with national policy by explicitly recognising that development will inevitably result in some landscape change. The policy should focus on achieving high-quality outcomes through collaboration between the Council and applicants, securing mitigation and enhancement measures that contribute to local character and sense of place. The policy should emphasise that proposals should integrate with the natural, built, and historic environment, and where impacts occur, they should be offset through proportionate and deliverable mitigation, agreed via planning conditions or obligations. This approach would aligns with and be consistent to the NPPF.		01 North Somerset Local Plan Pre-Submission Plan Consultation Representations.pdf

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					can be successfully mitigated and have a positive impact on the landscape. The policy therefore needs to be more positively worded. Indeed, the supporting text notes that: 'The policy is intended to ensure that development does not adversely affect landscape character. Development should contribute to the creation of places and spaces which are attractive, respect and enhance the particular local character of the landscape and are designed with the needs of people in mind.' This sentiment should come through more clearly in the main policy. Recommendation Policy DP38 should be revised to ensure it is positively prepared and consistent with national policy by explicitly recognising that development will inevitably result in some landscape change. The policy should focus on achieving high-quality outcomes through collaboration between the Council and applicants, securing mitigation and enhancement measures that contribute to local character and sense of place. The policy should emphasise that proposals should integrate with the natural, built, and historic environment, and where impacts occur, they should be offset through proportionate and deliverable mitigation, agreed via planning conditions or obligations. This approach would aligns with and be consistent to the NPPF.			
Policy DP39: Mendip Hills Area of Outstanding Natural Beauty	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Policy DP39 addresses the impact of the development proposal on the Mendip Hills National Landscape. It states that proposals must conserve and enhance its landscape and scenic beauty and enhance its wildlife and cultural heritage, taking into account the economic and social well-being of the area. It also notes that development which would have an adverse impact on the landscape, setting, tranquillity and scenic beauty of the Mendip Hills National Landscape, including views into and out, will not be permitted unless in exceptional circumstances and where it can be demonstrated that it is in the public interest. In the supporting text, reference is made to the relevant paragraphs in the NPPF. Paragraph 190 in the Framework states: 'When considering applications for development within National Parks, the Broads and National Landscapes, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of: a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy. b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other	The policy should be re-drafted to differentiate between those sites in the National Landscape and those that sit out outside but are in the setting. The text of the policy should be more in line with NPPF Paragraph 189. Furthermore, the supporting text should reflect NPPF Paragraph 190 and provide more clarity on what development is in the public interest, for example, new residential development whilst also making it clear who determines major development. This additional detail will provide for a much clearer understanding and interpretation of new development proposals that will have an impact on the National Landscape. Further, the policy is not positively prepared as it focuses primarily on preventing harm to landscape character without acknowledging that development will inevitably result in some degree of landscape change. This restrictive approach risks undermining the delivery of sustainable development and does not reflect the NPPF's requirement for policies to enable growth while protecting and enhancing valued landscapes. It also lacks clarity on how unavoidable impacts should be managed beyond mitigation. Policies should be positively worded to encourage enhancement and integration with local character. The current wording does not fully reflect these principles, making it inconsistent with national policy.		01 North Somerset Local Plan Pre-Submission Plan Consultation Representations.pdf

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					way; and c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.' The policy is subject to Footnote 67, which opines that for the purposes of paragraphs 190 and 191, whether a proposal is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined. Mac Mic support the principle of the policy but it is clear that a much greater level of detail is required either within the policy or the supporting text to set out what is considered to be in the public interest. Whilst it is not the purpose of Local Plans to repeat national guidance, it is clear, in this instance, that the policy would benefit from greater clarity in terms of not only what would be considered to be in the public interest but also how major development is determined. This would benefit the reader. In addition, clarification is required in relation to proposed development that sits outside the National Landscape but is located within its setting and will therefore have an impact on its landscape, setting, tranquillity and scenic beauty. Currently, the policy applies the same test to developments that are in the National Landscape to those that sit outside but would have an impact on its setting. As indicated above, the Framework, in Paragraph 190, only considers development in the National Landscape. This should be recognised in the policy and its should be clarified that the same test should not apply to development sites that sit outside the National Landscape. The wording Policy DP39 should in fact be more in alignment with NPPF Paragraph 189, which states: '… development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.' Recommendation The policy should be re-drafted to differentiate between those sites in the National Landscape and those that sit out outside but are in the setting. The text of the policy should be more in line with NPPF Paragraph 189. Furthermore, the supporting text should reflect NPPF Paragraph 190 and provide more clarity on what development is in the public interest, for example, new residential development whilst also making it clear who determines major development. This additional detail will provide for a much clearer understanding and interpretation of new development proposals that will have an impact on the National Landscape. Further, the policy is not positively prepared as it focuses			

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					primarily on preventing harm to landscape character without acknowledging that development will inevitably result in some degree of landscape change. This restrictive approach risks undermining the delivery of sustainable development and does not reflect the NPPF's requirement for policies to enable growth while protecting and enhancing valued landscapes. It also lacks clarity on how unavoidable impacts should be managed beyond mitigation. Policies should be positively worded to encourage enhancement and integration with local character. The current wording does not fully reflect these principles, making it inconsistent with national policy. Accordingly, the policy is considered to be unsound.			
Policy DP43: Affordable housing (including rural exception schemes)	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Policy DP43 considers affordable housing provision. The supporting text to the policy notes that there is a high level of affordable housing need in the district, with high house prices and rents. The policy specifies affordable housing requirements for different areas and types of development, ensuring affordability in perpetuity and integration with market housing. It states that to foster balanced and mixed communities, affordable housing will be required on all developments above a certain size. In terms of the Land north of Banwell Road, Elborough/ Locking the policy states that 30% of all housing should be for affordable housing purposes. This need is to be met through a mix of social rent (75%) and shared ownership (25%). This approach aligns with national planning policy, which requires local authorities to make sufficient provision for affordable housing in local plans, explaining that plans should set out how developers should contribute to providing such housing, including the amount and types of affordable housing required. These affordable housing contributions should be based on evidenced need and not undermine the deliverability of development. In regard to the last point, it is noted that the policy is supported by local evidence from North Somerset Local Housing Needs Assessment (ORS 2025). In addition, the policy states that if these requirements cannot be met this will need to be fully justified with clear evidence set out in a viability assessment which must demonstrate that all grant funding sources have been fully explored. This is important because in order to achieve the level of affordable housing requirement set out in the policy, it is critical that it can be demonstrated that this level of provision is viable when considered alongside all other contributions sought through the Local Plan. It is essential for the overall soundness of the plan that the proposed affordable housing quantum is subject to robust viability assessment. It should have regard to all other policy requirements for development and ensure that the total policy 'ask' is clearly assessed as part of a robust viability model to	Policy DP43, as drafted, is unsound as this will likely undermine the deliverability of the Local Plan, which, in turn, could compromise the ability to deliver the overall housing requirement. This is because it may not be may not be deliverable when considered alongside other policy requirements and infrastructure obligations. This is not consistent with national guidance and does not represent positive planning. The policy should be modified to seek a level of affordable housing which is viable. This in turn is likely to require the delivery of a greater number of homes than identified above to meet affordable housing needs.		01 North Somerset Local Plan Pre-Submission Plan Consultation Representations.pdf

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					inform the plan. It is essential that affordable housing requirement figure is robustly tested prior to Examination in order for the policy to be found sound. At present, there is limited certainty that this level of affordable housing is deliverable, noting that the infrastructure requirements associated with some of the proposed allocations (which are in some instances very extensive) do not appear to have been costed. Evidently, there is a requirement for further assessment, as it would seem likely that the percentage of affordable housing identified is unlikely to be viable at least in association with those proposed allocations where infrastructure is a requisite need. Recommendations Policy DP43, as drafted, is unsound as this will likely undermine the deliverability of the Local Plan, which, in turn, could compromise the ability to deliver the overall housing requirement. This is because it may not be may not be deliverable when considered alongside other policy requirements and infrastructure obligations. This is not consistent with national guidance and does not represent positive planning. The policy should be modified to seek a level of affordable housing which is viable. This in turn is likely to require the delivery of a greater number of homes than identified above to meet affordable housing needs. Mac Mic objects to this policy.			
Policy DP46: Housing Type and Mix	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Policy DP46 requires new residential development to provide a mix of housing tenures, types, and sizes appropriate to site characteristics and location, informed by the latest Local Housing Needs Assessment. For developments of 10 or more dwellings, the policy expects provision for a range of housing types, including bungalows, smaller homes for downsizing or first-time buyers, retirement accommodation, accessible homes, and self-build plots. It also mandates that all new dwellings meet Building Regulations M4(2) standards, with at least 5% meeting M4(3) standards for wheelchair accessibility. While the policy's objectives are understood, its current wording lacks flexibility and risks being inconsistent with national policy. The NPPF requires local plans to be positively prepared, justified, and effective. Policies should enable sustainable development and respond to changing market conditions and viability considerations. Policy DP46, as drafted, imposes prescriptive requirements that may not be appropriate for all sites, particularly strategic allocations or larger developments where design solutions and market dynamics vary significantly. The requirement to limit certain housing sizes where there is perceived over-provision could constrain the ability to respond to actual demand and market signals. Similarly, the mandatory proportion of accessible homes and self-build	Policy DP46 should be modified to introduce flexibility and ensure consistency with national policy. It should recognise that housing mix requirements must be informed by site-specific considerations, viability, and market demand. This means that provision should be made in the policy to allow for negotiation where prescriptive requirements would compromise deliverability and that all requirements will be subject to viability testing and proportionate to the scale and nature of development.		01 North Somerset Local Plan Pre-Submission Plan Consultation Representations.pdf

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					plots, without clear viability safeguards or recognition of site-specific constraints, risks undermining deliverability. The Framework emphasises that local requirements must be evidence-based, proportionate, and not compromise housing delivery. Policy DP46 does not currently provide sufficient flexibility to achieve these objectives.			
Land north of Banwell Road, Locking /Elborough					These representations have been prepared on behalf of Mac Mic Strategic Land (Mac Mic), who have an interest in Land north of Banwell Road, Elborough/Locking. Mac Mic is working in partnership with the landowners to promote this site for residential-led development and is aiming to bring forward an outline planning application for the site in 2026. The representations are made in response to the North Somerset Local Plan 2039 Pre-submission Plan (Regulation 19), which is currently out for consultation until 12th December 2025. Representations were submitted – in respect of the site - to the previous version of the Regulation 19 Pre-Submission Draft in January 2024. Following this, it was Council intention to undertake a second round of consultation under Regulation 19 in the summer of 2024. However, shortly after the second Regulation 19 Local Plan (July 2024) was approved, the government launched a consultation on changes to the National Planning Policy Framework (NPPF). These proposed alterations included placing greater emphasis on the need to increase housing building across the country. This was to be achieved, in part, by making the standard method housing target mandatory. This had implications for the North Somerset Local Plan, as it overall housing requirement was based on a locally derived target and set a much lower figure than that prescribed by the standard method. Following the publication of the consultation, North Somerset Council (NSC) decided to pause the Local Plan in order to identify additional housing supply, which would address the shortfall. Land north of Banwell Road, Elborough/Locking was not allocated in the Pre-Submission Draft in January 2024 but the representations submitted at that time demonstrated that the site was an appropriate, deliverable and suitable proposition for residential development. The information submitted with the representations (including a Vision Document) indicated that critical technical matters relating to the site’s development such as flood risk, landscape impact, local service requirements and sustainability could all be overcome. Following the pause to the Local Plan process, NSC placed out for a consultation, a Call for Sites, in October 2024. The Land north of Banwell Road, Elborough/Locking was submitted to this consultation together with supporting information.			01 North Somerset Local Plan Pre-Submission Plan Consultation Representations.pdf

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					In December 2024, the Government published a revised version of the NPPF, which sought to unlock economic growth by addressing housing and infrastructure under-delivery. It reiterated the Government's objective of significantly boosting the supply of homes and noted that it was important that a sufficient amount and variety of land comes forward where it is needed and that land with permission is developed without unnecessary delay. The introduction of the standard method meant that NSC had to accommodate a significant increase in their overall housing requirement. The requirement - as set out in the standard method - was 23,895 dwellings over the 15-year plan period. This was an additional 8,620 dwellings above the proposed housing supply target outlined in the Regulation 19 Publication Draft Local Plan (July 2024), which identified a requirement for 15,275 dwellings. Based on the information gathered from the Call for Sites, a Consultation Paper on Additional Sites was published in February 2025. This categorised the site as 'most suitable', that is, a site which is located at a sustainable growth location and had most potential for further consideration. The Consultation Paper stated that the site shown was smaller than the original Call for Sites submission because some areas had been removed as they fell within areas of coastal flood risk. The paper stated that the site had a capacity of 315 dwellings. Mac Mic made representations to the Consultation Paper on Additional Sites. Following this, Land north of Banwell Road, Elborough/ Locking has now been allocated in the Pre-Submission Draft of the North Somerset Local Plan. Mac Mic are wholly supportive of this allocation and following positive pre-application discussions are in the process of preparing an outline planning application for the site. Their proposals are based on the site allocation in the Local Plan but more detailed technical analysis has indicated that the site could accommodate additional homes, with an approximate site capacity of 415 new homes. This is based on a more detailed assessment of coastal flood risk and strategic flood defences. The following representations describe the site and the proposed vision for its development. The site encompasses Land to the South of Locking and to the North of Elborough. It is 31.8 hectares in size and is currently formed by a series of agricultural fields. Whilst it is recognised that parts of the site are close to areas of flood risk, the Vision Document submitted with the previous representations demonstrated that the development of the site would seek to minimise vulnerability to tidal, fluvial, and surface water flooding, without increasing flood risk elsewhere or causing harm to water quality or availability. This design approach has driven the approach to the site with much of the development areas sitting outside			

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					those areas that might be affected by flooding. This is reflected in the site allocation in the Regulation 19 Pre-Submission Draft. However, further analysis undertaken by Mac Mic has demonstrated that additional area outside the site allocation could accommodate development and consider that the site's capacity is nearer to 415 homes. This level of development would not have an adverse effect on flooding. The proposed layout means that significant levels of on-site open space can be created and the site will enable the establishment of a new country park. This will also have ecology and landscape impacts. The site's development will also ensure that the currently remote settlement of Elborough to be integrated into the wider catchment of Weston-super-Mare through the introduction of new on-site facilities and sustainable transport links. The site represents an excellent opportunity to deliver a diverse, low carbon community in a sustainable location, along with a country park whilst supporting NSC's vision and objectives for housing growth. Specifically, the site provides an opportunity to deliver approximately 415 homes within a mix of tenures and house types together with a local shop, community building and mobility hub. The country park will include new play spaces and allotments. The proposals will be supported by a site-wide green and blue infrastructure network that improve the site's drainage. New pedestrian and cycle routes will link Locking and Elborough within a network of active travel routes following key desire lines to local destinations thus encouraging sustainable modes of transport. This, together with new on-site facilities, will help reduce car dependency and promote health and well-being for future residents as well as existing residents of Elborough. The site therefore has numerous benefits: • It is under the control of one party, who can bring forward development at pace. • It has the ability to achieve a comprehensive residential-led development. • It will help meet the existing deficit in local and community facilities present in Elborough through the provision of a local shop, community building and mobility hub and a new country park. • The site will provide a range of sustainable transport links that will not only assist existing residents to access facilities in Locking but also those in Weston-super-Mare. • The proposed development will also address highway safety concerns in the vicinity of the site; and • The development of the site will be landscape-led. It will provide for a green spine through the site, which helps address drainage concerns and the visual impact of the site whilst improving biodiversity. THE SITE'S VISION			

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					The site lies to the south of Locking and to the north of Elborough. It is also to the north east of the village of Hutton, to the south of Locking Parklands and to the west of the strategic allocation at Wolvershill. Land north of Banwell Road, Elborough / Locking is not in the Green Belt, it is not within a Strategic Gap and does not contain any listed buildings. It is also not within any areas of landscape or ecological designation. The land is Grade 4 in terms of agricultural land classification. The site is generally flat along its southern extent but rises towards its northern boundary, which is formed by Old Banwell Road. Site access can be provided from this road and from Banwell Road in the south. The land proposed for development is free from constraints. The masterplan – illustrated below - has sought to successfully address potential concerns arising from flooding and topography. Given the site's location to the east of the built-up area of Weston-super-Mare and to the south and west of areas of significant existing and future development, it forms a logical location for a new, sustainable extension to meet North Somerset's housing needs. The site has excellent links to the strategic road and rail network given its proximity to the M5 whilst it will create and enhance existing sustainable transport links. It will also provide opportunities for residents in Elborough to access facilities in Locking, Locking Parklands and in the centre of Weston-super-Mare. The site is generally well contained by hedgerows, trees and planting, with a strong field pattern providing enclosure to individual parcels within the site. There is limited visibility from the Mendip Hills National Landscape and, where there is an impact, this has been mitigated through the masterplan in terms of the layout of the built development, the introduction of new planting, and the provision of significant levels of green infrastructure. The site has been subject to technical appraisals that have identified there are no physical or environmental constraints that would delay or preclude the development of the site. The whole site is under the control of one party meaning that development can be brough forward quickly. The site is a greenfield site, which means that there are no viability concerns, and the site is not subject to any known legal, physical, or environmental constraints that might otherwise affect development. As such, it represents a viable development option with a realistic prospect that new homes could be delivered within five years. Furthermore, it is clearly in a location that developers find attractive to bring forward housing sites for development, this is evident from recent developments in the surrounding area. Residential development therefore represents a viable future use for the site. The proposed development would therefore comprise the following:			

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					• Approximately 415 high quality new homes with a range of house types and tenures (including affordable provision). • A local shop and community building that will not only serve the site but also the existing settlement of Elborough. • A mobility hub providing a wide range of sustainable transport choices. • Much of the site will be formed by green infrastructure that will run through its central spine (new Country Park). It will be managed to maximise biodiversity, with the nature restoration of the rhyne, new attenuation features and a mosaic of wetland habitats established. This space will be a dark zone for bat movements. • Community green spaces and recreational opportunities will also be created including the potential for a range of natural play facilities scattered throughout a 'playable landscape' and allotments. • Existing Rhynes will be retained in-situ and a blue corridor created with biodiverse linear SuDS features. • A network of active travel routes and leisure trails permeates the entire development - forming the principal movement structure - and connecting to Weston-super-Mare, Locking Parklands and the wider countryside; and • New development will be nestled within the existing landscape, connected by active travel corridors and with the community hub and recreational facilities meeting the day-to-day needs of residents. Much of the site will be left as landscape with existing fields, rhynes, hedgerows and woodlands being integrated into the development. This will lend the site an identity rooted in its landscape and provide residents, workers and visitors a sense of well-being and connection to the environment. The site will be designed to ensure that cars do not dominate the environment and people have sustainable and lowcarbon transportation choices that are convenient and viable. Roads will be demoted in the overall movement hierarchy and active travel corridors set within greenways will form the primary infrastructure, encouraging cycling, walking and healthy lifestyles. The site is suitably and sustainably located for the development of a new low carbon and energy community. In addition to those on site, there are good opportunities for accessibility to local services and facilities, and the centre of Weston-super- Mare, to be achieved via sustainable transport modes. A mobility hub will provide alternative transport options. Underpinning this will also be a comprehensive active travel network, creating new walking and cycling links to Weston-super- Mare and allowing for new sustainable links. The proposed development of the site will be to create a new type of community set within extensive nature-rich green spaces to the east of Weston-super-Mare. The site will be a well-connected, sustainable location for new housing that will support recent development in the area whilst having its own distinctive, contemporary identity based on its unique landscape heritage.			

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					SUMMARY These representations have been prepared on behalf of Mac Mic in relation to Land north of Banwell Road, Locking / Elborough. They respond to the Pre-submission Plan Regulation 19 Consultation and have been informed by the relevant evidence base documents. Mac Mic are in the process of submitting an outline planning application in respect of the site, which is allocated for residential development in the Pre-Submission Draft. It is Mac Mic's view that the site represents a sustainable, deliverable and suitable site for residential development that will help meet the overall housing needs in North Somerset. The site will also assist in meeting pressing affordable housing requirements in the area. Moreover, the fact that it is the subject of a planning application means that it will come forward early in the plan period thereby helping to meet five-year housing land supply provision as well as assisting in ensuring that there is a consistent and sustainable trajectory of housing sites coming forward throughout the plan period. Given this, Mac Mic fully support the site's allocation for a residential development, however, more detailed analysis undertaken indicates that site can accommodate approximately 415 new homes and it is recommended that the site allocation is amended to reflect this further technical work. Mac Mic Land therefore generally support the Council's approach to the spatial strategy and residential land allocations and consider that they are sound, justified and positively planned. However, they consider that the drafting of some of the policies could be clarified through the provision of further detail whilst some policies will benefit from the inclusion of more flexibility. The Mac Mic Group's key comments on the Regulation 19 Pre-submission Draft of the Plan can be summarised as follows: • The Local Plan should provide further contextual information regarding the 'directions of travel' which should be used to inform the Vision and Strategic Objectives. • The allocation of Land north of Banwell Road, Elborough/ Locking is supported. • However, its site capacity should be increased from 315 to 415 new homes. • There is much to support in the Local Plan in relation to climate change, placemaking and flooding/landscape matters; but • A number of concerns are raised in relation to some of the proposed development management policies such as those relating to highway safety, landscape, flooding, and affordable housing. In summary, Mac Mic supports the allocation of this site for residential development, albeit consider that it can			

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					accommodate additional homes with a site capacity of approximately 415 homes being more appropriate. That said, it is considered that the site represents a suitable and sustainable location for development. Furthermore, the site is also under the control of one party and is available and deliverable in the short term, as seen by the ongoing work to prepare an application for the site during 2026.			
Land north of Banwell Road, Locking /Elborough	No	• Effective	Unsure	Unsure	Currently, this policy states that residential sites (or more than 10 units) and employment sites are identified in the Policies Map. These sites are shown in Schedule 1 and 2. These schedules indicate the potential capacity and principles to be applied for each site. Land north of Banwell Road, Elborough/Locking is identified as having an indicative capacity of 315 dwellings in Schedule 1: Large sites for residential development. The schedule states that development at the site is required to fund upgrades to Banwell Road junction with A371 (as identified on the Policies Map), make contributions to the expansion of primary, secondary and early years education in the local area and provide surface water attenuation together with demonstrating how this will drain the site. It also notes that any planning application must demonstrate that joined up safe active and sustainable travel provision can link this site (along with the allocation on Land to the west of Elborough) to Locking village and the A371 strategic cycleway. Proportionate contributions will also be required towards bus service provision and the existing Public Right of Way AX18/1/20 is to be upgraded. The text in Schedule 1 also notes that any proposed development must consider the approved skatepark facility to the north of the site, north of Old Banwell Road, and demonstrate that no new dwellings will be affected by that consented scheme. Mac Mic are in the process of preparing an outline planning application for Land north of Banwell Road, Locking/ Elborough. This followed positive pre-application discussions with the Council during the summer 2025. The proposed development will address each of the criteria set out in Schedule 1. Consideration has been given to off-site highway improvements to Banwell Road and these will be incorporated where it is proven that they are required following detailed highways analysis (which has informed the outline planning application submission). It is also proposed as part of the draft Heads of Terms to make contributions to local education provision within the vicinity of the site subject to viability considerations. The proposed site layout - which formed the basis of the Vision Document that was submitted with the representations to the Regulation 19 Pre-Submission Draft in 2024 - was cognisant of the potential flood concerns raised by development on this site and was designed and laid out to	Whilst Mac Mic supports the current draft of Policy LP5 and that Land north of Banwell Road, Locking/Elborough is included in Schedule 1, they object to the suggested capacity of the site and consider that it should be increased to 415 homes.		

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					avoid areas of the site that had a higher potential to flood. This layout informed the site allocation, which was first put forward in the Additional Sites Paper, and is now the basis for the allocation in the Pre-submission Draft. However, whilst the rationale for the site boundary appears to have been driven by flood risk data and analysis, it is Mac Mic's view that the site could accommodate additional development on site and that the site's capacity should be increased to circa 415 dwellings. As part of the information to be submitted in support of the outline application, Mac Mic will prepare a sequential test that demonstrates that further development can be accommodated. Notwithstanding the outcome of the Sequential Test, Mac Mic consider that the Exception Test can be passed. The existing strategic flood defences means that the planning balance/benefits of the scheme when assessed against the real world flood risk should take precedence. As such, they consider that a slight expansion of the site boundary is appropriate to allow the proposed residential development to be optimised. Whilst being driven by addressing flood matters on site, Mac Mic see the design ethos of split development areas as being a key attribute of the site. It allows for the introduction of the country park in the centre of site. This area will also provide for on-site green infrastructure, the retention of a strategic gap and the delivery of biodiversity. One of the many benefits of the development of this site is that it will improve the accessibility and sustainability of the existing settlement of Elborough. It is proposed that community facilities will be built in close proximity to the village whilst the creation of the country park will allow for the provision of new cycleways and pedestrian footpaths linking the southern parts of the site (and Elborough) to the north and the facilities within Locking and Locking Parklands (as well as Weston-super-Mare). This will be supported by proportionate contributions to bus service provision and improvements to existing public right of ways. The outline planning application has been the subject of community consultation. This has involved meeting with local Parish Councils and undertaking on-line consultation. It is clear from the feedback that Mac Mic has received that significant resources have been spent on the community facilities north of Banwell Road, Locking including the new skate park. Accordingly, the proposals have been revised to ensure that they complement rather than compete with existing facilities, for instance, the proposed development will now provide for allotments, which was indicated as being in demand by local communities. The design and layout of the site will also consider that proximity of the skate park and will ensure that no residential amenity issues arise. Land to the north of Banwell Road, Elborough/Locking therefore represents a suitable, available and viable option for residential development and Mac Mic supports its			

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					allocation in the Pre-Submission Draft. The evidence gathered to date and which will be presented with the application shows that the site can successfully address all technical matters such as flooding, landscape and highways. It will be a highly sustainable, well-located residential development that provides for significant levels of green infrastructure, help address deficits in local services and facilities provision, and enable sustainable (non-car based) transport links to be created that will allow existing settlements better access to job provision, services and infrastructure. Recommendation For these reasons, whilst Mac Mic supports the current draft of Policy LP5 and that Land north of Banwell Road, Locking/ Elborough is included in Schedule 1, they object to the suggested capacity of the site and consider that it should be increased to 415 homes.			

Name: Mac Mic Strategic Land Flax Bourton **I.D:** 63299425

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SP3: Spatial strategy	No	Effective				Mac Mic Strategic Land supports the overarching objective of directing development to sustainable locations and acknowledges the importance of prioritising areas with access to services, facilities, and sustainable transport. This approach aligns with the principles of the National Planning Policy Framework (NPPF) to promote sustainable patterns of development. The potential development site comprises Land between Farleigh and Flax Bourton and the Land to the East of Flax Bourton. Although the site is not considered by NSC to comprise a 'most suitable' location for housing development, this appears to be 'black and white' assessment of the settlement against a high-level and arbitrary strategy that does not allow sufficient flexibility to recognise where alternative locations for development can provide significant, tangible benefits for North Somerset. Its proximity to Backwell (and the sites that are proposed to be allocated for development) means that it should be considered as conforming with the wider spatial strategy and would support the focussing of new residential growth around Nailsea/Backwell. Its location means that it is in close proximity to facilities and sustainable travel modes and in conjunction with the proposed allocations to the east of Backwell can provide a highly sustainable comprehensive development. The land can provide important and wider benefits as part the delivery of a comprehensive development that is linked to the Land East of Backwell. These benefits include the provision of additional housing to meet any potential shortfall were any of the proposed allocation sites not to come forward. In addition, the inclusion of this area will enable other facilities to be created that will serve the wider Backwell area such as a new country park, strategic bat habitat and mitigation, areas for wider biodiversity net gain provision and Active Travel routes. This land could be maintained in perpetuity, thereby ensuring a permanent, natural separation so there is no coalescence between Backwell and Flax Bourton. There is also land that can be safeguarded for potential future expansion		North Somerset Local Plan Pre-Submission Plan - Flax Bourton Representations Final.pdf

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						of Flax Bourton Church of England primary school. The development of land at Flax Bourton would be consistent with the overall Spatial Strategy. When considered alongside the developments proposed at Land East of Backwell, development of 200-250 dwellings at Flax Bourton would be consistent with the stated aim to give priority to 'new residential and mixed use development in or close to urban areas where there is an existing or proposed wide range of facilities, services and jobs, and there are opportunities to encourage active travel, particularly at locations which are currently, or have the potential to be, well served by public transport. " Although the Spatial Strategy considers that exceptional circumstances did not exist to consider development in village locations within the Green Belt, the national policy context has clearly changed, and there is now a need to consider these locations, particularly where development would be complementary to the overall strategy and where it would be close to existing towns and the edge of Bristol. This should be reflected within the spatial strategy. In any event, Mac Mic wish to register an objection to certain elements of the policy that, in our view, are inconsistent with national guidance and risk reducing flexibility in meeting housing and employment needs across North Somerset. Our objection is made on the grounds of soundness, specifically that aspects of the policy are not fully justified, lack clarity, and may not be effective when assessed against NPPF requirements. The policy states that "residential development in areas at risk of ffooding now or in the future will be minimised outside the towns." While flood risk management is essential, the phrase "in the future" is ambiguous and could lead to uncertainty in decision-making. The NPPF (paragraphs 159-161) sets out a clear framework for assessing flood risk through the sequential and exception tests. We recommend aligning the policy wording with national guidance to ensure clarity and consistency. Recommendation To ensure the policy is sound and consistent with national guidance, we recommend aligning the flood risk wording with the NPPF sequential and exception test framework. Mac Mic supports the overall objectives of this policy but considers that, without modification, certain elements risk being inconsistent with national guidance and could undermine the effectiveness and deliverability of the Local Plan. We therefore request that the Inspector recommends amendments to ensure the policy is justified, clear, and flexible to enable a comprehensive development of land east of Backwell and to the east and west of Flax Bourton that can provide much needed new housing, additional financial contributions for the Nailsea and Backwell rail crossing, as well as transformational benefits for the local area.		
SP8: Housing	No	• Effective	No	Yes		Policy SP8 identifies the overall housing requirement of 23,700 dwellings within North Somerset during the plan period 2026 - 2041 . This figure is a minimum with a broad distribution of new dwellings to be in accordance with a spatial strategy that indicates that a high proportion of the new dwellings are to be located towards Weston-super-Mare and the other strategic development locations. The Council considers that this approach will seek to create mixed and balanced communities with a mix of house types and tenures to support a range of household sizes, ages and incomes to meet identified housing needs, including the provision of affordable and specialist housing. Mac Mic are supportive of the overall approach adopted in Policy SP8 (which supports the spatial strategy in Policy SP3). It is, however, critical		North Somerset Local Plan Pre-Submission Plan - Flax Bourton Representations Final.pdf

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						that the housing requirement of 23,700 remains a minimum figure. There will be opportunities within allocated sites to increase site capacity through the detail design process. This will enable additional housing to be provided over and above that set out in the Local Plan and such design iteration should not be precluded by policy. It is therefore imperative that Policy SP8 allows for positive movement in site capacity. The need is therefore to retain a minimum figure for the overall housing requirement as set out in PolicySP8. Recommendation There are no recommendations to change Policy SP8 but it is imperative that the overall housing requirement remains a minimum figure of 23,700 dwellings and that this is clearly and specifically set out.		
Policy LP5: Housing, employment and mixed use allocations	No	• Positively prepared • Effective	No	Yes		Currently, this policy states that residential sites (of more than 10 units) and employment sites are identified in the Policies Map. These sites are shown in Schedule 1 and 2, with the schedules indicating the potential capacity and principles to be applied for each site. The attached Framework Plan (Figures 2.1 and 2.2) sets out how the Land to the East and West of Flax Bourton is capable of being brought forward to provide c. 200-250 dwellings, together with public open space, allotments, active travel routes and scope for an extension to the existing primary school. As set out in previous representations, MacMic considers that the site(s) would provide valuable additional housing provision that should be considered consistent with the wider spatial strategy focussing housing development in the Nailsea and Backwell area and should be included as part of the preparation of the North Somerset Plan 2041. In this context, we are aware of the potential that other sites at East of Backwell are likely to propose a lower level of housing than was originally suggested through the Regulation 18 consultation, and that there remains some doubt about whether the level currently being proposed is achievable in the context of good planning/ design. With that in mind, we consider that the actual level of housing delivery may start to fall below what has been assumed to date. It is understood, however, that the Council does not agree that Flax Bourton should be regarded as forming part of the Nailsea and Backwell SOL. Even were NSC to conclude that the site(s) should not be taken forward for formal inclusion within the emerging Local Plan, it is considered that the site would represent a suitable 'reserve' site that would be brought forward were other proposed allocations either not accepted for inclusion by the appointed Local Plan Inspector, or those allocated sites fail to come forward within the envisaged timescale. On this basis, Mac Mic considers that it would be appropriate, justified and sound to include the Land East and West of Flax Bourton within Policy LP5 (and Schedule 1), with an indicative capacity of 250 dwellings, public open space, active travel routes and scope for an extension to the existing primary school. Land East and West of Flax Bourton represents a suitable, available and viable option for residential development and Mac Mic invites the Council to include its allocation in the Pre-Submission Draft. The evidence		North Somerset Local Plan Pre-Submission Plan - Flax Bourton Representations Final.pdf

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						gathered to date shows that the site can successfully address all technical matters such as flooding, landscape and highways. It will be a highly sustainable, well-located residential development that provides for significant levels of green infrastructure, help address deficits in local services and facilities provision, and enable sustainable (non-car based) transport links to be created that will allow existing settlements better access to job provision, services and infrastructure. Recommendation For these reasons, whilst Mac Mic supports the principle of the current draft of Policy LP5, they consider that the Land to the East of West of Flax Bourton should be included, either as a formal allocation or as a 'reserve site' within Policy LP5 and Schedule 1 with an indicative capacity of 200-250 dwellings.		
Policy LP7: Settlement boundaries	No	• Positively prepared • Effective	No	Yes	Mac Mic supports the principles of the Green Belt set out in draft Policy SP7 and welcomes that the Council proposes to recognise the 'exceptional circumstances' that exist to justify the release of land from the Green Belt. Without the release of land from the Green Belt, it is clear that the Council would not be able to meet its own housing requirements in the period to 2041. This would result in a failure of the plan-led system and leave the Council vulnerable to speculative unplanned development elsewhere. 4.27. Mac Mic does, however, consider that the wording of draft Policy SP7 (and draft Policy LP7) should be adjusted to provide a suitable level of flexibility and allow additional sites to be released from the Green Belt where they do not contribute to Green Belt objectives. Land that does not meet these objectives comprises 'Grey Belt' land, which is defined as sites comprising previously developed land and/or any other land that, in either case, does not strongly contribute to checking the unrestricted sprawl of large built-up areas, prevent neighbouring towns merging with one another or preserve the setting and special character of historic towns. This applies to Land to the East and West of Flax Bourton. 4.28. The wording of draft Policy SP7 (and LP7) should be amended to ensure that the Plan is positively prepared and sufficiently sound to allow alternative sites to come forward were, for example, housing delivery on allocated sites not to come forward in the timescale or scope (in terms of housing numbers) envisaged. The Land at East and West of Flax Bourton is a clear example of this and Mac Mic considers that it should also be removed from the Green Belt. 4.29. To be 'positively prepared' the NPPF is clear that the Plan should provide a strategy that as a minimum seeks to meet the area's objectively assessed needs. Mac Mic therefore considers that the draft Policies SP7 and LP7 should be re-worded to ensure that other sites can come forward and to ensure that the Council's	Recommendation 4.31. To ensure that the Plan is sound, positively prepared and effective, draft Policy SP7 (and LP7) should be re-worded (and the Proposals Map amended) to also inset from the Green Belt other sites that do not contribute to the Green Belt objectives, and that therefore represent 'Grey Belt' land, specifically including Land to the East and West of Flax Bourton.		North Somerset Local Plan Pre-Submission Plan - Flax Bourton Representations Final.pdf

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					minimum housing targets are met. Without this amendment the Council risks its policy basis being too inflexible to respond to site-specific delivery characteristics or changes in the market, and may lead to the Council being unable to demonstrate a five-year housing land supply in the future. The Land at East and West of Flax Bourton would provide this flexibility and has an indicative capacity of 200-250 dwellings. 4.30. In any event, we note that villages in the Green Belt that do not contribute to openness are 'inset' from the Green Belt. The boundaries of the Green Belt do, however, remain tightly drawn around the existing settlement boundaries. We do not agree with this approach and recommend that the wording of draft Policy SP7 (and LP7) is amended to refer to both villages and sites that do not contribute to the objectives of the Green Belt being 'inset' from the Green Belt. In relation to Flax Bourton, we consider that this should apply to the land shown on Figure 2.1.		
Policy DP1: High quality design	No	Effective	No	Yes		Mac Mic are supportive of Policy DP1 in principle. It is, however, noted that the policy requires that management plans should be submitted for the long term maintenance of all shared public and private spaces and facilities including public art, private drainage installations and SuDS and services that the developer intends to provide instead of the Council. It is agreed that this information should be provided, however, the policy does not specify when this information is required. This should be made clear in the policy, as it is not considered appropriate to provide this level of detail at the outline planning application stage. This information should only be submitted once the principle of development has been approved, either when a full application or a Reserved Matter submission is made. Recommendation It is considered that Policy DP1 should clearly specify when a management plan is required to be prepared and submitted in respect of the long term maintenance of shared public and private space, drainage infrastructure, SuDS and other services.		North Somerset Local Plan Pre-Submission Plan - Flax Bourton Representations Final.pdf
Policy DP5: Climate change adaptation and resilience	No	Justified	No	Yes		This policy requires all major development to submit a climate change adaptation statement. The purpose of this statement is to provide evidence as to how climate-related risks are to be addressed and reduced, through development proposals. The statement is to demonstrate how areas vulnerable to increased flooding have been avoided, how measures to mitigate high temperatures at building and site level have been incorporated, and to provide evidence to demonstrate how nature-based solutions, which enable carbon storage and provide flood resilience, have been integrated into proposals Mac Mic supports the Council's approach in seeking to ensure that the effects of climate change has been fully taken into account in development proposals. They note, however, that such statements are likely to replicate much of the information that is required to be submitted with major developments such as within Environmental Statements. Mac Mic supports the need for climate change resilience and, as a company, their schemes will seek to ensure that consideration of the impact of climate change is built into proposed development from the		North Somerset Local Plan Pre-Submission Plan - Flax Bourton Representations Final.pdf

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						start. Measures to address climate change are incorporated at the design stage. It is considered, however, that there are better mechanisms to achieve this goal than the provision of an additional statement or report. Rather, Mac Mic would wish to work closely with the Council during the application stages to agree and confirm the approach to be adopted. Recommendation Mac Mic therefore objects to this policy requirement for the submission of a climate change adaptation statement. It is not considered that this is justified and it will add extra expense and time to the planning application process. These matters can be adequately addressed in other supporting information and through negotiation and agreement with Officers during the pre-application/ application stages.		
Policy DP6: Net zero construction	No	• Justified	No	Yes		This policy, in summary, requires all development to minimise its impact on the environment, ensure that the design of a building prioritises energy reduction and incorporates renewable energy technologies to meet residual energy demand. 4.53. It states that all new buildings will be required to achieve net zero operational energy compliance in respect of both regulated and unregulated energy and minimise embodied carbon. All new development should seek to minimise embodied carbon in respect of both upfront (emissions associated with raw materials, transportation, manufacturing and construction) and whole life carbon. For development of more than 50 dwellings, or in excess of 5,000m2 non-residential floorspace, the policy recognises that proposals must be accompanied by an embodied carbon assessment that demonstrates that upfront embodied carbon emissions do not exceed 750kg CO2 e/m2 . 4.54. Furthermore, all new residential buildings must demonstrate through an energy statement, that the following have been achieved, inter a!ia, no on-site use of fossil fuels, space heating demand of less than 15kWh/m2/year and overall operational energy use of less than 35kWh/ m2/year. 4.55. While the objectives and aims of the policy are supported and there is a need to move towards development that minimises its impact on the environment. The current wording of this policy is not consistent with the guidance contained in NPPF (December 2024). In particular, paragraph 164 of the Framework sets out that: "New development should be planned for in ways that: a. avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through incorporating green infrastructure and sustainable drainage systems; and b. help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards. " 4.56. The Government has, for residential development, established a clear road map for achieving zero carbon ready homes. This is set out in the 'Future Homes Standards', which is due to be implemented in 2025. The Future Homes Standards will require carbon emissions produced by new homes to be 75-80% lower than those built to current standards. Any new homes built under these new Building Regulations standards will therefore need to be zero carbon		North Somerset Local Plan Pre-Submission Plan - Flax Bourton Representations Final.pdf

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						ready, which means that they will immediately be able to benefit from the decarbonisation of the electricity grid. Recommendation 4.57. Consequently, this policy should be amended to accord with the NPPF. The requirements of the Local Plan policy clearly go over and above those set out in the NPPF, particularly, in relation to new residential development. In order to ensure that the policy aligns with the NPPF, it is considered that this policy should be amended to accord with the Future Homes Standards, which will be mandatory from 2025. This will in time ensure that all new homes will become zero carbon. 4.58. In our opinion, it would be more appropriate for this policy to align with the Future Home Standards and Building Regulations, as additional requirements will have an impact on the viability of applicable scheme and will increase the cost of development. This would make the policy justified and would not raise issues of soundness.		
Policy DP14: Highway safety, traffic and provision of infrastructure associated with development	No	• Positively prepared • Effective	No	Yes		Policy DP14 sets out that development likely to have a severe residual cumulative impact on transport links, traffic congestion, or on the character and function of the surrounding area, will only be permitted where acceptable mitigation measures are delivered. All mitigating infrastructure will need to be delivered within an agreed specific timeframe and prior to the aforementioned impact becoming severe. In some circumstances, planning permission may be granted subject to the applicant entering into an appropriate legal agreement to deliver or fund the improvements required The supporting text notes that developers will need to determine the transport needs arising from their proposals and the means by which any adverse impacts will be mitigated. It continues by stating that the Local Plan approach allows for developers to provide or contribute towards the cost of providing necessary infrastructure, which may be off-site. The supporting text also states that to accommodate the road traffic it unavoidably generates, a development will be required to deliver or fund improvements to boost the attractiveness of walking, cycling and public transport, or traffic management measures, in the relevant corridor(s) sufficient to maintain overall road traffic at the otherwise expected level. Mac Mic object to the approach put forward in Policy DP14 in terms of highway safety and traffic management. The approach adopted is based on out-dated models of assessment - it is very much a 'Predict and Provide' model rather than a 'Vision and Validate' approach. It is apparent that the application of this policy will lead to new development being required to provide for new road space and will lead to increases in commuting traffic. The Vision and Validate approach seeks to set a vision for the long-term goals, objectives, and aspirations for the future of a transportation system, with the validation confirming that the chosen strategies, methods, or technologies align with the defined vision and achieve the desired outcomes and can effectively address the evolving needs of the community. This is the prevailing school of thought in term of transport planning and should be applied to this policy rather than the Provide and Predict model which is unlikely to withstand scrutiny at Examination. As such, the policy should be re-drafted to reflect the 'Vision and Validate' model. We would also comment on two points raised in the supporting text in that		North Somerset Local Plan Pre-Submission Plan - Flax Bourton Representations Final.pdf

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						it notes that developments may be required to contribute to funding the improvement of rail freight facilities, even where they are no direct benefits. It is considered that this clearly does not meet the tests for planning obligations as set out in NPPF Paragraph 58. Finally, the supporting text notes that proposals that reduce out-commuting from North Somerset will have a beneficial effect on the overall level of congestion by reducing traffic on the M5, which will need to be balanced against any detrimental local effect. Mac Mic note that this can only be achieved in the context of the proposed policy wording if local roads are provided with more highway capacity to ensure no detrimental local effect. This demonstrates the need to revise the policy as this follows the Provide and Predict rather than the Vision and Validate approach. Recommendation The reasoned justification to Policy DP14 should be re-drafted to reflect the Vision and Validate model of highway safety and traffic management. The requirement for development to contribute to the improvement of rail freight facilities even when there is no direct benefit should be removed from the policy, as this requirement does not meet the tests of planning obligations. Reference to out-commuting from North Somerset should also be deleted from the policy as it implies that a Predict and Provide model should be put in place.		
Policy DP17: Public transport accessibility	No	• Effective	No	Yes		Policy DP17 states that all residential development should be within a reasonable distance of a direct and frequent bus service providing access to a good range of facilities, services and jobs via a direct, safe and attractive pedestrian route while developments will be expected to encourage the use of public transport and deliver of effective and convenient services. This aspiration is supported by Mac Mic. Mac Mic are, however, concerned with the reference in the justification that in terms of locating development within a 'reasonable distance' this means a maximum of approximately 400 metre walking radius of a bus stop with a suitable service frequency, or 600m in rural areas. This is an out-of-date metric, as public transport accessibility should be based on the level of service and frequency of service sufficient to meet individual needs. It might be the case that greater distances can be applied. Recommendation The wording of this part of the supporting text should be amended accordingly and should also make reference to the prevailing topography as this will also have an impact on accessibility to public transport.		North Somerset Local Plan Pre-Submission Plan - Flax Bourton Representations Final.pdf
Policy DP38: Landscape	No	• Positively prepared • Consistent with national policy	No	Yes		This policy seeks to protect the character, sense of place, distinctiveness, and diversity of North Somerset's landscape. It states that all development proposals should, inter alia, not have an unacceptable adverse impact on the landscape character of the district; be carefully integrated into the natural, built and historic environment, aiming to establish a strong sense of place, respond to local character, and reflect the identity of local surroundings, whilst minimising landscape impact; and respect the tranquillity of an area. It also notes that where some harm to the local landscape character is unavoidable, but a development is otherwise deemed beneficial, then positive mitigation measures should be secured by a landscape condition		North Somerset Local Plan Pre-Submission Plan - Flax Bourton Representations Final.pdf

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						or planning agreement involving works on or off-site as necessary. The thrust and direction of this policy is supported by Mac Mic but they consider that it would benefit from re-drafting. The nature of development means that there will be an impact on the landscape and its character (in the wider sense). This should, therefore, be more clearly recognised within the policy and it should be drafted such that the Council and applicants will / should work together to achieving wider landscape aims and to ensuring that any impacts arising can be successfully mitigated and have a positive impact on the landscape. The policy therefore needs to be more positively worded. Indeed, the supporting text notes that: 'The policy is intended to ensure that development does not adversely affect landscape character. Development should contribute to the creation of places and spaces which are attractive, respect and enhance the particular local character of the landscape and are designed with the needs of people in mind ' This sentiment should come through more clearly in the main policy. Recommendation Policy DP38 should be revised to ensure it is positively prepared and consistent with national policy by explicitly recognising that development will inevitably result in some landscape change. The policy should focus on achieving high-quality outcomes through collaboration between the Council and applicants, securing mitigation and enhancement measures that contribute to local character and sense of place. Wording should emphasise that proposals should integrate with the natural, built, and historic environment, and where impacts occur, they should be offset through proportionate and deliverable mitigation, agreed via planning conditions or obligations. This approach aligns with NPPF principles of sustainable development and effective implementation.		
Policy DP46: Housing Type and Mix	No	• Effective • Consistent with national policy	No	Yes		Policy DP46 requires new residential development to provide a mix of housing tenures, types, and sizes appropriate to site characteristics and location, informed by the latest Local Housing Needs Assessment. For developments of 10 or more dwellings, the policy expects provision for a range of housing types, including bungalows, smaller homes for downsizing or first-time buyers, retirement accommodation, accessible homes, and self-build plots. It also mandates that all new dwellings meet Building Regulations M4(2) standards, with at least 5% meeting M4(3) standards for wheelchair accessibility. While the policy's objectives are understood, its current wording lacks flexibility and risks being inconsistent with national policy. The NPPF requires local plans to be positively prepared, justified, and effective. Policies should enable sustainable development and respond to changing market conditions and viability considerations. Policy DP46, as drafted, imposes prescriptive requirements that may not be appropriate for all sites, particularly strategic allocations or larger developments where design solutions and market dynamics vary significantly. The requirement to limit certain housing sizes where there is perceived over-provision could constrain the ability to respond to actual demand and market signals. Similarly, the mandatory proportion of accessible homes and self-build plots, without clear viability safeguards or recognition of site-specific constraints, risks undermining deliverability. National policy emphasises that local requirements must be evidence-based, proportionate, and not compromise housing delivery. DP46 does not		North Somerset Local Plan Pre-Submission Plan - Flax Bourton Representations Final.pdf

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						currently provide sufficient flexibility to achieve these objectives. Recommendation Policy DP46 should be modified to introduce flexibility and ensure consistency with national policy. It should recognise that housing mix requirements must be informed by site-specific considerations, viability, and market demand. This means that provision should be made in the policy to allow for negotiation where prescriptive requirements would compromise deliverability and that all requirements will be subject to viability testing and proportionate to the scale and nature of development.		

Name: Mae Maitland **I.D:** 29291649

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I wish to object to the proposed allocation and strategic growth designation for Backwell within the emerging Local Plan. The scale, location, and supporting evidence for this level of development are fundamentally unsound and would cause irreversible harm to the village, its landscape, and its community. 1. Excessive and disproportionate housing numbers Backwell already has approvals for around 800 new homes—representing a 40% increase in the size of the village. Adding a further 1,000 homes would result in complete overdevelopment. Backwell is being asked to take a higher number of houses than any other village in North Somerset, and even proportionally more than several towns. The village is expected to absorb 7% of the district's total housing allocation, compared with Clevedon's 2%. No justification, needs assessment, or viability analysis has been provided to support this extraordinary level of growth. 2. Lack of supporting infrastructure Despite the significant additional housing already approved, there is no corresponding investment in school capacity, healthcare provision, leisure facilities, or essential services. These provisions are already under strain, and the Local Plan offers no credible strategy for accommodating the needs of thousands of new residents. The proposed new road is neither an effective solution for existing congestion nor a viable means of supporting further growth. It would not relieve traffic on Station Road, Backwell Common, or Chapel Hill. Constructing a road under or over the railway is likely to be prohibitively expensive and potentially unfeasible. Yet the Infrastructure Delivery Plan provides no analysis, no clear costings, and no secured funding for this critical piece of infrastructure. 3. Loss of high-quality agricultural land and environmental harm Backwell contains Grade 1 Agricultural Land, currently used for food crops and grazing. Only around 7% of such high-quality land remains across the whole of North Somerset. Government policy clearly states that we "must protect our best and most versatile land" to safeguard food security. The proposal directly contradicts this national objective and undermines long-term food resilience. The development would also destroy important wildlife habitats in a country already facing severe biodiversity decline. The plans threaten the Brockley Maternity Roost and the SSSI, where rare Lesser and Greater Horseshoe Bats rely on the surrounding land to forage. The Local Plan provides no adequate ecological assessment or mitigation strategy. 4. Flooding risks	The addition of the further 889 dwellings to Backwell is not sound, as detailed above, and this proposed site should be removed from the NSC Local Plan 2041		

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					Backwell Common and nearby areas are already prone to flooding, and Backwell Lake and the adjacent fields—where new roads and housing are proposed—lie on a floodplain that floods regularly. Large-scale development would exacerbate these risks significantly. No convincing flood mitigation evidence has been presented. 5. Impacts on community cohesion and village character The Local Plan offers no social cohesion impact assessment for development of this scale. The sheer volume and pace of the proposed growth would fundamentally change the character of Backwell, overwhelm its facilities, and undermine the distinct identity of the village. The designation of Backwell as a strategic growth location does not account for the loss of Green Belt, the loss of high-quality agricultural land, or the risks of infrastructure not being delivered on time—if at all. 6. Poor sustainability and lack of employment opportunities Backwell is not an employment hub; most existing residents commute elsewhere. Placing such a large proportion of the district's housing here, without corresponding local job creation, is unsustainable and contradicts the stated objectives of reducing car dependency. The railway station, which is often cited as a justification for growth, is not fit for purpose as a transport hub. It is inaccessible for many people with mobility issues and poses practical challenges for families with young children. It cannot support the increased reliance that the Local Plan anticipates. 7. Affordable housing and funding concerns Government policy requires 50% affordable housing on Green Belt sites. While this may appear beneficial, it also significantly reduces the funds developers can contribute to essential infrastructure—further weakening the viability of delivering roads, schools, flood defences, healthcare, and other critical services. 8. Unsound, unsustainable, and undeliverable Taken together, the proposals for Backwell are destabilising, unsustainable, and undeliverable. The level of growth is not supported by evidence, not supported by infrastructure, and not aligned with national policy on food security, environmental protection, or sustainable transport. For these reasons, I strongly object to the proposed allocation and urge the Council to reconsider the scale and location of development in Backwell within the Local Plan.			

Name: Magali Bates **I.D:** 39285537

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell has already had a massive amount of housing approved. This is already too much for the village - we already have an issue with traffic. There aren't enough school places. The railway station can't take this volume of increased traffic - and most people commute elsewhere. Also, WE NEED OUR GREENBELT LAND. It is utter insanity to build more housing on greenbelt land. It is needed to grow food on, and our wildlife need it. We are going to destroy the whole planet and ourselves if we keep on incessantly destroying this precious greenbelt land. Backwell has been earmarked for more houses than the other villages in North Somerset, and it just doesn't have the infrastructure to cope with this, plus it will destroy the community of this lovely village. The government has committed to acting positively to mitigate the effects of climate change, and has said that it would protect our best and most versatile land to grow food on. This directly contradicts that pledge.			

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					The land regularly floods here and this will make it worse. And again, I will say it, because I am so passionate about this - we cannot keep on destroying our environment. We as humans will pay the price for this. From a moral and a practical point of view, we have a duty to protect the environment and the wildlife in the places we live. I feel so strongly about this - I will protest, and I will take whatever peaceful action I can. It is just not right.			

Name: Maggie Storey **I.D:** 62907425

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm					I am very concerned about the ecological impact that the proposals for the development of Tower Farm and Black Rock would have and believe there are alternative brownfield sites or greenfield sites with lower ecological impact, both in Portishead and across North Somerset. I also believe that there are opportunities to increase the housing density on proposed brownfield sites, which could reduce the need to develop these two sites. Both these areas were added to the Green Belt in the 1980s due to their high ecological importance. The strategic ecological importance of both these sites in relation to Weston Big Wood (designated a SSSI) and the Gordano Valley green corridor needs to be taken into consideration. In addition, there has been no demonstration of the exceptional circumstances for using these Green Belt sites for development. For these reasons, Tower Farm and Black Rock should be removed from the Local Plan and alternative proposals considered as mentioned above.			
Black Rock, north of Clevedon Road					I am very concerned about the ecological impact that the proposals for the development of Tower Farm and Black Rock would have and believe there are alternative brownfield sites or greenfield sites with lower ecological impact, both in Portishead and across North Somerset. I also believe that there are opportunities to increase the housing density on proposed brownfield sites, which could reduce the need to develop these two sites. Both these areas were added to the Green Belt in the 1980s due to their high ecological importance. The strategic ecological importance of both these sites in relation to Weston Big Wood (designated a SSSI) and the Gordano Valley green corridor needs to be taken into consideration. In addition, there has been no demonstration of the exceptional circumstances for using these Green Belt sites for development. For these reasons, Tower Farm and Black Rock should be removed from the Local Plan and alternative proposals considered as mentioned above.			

Name: Malcolm Backwell **I.D:** 50858497

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Approval has already been granted for 800 houses in Backwell which represents a 40% increase for the village. Under this Plan Backwell is allocated a higher number of houses than any other village in North Somerset, and even a higher growth percentage than some towns. We are expected to take 7% of the district's housing allocation, compared to only 2% in Clevedon. The growth is not supported by a needs or viability analysis for an extra 1,000 houses and these additional numbers are simply not sustainable in such a small area. The Infrastructure Delivery Plan lacks analysis, costings and funding guarantees for the new road or services. Backwell already has a substantial deficit in school places and no investment in health services or leisure facilities. The current level of infrastructure and services cannot support another 1,000 houses and any additional infrastructure would need to be in place before construction commences. The site is located within the green belt on Grade 1 Agricultural Land currently used for food crops and grazing. There is only 7% of this high quality land left in the whole of North Somerset and the land in question is also already prone to severe and regular flooding. Government policy requires 50% affordable housing on greenbelt land, but this reduces the available funds developers can contribute towards infrastructure.			

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					Development would destroy valuable wildlife habitats and further harm biodiversity in one of the world's most nature-depleted countries including the Brockley Maternity Roost and SSSI, with rare Lesser and Greater Horseshoe Bats relying on the land for food. Backwell is not an employment hub; the majority of residents commute to Bristol or to nearby towns. The proposed new road would not effectively serve Nailsea traffic or relieve congestion on Station Road, Backwell Common and Chapel Hill. Construction of the road under or over the railway line would prove to be prohibitively expensive and possibly entirely unfeasible.			

Name: Malcolm Ingram **I.D:** 62789505

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Justified • Effective • Consistent with national policy	Unsure	Unsure	1. There has been a significant lack of community involvement and consultation methods employed by NSC. NSC has not engaged properly with local community of Pill and Easton in Gordano about the plan. This is move that will result in an increase of 44% in population and thus requires extensive consultation with local residents in the villages concerned 2.Deviation from Settlement Boundaries (SP6). Land outside established settlement boundaries should not be included in proposed development allocation in Pill and EIG. Extending beyond the settlement boundaries will undermine the planning rules for SP6 and SP11. This will increase pressure on infrastructure, set precedent for further expansion, and affect cohesion of the villages. 3. Spatial strategy and transport. Pill and EIG have very limited facilities, services and jobs. They will become dormitory areas for Bristol. The proposed new railway will not encourage people to use this to get to Bristol as there will be few trains per hour and 3 carriages, likely to be full from the large town of Portishead. Car traffic will be increased considerably on already dangerously congested A369 and bottle necks into Bristol causing adverse impacts on this route. Therer is an ongoing consultation regarding serious problems with Junction 19 which has yet to report. 4. Placemaking. The proposed sites suggest a high density of houses which is not appropriate to the locations, not producing sustainable communities. Too many houses are proposed for the land, resulting in poor combinations of green space and community spaces.. 5. Green belt land. No reasonable alternatives to using Green Belt have been considered prior to these proposals and these initial considerations should start with maximising brownfield sites and optimising sites in the city with higher- density capacity before destroying small communities with long standing and successful faciltiies such as schools and medical centres.	1. Well publicised public meeting(s) with the local community to hear a wide range of views from all ages, some of whom are excluded via this e-response 2. Review of sites to ensure compliance with NSC proposed policies. Consequestial reports from these findings to be made public. 3. Acknowledgement of existing settlement boundaries and no extension to them. 4. Review of the transport infrastructure in the area which is already straining from increases in traffic from extensive Portishead developments. The limited commuter link via the as yet unestablished railway link will be completely inadequate in solving this.	I do not support the soundness or legal comliance of NSC local plan 2041	

Name: Malcolm Reed **I.D:** 14394881

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Vision, Strategic Priorities and Sustainability Objectives	No	• Justified	Unsure	Yes	This plan has been developed in the absence of and contrary to the democratic wishes of the Backwell electorate.			

Name: Marcus Plaw Persimmon Homes **I.D:** 39305665

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Vision, Strategic Priorities and Sustainability	No	• Positively prepared	Yes	No	Page 7 'Introduction' The Plan Period of between 2026 and 2041 should be extended so to run for a 15 year period following the adoption of the Local Plan and so to align with NPPF (para 22). Notwithstanding the Company's concerns relating to the	The draft Local Plan should be amended to reflect a 15 year timescale from adoption in 2027 – and this will require careful review of evidence-base		

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Objectives		• Consistent with national policy			soundness of the Plan – a plan period from 2027-2042 is more realistic set against the Council's Local Delivery Scheme which now presents an inaccurate timeline. Whilst the Local Plan sets out the consultation approach adopted leading to the Regulation 19 Draft (and having regard to the evidence base – notably the Duty to Cooperate Statement of Compliance, Oct 2025) there has not been a consistent, logical approach to defining and understanding the spatial strategy and distribution of development. The Council has adopted an approach is one which seeks to avoid first land at risk of flooding, then the green belt and other designations of significance including National Landscapes (AONBs). They have taken an unduly cautious approach without proper consideration of evidence that supports the plan. The settlement strategy has not taken a sensible, informed approach to spatial distribution noting that the housing requirement reflected in earlier Local Plan consultations were themselves not reflective of objectively assessed need set against an appropriate methodology. Further, it is does not respond positively to development in zones of flood risk where sites can be made safe through technical interventions. This means unsustainable sites have been identified ahead of others that require flood mitigation measures. The Plan does not demonstrate that those issues associated with unmet need arising from neighbouring authorities (notably Bristol City Council) have not been fully considered and positively responded too. Objection and Suggested Changes to the Vision (Page 11) The Vision as currently drafted is aspirational only and lacks measurable commitments. It does not explicitly state that the Council will meet its full housing requirement or address the need for timely and sustainable delivery of new homes. This omission undermines the effectiveness of the Local Plan and fails to provide benchmarks against which success can be tested and reviewed. There are no clear measurable goals. The Vision does not set out standards or indicators to assess whether its objectives are achieved. Without measurable outcomes it is weakened. It fails to commit explicitly to meeting housing need. The Vision should explicitly state that the Council will meet its objectively assessed housing requirement and work positively to address promptly any shortfall. The Local Plan should be drafted to achieve this. While strategic priorities are listed, they are not integrated into the Vision text. The Vision should reflect priorities such as housing delivery, economic development and growth, and sustainable development in a clear and actionable way. The NPPF para 36 requires that plans meet their needs – which are fully tested. It should therefore explicitly seek to meet the district's housing requirement in full, including any agreed contribution to unmet needs from neighbouring authority of Bristol.	information in response. Bristol's unmet need must be addressed. The Vision should be reworded to include: "By 2042 [an extended plan timeline], North Somerset will be a thriving, sustainable district that meets its full housing requirement and supports inclusive growth. The Local Plan will deliver a mix of homes, employment opportunities, and infrastructure, ensuring development is well-connected and suitably sited, resilient to climate change, and which enhances the quality of life for all communities. These commitments as presented will be monitored and the plan reviewed to respond to address any shortcomings or shortfalls affecting the Plans effectiveness."		
SP1: Sustainable Development	No	• Positively prepared • Justified • Consistent with national policy	Yes	No	For the purposes of sustainable development, a scheme should align with the Local Plan's Vision (which should be amended). In reviewing the Local Plan as whole, it is appropriate for bullet 2 of the policy to also reference the proximity of public transport facilities as a means of encouraging new development – including a mixture of higher density housing where readily reachable by foot and other sustainable modes. A new bullet should be provided stating that development should reasonably related to the built form of a village or town. This would support the consideration of suitably located new development that may be in or adjoining urban areas or rural locations. Inclusion would support the delivery of new development responding to the revised Vision and Objectives of the draft Local Plan.	The Policy should be amended to read: - Prioritise walking and cycling, maximise the use of effective public transport and encourage the creation of liveable neighbourhoods through the location of development within or close to urban or built up areas.		

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SP2: Climate Change	No	‣ Positively prepared ‣ Effective ‣ Consistent with national policy	Yes	No	As worded this Policy is unsound as it lacks precision and so is not effective so not consistent with national policy. First, the Policy appears to apply to all development proposals which would be unreasonable and unworkable – and so requires refinement. Secondly, with this additional requirement, each relating to further reporting adds to the work required in supporting a planning application which ultimately means that the timescales for determining planning applications will be extended and adversely affected – most probably well beyond statutory determination periods. The application of the provisions of this policy should be made clearer so to ensure that it does not place unreasonable or excessive burdens on applicants reflecting in increased cost and time.	The policy should be reworded to clarify to which applications it is applicable. Further, there should be justification for this additional work – with evidence that it will not compromise in any way decision making.		
SP3: Spatial strategy	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Yes	No	Whilst some of the provisions of this Policy appear reasonable, the Spatial Strategy that has been adopted here by the Council does not sensibly reflect appropriate planning principles and therefore undermines its effectiveness. The Policy does not present the housing requirement, explain its distribution or commit to meeting its housing requirement over the plan period. So it is questionable if it is deliverable over the plan period and does not appear to have been positively prepared. The delivery of development close to and adjoining urban areas is supported – and this should be reflected fully in the emerging policies. And where development is adjoining urban there should be recognition that in some cases that can bring about positive We note that its provisions are picked up in other draft development control policies. Whilst note that the policy does not rule out totally residential development in areas that are at risk of flooding now or in the future, we believe that the policy should recognise that where there are evidenced and demonstrable solutions that minimise the risk of flooding then this should be given appropriate weight in the determination of planning applications. However, other draft flood risk-related policies contradict this. To state that beyond development areas in villages and in the countryside will relate to community needs conflicts with the provisions of the first sentence in that priority will be given to development in or “close” to urban areas. Further, referencing community needs is unclear – particularly where needs go beyond that which is required by the community – for example villages benefitting from rail services which support sustainable commuting to places of work. The Local Plan does not therefore allocate sufficient land in villages to meet needs. Innovative technical approaches and responses to addressing flood risk should be explored so as to ensure that sites can be delivered in locations that are sustainable. In the justification text, it refers to the development being focused at towns and urban areas. However, the locational strategy and distribution of homes does not reflect that – notably Portishead which has seen significant growth over the past 20 years, but is only now to support up to 7% of the housing requirement as identified in the Local Plan; and of the 7% the vast proportion is through urban regeneration to which there is no real strategy and certainly not one which would deliver quickly a mixture of home types as the quantum presented reflects high density flatted developments – which does not fully align with Government policy. At Wolvershill (Banwell) some 14% of the Local Plan’s housing requirement is directed towards it – however, there are doubts over viability and therefore overall deliverability. In that regard the draft Local Plan and its Spatial Strategy do not present the most appropriate strategy and cannot be positively prepared to meet objectively assessed development requirements. No reference in the spatial strategy is made to a settlement hierarchy for the purposes of spatial planning and distribution – and therefore no reference is	The Council’s Spatial Strategy is not based upon a sound approach. The outcome of the JR decision is fundamental to the spatial distribution of development in the district – and this has been made clear in correspondence from the Council (as referred to). I that regard, the Local Plan should await the outcome of the JR in respect of development at Yatton and then move to consider the implications of the judgement – with a view to undertaking another review of site allocations where sites in areas of flood risk and which are well located can be delivered through agreed mitigation measures. The Spatial Strategy should also address unmet needs – to ensure that it is positively prepared and justified and deliverable over its plan period.		Email NSC 26.9.25.pdf

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					made (and so no clarity) to the evidence supporting the policy's wording. This is a flaw in the draft Local Plan. The draft Local Plan does not address Bristol's unmet need – a matter that should be addressed now and not left for a subsequent review. Further, the statement that the Green Belt sites are located in the most sustainable locations is incorrect. At Portishead, for example, land east of the town (North of the Portbury Hundred) land that is sustainably located adjoining the urban area with ready access to facilities including bus services and a new train station (opening 2028) can be readily delivered. Whilst in Green Belt, it is considered to be Grey Belt and issues of flood risk can be readily resolved through a technical response which includes land raising. It is an appropriate site and should be allocated. Approach and implications for site identification in Flood Zones The Council's approach to spatial distribution is one which seeks to avoid development in areas of flood risk. The Council has not been consistent in that approach: in correspondence attached (26.9.25) from the Council in respect of a Judicial Review (JR) for 190 homes granted permission in Yatton, North Somerset, in Flood Zone 3, it confirms that the outcome of the JR is fundamental to the Council's strategy. Therefore the Council recognise that the JR outcome will have implications for local plan making ("significant practical implications for the Council's strategy on land availability, development within flood plains, ..."). So, it is important. It therefore follows that should the JR be unsuccessful, then the Council should, in the interests of planning for the district over the next 15 years (and setting out a direction which is beyond that) reassess its approach (as presented in the draft Local Plan) to spatial planning: distribution of homes and other forms of development along with their delivery timescales; the sites identified themselves where flood mitigation as part of a scheme warrants investigation and technical responses (solutions) so the they can be readily resolved. A lack of consistency of approach to flood risk The Council has sought to avoid development in areas of flood risk – choosing to direct new land allocations to areas free of flooding (sea and river). However, it is clear from a simple review of allocations that the Council has not been consistent in that approach. For example and comparing draft allocated sites with EA Flood Risk Maps for Planning: - Portishead: Wyndham Way Development Framework Area (LP20) – land is within Flood Zone 2 and 3 - Clevedon: Castlewood (120 homes) – land is within Flood Zone 3 - Clevedon: Land North of Churchill (44 homes) – land is within Flood Zone 3 - Clevedon: Land off Millcross (50 homes) – land is within Flood Zone 3 - Easton-in-Gordano/Pill: Land at Lodway Farm (160 homes) – part of land within Flood Zones 2 and 3 In Weston-super-Mare, there are other sites in areas that flood and are greenfield, that have been allocated. It is clear therefore that the approach and objectives being pursued by the Council do not follow a methodology that avoids areas of flood risk and so the strategy is not consistent.			
SP4: Placemaking	No	• Positively prepared • Consistent with national policy	Yes	No	The Company recognises the importance of placemaking. It is therefore important for the design and layout of a scheme to respond positively to its surroundings. As such it is unhelpful for the development to be supported where it accords with the principles set out in the National Design Guide; National Model Design Code and other documents as listed in the policy. It is reasonable for applicants to have regard to the provisions of the documents, but it is for design to be informed by site specific considerations such as access, landscape setting, and urban/built form context – as reflected in the remainder of the policy. We consider that to be a more consistent approach to applying national planning policy. The draft policy is not supported by evidence that justifies this approach of according with the aforementioned Guides and Codes.	Policy SP4 be reworded with greater emphasis that development schemes should be designed in response to development context. The Local Plan policy and supporting text should also provide further detail in respect of the use of design panels and their use is applicable to certain forms of development and can be optional in that regard. The supporting text must make clear that their use will not protract application preparation.		

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					The expectation placed upon applicants to submit proposals for review by a design panel is unreasonable given that the policy does not set any size, scale or use criteria. Whilst design panels are helpful it should be noted that this service will inevitably come at a cost which is not recognised (and can be burdensome) and can protract application preparation unduly. Such a requirement for design review should be optional only.			
SP5: Towns	No	‣ Positively prepared ‣ Consistent with national policy	Yes	No	The Policy is helpful inasmuch as it sets out what appear to be key considerations for the delivery at towns – but presents little detail in its wording. The Policy should promote the delivery of new housing by expressing that a mixture of homes both in type and tenure will be supported – this is reflected in NPPF policy. Policy SP6 recognises a mixture of type and tenure, but SP5 does not. In the assessment of a town's capacity to accommodate growth, consideration should be given to the existing and proposed level of provision of facilities at a town. This would make the policy more effective and consistent with national policy. The Policy should include a settlement hierarchy with the towns of Weston-super-Mare, Portishead, Nailsea and Clevedon the main focus for new development recognising their size, scale and service offer. This is a conventional approach and one which provides clarity to users of the Local Plan.	The Policy should address the requirement for a mixture of homes to be provided to support the delivery of a robust planning strategy. The Local Plan should provide a settlement strategy against for the spatial distribution of objectively assessed development requirements. The hierarchy should consider towns and villages by their levels of sustainability. The most sustainable towns are Weston-super-Mare, Portishead, Nailsea/Backwell and Clevedon – and therefore sensible levels of distribution should be applied. In the case of Portishead, its proximity to Bristol; levels of accessibility by road and public transport (notably with the introduction of a new train line); and capacity to accommodate new development in suitable, sustainable locations on its periphery.		
SP6: Villages and rural areas	No	‣ Positively prepared ‣ Consistent with national policy	Yes	No	Without a settlement hierarchy (see representation to draft Policy SP5, this draft policy does not function properly (nor does Policy SP1). A settlement hierarchy will allow for the plan to be monitored and managed and assist in the delivery of homes where site allocations have not come forward or are faltering badly set against anticipated delivery rates. Yatton, given its size, scale, composition and level of accessibility – notably its train station, should be set high in the settlement hierarchy. The draft Policy goes on to say that outside of settlement boundaries new development will be restricted (referring to examples). This is not consistent with the Policy SP3 which speaks of residential development at risk of flooding will be minimised, not resisted or restricted. There policies lack clarity and should be amended reflecting opportunities for residential development in locations where potential impacts, such as risk of flooding can be addressed through interventions. Other development including housing which reasonably relates to existing built and urban forms should also be considered acceptable and set against other planning considerations including meeting the Council's obligation of delivering its housing requirement. That is the most appropriate strategy.	The Policy should be justified and positively prepared – so should refer to a settlement strategy (along with Policy SP5) – within which Yatton should be set high in the village hierarchy. The emerging policy approach to the delivery of housing close to a train station should be reflected in the policy and hierarchy.		
SP7: Green Belt	No	‣ Positively prepared ‣ Consistent with national policy	Yes	No	We note that land is identified in this policy for removal from the Green Belt. We recognise that sites will need to be uncovered through the removal of the Green Belt to meet the Council's housing requirements. However, we question i) whether the correct sites (and their quantum) have been identified in the list; and ii) why land on the eastern edge of Portishead and north of Festival Way, Long Ashton has not been removed from the Green Belt as a means of delivering much needed homes in sustainable locations. The sites presented will require robust assessment in terms of their suitability and deliverability – and those with notable constraints which will need to be reviewed and addressed – as they may not be readily suitable for development. However, as illustrated by separate objections made by the Company (accompanied by supporting information) the following should be	That the policy be amended to include the following sites: - Land at East Portishead – 650 dwellings - Land north of Festival Way, Long Ashton – 20 dwellings Grey Belt should be referenced in the Policy. Also, that there is a commentary provided in the plan relating to the delivery of development on the edges of settlements inset in the Green Belt.		

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					included within a list of locations: - Land at East Portishead – 650 dwellings - Land north of Festival Way, Long Ashton – 20 dwellings We note that villages in the Green Belt which do not contribute to openness are inset in the Green Belt and this is welcomed. If they do not contribute to Green Belt openness then in is reasonable to believe that land on their edges is not so sensitive inasmuch as it relates to a village that is inset for a reason. Their inclusion would make the plan sound by reason of making the plan effective by delivering new homes; and justified through an appropriate strategy. Reference in the policy to Grey Belt should also be made, given that it is a factor in the sequential site identification process. Please refer to other information submitted to this consultation promoting the aforementioned two sites.			
SP8: Housing	No	‣ Positively prepared ‣ Effective ‣ Consistent with national policy	Yes	No	The housing requirement is set over the plan period of 2026 to 2041 – equivalent of 1,580 homes. However, it is notable that the plan period is unrealistic and is likely to run until 2042 (reflecting 15 years (minimum) from adoption in 2027). The reason for changing the plan period is that the Local Development Scheme published in February is already out of date in its local plan preparation timings by around 6 months as it stands. It follows that adoption is pushed into the Spring of 2027. In that regard, it would be sensible to include a further year's uplift in the housing requirement – so a further 1,580 homes – thereby increasing the requirement for 2026-2042 to 25,280 homes – with is significantly above the Standard Method requirement and the 24,495 that the spatial strategy allocations sum to. As a result, it is sensible for the draft Local Plan to reconsider its housing requirement and plan for the shortfall. It would be sensible too for this to be done now in advance of the Submission of the Local Plan as this is only a matter which the Examination will need to consider. The draft Local Plan should be deemed sound by the Council before its Submission – and it should have been addressed with corrections before the Plan's consultation. Spatial Distribution: The quantum of development is disproportionate to the district settlements – reflecting a flawed spatial distribution policy. There should be more sites, with those larger unsustainable allocations reduced in size. The number of homes (and proportion of homes) identified for each settlement does not reflect accurately the status and level of sustainability of key settlements or the effect of site constraints – notably flood risk given that the Council is taking a very precautionary approach in allocating homes in areas susceptible to flooding. To be clear, and as presented in National Policy, flooding takes numerous forms: tidal, river and surface water. The sites identified and the capacities presented do not, in some cases reflect these constraints. Therefore an inconsistent and therefore unsound approach/ methodology has been applied. The Plan cannot be said to be positively prepared, justified, effective or consistent with national policy. Weston-super-Mare – whilst it is the largest and most sustainable location, some draft allocations are located in areas susceptible to flooding (having regard to the Flood Risk Maps), and therefore the approach to identification of sites outside of areas that flood areas does not appear to be being followed. Wolvershill – this is an allocation on the eastern edge of Weston-super-Mare which does not appear to follow any clear logic. It is a substantial allocation and one which means other settlements are prejudiced. It is allocated as it is outside of the flood plain only - and that does not mean it is locationally sustainable. It prejudices the ability of other sites to come forward as	The Policy should be amended so to reflect the contents of this representation. However, the distribution of houses should be corrected with a view to increasing the proportion on homes in Portishead – with sites identified to accommodate that quantum. The additional homes to be sourced from the redistribution of homes from those settlements not capable of realistically delivering homes in the next 5 years or longer; and by addressing Bristol's unmet need through further homes. The distribution of the sites should also be considered given that development at Wolvershill is of a scale that prejudices the delivery of other sustainable sites that are capable of bolstering housing supply.		

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					allocations where mitigation can form part of the scheme's development. The development trajectory of the site is significantly over that which is realistic, which itself prejudices the a healthy rolling 5 year supply of homes. This allocation requires careful scrutiny. Woodspring – this allocation represents a site which borders Bristol and therefore, geographically, supports Bristol's needs – albeit it is not made up of the redistribution of unmet Bristol housing need. Nailsea and Backwell – Having regard to the number of homes proposed and then breaking those down on a site specific basis, it is noted that with a total of some 3,728 homes planned, high quality accessibility (so to facilitate permeability) is fundamental to achieve this quantum. It is noted that for land taking access off Youngwood Lane (and so allocations "South of Nailsea" for 582 homes and "Youngwood Lane" for 282 homes) to benefit from access to the north up to The Perrings. Therefore, it would be beneficial for the Youngwood Lane junction with The Perrings to be recognised as a key component of the development and referenced at Schedule 1 Large Sites at the sites' requirements. Ready access can be provided as evidenced in the submitted information supporting this representation. Pill and Easton-in-Gordano – receiving 4% of the housing numbers (1100 homes) its centre is constrained as is its level of centre offer, but the difference between the village and Portishead in terms of quantum is only some 37% which is inexplicable when considering the profile and status of Portishead. Portishead – in receiving just 7% of the planned housing growth (1601 homes) given that Portishead was until recently, Europe's fastest growing town is bewildering. The town has seen a growth is services and facilities – but as with other towns has seen a contraction in some areas. There needs to be further development directed at the town through urban growth. The town is proximate and accessible by a choice of mode of transport to Bristol and the major employment areas of Royal Portbury Dock, Avonmouth and Severnside. The town is also seeing major investment in infrastructure through the reinstatement of its railway line within the next three years – with train services running between the town and central Bristol. From a sustainability appraisal perspective, the town should be receiving a significantly greater proportion of the housing requirement – so that it can respond to need for new housing in attractive locations that also respond to neighbouring Bristol's unmet need. Clevedon – it has constraints and notably housing sites are identified that are in Flood Zone 3. There needs to be a strategy for its growth and regeneration that responds to local constraints. Villages and rural areas – the Council's approach to development in villages is confused. Settlements, such as Yatton which are served by train stations are inherently sustainable. This has reinforced by the Government in a recent Ministerial Statement highlighting specifically the opportunities for housing development proximate to train stations. Therefore, it is important for North Somerset to respond to this now, and positively, to meet its housing supply obligations. Yatton presents such opportunities with land at Rectory Farm (North) benefitting from being close to and accessible from a train station. It has planning permission for the development of up to 190 new homes (50% affordable). This site should be allocated in the emerging local plan and its quantum included in the overall supply for the district – being a commitment.			

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					Of particular note is the omission of any reference to Bristol City Council's unmet need. Whilst it has been recently suggested by Government that that in 2026 the Duty to Cooperate will no longer be a policy requirement, what remains – and has, obviously, been the case always, is for neighbouring local authorities or those that have a close relationship in neighbouring cities or major urban areas, to engage in constructive inter-district or regional planning. That ensures a plan is effective. Such joined up working naturally delivers better results more promptly. It is accepted that some 10,400 homes cannot be accommodated by the neighbouring Bristol City Council and therefore neighbouring authorities should assist in meeting (accommodating) this unmet need. For North Somerset this means that sites must be found to accommodate a proportion of these homes. Through engagement with Bristol City Council on this longstanding issue, North Somerset must, by now, have agreed a solution and agreed to accommodate some of Bristol's need, not merely evidenced discussions about it. Should it be that, say 40% of the unmet need requires redistribution then just over 4,000 new homes should be added to the overall requirement for the district and distributed to locations that respond to Bristol's needs and supports North Somerset's growth. To be clear, it is unacceptable for the district to come forward with a plan which ignores this matter or simply does not address it because it is not, yet, a member district of WECA. Such an approach is not forward planning but ducking an issue.			
SP8: Housing	No	‣ Positively prepared ‣ Consistent with national policy	Yes	No	A delivery trajectory is provided for Wolvershill within the evidence base of 200 homes per annum in the "Appendix I – Development appraisal and assumptions build up and overview". This does not appear to be evidenced elsewhere - in the evidence base documentation. 200 homes per annum is a significant number on a large strategic site - and there is no evidence that such a rate has been achieved in North Somerset historically. Indeed the housing delivery rates across the district have been overestimated consistently by the district which has distorted and adversely affected the Council's 5 year housing supply position. There is no full, transparent site delivery information presented in the evidence base supporting this consultation.	There should be clear information relating to housing delivery rates for sites so to asses the likelihood of delivery. Without this information, the plan is fundamentally flawed as no certainly can be provided relating to the Council meeting its housing supply obligations.		
SP8: Housing	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Yes	No	The draft Local Plan does not recognise nor look to clearly remedy the housing land supply shortfall. Having regard to the appeal decision notice with regard to APP/D0121/W/24/3343144 in respect of the an application for up to 190 new homes at Yatton, approved March 2025, the issue of housing supply and the delivery of market housing was a key topic for discussion. There was a material and significant shortfall in assessed housing land supply between 2024-2029 with the Council and Persimmon Homes suggesting a figure of between 3.07 years and 2.33 years respectively - with the Inspector at that time concluding 2.79 years' supply. Since then there has been no significant uplift in delivery. The Inspector considered that the Yatton site would make a useful contribution towards supply given that the Local Plan clearly needed to allocate more homes to address the shortfall and satisfy forecast needs. Given that there is no clear trajectory presented regarding the delivery of the sites identified, then this is a matter which requires scrutiny, and careful consideration and a positive response.	The Council, in identifying the site allocations should ensure that they are deliverable in their entirety and the Inspector should be comfortable that accurate delivery trajectories have been presented to ensure this.		
SP10: Transport	No	‣ Positively	Yes	No	Whilst the Company is supportive of development that is connected appropriately to transport facilities and services, we note that bullet 3 requires development proposals to deliver "… better local bus, rail and rapid	The Policy should provide clarity over how the uptake in public transport will be achieved. Further, the Policy should		

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		prepared Consistent with national policy			transit services and infrastructure supporting uptake in public transport use for journeys to work, leisure and other purposes.”. The policy does not provide adequate clarity as to how all these requirements must be demonstrated or achieved. Further, how can an applicant demonstrate, for example, uptake and patronage will be improved through development? It is reasonable to expect that development next to existing transport facilities will add to patronage and be supportive, however providing clear evidence, certainly for smaller developments will be challenging, time consuming and costly – presenting an unduly onerous requirement on applicants. This policy should be re-written as it lacks precision and therefore is not effective.	reference how improvements will be funded – through CIL or S106 contributions.		
Policy LP3: Strategic location: Nailsea and Backwell	No	Positively prepared Consistent with national policy	Yes	No	The delivery of such a significant number of homes across Nailea (a town) and Backwell (a village) – some 15% of the total number of homes planned. For both settlements, the locations of new development good quality means of access – for good placemaking. Connectivity and linkages should therefore be considered carefully. At Backwell the deliverability of the Station Road to A370 link requires careful consideration and assessment. As Nailsea, careful consideration is required too in respect connections at the Land South of Nailsea to Youngwood Lane/The Perrings. It would be sensible for the policy to emphasise the importance of north/south connectivity to on the eastern side of the allocation – so to improve accessibility to the town's services and facilities. This approach would accord more fully with National Planning Policy. See also comments made specifically to the allocation at Land South of Nailsea.	The Policy and Schedule 1 should reference the importance of achieving strong permeability and to explore fully opportunities for secondary access being taken from the junction of The Perrings and Youngwood Lane. Please see comments made specifically to the allocation at Land South of Nailsea.		
Policy LP5: Housing, employment and mixed use allocations	No	Positively prepared Consistent with national policy	Yes	No	The Policy and Local Plan text should be amended to incorporate the following site: Land at Parsonage Road (North of Festival Way), Long Ashton Persimmon Homes Severn Valley controls Land at Parsonage Road, Long Ashton, comprising 3.45 acres, with residential development potential for up to 20 dwellings. The Site is located in the Green Belt and Flood Zone 2, with a small section of Flood Zone 3 in the west. Long Ashton is a settlement well served by services and facilities with one surgery, one chemist, one community centre, one Co-Op, one park and two playgrounds. Alongside these representations, is an indicative masterplan and a Flood Risk Due Diligence Assessment (January 2024) prepared by Rappor, which support the site’s deliverability and why it should be allocated for residential development. Sustainability: Primary schools are easily accessible from the site, with Northleaze Primary School immediately to the west and Birdwell Primary School is 1km to the west and walkable within 18 minutes. Between the two schools there is capacity to serve pupil numbers generated by the site’s development. The Land at Parsonage Road is situated at the edge of the settlement towards Bristol. It is in an area that, as per draft Policy DP15, would minimise the need to travel encouraging walking, cycling and public transport over private car usage. The site bounds Festival Way (National Cycle Network Route 33), a cycle route which usefully connects Nailsea and the centre of Bristol – and one which the Festival Way enables cycling from the Site to the centre of Bristol in 18 minutes, or to Nailsea in 32 minutes. The Stage 7 Transport Assessment recognises that the route could benefit from improvements. This Site has the benefit of being within walking distance (22 minutes away) from the Park & Ride, which would enable residents to take modes of active travel to the Park	Recommendation It is requested that: Land at Parsonage Road is released from the Green Belt for residential development. Land at Parsonage Road for residential development for up to 20 dwellings.		YANLEY~1.PDF PARSON~1.PDF

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					& Ride. Development at the Site, therefore, would make a genuine contribution to the Council's ambitions of increasing levels of active travel and public transport usage. Flood Risk: While the site is located in Flood Zone 2, with a small section of Flood Zone 3b, a suitable flood risk assessment and drainage strategy produced through the planning and design process would be able to address fully the on-site flood risk issues – responding to the principles of draft Policies DP9 and DP10. The attached indicative masterplan allows for 14 dwellings, while excluding development from the area marked as Flood Zone 3b. The attached Flood Risk Due Diligence Note provides more detail. Landscape: North Somerset Council's 2018 Landscape Sensitivity Assessment marked this land as having low landscape sensitivity. It is part of the only area surrounding Long Ashton that is rated as such, with the majority of the land surrounding Long Ashton rated as having high landscape sensitivity. The allocation of this site for residential development would therefore not have lead to significant landscape impacts, subject to good-practice masterplanning – with any new development at the site also being set against existing built form. Green Belt: The Site is situated within the Green Belt. Development of the Site create any substantial reduction in the gap between Bristol and Long Ashton, and would not conflict with para 138 (b) of the NPPF – the Green Belt's five purposes. Instead, the development at the Site would provide a sensible rounding off of Long Ashton, with a green edge to the settlement still being retained on the south side of Festival Way. Sensitive masterplanning and landscaping can readily achieve this. As per para 138 of the NPPF, Green Belt serves 5 purposes. The section below helpfully comments on each purpose in relation to Land at Parsonage Road, Long Ashton. a) To check the unrestricted spawl of large built-up areas The release of Land at Parsonage Road would not constitute unrestricted sprawl. Long Ashton is not a large built-up area, and in any event its release would take the settlement boundary in this part of Long Ashton up to the defensible boundary of the active travel route, Festival Way. b) To prevent neighbouring towns merging into one another Long Ashton is not a town but in any event the release of the site would not lead to the merging of Long Ashton and the nearest settlement, Bristol. The site would follow the form of the existing settlement boundary, marked by development along Parsonage Road. c) To assist in safeguarding the countryside from encroachment The countryside would not be encroached by the release of the site from Green Belt. As above, the site would take the settlement boundary of Long Ashton to the defensible boundary of Festival Way. The indicative masterplan attached to these representations allows for green space on the eastern edge, which means that the gap between Long Ashton and Bristol is not made any shorter. d) To preserve the setting and special character of historic towns An allocation of up to 20 dwellings at the site would not harm the setting or character of Long Ashton. Any development would respond sensitively to the built form of Long Ashton. Notwithstanding this, Long Ashton is not an historic town. e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land There are no brownfield opportunities within Long Ashton to accommodate a			

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					development of this scale and form, which is of particular importance given North Somerset's need to find additional sites for residential development. The site does make a strong contribution to the purposes of the Green Belt. In not providing a strong contribution to the Green Belt's purposes, the site qualifies for Grey Belt status. The Flood Zone 2 and partial Flood Zone 3 affecting the site does not preclude the site from having Grey Belt status. Instead, the NPPF clarifies that Grey Belt should exclude land which is affected by footnote 7 constraints (in this case flood risk). However, as the attached Flood Risk Due Diligence Assessment demonstrates, technical solutions allow the site to be developed so that the Exceptions Test is passed, by ensuring the development is safe for its lifetime. Housing Supply: As set out previously in these representations, North Somerset Council have a significantly shortfall in identified housing supply, against their housing requirement. This shortfall is a minimum of 8,620 dwellings, before Bristol's unmet need is considered. It is therefore imperative that the Council allocate more land for residential development. An allocation for residential development of Land at Parsonage Road will contribute to the Council's efforts to address this shortfall, through the development of up to 20 dwellings in a sustainable location. Housing Supply Long Ashton Housing Need As previously mentioned, a significant and persistent shortfall in supply is affecting the District. The Council is tasked with meeting its standard method housing requirement. The Council should also be addressing Bristol's unmet need. It is not sufficient for the Council to put off that task or expect WECA strategic planning to pick this matter up – the situation will only worsen over time making rectification more challenging and lengthy. Not only would the site support North Somerset's housing supply on a district wide basis, but an allocation and development of the site would contribute to meeting the identified local housing need that exists in Long Ashton. At a planning appeal (reference APP/D0121/W/23/3315584) in 2024 the Council accepted the conclusions of the Appellant's Housing Needs Survey 2023 for Long Ashton. That appeal document establishes a market housing need of 152 dwellings over 5 years and an affordable housing need of 143 dwellings over 5 years. At present, the development commitments and draft allocations will not meet this housing need. An allocation for residential development at Land at Parsonage Road would contribute to meeting both elements of Long Ashton's housing needs. Attached is: Red Line Plan: Yanley Lane [Parsonage Road] Site Outline A1_C & Parsonage Road Indicative Masterplan Long Ashton Neighbourhood Plan: The site is designated in the Long Ashton Neighbourhood Plan (adopted in 2015) as part of the Area of Separation from Policy ENV1. Notwithstanding the fact that the Neighbourhood Plan is now out of date, as discussed above the release of this land from the Green Belt would not lead to any reduction in separation between Long Ashton and Bristol. Sustainability Appraisal: The site has been considered as part of the Council's Sustainability Appraisal, against the sustainability objectives, however it does not appear that this has been carried out accurately. Below are some of the highlighted assessments, and the issues that relates to them. "SA objective 2.1: Boost housing delivery and meet the housing need identified within the plan period. Negligible (0)			

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					All sites are recorded as having a negligible effect in relation to this SA objective.” This does not reflect the shortfall in housing that North Somerset is faced with, not does it reflect the housing need in Long Ashton that the Council accepted at the planning appeal referred to above. “SA objective 2.2: Deliver affordable or specialist housing where it is most needed to meet the needs of North Somerset’s population. Significant Positive (++) The site is not located in an area with identified need for affordable housing (as per the Barriers to Housing and Services IMD domain)” Similarly to the comments on SA Objective 2.1, there is demonstrably an identified need for affordable housing within Long Ashton. The Council accepted this as part of the planning appeal referred to previously and this positive position is seen as helpful. “SA objective 2.3: Achieve reasonable access to a wide range of community, educational, town centre and healthcare facilities. Significant negative (--) The site is located more than 720m from the nearest town, district or local centre” The site is in a highly accessible location and this score does not reflect that.			
Policy LP5: Housing, employment and mixed use allocations	No	• Positively prepared • Consistent with national policy	Yes	No	Land to the North of Rectory Farm, Yatton Persimmon Homes Severn Valley controls Land to the North of Rectory Farm, Yatton. The site is located on the west of Yatton, between the Strawberry Line and the existing built form of Yatton. It comprises approximately 33 acres of predominately flat, greenfield, agricultural land. It is bound to the north by agricultural fields, to the east by residential development, to the south by farm buildings and agricultural fields. Since the last representations on this site were submitted at earlier stages of the Local Plan, an Outline planning application (ref: 23/P/0664/OUT) has been taken to appeal. Following a planning inquiry taking place during September 2024 and January 2025, on 18 March 2025 the appeal was allowed by the Inspector, granting planning permission for 190 dwellings. These representations should be read alongside the associated documents submitted as part of the planning application. For the sake of ease, the Illustrative Masterplan (Ref; edp7842_d003-G) and Design & Access Statement (edp7842_r001 Part 1 to Part 5) have been included within this submission along with the appeal decision of April 2025 (ref: APP/D0121/W/24/3343144). Land to the North of Rectory Farm is proposed for an allocation in the North Somerset Local Plan for up to 190 dwellings. As has been set out previously in the Company’s representations, North Somerset Council is faced with a significant housing requirement and is presently showing a significant shortfall in supply without any sign of rectification. This is a situation which must be resolved promptly through the delivery of housing at sustainable locations such as Rectory Farm (North) Yatton. This representation is a positive response to this issue: the Land to the North of Rectory Farm and its planning permission set out that the site is sustainable and deliverable. Allocation of Land to the North of Rectory Farm, Yatton for 190 dwellings would make a significant contribution to addressing this shortfall – supporting the growth of the town through its prompt development. The scheme also provides 50% affordable homes. The site immediately abuts the settlement boundary along the site’s eastern	It is requested that: - Land to the North of Rectory Farm, Yatton be allocated for up to 190 homes.		230324~2.PDF 230324~1.PDF d003-G.PDF 230324~4.PDF 230324~3.PDF 230325-5.PDF Decision.pdf

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					edge. Development at Land to the North of Rectory Farm would be well connected to the existing settlement and key transport nodes, including Yatton train station; which offers frequent services to Cardiff and Taunton, with Bristol Temple Meads a 15 minute train journey away. It should be recognised, that the Government is supportive of development at and around train stations given the inherent sustainable transport benefits of this planning approach – seeking increased densities. In supporting this, the attached illustrative masterplan presents suitable access points through Shiners Elm and Rectory Farm connecting this new site to the established built form of Yatton. Turning to the wider suite of documents submitted as part of the planning application, issues of flood risk have been considered and options identified to mitigate its impact to acceptable levels. Whilst the site falls within Flood Zone 3, it is an area of land benefitting from flood defence. The flood risk and drainage documents set out that suitable mitigation measures are possible so to ensure that the site is safe developable. The Inspector carefully considered these and other matters in allowing the appeal. The planning decision is subject to Judicial Review to be heard early in 2026. Notwithstanding this pending process, the Council should duly allocate this site for development noting that it still has planning permission and can be classed as a commitment.			
Policy LP5: Housing, employment and mixed use allocations	No	• Positively prepared • Consistent with national policy	Yes	No	The Policy and Local Plan text should be amended to incorporate the following site: Land at East Portishead Persimmon Homes Severn Valley controls Land East of Portishead, which extends to approximately 85 acres of land. It is located north of the Portbury Hundred with Wyndham Way roundabout at its South Western corner and Sheepway crossing the site from the south west to the north east. The disused railway line, which is proposed to be re-opened, runs east to west across the northern boundary of the site. The site directly abuts the settlement boundary, with existing residential development to the west and land to the east that is predominantly agricultural. This is to be read in conjunction with the following documents: Land East of Portishead Vision Document - March 2025 Framework Masterplan (edp7522_d011-A) Opportunities & Constraints Plan (edp7522_d011-A) Grey Belt Appraisal – March 2025 Ecological Constraints and Opportunities Report (ref: 1564B-ECOR-RP) Affordable Housing Needs Report (January 2024) Transport Note – March 2025 Flood Risk & Drainage – Outline Strategy – March 2025 By way of background, the site was presented at the Regulation 18 Consultation in early 2022 – in support of the need to deliver new homes to meet housing need, and in the previous Regulation 19 consultation. The site is again promoted through the Regulation 19 Local Plan.	It is requested that: Draft Policy added to allocate Land East of Portishead for residential development for u up to 650 dwellings. Schedule 1 be amended to reference the site. Draft Policy SP7 be amended to release Land East of Portishead from the Green Belt for residential development. The Plan is amended elsewhere to reference the inclusion of the site.		EDP752~2.PDF EDP752~1.PDF P25-05~1.PDF AHNREP~1.PDF 1564B-~1.PDF LANDEA~1.PDF EDP752~3.PDF PORTIS~1.PDF

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					In support the following information is presented to inform discussions about omission sites which will need to be discussed in response to meeting promptly the identified need, responding to those sites which it is considered are not deliverable at the rate or quantum identified in the draft plan, and responding to the positive sustainable benefits of delivering new housing at Portishead. When set within the context of the draft Local Plan, it is noted that urban regeneration is planned as a means of delivering a significant proportion of the town's overall allocation for housing. However, even with the houses proposed, this sustainable town is not receiving an appropriate proportion of the homes required. Green Belt: As is the case with all of the land around Portishead, the site forms part of the Bristol and Bath Green Belt, which was designated as such in the 1950s. Land within this part of the Green Belt was not designated for its landscape importance, but to restrict urban sprawl and promote the optimisation of existing urban sites. Portishead has undergone significant urban regeneration in recent decades, particularly around Portishead Marina. Following this, there are now limited opportunities for Portishead to accommodate any substantial housing growth without Green Belt release. With this level of urban development in Portishead, it is clear Green Belt around Portishead has served its purpose in assisting urban regeneration. The sixth Strategic Priority of the draft Local Plan seeks to address the decline in Portishead's town centres, but this cannot be achieved through further urban regeneration, as there simply is not sufficient deliverable brownfield land available. The attached Grey Belt Appraisal concludes that the site should be classified as Grey Belt. This is subject to technical considerations which, as demonstrated by the Flood Risk & Drainage Outline Strategy, can be suitably addressed. Having regard to the Green Belt Assessment undertaken for the Council and in reviewing it against the purposes a, b and d, the company's site is not considered to contribute strongly to those purposes. The assessment references heritage issues (associated with unscheduled monuments – which include a cold war subterranean fuel pipe) and flood risk concerns as contraints – which are not considerations for the purposes of assessing the land. The Grey Belt Assessment undertaken for the Company does not come to the same overall conclusion – but both assessments point strongly to its careful evaluation as Grey Belt. However, site should therefore be released from the Green Belt and allocated for development. It is necessary to release land from the Green Belt around Portishead to accommodate the level of growth that North Somerset is required to meet over the plan period. When set within the context of the draft Local Plan, it is noted that urban regeneration is planned as a means of delivering a significant proportion of the town's overall allocation for housing. However, even with the houses proposed, the town is not receiving an appropriate proportion of the homes required. Sustainability: Within the draft Local Plan there is a fundamental flaw in that there is no clear settlement hierarchy. While there is a town centre hierarchy, this relates exclusively to town centre uses and does not set out the foundations or context for a spatial planning and development distribution.			

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					The site is within the Environment Agency designated Flood Zone 3 but benefitting from flood defences with a 0.5% Annual Exceedance Probability. The appended Flood Risk & Drainage – Outline Strategy, prepared by Rappor, sets out that development of the site would be acceptable from a flood risk and drainage perspective. Portishead benefits from having four primary schools and one secondary school within the town. St Katherine's secondary school is also located 5 miles from Portishead to the East of Pill with Clevedon School also around 5 miles away from the town to the South. As well as schools, Portishead also benefits from at least four nurseries and pre-schools for children under school age to attend. It is contended that taking a development of say 550 homes, the town has sufficient capacity in childcare, primary, secondary and post-16 places to meet the such a development's needs. As well as employment offerings in the form of the retail, food and drink establishments in the town, there are also a number of employment areas and large scale employers in the town. Employment in the town includes the Avon and Somerset police headquarters as well as a number of businesses operating from business parks such as those at Harbour Court, Gordano Court, Kestrel Court and Middle Bridge Business Park. Portishead benefits from two health centres in the form of Portishead Healthcare Centre and Marina Healthcare Centre. These two health centres are complemented by a pharmacy within the town. Additionally, there are some 10 dental practices operating in the town. The town has a good retail offer. It in, which includes a number of large supermarkets such as Waitrose, Sainsbury's, Aldi and Lidl as well as a number of smaller convenience supermarkets such as Co-op and Tesco. The town's high street is thriving with a good mix of national chains and local independent shops and service providers. A number of the major banks also have a presence within the town. The town has a low vacancy rate as a reflection of its vitality and viability. Outside but close to the high street is a retail park (north of Wyndham Way) which includes a mixture of convenience and comparison floorspace with a drive-thru restaurant. Portishead is well served by sports and leisure facilities, with the Parish Wharf Leisure Centre located in Portishead that is open all year round. It offers to the public a gym, workout classes, a swimming pool, family swimming pool, soft play and a crèche. Other leisure facilities operate across the town. The town benefits from a number of public open spaces, which include children's, play areas and playing fields as well as parks with formal walking routes. Such areas include the Portbury Wharf Nature Reserve to the East of the town, which offers the community access to walks in the countryside on the edge of the town. There are also at least eleven children's play areas reasonably distributed throughout the town – and with the more recent developments of the Vale and Village Quarter providing complementary provision with MUGAs and play parks. The Draft Local Plan's Proposals Map for Portishead identifies the town's central urban area as the major location for change – around Wyndham Way. Supporting this is the reinstatement of a train service to Bristol – for which work along the track has commenced with opening planned for 2028. The new train station is planned to be built close to the eastern edge of the town			

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					at the junction of Phoenix Way and Quays Avenue. Government planning initiatives are moving towards focusing development close to train stations. It can be readily seen that Portishead is a major town in North Somerset – and would be set high in a district settlement hierarchy. And rightly so, it was one of the fastest growing towns in Europe in the first part of the 21st Century and is suitably positioned next to the urban area of Bristol, the employment areas around Royal Portbury Dock and Avonmouth/Severnside. Returning to the Council's Sustainability Appraisal (SA), November 2023, we have considered the promotion site against the objectives of the SA. It is reasonable to expect that the site delivery of development will deliver overall positive sustainable benefits – supporting a sound Local Plan strategy. "SA objective 2.1: Boost housing delivery and meet the housing need identified within the plan period. Negligible (0) All sites are recorded as having a negligible effect in relation to this SA objective" As set out elsewhere in the Company's representations, the draft Local Plan does not meet its actual housing need. The allocation of this would be a "significant positive" in assisting the Council in meeting its housing need. "SA objective 2.5: Achieve healthy living opportunities promoting good access to healthcare centres, open spaces, Public Rights of Way, walking and cycling opportunities, and outdoor leisure activities. Significant positive/Significant Negative (++/--) The site is within 720m of at least one healthcare centre, one type of open space, one Public Right of Way, one cycling route and one indoor/outdoor leisure facility and/or the site is of a scale (very large or large, see Table B.3) that potential development would deliver significant new green infrastructure and connectivity" The score for this objective has been given as both "significant positive" and "significant negative". If it is intended to have both scores, it is not clear for what reasons the "significant negative" applies. In any event, this site does not meet the criteria for "significant negative". "SA objective 3.2: Minimise vulnerability to tidal fluvial flooding, without increasing flood risk elsewhere. Also minimise surface water flood risk and harm to water quality and availability. Significant negative (--) More than 60% of the site is within Flood Zone 3a or 3b" The site benefits from existing flood defences, providing protection up to and including the 1 in 200-year flood event. On site mitigation measures to ensure the development is safe for its lifetime are possible and would be detailed in any future planning application. The scoring against this objective does not reflect the flood defences which the site benefits from. "SA objective 3.3: Reduce the need to travel by car to minimise environmental impacts of unsustainable forms of travel, including transport			

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					related carbon emissions and air pollution. Ensure good access to infrastructure that promotes travel by active modes (walking and cycling). Minor positive (+) The site is more than 1.8km from a railway station but it is within 450m of a bus stop and cycle route” The site will be 800 metres from the Portishead railway station, which is due to open in the next three years. “SA objective 3.6: Protect and where possible enhance biodiversity, geodiversity and green infrastructure and allow for its adaptation to climate change, particularly with respect to protected habitats and species. Minor negative (-) The site is within 250m of a locally designated site. The site is within zone B or C for the North Somerset and Mendip Bats SAC” Aside from Zone B/C of the SAC, the site does not sit within any other ecological designation. The site will be required to deliver a minimum of 10% BNG and the appended Ecological Constraints and Opportunities Report sets out the range of opportunities that the BNG can be created – reflecting a positive response. Affordability: When compared against national averages, it is clear that Portishead is particularly affected by an affordability crisis. Figure 1 below presents the change in median house prices over time, with the gap between Portishead and the national average consistently widening over time. Below, sets out 2025 (March) median house prices for Portishead on a constituency basis (source: House of Commons Library): Portishead Redcliffe £455,000 Portishead South £400,000 Portishead Central £352,500 England and District data below taken from GOV.UK: England £291,000 North Somerset £313,487 In North somerset alone, between March 2024 and March 2025 house prices rose by 5.1% When contrasted against the figures for North Somerset, it is apparent that this increase in houses prices cannot be solely attributed to North Somerset’s district-wide housing availability problems. Instead, Portishead’s house prices have increased at a rate greater than that of North Somerset, suggesting there is also a localised issue of housing availability in Portishead which is driving prices onwards. Housing Supply: At the Regulation 18 stage, Portishead was identified through the Preferred Options Evidence Base as one of the most sustainable settlements in the authority area. At that stage, only five sites were allocated for residential development in Portishead, with four in urban areas outside of the current Green Belt and one put forward for Green Belt release. At Reg 18 consultation, it was raised by the Company that this was not a sufficient level			

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					of housing growth. Further housing growth is now planned – with 1601 homes identified. Windfalls are anticipated to contribute 7% of the housing in the district over the Plan period. The Local Plan tells us that sufficient housing sites have been identified, however, there are doubts over how robust or sound these are and therefore whether they will deliver development to satisfy needs promptly. Compounding this is the draft Local Plan making no meaningful reference to the unmet housing need of Bristol. Bristol's Local Plan is undergoing Examination and a key challenge being grappled with is meeting its unmet housing need. Concerns have recently been reported by its Inspectors noting a significant shortfall in meeting overall needs. The figure of 34,650 homes was not considered sound with an increase of some 5000 sought at this time. An unmet housing need figure is also sought by the Inspectors. The unmet housing need figure is to be confirmed by Bristol City Council but previously it equated to some 10,400 homes. North Somerset Council should still engage positively with neighbouring local authorities in delivering new development to meet identified needs – and to resolve issues associated with unmet need. While North Somerset Council is not obliged to address unmet need, given the draft Local Plan and the evidence base that supports it, it is not clear that North Somerset Council have used reasonable endeavours (alongside other authorities) to identify any land that could accommodate a share of this shortfall. Not only is land East of Portishead suited to meet existing identified needs now, it is very well positioned spatially to Bristol, and its connectivity with Bristol will only improve through reinstatement of the trainline from Portishead to Bristol Temple Meads in less than 3 years. And so, sites sufficiently proximate to Bristol are considered suitable and reflects a sensible approach to town planning. An allocation of Land East of Portishead for circa 650 dwellings will provide a significant contribution to North Somerset Council's housing supply and Bristol's unmet need. Sensibly, there is therefore a need to identify residential allocations well related to Bristol. Portishead is capable of accommodating more than 7% of the district's housing requirement given that it is the second largest town in the district and has seen growth is services, facilities and infrastructure over recent years. The town should be a focus for development. Affordable Housing: Drawn from bespoke work on behalf of Persimmon Homes, consultants, Pioneer have produced an Affordable Housing Need Report, January 2024 submitted alongside accompanying representations. It makes clear that there will be a shortfall in affordable housing across North Somerset an across many settlements unless there is a policy shift towards delivering more housing overall. For Portishead, a shortfall is predicted – some 221 units set against deliverable affordable housing between 2024-2039 based upon planned housing distribution/allocations based upon the Dixon Seale viability outcomes. Neighbourhood Plan: The Portishead Town Neighbourhood Plan (NP) was 'made' 19 September 2023 with the plan's eastern boundary extending broadly around the urban area. The NP broadly prioritises brownfield development – a component of the NP's Vision. Reflecting this is the area of Wyndham Way, as identified in			

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					the NP and within which, 'Old Mill Road', a centrally located industrial park is identified for mixed development in the adopted Local Plan. In the Reg 19 Consultation, that area is within an extended area falling under draft Policy LP17: Wyndham Way – which, simply put, proposes higher density mixed growth through regeneration. Supporting that regeneration is a North Somerset Council-led initiative (including ABRDN plc and local stakeholders). That initiative resulted in a Wyndham Way Study Consultation with a masterplan consulted upon during Autumn 2022. What should be noted is that the masterplan places significant emphasis on higher density housing – as there is insufficient space to provide family homes set around a mixed development including light industry, studio and workshop space so making it suitably sustainable. In light of the need for land assembly, comprehensive site planning and phased development, it is highly questionable that this level of regeneration could be delivered in good time and certainly as the Council anticipates – as reflected in the Local Plan's evidence base. It follows, therefore that the plan should follow a realistic, robust and ultimately 'sound' spatial strategy. In accommodating housing need and that to include a mixture of housing types rather than flatted development in a sustainable location it makes sound planning sense that a suitable deliverable site is identified. It should accommodate an attractive, well planned, mixed development that can complement any regeneration initiatives in the town			
Policy LP9: Extent of the Green Belt	No	‣ Positively prepared ‣ Consistent with national policy	Yes	No	The policy should be amended in light of the information supporting in the representations by the Company to include land at Portishead and Land at Long Ashton.	The policy be amended to state: "… 1. Release of land from the Green Belt to accommodate residential development at the following locations: - Land at East Portishead - North of Festival Way, Long Ashton …"		
Policy LP15: Local Green Space	No	‣ Positively prepared ‣ Effective ‣ Consistent with national policy	Yes	No	The Policy lacks clarity. It would be helpful so to make it effective with text stating "Any development permitted must have very strong justification, be ancillary to and directly related to the particular LGS, would enhance its role and function; be very small scale relative to the open area, and sensitively sited and designed" be woven into the text of the policy.	It is requested that Policy LP15 has further text introduced to state: "Any development permitted must have very strong justification, be ancillary to and directly related to the particular LGS, would enhance its role and function; be very small scale relative to the open area, and sensitively sited and designed".		
Policy LP20: Wyndham Way	No	‣ Positively prepared ‣ Justified ‣ Consistent with national policy	Yes	No	To be clear, a Wyndham Way Consultation Plan underwent public consultation in 2022 and comments were made to the consultation by the Company. Both support and concerns were raised as part of the consultation. It was recognised that the town should and can accommodate further development. We consider that development on the periphery of the town at East Portishead is suitable for development. As part of comments to the Wyndham Way Study Area consultation was reference to the document's status. It was not presented as SPD nor as a Planning/Development Brief. In the consultation document it was said to be part of the evidence base for the Local Plan. This raises questions as to the weight attached to it, levels of reliance and referencing in the Local Plan. Simplified, the allocation provides for high density living – flatted development with, in certain locations, alternative ground floor uses. This approach does not reflect national planning policy which promotes a mixture	The Local Plan policy and supporting text should be amended to clarify the status of the Wyndham Way Framework Study and therefore its use and the weight attached to it. The Local Plan should also consider whether the number of new homes is realistic and would amount to a mixture of new homes rather than predominantly flatted development.		

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					of home and tenures. That is not to say that flatted development should not form part of a mixed development, however: 1.Delivery will require land assembly - so there must be buy-in by landowners to ensure that the development is appropriately planned 2.The scheme does not appeal to deliver a mixture of house types to meet needs – and so alternative sites should be identified 3.The Policy states that development should “adhere to…. Consideration of the impact on infrastructure such as schools… etc”. Such a statement is not precise as, surely, in allocating the site, due consideration would have been given to these services and facilities and any significant impacts. The same can be said about considering the proposed railway and its impact. Therefore, as it stands the policy does not appear justified in being based upon evidence, nor consistent with national policy.			
Policy LP20: Wyndham Way	No	• Positively prepared • Consistent with national policy	Yes	No	The company objects to the provisions of this proposal in that it is imprecise. It sets out a list of principles that apply to all proposals. The Policy should assist the user advising whether these requirements in part or full relate to both full and outline applications. In both instances, the provisions of the policy are unduly onerous. The Policy should be rewritten explaining that which is relevant to outline and full applications. In being rewritten it would be more effective. The level of detail provided is unduly onerous with policy test requirements relating to all aspects of design. It would be more reasonable for a Design and Access Statement to address the key design and function considerations. Reference too to management plans being “…submitted for the long term maintenance of all shared public and private spaces and facilities including public art, private drainage installations and SuDS and services that the developer intends to provide instead of the council.”. Whilst in some cases, indications of potential routes to site and facility management can be provided, given the protracted timescales and evolution post-submission of some development proposals, such accurate management information may not be readily available. A level of flexibility would therefore be a helpful response and should be incorporated into the policy wording.	The Policy should be rewritten to explain fully to which applications it applies.		
Policy DP1: High quality design	No	• Positively prepared • Consistent with national policy	Yes	No	The company objects to the provisions of this proposed policy in that it is imprecise. It sets out a list of principles that apply to all proposals. The Policy should assist the user advising whether these requirements in part or full relate to both full and outline applications. In both instances, the provisions of the policy are unduly onerous. The Policy should be rewritten explaining that which is relevant to outline and full applications. In being rewritten it would be more effective. The level of detail provided is unduly onerous with policy test requirements relating to all aspects of design. It would be more reasonable for a Design and Access Statement to address the key design and function considerations. Reference too to management plans being “…submitted for the long term maintenance of all shared public and private spaces and facilities including public art, private drainage installations and SuDS and services that the developer intends to provide instead of the council.”. Whilst in some cases, indications of potential routes to site and facility management can be provided, given the protracted timescales and evolution post-submission of some development proposals, such accurate management information may not be readily available. A level of flexibility would therefore be a helpful response and should be incorporated into the policy wording.	The Policy should be rewritten to explain fully to which applications the principles apply. Reference to management plans being “…submitted for the long term maintenance of all shared public and private spaces and facilities including public art, private drainage installations and SuDS and services that the developer intends to provide instead of the council.” requires rethinking. Whilst in some cases, indications of potential routes to site and facility management can be provided, given the protracted timescales and evolution post-submission of some development proposals, such accurate management information may not be readily available. A level of flexibility would therefore be a helpful response and should be incorporated into the policy wording.		

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Policy DP5: Climate change adaptation and resilience	No	• Positively prepared • Consistent with national policy	Yes	No	The provisions of this policy are unduly onerous and unreasonable. The requirement for a climate change adaptation statement places an unreasonable burden on applicants and also, ultimately, officers the latter who are charged to determine planning applications within their statutory periods. Flood Risk Assessments coupled with Drainage Assessments provide evidence covering the provisions of this policy – and these are documents found normally in the Council's planning application checklist and expected to accompany planning applications as necessary. The Policy also lack precision. It references: - Avoiding areas vulnerable to 'increased' flooding. Such terminology is unclear to the user and so it is assumed only that this means areas that could, in the future, be liable to flooding. Clarification is necessary. - Measures mitigating high temperatures at building and site levels is something that can be achieved say through strategic planting and wider green infrastructure. It is unhelpful for the policy to use 'for example' in its wording – the policy should be drafted with more precision and clarity. - Not impacting air quality. Again this is a matter which matter for a bespoke air quality assessment undertaken as part of a planning application. - Nature-based solutions are again matters best addressed through technical reports on ecology, flood risk and drainage (and other relevant documents including the DAS).	That the Local Plan policy is amended responding to the following: - Avoiding areas vulnerable to 'increased' flooding. Such terminology is unclear to the user and so it is assumed only that this means areas that could, in the future, be liable to flooding. Clarification is necessary. - Measures mitigating high temperatures at building and site levels is something that can be achieved say through strategic planting and wider green infrastructure. It is unhelpful for the policy to use 'for example' in its wording – the policy should be drafted with more precision and clarity. - Not impacting air quality. Again this is a matter which matter for a bespoke air quality assessment undertaken as part of a planning application. - Nature-based solutions are again matters best addressed through technical reports on ecology, flood risk and drainage (and other relevant documents including a DAS).		
Policy DP6: Net zero construction	No	• Positively prepared • Justified • Consistent with national policy	Yes	No	Persimmon Homes is fully committed to reducing direct carbon emissions from our construction activities and indirect carbon emissions, from both operational energy use in the homes, and across our value chain. We already have in place near-term (to 2030) carbon reduction targets approved by the Science Based Target Initiative (SBTi), and have set long term NZC targets which are in the process of being approved by the SBTi. Supporting this we have developed our Net Zero Carbon Transition Plan and have a set a timeframe of 2045, with clear actions plans in place. Our vertical integration strategy with advanced timber frame manufacturing capability, and our own concrete brick and tile factory enables us to deliver homes which have lower carbon footprints than traditional builds. We welcome consistent policy direction which is achievable in practice, both in terms of cost benefit analysis and availability of technologies and materials at scale, thereby helping us deliver much needed high quality affordable homes and build sustainable communities. We are already delivering zero carbon ready homes for customers through replacing gas heating systems with alternative electric technologies such as air source heap pumps, and ensuring a fabric first approach with high levels of thermal efficiency through improved insulation and windows and doors. As the grid decarbonises, these non-gas heated homes will become zero carbon in use, and in addition solar PV roof systems can be installed onto homes to support levels of self-generation. Reducing embodied carbon across the value chain is a complex area and requires system level changes, technology advancements, and extensive collaboration. We have strong relationships with our supply chain and are	We would request that the proposed embodied carbon policy allows companies to undertake upfront embodied carbon assessments on core house types within a development, rather than having to undertake studies on every property and variation. Turning to Net Zero Operational Energy: residential, the policy should just refer to the Building Regulations (Pt.L) otherwise there will be confusion and conflict between the two. We refer to the above concerns relating to the embodied carbon levels.		

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					working collectively on sustainability initiatives and programmes. Specific to the draft policy on embodied carbon, the Company supports the requirement for an embodied carbon assessment to be submitted alongside applications, and for the methodology to be nationally recognised to ensure consistency, such as to the RICS professional standards and guidance - whole life carbon assessment for the built environment. We would not want this information coupled with other information supported by policies to place unduly onerous requirements on applicants. The proposed target: "- For developments of 50 or more dwellings the upfront embodied carbon emissions do not exceed 750kg CO2e/m2" is not fully justified as previously it was set at 900kg CO2e/m2 and should be reset to that. Turning to Net Zero Operational Energy: residential, the policy should just refer to the Building Regulations (Pt.L) otherwise there will be confusion and conflict between the two. Referring to a future SPD that has not been prepared is unreasonable as the content of that document is unknown.			
Policy DP8: Efficient use of land	No	‣ Positively prepared ‣ Consistent with national policy	Yes	No	The Company supports the efficient use of land. However, this must be set against placemaking and from a housing delivery perspective, providing new homes to meet the identified needs. It is noted that the higher densities are supported in centres and transport hubs. Such development should not be restricted to close proximity. It is not sensible for development to be restricted by an unjustified or unrealistically short walking distance. That is to say that a person may not walk a distance slightly less than the length of Portishead marina to reach a train station. Greater flexibility should be given the distance from a transport hub, notably a train station, where high density development is encouraged (and a presumption of development is given). The minimum density of development at 40dph would appear reasonable – where balanced against local context which could influence a site's capacity for development in both type and layout. The Local Plan should have regard to emerging national policy.	The Council should consider the benefits of higher density development around train station locations and consider that in the context of those settlements with and are soon to receive train services. This approach should be embraced now as opposed to waiting for a Local Plan Review.		
Policy DP9: Flood risk	No	‣ Positively prepared ‣ Consistent with national policy	Yes	No	The wording of this policy is unduly onerous. It should be considered against the outcome of a Judicial Review into the grant of planning permission for the development of up to 19 homes at Yatton - whereby sites can be found to be acceptable in areas of flood risk where mitigation makes them safe for users/ occupiers. However, for consideration at this time is that the Policy should align with NPPF and PPG in both being policy. It is considered that it does not meet that soundness test: - A defined area of search should be based on local circumstances and appropriate to the nature and scale of development and so seeking a district-wide site search is unreasonable – and so sensible, informed areas should be agreed between parties. - Suitable sites should be for the same use and deliverable concurrently. - The Policy should be explicit to reflect NPPF para 175 where if a development is shown to be safe and not increase flooding elsewhere – then a sequential assessment is not needed.	The policy should be redrafted to more fully align with PPG and NPPF policy as explained above. The area of search should be more considered, as should the application of sequential testing and matters of deliverability.		

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DP11: Rivers, watercourses and springs	No	• Positively prepared • Consistent with national policy	Yes	No	The company objects to the provisions of this policy which combine technical and design related matters and which duplicates and/or goes beyond other topic-based policies. Under separate legislation, development is not allowed to adversely affect watercourse water quality. It does not require additional planning policy as presented here. No indication is presented in respect of as to how improvements to watercourse corridors will take place when, for example, such corridors are in third party ownership.	The policy should be amended to recognise that technical reports supporting planning applications will cover the relevant and important issues. Improvements offsite can be challenging due to ownership constraints and so should be carefully referenced in the Local Plan.		
Policy DP12: Development in the Green Belt	No	• Positively prepared • Consistent with national policy	Yes	No	Reference in the policy's wording should refer to insetting rather than exclusion to align more fully with national planning policy. The wording to the policy referring to development "Outside of settlement boundaries…" should refer to those settlements in the Green Belt – for clarity. Turning to the development outside of settlement boundaries, infilling opportunities should not be so restrictive to prevent reasonable development proposals from coming forward where they relate to the neighbouring built form and, as such would constitute Grey Belt – which is not picked up in the wording. Sensible and sensitively planned rounding off of settlements can be readily achieved without creating incongruous additional development – particularly next to inset villages given that they do not contribute to Green Belt openness. The Council can simply apply design policies to ensure that new development is complementary and not out of place through poor planning and design. The Policy does not consider Grey Belt: its identification and policy considerations. This is a significant omission. The policy (or additional policy) should respond to this – set against the Green Belt Assessment work informing the Local Plan rather than staying silent. Grey Belt opportunities can deliver a number of new homes in sustainable locations and so should be considered fully - and set against a reappraisal of the spatial distribution of sites.	The draft policy should review opportunities on the edge of settlements that are inset in the Green Belt – particularly when set against the Grey Belt tests they are suitable to accommodate development going towards meeting, even in a small way, the Council's housing requirement.		
Policy DP14: Highway safety, traffic and provision of infrastructure associated with development	No	• Positively prepared • Consistent with national policy	Yes	No	The requirement for highway mitigation infrastructure to be delivered in an agreed timescale is unreasonable given the nature of development and the uncertainty of the planning process including the impact of other development that's permitted but not developed of under construction. Such a requirement for delivery may be a matter for discussion with the highways authority so need not be referenced in policy. Careful consideration should be given to the highways evidence – given that the strategic road network plays an important role in the deliverability of key development sites. By way of example, Stroud District Council's emerging Local Plan has stalled for years due to the Plan being Examined in advance of robust (agreed) highways infrastructure evidence being presented to inform site selection. Without that being accurately presented the draft Plan's allocations may not be sound.	That the Local Plan references the highways infrastructure reporting confirming that it is robust and sufficient to delivery the housing allocations in a timely manner.		
Policy DP15: Active and sustainable transport	No	• Positively prepared • Consistent with national policy	Yes	No	The provisions of this policy are unreasonable. It sets out a hierarchy or sequence which prioritises modes of movement. In the real world, such an approach is too regimented and lacks flexibility. Any requirement to mitigate for existing deficiencies in public transport unrelated to a development scheme should not be pursued through this policy. It is for the Council to prepare a sound Community Infrastructure Levy schedule should funds from development be directed to wider transport infrastructure requirements.	That the policy does not set out a travel hierarchy that is inflexible. Further, that the Policy refers to that which is covered through CIL or S106.		

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Policy DP35: Nature conservation	No	‣ Positively prepared ‣ Consistent with national policy	Yes	No	Requirements for maintaining and reasonably enhancing green infrastructure are acceptable but only where they are necessary and relate to the development proposed. The policy should provide further flexibility so that there may be circumstances where alternate or compensatory wildlife features are permissible – and that public rights of way can be diverted or stopped up where compensatory provision is available. Where the policy requests that green infrastructure provision or enhancement be made on site then such a requirement should be provided only where justified by evidence – and this should be added to the policy's wording.	The policy should provide further flexibility so that there may be circumstances where alternate or compensatory wildlife features are permissible – and that public rights of way can be diverted or stopped up where compensatory provision is available. Where the policy requests that green infrastructure provision or enhancement be made on site then such a requirement should be provided only where justified by evidence – and this should be added to the policy's wording.		
Policy DP35: Nature conservation	No	‣ Positively prepared ‣ Consistent with national policy	Yes	No	The Policy as drafted appears overly prescriptive and duplicates other policies which is unhelpful. Further, the reference to addressing principles within 'Building with Nature' is unclear as they are not expressed – nor does the Policy cater for a situation where 'Building with Nature' is no longer material given it is a voluntary framework.	That the policy be amended to add flexibility to the use of 'Building with Nature' given it is a voluntary framework.		
Policy DP37: Trees, Woodlands and Hedges	No	‣ Positively prepared ‣ Consistent with national policy	Yes	No	The provisions of this policy appear onerous and unreasonable. The type of tree pit design is dependent in part on the trees planted and it is reasonable to expect that tree pit designs are provided within an arboricultural report or landscaping report in response to a development scheme. It need not be presented in local plan policy. Turning to the equivalent of a minimum of one tree per dwelling being planted in gardens and community gardens appears excessive and adds further to costs associated with delivering new homes. Home owners have the ability to plant trees in their gardens. The policy requires trees in addition to those planted, say as screening or to bolster and improve existing planted areas – and again this appears excessive and unduly onerous. Tree maintenance and management would normally be dealt with through a management agreement outside of a planning application. This appears onerous – and it would be unreasonable for this to be policy amplified through a Trees and Woodland SPD the content of which is unknown. Further, this and other information requests will make the determination process even more complicated for applicants – and further work for planning officers tasked with determining planning applications within statutory timescales.	The Policy should be amended so that planting of a minimum of one tree per garden is deleted. Tree pit design should not be forced through policy – but simply proposed as part of a planning application. Tree management should also be outside of the application process.		
Policy DP38: Landscape	No	‣ Positively prepared ‣ Consistent with national policy	Yes	No	Factoring in and responding to landscape features is a key consideration in masterplanning. However, the policy should present clear guidance to applicants requesting that development respects the character of historic landscape as opposed to stating it will also "respond through masterplanning to the historic landscape ...etc" is a key omission and should be addressed.	The Policy should be amended to include reference to respecting the character of historic landscapes.		
Policy DP43: Affordable housing (including rural exception	No	‣ Positively prepared ‣ Consistent with	Yes	No	The affordable housing requirements are noted – and it is welcomes that the policy references viability tests where policy compliance may not be achievable. Clearly to meet the need that is identified, the Council should focus on delivering homes – by assisting applicants to achieve speedy decisions. The policy requirements for affordable housing including within the Green Belt should be based upon robust evidence and also reflect	The affordable mix of 75% social rented and 25% shared ownership is reasonable - however, the Council should make reference to the types of affordable provision such as first homes, affordable rent and other forms of equity share - and		

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schemes)		national policy			Government Policy. The affordable mix of 75% social rented and 25% shared ownership is reasonable - however, the Council should make reference to the types of affordable provision such as first homes, affordable rent and other forms of equity share - and reflect those options in the text of the plan.	recognise and reflect those options in the text of the plan.		
Policy DP46: Housing Type and Mix	No	‣ Positively prepared ‣ Consistent with national policy	Yes	No	The policy as drafted places unduly onerous requirements on the delivery of a mixture of new homes and which fails to consider fully the market. Further, in respect of adaptable homes, the quantum required covering a 5% requirement across both market and affordable homes is unreasonable and excessive – restricting the overall availability of homes. It would be more appropriate for the market homes to be required to meet the M4(2) standards only and capable of being subsequently adapted. The concern in providing 5%, homes could end up being unsold should there not be demand in a specific location.	The policy should be amended in response to the comments above. Inasmuch that in respect of adaptable homes, the quantum required covering a 5% requirement across both market and affordable homes is unreasonable and excessive – restricting the overall availability of homes. It would be more appropriate for the market homes to be required to meet the M4(2) standards only and capable of being subsequently adapted. The concern in providing 5%, homes could end up being unsold should there not be demand in a specific location.		
Policy DP49: Healthy Places	No	‣ Positively prepared ‣ Consistent with national policy	Yes	No	The provisions for health impact assessments should be set out in the plan and not left for consultation with the Council. Those discussions will take time and no doubt come with a charge – this is simply unhelpful and lacks clarity.	Health Impact Assessment requirements be set out in the Local Plan.		
Policy DP52: Protection of open space and recreation	No	‣ Positively prepared ‣ Consistent with national policy	Yes	No	The Policy as drafted should be amended to clarify that development on open space/recreation space will also be permitted where identified through a local plan allocation.	The Policy as drafted should be amended to clarify that development on open space/recreation space will also be permitted where identified through a local plan allocation.		
Policy DP53: Best and most versatile land	No	‣ Positively prepared ‣ Consistent with national policy	Yes	No	The Policy as drafted is too prescriptive in requesting that where residential development is proposed on land that is better quality it should be reserved for uses such as gardens and allotments. That may not be practicable from a design and layout perspective and therefore unhelpful in the maximisation of development densities. That requirement should be amended.	The policy be amended to recognise that in some circumstances development avoiding parcels of better quality land may not be practicable from a design and layout perspective.		
Policy DP63: Infrastructure delivery and development contributions	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Yes	No	The policy is onerous in that it requires that 'provision' will be required to meet 'shortfall' in education, health, sport, recreation, open space and community facilities and this requires explanation as such provision can also be supported through financial contributions – and so the policy does not differentiate sufficiently between use of CIL and S106 contributions.	The Policy should provide clarity in the use of CIL and S106 so to ensure that there is no overlap and so duplication/ double dipping is avoided. This will provide transparency for applicants where financial payments and/or contributions are applicable.		

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Land south of Nailsea	No	• Positively prepared • Consistent with national policy	Yes	No	North Somerset Council has a significant housing requirement. There is a need to deliver sustainable development promptly. There is also a housing supply shortfall which is significant and reflects a long-term persistent trend. Deliverable housing development is fundamental – and in allocating land for development it is essential that sites meet the quantum planned for over the Plan period. They should also plan for unmet need and the draft Local Plan is allocating development land albeit not in response to Bristol's unmet need. Transport evidence supporting the draft Plan recognises Nailsea as a settlement that benefits from a good level of access to local amenities, facilities and services whilst also having links to Bristol and its employment opportunities. Festival Way, a cycle route connecting Nailsea and the centre of Bristol, is "largely traffic-free" and would therefore have capacity for increased usage. Nailsea (and Backwell) also benefits from its train station with regular local services to Bristol and Weston-super-Mare. Whilst the Land South of Nailsea allocation is supported in principle, it is clear that adequate and well-planned access arrangements are required for it. Means of access should respond to the need for safe and convenient movement to services and facilities that will support the success delivery of the new homes and embrace sustainable planning and design principles. The draft Local Plan recognises at Schedule 1 that access is important for this allocation (and so its soundness). The Company recommends an amendment to the draft Local Plan (in the relevant policy and text) that includes reference to the use of an access at the junction of The Perrings and Youngwood Lane. The Company controls land south of the The Perrings along Youngwood Lane. Appended to these representations are access drawings options (Drawing Ref: P22-0470-SK01 and P22-0370-SK02) that illustrate options for access to the draft allocation site from Youngwood Lane. The scheme as shown illustrates how readily achievable a new access can be delivered to support development connectivity and permeability. The two drawings set out that there are multiple options for an access taken from this junction, which could facilitate a foot/cycleway alongside the road or the road could serve a bus. The inclusion of this route as part of the allocation would support a number of the draft Local Plan's strategic priorities, including encouraging sustainable modes of movement; reducing car usage, encouraging walking and cycling and enhancing health and wellbeing. Providing access through the Company's land at the junction of The Perrings and Youngwood Lane and to this additional land presented for inclusion within the South of Nailsea allocation will enable better, more connected new development to be delivered on the edge of the town. See attachments: P22-0470_SK01_Access and P22-0470_SK02_Access	That the allocation and supporting text in the plan reference the use of the junction of The Perrings and Youngwood Land as a means of improving connectivity and sustainable movement.		P22-04~2.PDF P22-04~1.PDF
Land west of Winterstoke Road	No	• Positively prepared • Consistent with national policy	Yes	No	Whilst the plan is considered unsound - Land west of Winterstoke Road is supported and information is presented with this representation.		Persimmon Homes Severn Valley controls land at Land at Woodspring Fields. The land is situated within the settlement boundary of Weston-super-Mare (and is also known as "Woodspring Fields"). It is bounded in part by Weston-super-Mare FC's grounds to the north, Winterstoke Road to the east, a	WSMWOO~1.PDF DRAFTS~1.PDF C23167~2.PDF C23167~1.PDF WOODSP~1.PDF

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							rhyne leading to an industrial premises to the south and railway line to the west. The site extends to approximately 5.5 ha. It is predominately level undeveloped land. The site is allocated for residential development in the adopted North Somerset Local Plan. It has been consistently retained as a proposed allocation in subsequent drafts. In the draft Local Plan the site is identified as “Land to the west of Winterstoke Road, Weston-super-Mare” with capacity for 134 homes. The retention of this proposed allocation is supported. In supporting further this allocation the following information is submitted to illustrate how the site could be developed: • Revised Draft Layout Plan 001 RevA (for illustrative purposes) incorporating a repositioned 9v9 football pitch • Red Line Plan A0-C • Access Appraisal & Appraisal Options (Apex Transport) • Flood Risk Due Diligence Assessment (Rappor) The land offers an excellent location for new residential	

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							development. The density presented in the Draft Layout Plan on a gross basis is around 22 homes p/ha noting that the site features including trees, hedgerows and rhynes (with maintenance strips) and a playing pitch. Ready access is available for vehicles and pedestrians from Winterstoke Road – and to bus services. For the most part the site is situated within defended Flood Zone 3 – however flood mitigation through technical solutions can be delivered and the site can come forward for development. Recommendation It is requested that: Land at Woodspring Fields is retained as a housing allocation capable of accommodating up to 134 new homes.	

Name: Marcus Ribbon-Miles **I.D:** 62773633

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Consistent with national policy	Unsure	Unsure	I attend Backwell School and do not understand why there is a suggestion to build here on Grade 1 agricultural land. We need to be able to feed ourselves now and in the future. Please do not allow this to go ahead and destroy this ability! We have all seen the impact of the geopolitical world on food imports and exports and scarcity needn't happen in this country if we safeguard our farmland. I am also concerned for the wildlife that inhabits these fields and hedgerows and the bats that also use these fields to forage over. The knock-on effects for local biodiversity is awful. Backwell is already allocated 800 new houses which will have a huge impact on the community in a massive scale and there has been no agreement to improve services or money put forward by the developers to create a useful bypass (which would actually need to rnu from Lond Ashton to the North of Nailsea to benefit the area). I walk along Station Road every day to school and it is already dangerous. I have seen lots of friends have near misses with cars and lorries. Please do not approve any more building for Backwell. We have got more than our fair share of new houses.			

Name: Margaret Anne Hughes **I.D:** 40001089

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Churchill Avenue	No	• Positively prepared • Justified • Effective	Unsure		NSC have not considered the high risk of flooding in this open area is built on. Access will not be easy. The Air ambulance uses this area in emergencies, when needed, and this would not be possible if the area is built on, which would put lives at risk. The area is a valuable place for wildlife and environmental studies. It is a haven in a large built up area, and of value to local families.			

Name: Margaret Beaumont **I.D:** 62864225

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	1. Backwell dates back to at least the Iron Age (Backwell Hillfort) and was documented in the Domesday Book in 1086 as 'Bacoile'. Its church dates back to the 13th century. The character of Backwell would be destroyed by the proposed developments resulting in an 80% growth in Backwell's population. 2. Backwell already has 800 new houses approved, a 40% increase for the village. These additional numbers would lead to complete overdevelopment. 3. The proposed road would not effectively serve Nailsea's traffic or relieve congestion on Station Road, Backwell Common, or Chapel Hill. Engineering the road under or over the railway would be highly expensive and possibly unfeasible. 4. Despite this increase, there is a deficit in school places and no investment in health services or leisure facilities. For example, the GPs' surgery operates from a small bungalow, with no parking available for patients except for a few spaces outside the practice on the main A370 road. 5. Backwell's lack of infrastructure and services cannot support another 1,000 houses. 6. Backwell is allocated a higher number of houses than any other village in North Somerset, and an even higher growth percentage than towns in the region. Backwell is expected to take 7% of the district's housing allocation, compared to Clevedon's 2%. 7. There is no needs or viability analysis for an extra 1,000 houses. 8. Backwell is not an employment hub, most residents commute. The carpark at Nailsea & Backwell Railway Station is currently full to capacity on weekdays. Where will a further 1,000 rail commuters park? A local link bus was tried some years ago, but was found not to be viable. 9.. The current bus service from Nailsea & Backwell Station to Bristol is every 70 minutes and has to be a single-decker to pass under the railway bridge on Station Road. 10. The proposed development s are on Grade 1 Agricultural Land, currently used for food crops and grazing cattle. There is only 7% of this high quality land left in the whole of North Somerset. 11. Government policy states that "we must protect our best and most versatile land" to safeguard food security. The proposals contradict this policy and undermine food security. 12. Development would destroy valuable wildlife habitats and further harm biodiversity in one of the world's most nature-depleted countries. 13. The Infrastructure Delivery Plan lacks analysis and costings, and there are no funding guarantees for the new road or services. 14. Backwell Common and surrounding areas are prone to well-publicised flooding, particularly around the railway line, which would be aggravated by more housing. 15. Concerns regarding the strategic growth location designation include the impact on the area's character, the loss of Greenbelt and high-quality agricultural land, the risk of flooding, and uncertainty over whether the highly controversial road can be permitted, funded and delivered on time to support the proposed housing. 16. Backwell Lake (Wessex Water's balancing reservoir) and adjacent fields, where the new roads and housing is planned and are on a floodplain, which floods regularly. 17. Government policy requires 50% affordable housing on Greenbelt Land, but this reduces the funds developers contribute towards infrastructure. 18. The sheer volume of growth with the required investment in infrastructure and services over such a short period is destabilising, unsustainable and undeliverable. Housing construction companies estimate that they will construct 80 houses per year, meaning an 11-year development to the north of the A370 main road. 19. The railway station is not fit for purpose as a transport hub; it remains inaccessible for people with mobility issues and presents serious challenges when travelling with young children. Wheelchair users travelling from Bristol and wishing to alight at Nailsea & Backwell Station currently need to continue on to Yatton and travel back to Nailsea & Backwell in order to descend on the ramp from the north side of the platform. There is no access or egress by wheelchair from the south side of the station owing to steep steps both on a bridge over the line and down from the platform to Station Road.			

Name: Margaret Davies **I.D:** 58578177

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	Unsure		No	Unsure	I don't consider that north somerset council have utilised all brown field sites to be able to justify taking a recently added greenfield site,only added in the late 1980 's due to a high ecological value ,a value which has not changed , a greenfield site which is next to a SSSI , a small buffer zone would not protect these precious woods from being destroyed, there seems to be no consideration of the effect of the noise and light pollution would have on this area. Also the access would be down one road, by a school which already gets very congested at times, I'm surprised that there has never been a serious accident already, to put more cars in the area is a disaster waiting to happen, so the site cannot provide safe or suitable access. The company which has the land, has said it's in easy walking distance of the train station, which does not yet exist and the local shops, they have obviously never tried to walk it and are only looking at a map, quite the fairy story. The high street is always congested and to put another 500 plus cars a day into the mix is not in my opinion viable. The housing that Portishead is really in need of is smaller starter homes, close to the local amenities, for local people, not large expensive homes which is what these would probably be. National planning policy also states that Green Belt changes can only been made in exceptional circumstances, which these are not, I believe there is no justification for the council to allow this develpoement to proceed.	To remove Tower Farm completely from the document		
Black Rock, north of Clevedon Road	No	‣ Justified ‣ Consistent with national policy	No	Unsure	This area is already a buffer between the road and Weston Big Wood, any development in this area would seriously undermine the viability of the wood, an area of SSSI and as such was added to the Green Belt in the late 1980's and cannot justifiably be removed after such a short time, when nothing has changed. National planning policy allows changes only in exceptional circumstances, which these are not, there are plenty of other brown field sites around the wider area, especially Clevedon. Portishead has had so much development over the last 20 years that the road infrastructure is a breaking point.	To remove Black Rock from the Local Plan.		

Name: Margaret Hawes **I.D:** 62773985

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Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	There are already 800 new houses approved in a village of 2000 houses. These additional numbers would lead to complete overdevelopment. The proposed road would not effectively serve Nailsea’s traffic or relieve congestion on Station Road. There is a lack of school places and no investment in health services or infrastructure. Backwell has been allocated a higher number of houses than any other village in North Somerset. 7% of the districts housing allocation as opposed to Clevedon 2%. Grade 1 agricultural land will be used for building development. There is only 7% of this high quality land left in the whole of North Somerset - this is against Government policy.Backwell Common and surrounding areas are prone to flooding and Backwell Lake and adjacent fields are on a floodplain. This is where the new roads and housing is planned. The railway station is inaccessible for people with mobility issues and present serious challenges when travelling with young children.			

Name: Margaret Pownall **I.D:** 62020033

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	‣ Positively prepared ‣ Justified ‣ Effective	No	No	SP7 GREEN BELT Regarding Green Belt Review Background paper 11 I question whether ‘due diligence’ has been observed in the selection of Green Belt sites, namely Markham Fields (HE2015 and He201097) and (HE20491) Lodway Farm. The matter of 10% Biodiversity Net Gains are unsubstantiated and how is it to be measured if the top soil, trees and hedges are not assessed before any work begins. I do not find a ‘robust and credible evidence base’ has been applied to these locations as there is little evidence of credible surveying.	As outlined above, I feel the justification for the choice of sites is not based on robust and credible data. Therefore the plan was not prepared with 'due diligence'. Prepare Independant Environmental Impact Assessments for : sensitive ecological sites, rare landscapes features,		3 - Environment - Background Paper 3.pdf

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					I also disagree that the plan is ‘effective’ as the issues below demonstrate there is no clear plan for ‘flexibility ’ or it being ‘able to be monitored’. Monitoring of the sites after development has started is pointless as the removal of top soil, moving of natural water courses and overloading of drainage systems cannot be easily rectified retrospectively. I think an Environmental Impact Assessment should be applied to rare landscape features, endangered habitats, hydrological issues on the sites. Markham Field Site In answer to the question posed, “does site affect stage 2 GBA” I think it most definitely does. Any disturbance to the Rare Habitat of Ancient Woodland and the associated water course within it should (according to Natural England) should be given AT LEAST a 15m buffer zone, and MORE where a sensitive wildlife corridor is involved. The proposed development would not deliver this and ‘should provide a strong reason for restricting development.’ The arable land (mistakenly labelled Grade 3) is semi-improved grassland (GRADE 1 or 2) and is designated ‘species rich’. Lapwing and Skylark feed and breed on this site, both are on the UK red list of most endangered species. The hedges and trees on the field borders are also valuable habitat for and should be protected according to UK Biodiversity Action Plan. (UKBAP) As recently as 2020 this area was noted as worthy of protection in the Ecology report by Wildlife Trust Consultancies for the Neighbourhood plan approved by North Somerset Council. Lodway Farm Site Again, the Green Belt status of this site, given the rarity of the habitats involved should not be put at risk and begs the question whether due diligence has been observed. This site is on low ground and prone to flooding which would have a direct effect on any building development. I could see no evidence that the complex system of rhynes and other drainage channels had been fully surveyed independently of Portbury Docks, whom I believe manage them for the benefit of the wildlife, great crested newts, water vole etc. The proximity to the water also makes it suitable for roosting waterbirds, who also feed there seasonally. This site is also of particular importance for amphibians as it provides wetland habitat with breeding pools. Frogs and toads converge from the surrounding area and many traverse the Lodway farm site to breed. The adjacent Avon foreshore of the rivers Avon and Severn provides a nationally rare tidal salt grass area and is of importance to waterbirds and marine species. This is designated as a SAC (Special Area of Conservation) and SPA (Special Protection Area). The area is also a RAMSAR site adjoining the similar one on the Portishead shoreline. Whereas this adjoining site ,Portishead LP14, has been apparently found suitable to maintain its Green Belt status, the site in Lodway has been designated suitable for house building. This defies logic as the smaller area borders the Avon estuary and therefore its ecology will be specific to the site and represent a slightly different ecosystem of greater rarity. LP4 Strategic locations PEIG I question whether ‘due diligence’ has been observed in the selection of suitable sites.	critically endangered species habitat, hydrological issues (on wetland sites) see comments above Note the Natural England guidance on extended buffer zones for Ancient Woodland and its associated natural water course. Markham HE2015 Maintain onsistent treatment of identical adjacent sites in Pill (p009) and Portishead (p007) adjoining Portbury Dock.		

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					The matter of 10% Biodiversity Net Gains seems unsubstantiated and how is it to be measured if the top soil, trees and hedges are not assessed before any work begins. I do not find a ‘robust and credible evidence base’ has been applied to these locations as there is no evidence of credible surveying. I also disagree that the plan is ‘effective’ as the issues below demonstrate there is no clear plan for ‘flexibility ’ or it being ‘able to be monitored’. Monitoring of the sites after development has started is pointless as the removal of top soil, moving of natural water courses and overloading of drainage systems cannot be easily rectified retrospectively. I think an Environmental Impact Assessment should be applied to all the sites. EXAMPLE Markham field site HE 2015 This site borders Ancient Woodland, including Markham Brook which according to Natural England requires a minimum buffer zone of 15m . This wildlife corridor is rare habitat, providing for invertebrates, mammals, birds and for example, 2 species of horseshoe bats (Recorded in BRERC, Bristol Regional Environmental Records Centre). The arable land is designated highest quality (Best and Most Versatile) Grades 1 or 2 both of which are protected and cannot be replaced after building work has started. Red listed bird species like Skylark and Linnet are recorded feeding and breeding there.(BRERC) This site is on higher ground and the extra load of run off water from the development will reduce the water quality of Markham brook. This will be detrimental to the value of the habitat. During heavy rain the lower village is more likely to flood. There is no Environmental Impact Assessment evidence that the mitigating pond will be effective. Environment Data from North Somerset Council The Local Neighbourhood Plan for Abbotts Leigh, Ham Green, Pill and Easton in Gordano (2020-2026) Background Paper 3 - Natural Environment Ecology Review by ‘Wildservice’ (The Wildlife Trusts Consultancies)			

Name: Margaret Rogers **I.D:** 62812289

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell already has 800 new houses approved and additional development East of Backwell will lead to over development There is not enough school places and there is no investment in additional GP Services or leisure facilities the lack of these services and infostructure cannot support another 1,000 houses The Government states that we must protect our best land to protect food security these proposals undermine food security Backwell common is prone to flooding which more housing will make worse The railway station cannot be considered a transport hub as it is inaccessible for people with mobility issues such as myself	No	No	

Name: Margot Held **I.D:** 62772545

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at North West Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Loss of Access to Nature and Impact on Protected Species This development will significantly reduce access to nature for local residents. One of the main reasons I chose to live in Nailsea was its proximity to open countryside, which is vital for wellbeing. The proposed site consists of open fields that provide habitats for many species and have been identified as foraging grounds for the rare Greater and Lesser Horseshoe Bats, which are protected under UK and European law. In addition, the development will result in the loss of trees, hedgerows, and a general reduction in wildlife corridors. These features are critical for supporting biodiversity and connecting habitats. The impact on wider ecology has not been properly considered, and once these corridors are broken, the consequences for local wildlife will be severe and irreversible. Ecological and Planning Policy Concerns The proposal appears inconsistent with local planning policies that prioritise environmental protection and sustainable development. It also fails to demonstrate how it will achieve biodiversity net gain, as required by the National Planning Policy Framework (NPPF) and North Somerset Local Plan. At a time when nature is under increasing pressure, developments should enhance biodiversity and climate resilience, not erode it. Potential Impact on Waterways and Flood Risk I am concerned that the development could affect the existing network of waterways and drainage systems in the area. These open fields likely provide natural flood management and habitat for aquatic and riparian species. Replacing permeable land with hard surfaces may increase surface water runoff, raising the potential for localised flooding both on-site and downstream, especially during heavy rainfall. Changes to water flow and drainage patterns could also disrupt wildlife that depends on these ecosystems. Without a robust, evidence-based plan for sustainable drainage and water management, these risks remain unaddressed.	I understand that some development will need to happen to meet housing needs. However, it must be planned with nature in mind, not at its expense. Destroying habitats and green corridors is short-sighted and conflicts with sustainability goals. To make this plan more sound, the following options should be considered: Retain and Enhance Green Corridors: Preserve existing trees, hedgerows, and wildlife corridors including waterways within the site design. Where removal is unavoidable, create compensatory corridors to maintain habitat connectivity. Accessible Green Space: Integrate public green spaces and maintain rights of way to ensure residents retain access to nature for wellbeing. Buffer Zones: Establish buffer areas between development and sensitive habitats to minimise disturbance. Biodiversity Net Gain Plan: Provide a clear, measurable strategy for achieving at least 10% biodiversity net gain, as required by the Environment Act and NPPF. This could include habitat creation, native planting, and funding local conservation projects. Compliance with Local Plan Policies: Demonstrate alignment with North Somerset Local Plan policies (e.g., CS4 on Nature Conservation, CS9 on Sustainable Transport) and NPPF paragraphs 174 and 180. Protect Riparian Habitats: Maintain and enhance natural watercourses and surrounding vegetation to support wildlife and water quality.		
Youngwood Lane	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	1. Loss of Access to Nature and Impact on Protected Species This development will significantly reduce access to nature for local residents. One of the main reasons I chose to live in Nailsea was its proximity to open countryside, which is vital for wellbeing. The proposed site consists of open fields that provide habitats for many species and have been identified as foraging grounds for the rare Greater and Lesser Horseshoe Bats, which are protected under UK and European law. In addition, the development will result in the loss of trees, hedgerows, and a general reduction in wildlife corridors. These features are critical for supporting biodiversity and connecting habitats. The impact on wider ecology has not been properly considered, and once these corridors are broken, the consequences for local wildlife will be severe and irreversible. 2. Traffic and Infrastructure Issues Transport modelling shows notable increases in vehicle movements on the network of rural lanes around Nailsea. There are no clear, workable plans to mitigate this impact. The lanes will become congested and unsafe for pedestrians, cyclists, and horse riders. In addition, there is general concern about the significant increase in traffic and the lack of any clear adjustments to local public transport options to accommodate this new pressure. Without improvements to sustainable transport	I understand that some development will need to happen to meet housing needs. However, in this case I generally object the planned proposal on this space. If it is to ahead it must be planned with nature in mind, not at its expense. Destroying habitats and green corridors is short-sighted and conflicts with sustainability goals. To make this plan more sound, the following options should be considered: • Preserve and Enhance Wildlife Corridors: Retain existing trees, hedgerows, and green spaces, and integrate them into the site design. • Achieve Biodiversity Net Gain: Provide clear, measurable plans for at least 10% biodiversity net gain, including habitat creation and native planting.		

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					infrastructure, the development risks creating long-term congestion and safety issues, and could lead to further land destruction if road widening or additional infrastructure is required in the future. 3. Loss of Agricultural Land and Food Security The development will result in the permanent loss of agricultural land, which is vital for future food security. At a time when sustainability and resilience are key priorities, sacrificing productive land for housing undermines these goals.	• Buffer Zones: Establish buffer areas between the development and sensitive ecological sites. • Green Infrastructure: Include accessible green spaces and maintain public rights of way for community wellbeing. • Transport Improvements: Commit to upgrading local public transport and active travel routes to reduce car dependency. • Sustainable Land Use: Prioritise brownfield sites over agricultural land wherever possible. • Community Engagement: Work with residents to ensure development supports wellbeing and environmental protection.		
Land north of Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I understand that some development will need to happen to meet housing needs. However, it must be planned with nature in mind, not at its expense. Destroying habitats and green corridors is short-sighted and conflicts with sustainability goals. To make this plan more sound, the following options should be considered: 1. Loss of Access to Nature and Impact on Protected Species This development will significantly reduce access to nature for local residents. One of the main reasons I chose to live in Nailsea was its proximity to open countryside, which is vital for wellbeing. The proposed site consists of open fields that provide habitats for many species and have been identified as foraging grounds for the rare Greater and Lesser Horseshoe Bats, which are protected under UK and European law. In addition, the development will result in the loss of trees, hedgerows, and a general reduction in wildlife corridors. These features are critical for supporting biodiversity and connecting habitats. The impact on wider ecology has not been properly considered, and once these corridors are broken, the consequences for local wildlife will be severe and irreversible. 2. Ecological and Planning Policy Concerns The proposal appears inconsistent with local planning policies that prioritise environmental protection and sustainable development. It also fails to demonstrate how it will achieve biodiversity net gain, as required by the National Planning Policy Framework (NPPF) and North Somerset Local Plan. At a time when nature is under increasing pressure, developments should enhance biodiversity and climate resilience, not erode it. 3. Potential Impact on Waterways and Flood Risk I am concerned that the development could affect the existing network of waterways and drainage systems in the area. These open fields likely provide natural flood management and habitat for aquatic and riparian species. Replacing permeable land with hard surfaces may increase surface water runoff, raising the potential for localised flooding both on-site and downstream, especially during heavy rainfall. Changes to water flow and drainage patterns could also disrupt wildlife that depends on these ecosystems. Without a robust, evidence-based plan for sustainable drainage and water management, these risks remain unaddressed. 4. Pressure on Transport and Town Infrastructure There is concern about the significant increase in traffic resulting from over 300 new homes, with no clear plans to address this impact. The development will add hundreds of additional vehicles to local roads, increasing congestion and safety risks on routes that are already under pressure. Beyond traffic, the increase in population will place additional strain on the town's	1. Loss of Access to Nature and Impact on Protected Species • Retain and Enhance Green Corridors: Keep existing trees, hedgerows, and wildlife corridors wherever possible. Where removal is unavoidable, create compensatory corridors and plant native species. • Protected Species Mitigation: Carry out detailed ecological surveys (including bats) and implement measures such as bat-friendly lighting, roosting boxes, and habitat buffers. • Accessible Green Space: Include public green spaces and maintain rights of way to ensure residents retain access to nature for wellbeing. • Buffer Zones: Establish buffer areas between development and sensitive habitats to minimise disturbance. • Community Engagement: Work with residents to ensure development supports wellbeing and environmental protection. 2. Ecological and Planning Policy Concerns • Biodiversity Net Gain: Provide a clear, measurable plan for achieving at least 10% biodiversity net gain, as required by the Environment Act and NPPF. This could include habitat creation, native planting, and funding local conservation projects. • Policy Compliance: Demonstrate alignment with NPPF paragraphs 174 and 180 and North Somerset Local Plan policies (CS4 on Nature Conservation, CS9 on Sustainable Transport). • Climate Resilience: Incorporate green infrastructure and tree planting to support carbon capture and reduce heat island effects. _____ 3. Potential Impact on Waterways and Flood Risk • Hydrological Assessment: Undertake a full study of water flow and flood risk before approval. • Protect Riparian Habitats: Maintain natural		

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					infrastructure—schools, healthcare services, utilities, and community facilities—yet there appear to be very few plans to accommodate this growth. Public transport options also remain unchanged, meaning residents will be heavily reliant on cars, which conflicts with sustainability goals and local planning policies promoting active travel and reduced car dependency. Without a comprehensive strategy for transport improvements, sustainable travel options, and infrastructure upgrades, this development risks creating long-term congestion, reduced safety, and diminished quality of life for existing and new residents.	watercourses and surrounding vegetation to support wildlife and water quality. • Monitoring Plan: Commit to long-term monitoring and maintenance of drainage systems. 4. Pressure on Transport and Town Infrastructure • Public Transport Enhancements: Expand bus routes and frequency to reduce car dependency. • Active Travel Infrastructure: Include safe cycle lanes and pedestrian paths to encourage sustainable travel. • Community Infrastructure Contributions: Through planning obligations (e.g., Section 106), fund improvements to schools, healthcare, and utilities to accommodate population growth. •		
Land off Pound Lane, Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I strongly object to the proposed development of 100 homes adjacent to Moor End Spout Nature Reserve. This site is home to many protected species and provides an important wildlife corridor. Building next to the reserve would destroy valuable habitats and fragment ecosystems, causing irreversible harm to local biodiversity. The ecological impact of this development has not been fully understood or assessed, and once these habitats are lost, they cannot be replaced. One of the main reasons I chose to live in Nailsea was its proximity to nature. Access to green spaces is vital for wellbeing, and Moor End Spout is a cherished part of our community. Losing this natural environment would diminish the quality of life for residents and undermine efforts to protect wildlife. The proposal also contradicts wider environmental commitments to safeguard biodiversity and promote sustainable development. At a time when nature is under increasing pressure, we should be enhancing and protecting these areas, not building over them. For these reasons, I urge the local planning authority to reject this application and prioritise the long-term health of our local environment and community.			
Poplar Farm, Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	1. Loss of Access to Nature and Impact on Protected Species This development will significantly reduce access to nature for local residents. One of the main reasons I chose to live in Nailsea was its proximity to open countryside, which is vital for wellbeing. The proposed site consists of open fields that provide habitats for many species and have been identified as foraging grounds for the rare Greater and Lesser Horseshoe Bats, which are protected under UK and European law. In addition, the development will result in the loss of trees, hedgerows, and a general reduction in wildlife corridors. These features are critical for supporting biodiversity and connecting habitats. The impact on wider ecology has not been properly considered, and once these corridors are broken, the consequences for local wildlife will be severe and irreversible. 2. Ecological and Planning Policy Concerns The proposal appears inconsistent with local planning policies that prioritise environmental protection and sustainable development. It also fails to demonstrate how it will achieve biodiversity net gain, as required by the National Planning Policy Framework (NPPF) and North Somerset Local Plan. At a time when nature is under increasing pressure, developments should enhance biodiversity and climate resilience, not erode it. 3. Potential Impact on Waterways and Flood Risk I am concerned that the development could affect the existing network of waterways and drainage systems in the area. These open fields likely provide natural flood management and habitat for aquatic and riparian species. Replacing permeable land	I generally object for this space to be built on. However, mitigation actions could include: Retain the access to the fields as this is a popular walking, birdwatching, dog walking, jogging, recreation route for local residents. Preserve Existing Habitats: Retain trees, hedgerows, and wildlife corridors wherever possible. Where removal is unavoidable, create compensatory corridors and plant native species. Protected Species Safeguards: Conduct detailed ecological surveys (including bats) and implement mitigation measures such as bat-friendly lighting, roosting boxes, and habitat buffers. Maintain Public Access to Nature: Integrate accessible green spaces and protect existing rights of way for walking and cycling. Buffer Zones: Establish buffer areas between development and sensitive habitats to minimise disturbance. Biodiversity Net Gain Plan: Provide a clear, measurable strategy for achieving at least 10% biodiversity net gain, as required by the Environment Act and NPPF. This could include		

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					with hard surfaces may increase surface water runoff, raising the potential for localised flooding both on-site and downstream, especially during heavy rainfall. Changes to water flow and drainage patterns could also disrupt wildlife that depends on these ecosystems. Without a robust, evidence-based plan for sustainable drainage and water management, these risks remain unaddressed. There is concern about the significant increase in traffic resulting from 100 new homes, with no clear plans to address this impact. The development will add hundreds of additional vehicles to local roads, increasing congestion and safety risks. Beyond traffic, the increase in population will place additional strain on the town's infrastructure—schools, healthcare services, utilities, and community facilities—yet there appear to be few plans to accommodate this growth. Public transport options also remain unchanged, meaning residents will be heavily reliant on cars, which conflicts with sustainability goals and local planning policies promoting active travel and reduced car dependency. Without a comprehensive strategy for transport improvements, sustainable travel options, and infrastructure upgrades, this development risks creating long-term congestion, reduced safety, and diminished quality of life for existing and new residents.	habitat creation, native planting, and funding local conservation projects. Policy Compliance: Demonstrate alignment with NPPF paragraphs 174 and 180 and North Somerset Local Plan policies (CS4 on Nature Conservation, CS9 on Sustainable Transport). Climate Resilience Measures: Incorporate green infrastructure, tree planting, and sustainable drainage systems (SuDS) to support climate adaptation and ecological health. Hydrological Assessment: Undertake a full study of water flow and flood risk before approval. Implement SuDS: Use permeable surfaces, swales, and retention ponds to manage runoff and reduce flood risk. Protect Watercourses: Maintain natural waterways and riparian habitats to support wildlife and water quality. Monitoring and Maintenance: Commit to long-term monitoring of drainage systems and ecological impacts. Public Transport Enhancements: Expand bus routes and frequency to reduce car dependency. Active Travel Infrastructure: Include safe cycle lanes and pedestrian paths to encourage sustainable travel. Community Infrastructure Contributions: Through planning obligations (e.g., Section 106), fund improvements to schools, healthcare, and utilities to accommodate population growth.		
Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	This development concerns me especially due its size and the potential significant impact it will have on the local community and nature. 1. Loss of Access to Nature and Impact on Protected Species This development will significantly reduce access to nature for local residents. One of the main reasons I chose to live in Nailsea was its proximity to open countryside, which is vital for wellbeing. The proposed site consists of open fields that provide habitats for many species and have been identified as foraging grounds for the rare Greater and Lesser Horseshoe Bats, which are protected under UK and European law. In addition, the development will result in the loss of trees, hedgerows, and a general reduction in wildlife corridors. These features are critical for supporting biodiversity and connecting habitats. The impact on wider ecology has not been properly considered, and once these corridors are broken, the consequences for local wildlife will be severe and irreversible. 2. Ecological and Planning Policy Concerns The proposal appears inconsistent with local planning policies that prioritise environmental protection and sustainable development. It also fails to demonstrate how it will achieve biodiversity net gain, as required by the National Planning Policy Framework (NPPF) and North Somerset Local Plan. At a time when nature is under increasing pressure, developments should enhance biodiversity and climate resilience, not erode it. 3. Pressure on Transport and Town Infrastructure There is concern about the significant increase in traffic resulting from 582 new homes, with no clear plans to address this impact. The development will add hundreds of additional vehicles to local roads, increasing congestion and safety risks on routes that are already under pressure.	While I understand housing needs must be met, I object to the development in this specific site. If it is to go ahead it should be planned with nature and community in mind, not at their expense. To make this proposal more sound, the following actions are essential: Preserve and Enhance Wildlife Corridors: Retain trees, hedgerows, and green spaces; create compensatory habitats where loss is unavoidable. Achieve Biodiversity Net Gain: Provide a clear, measurable plan for at least 10% net gain, including habitat creation and native planting. Transport and Infrastructure Upgrades: Improve roads, expand public transport, and add safe walking/cycling routes. Community Contributions: Through planning obligations (e.g., Section 106), fund improvements to schools, healthcare, utilities, and community facilities. Policy Compliance: Demonstrate alignment with NPPF paragraphs 174 and 180 and North Somerset Local Plan policies CS4 and CS9.		

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					Beyond traffic, the increase in population will place additional strain on the town's infrastructure—schools, healthcare services, utilities, and community facilities—yet there appear to be few plans to accommodate this growth. Public transport options also remain unchanged, meaning residents will be heavily reliant on cars, which conflicts with sustainability goals and local planning policies promoting active travel and reduced car dependency. Without a comprehensive strategy for transport improvements, sustainable travel options, and infrastructure upgrades, this development risks creating long-term congestion, reduced safety, and diminished quality of life for existing and new residents. 4. Additional Impacts of Significant Population Growth A development of this scale will have far-reaching consequences beyond housing: Healthcare Capacity: GP surgeries, dental practices, and hospitals may not cope with the increased demand, leading to longer waiting times and reduced access to care. Education Pressure: Schools may become overcrowded, forcing children to travel further for education. Emergency Services: Police, fire, and ambulance services will face higher demand, potentially affecting response times. Utilities and Waste: Water supply, sewage systems, and energy infrastructure will need upgrades to prevent service disruption. Waste collection and disposal services will also require expansion. Community Facilities: Parks, leisure centres, and public spaces will experience higher usage, reducing quality of life if not expanded. Economic Impact: Without local job creation, commuting pressures will increase, adding to traffic and emissions. Cumulative Impact: Combined with other planned developments, the strain on infrastructure could be overwhelming. 5. Loss of Agricultural Land and Food Security The development will result in the permanent loss of agricultural land, which is vital for future food security. At a time when sustainability and resilience are key priorities, sacrificing productive land for housing undermines these goals.			

Name: Maria Lage **I.D:** 29232641

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP11: Transport infrastructure, allocations and safeguarding					With the increase of the number of houses in these estates, even more cars will pass through Tickenham village - which is unsustainable. Certain parts of the village have no pavements or raised pathways for individuals to use. And where some exist, they are very narrow and dangerous to use - when my children were very young they would walk along this way to the bus stop and they would say the fast pace of the cars, lorries and trucks would make it very dangerous so they would wait until the road would quieten down. Now there is no such quiet break in traffic such that these pavements cannot be used and bus / public transport. Therefore lorries should not be authorised to come through Tickenham village except for service vehicles and clearly the additional cars would make it impossible to exit the house on foot. Near the school, a speed ramp should be built. Country lanes around Clevedon Road are no longer fit for so much traffic - so even more traffic will come via Clevedon Road. These country lanes are now constantly used for all types of traffic: not just horses, bikes, or occasional cars or agricultural machinery. If there isn't enough money from the council to support the need of additional cars and vehicles on the road, the developers of the estates must be providing funds to the local	Lorries should not be authorised to come through Tickenham village except for service vehicles. Near the school, a speed ramp should be built. If there isn't enough money from the council to support the need of additional cars and vehicles on the road, the developers of the estates must be providing funds to the local authority to support; they make substantial profits from these homes and it is only reasonable to ask this of them.		

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					authority to support; they make substantial profits from these homes and it is only reasonable to ask this of them. Even coming out of my home, I can easily spend 5-10 minutes waiting for a break in the traffic to enter/exit my house. Ultimately, there are alternative roads that could be developed to take this traffic and would not impact on so many houses, and people.			

Name: Marian Donovan **I.D:** 51397441

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The development is guaranteed to have very adverse effects on the local amenity of Backwell Lake. The wildlife has been carefully encouraged and the Lake is a very valuable asset to both Nailsea and Backwell. It was built there to alleviate drainage issues as the area is in a very well known/acknowledged flood plain. Putting another 600 houses there would bring the town boundaries right alongside each other and so Nailsea/Backwell would become one large conurbation, totally destroying the character of each town. The infrastruture is very poor there - traffic going north via the A370 would create major traffic jams on Station Road into Backwell and equally bad circulation on Staition Road going into Nailsea and subsequently on the Wraxall Road or Tickenham Road to the motorway junction.			
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The addition of almost 900 houses is guaranteed to have a very significant effect on the traffic on the A370 in both directions. There is already planning permission granted for about 700 houses (Grove Farm, Farleigh Fields and Dark Lane) which will be having a significant effect on the roads and hence also on the buses' progress towards and away from Bristol. There is no facility to widen the road anywhere within the village boundaries that would be effective. When there is a problem on the M5, the traffic is always redirected through the village and regularly causes total gridlock along its length. The railway station is presented as one of the sustainable features of the immediate area - it has no access for wheelchairs/ disabled and has extremely difficult (not to mention dangerous) access for baby buggies and bicycles. There has been a feasibility study to address these problems and the outcome was that it was not possible to improve access. There are very few employment opportunities in Backwell so anyone moving there would have to commute to their place of work somehow. To effectively double the size of the village would seriously destabilize the social cohesion of the village. There would be few opportunities for social interaction and lead to isolation. Where are the plans for any accommodation for older residents who may want to downsize but remain in their social circle? This would free up some of the existing housing for younger families. The Secondary school is already full to capacity - where are all the teenagers going to go to school? Grove Farm appears to have provision for a new primary school but no doubt it will not be constructed until everything else has been done so the infants/primary schools will also be bursting at the seams. To introduce a further 850 houses the other end of the village will cause more problems for parents driving their kids to school, either in Dark Lane or Grove Farm. Parts of Backwell are in the flood plain and frequently flood. It is very difficult to get house insurance when there is a known risk. The proposed development is definitely liable to flooding, regardless of the mitigating building works. With so much more development in the area, there are fewer places for the water to drain - the A370 often floods in certain specific areas. Because of the Government constraints on Green Belt developments, the builders are going to be less inclined to contribute to new infrastructure needed as a result of the extra housing. The proposed development will seriously impact the wildlife and biodiversity in our area - we would be losing valuable agricultural land which the country is going to need in the not-so-distant future. People move to Backwell and Nailsea in order to get away from the city life and enjoy the countryside. By doubling the size of Backwell, all those advantages will be lost and it will rapidly become a sprawling conurbation with all that brings - anonymous neighbourhoods and a rise in crime. The proposed development will make it ever more inevitable that Nailsea and Backwell will merge and all the assurances made in our previous local plan will be broken.			

Name: Marianne Claire Nolan **I.D:** 62772737

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Land north of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I totally oppose the NSC Reg 19 Local Plan for a number of reasons: The proposed figure of 1817 new homes in Nailsea would lead to a total overdevelopment of the town The land to the North of Nailsea is planned to be removed from the Green Belt. This will lead to a reduction in green open space which has been proven to be so important for health and wellbeing. Additional development will place huge pressure on the town's existing health and leisure provision. Development would destroy valuable wildlife habitats, for example Moorend Spout nature reserve and foraging locations for the rare Greater and Lesser Horseshoe bats, which are a protected species. There are no clear, workable plans to mitigate against notable increases in vehicle movements on the network of rural lanes around Nailsea.			

Name: Marie Malloy **I.D:** 39108705

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	As a resident of Backwell, I feel increasingly concerned about the scale of development being proposed. We already have 800 new homes approved, which represents a 40% increase in the size of our village, and it's difficult to see how adding even more wouldn't have a significant impact on the character of Backwell. There are also uncertainties around the proposed new road, as it is not clear whether it would genuinely help with existing traffic issues in Nailsea or reduce congestion on Station Road, Backwell Common, or Chapel Hill. In addition, creating a road under or over the railway would likely be very costly and may prove challenging to deliver. Even with the growth already planned, our schools are filling up quickly, and there has been very little investment in health or leisure facilities. At present, it doesn't feel as though the local infrastructure could comfortably support another 1,000 homes. It is also concerning that Backwell has been allocated more housing than any other village in North Somerset, and proportionally more than some larger towns. It would be helpful to understand why such a large share has been directed here. Much of the land being considered is Grade 1 Agricultural Land used for food production and grazing. Only a small proportion of this top-quality land remains in North Somerset, and Government policy encourages protecting our "best and most versatile" land to support long-term food security. This makes the potential loss of this area particularly worrying. There are also environmental concerns. The land provides important habitats in a country already facing significant biodiversity pressures, and losing these spaces would have a noticeable impact on local wildlife. Finally, flooding is already an issue on Backwell Common and the surrounding areas, and there is understandable concern that additional development could make this worse. Backwell Lake (the Reservoir) and the nearby fields—where new roads and housing are being proposed—lie on a floodplain that floods regularly.	Infrastructure should be priority before any development.		

Name: Marie Villis **I.D:** 62862689

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Black Rock, north of Clevedon Road	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	This area NSC are considering other brownfield or greenfield sites that would have a far lower ecological impact in Portishead or across NSomerset. The strategic ecological importance of this site as a SSI protecting Weston Big Wood and the green corridor of the Gordano Valley. Both areas were added to the Green belt in the late 1980's due to the importance of the high ecological value . National planning policy only allowed Green belt changes in exceptional circumstances! These have not been demonstrated ! Therefore this site can not provide safe and suitable access.			

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					Any development of this site would create unacceptable transport impacts, failing national soundnesstests For these reasons the site should be immediately removed from the Local plan			

Name: Marjorie Hookham **I.D:** 29101729

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm		‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	The proposed development is on green fields adjacent to Weston Big Wood, an ancient woodland and an SNCI. The whole parcel of land is essential to the green corridor through the Gordano Valley, provides valuable habitats and assists with water retention. The Wood itself is managed by the Woodland Trust and supported by Avon Wildlife Trust. In addition, placing houses in this location would inevitably put intense pressure on already overloaded infrastructure. Although not far from the High Street it is at the top of a significant hill and most residents use their cars knowing that if they walk or cycle they are faced with the inevitable hard slog back up to the top. Traffic in and around The Downs and Down Road is already frequently jammed at school drop off and pick up times with resulting pollution. This land should not be developed but should be kept as green space, protecting the wood and the green corridor, so important to diversity and the health of the community. I do not support the 2041 Plan for development at Tower Hill Farm			
Black Rock, north of Clevedon Road	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	This farmland lies below Weston Big Wood and is again part of the green corridor, so important for habitat, biodiversity and water retention. It borders the Portishead to Clevedon Road to which development would add pressure. Portishead residents who currently use the route with current traffic levels would no doubt attest to the fact that cyclists already come under pressure from impatient drivers. Concreting and tarmacing greenbelt land goes against national policy, increases flood risk and impacts community health. Instead we should be protecting such assets and concentrating development on brownfield sites, especially those closer to amenities and, in particular, close to transport links, thus avoiding additional pressure on already overloaded infrastructure. I do not support the Plan for the Black Rock location	No modification would make the Plan acceptable. The land should remain as countryside		

Name: Mark Jaloszynski **I.D:** 30918657

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land to the west of Elborough	No	‣ Justified ‣ Effective	Unsure	No	Not Sound The development site does not align to your own Local Plan policies; SP11: Historic and natural environment, SP6: Villages and rural areas and, Policy DP2: Residential development within settlement boundaries. Does not align with your Vision, strategic priorities and sustainability objectives, specifically Sustainable development objective; 3.2 Minimise vulnerability to all forms of flooding, now or in the future, without increasing flood risk elsewhere. Also minimise	Remove the development site and align the proposal to your own Local Plan policies; SP11: Historic and natural environment, SP6: Villages and rural areas and further policies and Policy DP2: Residential development within settlement boundaries and Sustainable development objective 3.2		Flooding risk.png

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					harm to water quality and availability Not in compliance with Duty To Cooperate. Concerns raised as consultation process in earlier in the year for the Additional Housing Site proposal have not been captured in the considerations, specifically; - Scale of development considering nearby developments in Locking Parklands, Haywood Village and proposed in Wolvershill - Impact on loss of habitat, green space, trees and hedge rows - Increase car journey / traffic impacts to Locking and Hutton - Lack of suitable road network, specially Barnwell Road, Old Barnwell Road and the Bury; safety and capacity			
Land north of Banwell Road, Locking /Elborough	No	• Justified • Effective	Unsure	No	Not Sound The development site does not align to your own Local Plan policies; SP11: Historic and natural environment, SP6: Villages and rural areas and, Policy DP2: Residential development within settlement boundaries. Does not align with your Vision, strategic priorities and sustainability objectives, specifically Sustainable development objective; 3.2 Minimise vulnerability to all forms of flooding, now or in the future, without increasing flood risk elsewhere. Also minimise harm to water quality and availability Not in compliance with Duty To Cooperate. Concerns raised as consultation process in earlier in the year for the Additional Housing Site proposal have not been captured in the considerations, specifically; - Scale of development considering nearby developments in Locking Parklands, Haywood Village and proposed in Wolvershill - Impact on loss of habitat, green space, trees and hedge rows - Increase car journey / traffic impacts to Locking and Hutton - Lack of suitable road network, specially Barnwell Road, Old Barnwell Road and the Bury; safety and capacity	Remove the development site and align the proposal to your own Local Plan policies; SP11: Historic and natural environment, SP6: Villages and rural areas and further policies and Policy DP2: Residential development within settlement boundaries and Sustainable development objective 3.2. Elborough has been deliberately ignored with the identification of a settlement boundary, contrary to your own policy. Other villages and settlements of comparable size have identified boundaries in NSC.		Flooding risk.png

Name: Mark Taylor **I.D:** 63024481

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm					I have visited the North Somerset local plan 2041 site and would like to comment on particular developments proposed around Portishead, in particular the sites at Tower Farm and Black Rock. I have lived in North Weston since 2000 and I have seen a huge development of Portishead from a small town into what it is today. The developments on the Vale and on and around the Marina has saturated a small community with massive infrastructure issues, such as road networks, schools and general facilities. A railway link has been promised for many years in the area and funding has continually been withdrawn. Now the government is insisting on more houses to be built then there is now funding promised. This is nothing new, as this was always part of a plan when the previous developments were put forward. As always the developments get completed and then the funding for the infrastructure is withdrawn. I believe the government requires affordable housing. If you look at the average house prices in and around Portishead these are not affordable to the people that want to get on the housing ladder. Four- and Five-bedroom houses are not required. What is required is good old fashioned two- and three-bedroom houses that can be starter homes or council owned rented accommodation. Developing the above sites will never filter down sufficiently to get people onto the housing ladder. The above sites were deemed green belt sites in the 1980’s and a green corridor created from the marina area of Portishead to Clevedon to protect the surrounding wildlife. The government have relaxed the rules to allow green belt to be recategorized so development of housing can take place in EXCEPTIONAL CIRCUMSTANCES. I believe there are no exceptional circumstances that exist for the development of these sites. There are plenty of alternative brown sites that can be developed without massively disrupting and in part destroying the local wildlife infrastructure. The ecological impact that housing development would case Weston Big Wood would be catastrophic. There is a need to protect the Weston Big Wood SSSI and the Gordano Valley green corridor, for today and future generations. I side point about protecting green corridors is the fact that during the Covid pandemic time, the government pushed and promoted that people should get out and enjoy the green spaces as part of their own well being and mental health. Why has this policy changed? The mental health capacity within the NHS is under massive strain already without removing valuable areas where people can help themselves at no real cost and keep their mental health in check. We have a cost-of-living crisis so free spaces such as Weston Big Wood should not be put under threat. One such brown site is around the Old Mill area. It is mentioned that to build would mean lose of jobs. I disagree. There could be suitable development where workspace is development at ground level and smaller one or two bedroomed homes could be built above. These would be affordable and jobs would not be lost. This would be forward thinking and rejuvenate an area that would benefit from re-development. Both the proposed sites above would struggle to provide safe and suitable access into the communities surrounding them. The Clevedon Road area in particular is already busy with the traffic travelling through most of the day, but specifically early morning, between 0630hrs and 0930hrs and evening times, from about 1430hrs until 1800hrs. Police headquarters employs a large number of people who mainly travel to the site in a vehicle. There are two schools, St Josephs and Gordano Comprehensive, that again have a huge amount of children attending, who also create traffic issues on the Bristol Road and Clevedon Road and surrounding areas. Finally, there are the commuters who need to travel out of Portishead to Bristol or return home. As I mentioned at the beginning Portishead is already saturated with people and the road network is already under pressure. No train, with two carriages and leaving once an hour is going to solve this problem that already exists. Further development meaning, more cars and people, would bring Portishead to a standstill. In addition to the access and movement of vehicles and people, in, out and around Portishead is the additional issue of when the M5 motorway closes. This happens regularly due to accidents and repairs work. It also raises traffic levels during school holiday times when vehicles use Clevedon Road as a way of avoiding the inevitable car park that is the M5 during the summer months, when people head to Devon and Cornwall. Large HGV’s on strict delivery times come hurtling through North Weston at all times of the day and night when this happens. My questions are simple. Is this safe? Is this sustainable? Is this not creating more of a problem? Does this meet the national soundness tests? I believe not and I believe this has not properly been considered when these plans have been proposed to develop the areas above. There is one more point I would like to make in respect of the impact of the traffic. Police headquarters and the fire service run out of Blackrock and Valley Road. Operational staff regularly travel at high speed with their appropriate sirens and lights displayed as they rush to an emergency. Again, these vehicles travel along Clevedon Road, past two schools and the main road out to the motorway network. Placing more vehicles in this already crowded space would only increase the possibility of further accidents or delay for them to reach the emergency they are attending.			

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					In submission I do not believe these areas should be developed. There is no sustainable infrastructure. It is unsafe to the residents with the amount of traffic it would bring. It would destroy and well needed green corridor for both the wildlife and the residents of Portishead. For these and the above reasons I believe the Tower Farm or Black Rock areas should be removed from the local Plan.			
Black Rock, north of Clevedon Road					I have visited the North Somerset local plan 2041 site and would like to comment on particular developments proposed around Portishead, in particular the sites at Tower Farm and Black Rock. I have lived in North Weston since 2000 and I have seen a huge development of Portishead from a small town into what it is today. The developments on the Vale and on and around the Marina has saturated a small community with massive infrastructure issues, such as road networks, schools and general facilities. A railway link has been promised for many years in the area and funding has continually been withdrawn. Now the government is insisting on more houses to be built then there is now funding promised. This is nothing new, as this was always part of a plan when the previous developments were put forward. As always the developments get completed and then the funding for the infrastructure is withdrawn. I believe the government requires affordable housing. If you look at the average house prices in and around Portishead these are not affordable to the people that want to get on the housing ladder. Four- and Five-bedroom houses are not required. What is required is good old fashioned two- and three-bedroom houses that can be starter homes or council owned rented accommodation. Developing the above sites will never filter down sufficiently to get people onto the housing ladder. The above sites were deemed green belt sites in the 1980’s and a green corridor created from the marina area of Portishead to Clevedon to protect the surrounding wildlife. The government have relaxed the rules to allow green belt to be recategorized so development of housing can take place in EXCEPTIONAL CIRCUMSTANCES. I believe there are no exceptional circumstances that exist for the development of these sites. There are plenty of alternative brown sites that can be developed without massively disrupting and in part destroying the local wildlife infrastructure. The ecological impact that housing development would case Weston Big Wood would be catastrophic. There is a need to protect the Weston Big Wood SSSI and the Gordano Valley green corridor, for today and future generations. I side point about protecting green corridors is the fact that during the Covid pandemic time, the government pushed and promoted that people should get out and enjoy the green spaces as part of their own well being and mental health. Why has this policy changed? The mental health capacity within the NHS is under massive strain already without removing valuable areas where people can help themselves at no real cost and keep their mental health in check. We have a cost-of-living crisis so free spaces such as Weston Big Wood should not be put under threat. One such brown site is around the Old Mill area. It is mentioned that to build would mean lose of jobs. I disagree. There could be suitable development where workspace is development at ground level and smaller one or two bedroomed homes could be built above. These would be affordable and jobs would not be lost. This would be forward thinking and rejuvenate an area that would benefit from re-development. Both the proposed sites above would struggle to provide safe and suitable access into the communities surrounding them. The Clevedon Road area in particular is already busy with the traffic travelling through most of the day, but specifically early morning, between 0630hrs and 0930hrs and evening times, from about 1430hrs until 1800hrs. Police headquarters employs a large number of people who mainly travel to the site in a vehicle. There are two schools, St Josephs and Gordano Comprehensive, that again have a huge amount of children attending, who also create traffic issues on the Bristol Road and Clevedon Road and surrounding areas. Finally, there are the commuters who need to travel out of Portishead to Bristol or return home. As I mentioned at the beginning Portishead is already saturated with people and the road network is already under pressure. No train, with two carriages and leaving once an hour is going to solve this problem that already exists. Further development meaning, more cars and people, would bring Portishead to a standstill. In addition to the access and movement of vehicles and people, in, out and around Portishead is the additional issue of when the M5 motorway closes. This happens regularly due to accidents and repairs work. It also raises traffic levels during school holiday times when vehicles use Clevedon Road as a way of avoiding the inevitable car park that is the M5 during the summer months, when people head to Devon and Cornwall. Large HGV’s on strict delivery times come hurtling through North Weston at all times of the day and night when this happens. My questions are simple. Is this safe? Is this sustainable? Is this not creating more of a problem? Does this meet the national soundness tests? I believe not and I believe this has not properly			

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					been considered when these plans have been proposed to develop the areas above. There is one more point I would like to make in respect of the impact of the traffic. Police headquarters and the fire service run out of Blackrock and Valley Road. Operational staff regularly travel at high speed with their appropriate sirens and lights displayed as they rush to an emergency. Again, these vehicles travel along Clevedon Road, past two schools and the main road out to the motorway network. Placing more vehicles in this already crowded space would only increase the possibility of further accidents or delay for them to reach the emergency they are attending. In submission I do not believe these areas should be developed. There is no sustainable infrastructure. It is unsafe to the residents with the amount of traffic it would bring. It would destroy and well needed green corridor for both the wildlife and the residents of Portishead. For these and the above reasons I believe the Tower Farm or Black Rock areas should be removed from the local Plan.			

Name: Marta Haire **I.D:** 63123137

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Black Rock, north of Clevedon Road	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	NSC has not properly considered: Alternative brown and green field sites with much less ecological impact both in Portishead and across North Somerset. The opportunity to increase housing density on proposed brown field sites across North Somerset which would mean these sites are not required to meet local housing targets. The strategic ecological contribution of these specific sites in protecting the unique environment of Weston Big Wood (SSSI} and the Gordano Valley strategic green corridor The fact that these sites were specifically added to the Green Belt in the late 1980's because of their high ecological value. For the above reasons, the Local Plan is unsound because National Planning Policy states that sites can only be removed from Green Belt for development under exceptional circumstances and these exceptional circumstances are not proven. No modifications short of removing the allocation completely is appropriate for this site. The land should be retained as undeveloped green space and potentially used for biodiversity net gain purposes. North Somerset Council should instead increase housing density on already known and new brown field sites in Portishead and North Somerset and look to develop on other green field sites in Portishead and the rest of the district which will have much less ecological impact. (please see supporting paper for details).			Attachment.pdf

Name: Martin Brown **I.D:** 62854753

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared • Justified • Effective	No	No	Re: Housing north of Weston Big Wood (Tower Road). The plan is flawed on many fronts. The immediate area on and off Down Rd is already saturated with housing with roads constantly being snarled with traffic moving to and from the town's high street and or exit away via A369. The construction vehicles alone will heighten the risk of incident and accident involving the children and parents of High Down Schools which has for many years been a concern with the volume of traffic. The unique beauty of the historic Weston Big Wood will be considerably compromised, if not, completely ruined and lost.			

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		• Consistent with national policy			I urge the planning of this proposal to be rejected.			

Name: Martin Howard **I.D:** 62772897

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm					In response to the above… There are alternative brownfield and greenfield sites with less ecological impact and the fact that the proposed sites were in fact added to the green belt in 1980s because of their high ecological value. Neither site can provide suitable or safe access. Such development would result in unacceptable transport impact and thereby likely to fail national sound tests. Portishead is already stretched for facilities..limited school places, particularly in area proposed, limited access to medical services, currently one pharmacy, soon no banks, small postal facility and limited parking throughout the town. Traffic along Down Road, particularly at school times, often results in gridlock so additional access in this area would make that situation even worse and add to the potential for road accidents. Therefore we believe, based on the above facts alone, the Tower Farm and Black Rock sites should be removed from the Local Plan.			
Black Rock, north of Clevedon Road					In response to the above… There are alternative brownfield and greenfield sites with less ecological impact and the fact that the proposed sites were in fact added to the green belt in 1980s because of their high ecological value. Neither site can provide suitable or safe access. Such development would result in unacceptable transport impact and thereby likely to fail national sound tests. Portishead is already stretched for facilities..limited school places, particularly in area proposed, limited access to medical services, currently one pharmacy, soon no banks, small postal facility and limited parking throughout the town. Traffic along Down Road, particularly at school times, often results in gridlock so additional access in this area would make that situation even worse and add to the potential for road accidents. Therefore we believe, based on the above facts alone, the Tower Farm and Black Rock sites should be removed from the Local Plan.			

Name: Martin Rayner **I.D:** 62846113

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm					Hi, to whom ever this may concern, I thought until recently that logic and common sense had prevailed on this matter, why is this even being proposed again when there are so many reasons against it? The most obvious and important reason as far I can see is the preservation of the big wood and all that it contains. Anyone who thinks that surrounding the wood as suggested is not going to have a disastrous effect is kidding themselves for the wrong reasons. Surely we should be doing the opposite, by allowing the wood to expand naturally as we have precious few of these places. The worrying question is why has this been even been considered?			

Name: Martin Van Eker **I.D:** 62700225

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	Unsure	I feel that before including the Tower Farm site in the local plan, the council has not properly considered alternative brown and greenfield sites, both within Portishead and in the wider North Somerset County, with significantly less ecological impact. The council could consider increasing the density of housing on proposed brown field sites across the county when would mean they could meet their housing targets and thus avoiding building on this unique and precious environment. The unique and strategic ecological contribution to the Tower Farm site is protecting the unique environment of the Weston Big Wood (SSSI) and the wider Gordano Valley green corridor. If we lose these valuable fields, it will have a significant impact on Weston Big Wood as a whole. Black Rock and Tower farm site were only granted greenbelt status in the 1980s because of their high ecological value and the connection with Weston Big Wood. Therefore, the Tower farm and Black Rock sites should be removed from the Local Plan. I believe that no modification short of removing the allocation entirely would make this site appropriate. Given its direct adjacency to ancient woodland, its loss would be irreversible and cannot be mitigated sufficiently. The land should instead be retained as undeveloped green space, managed to enhance biodiversity and provide sustainable public access, in line with the Avon Wildlife Trust's 2030 Strategy and national "30 by 30" nature recovery goals.			
Black Rock, north of Clevedon Road	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	Unsure	I feel that before including the Black Rock sites in the local plan, the council has not properly considered alternative brown and greenfield sites, both within Portishead and in the wider North Somerset County, with significantly less ecological impact. The council could consider increasing the density of housing on proposed brown field sites across the county when would mean they could meet their housing targets and thus avoiding building on this unique and precious environment. The unique and strategic ecological contribution to the Black Rock site is protecting the unique environment of the Weston Big Wood (SSSI) and the wider Gordano Valley green corridor. If we lose this valuable field, it will have a significant impact on Weston Big Wood as a whole. Black Rock and Tower farm site were only granted greenbelt status in the 1980s because of their high ecological value and the connection with Weston Big Wood. Therefore, the Tower farm and Black Rock sites should be removed from the Local Plan.	I believe that no modification short of removing the allocation entirely would make this site appropriate. Given its direct adjacency to ancient woodland, its loss would be irreversible and cannot be mitigated sufficiently. The land should instead be retained as undeveloped green space, managed to enhance biodiversity and provide sustainable public access, in line with the Avon Wildlife Trust's 2030 Strategy and national "30 by 30" nature recovery goals.		

Name: Martyn Frampton **I.D:** 58388577

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Leighton Crescent								

Name: Martyn Pearce **I.D:** 62560449

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Overdevelopment of area, no infrastructure considerations, no consideration to additional facilities required, doctors, dentists, schools, cycle lanes. NO access for disabled people to Backwell train station to use trains on line toward Weston from Bristol. Purchase of land required and a lift installed, whole station needs redevelopment or relocated.			

Name: Martyn White **I.D:** 62850753

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Churchill Avenue	No	‣ Justified	No	No	The land known as penny fields was given to the people of Clevedon and it does not belong to NS council therefore it is not yours to sell for development. There is very little land left for open space and this area is culturally significant due to the bio diversity of the river and surrounding open space. I have seen deer, swans, morehens even an otter in this river and that will all disappear with this development. North Somersets obsession with developing all of our green spaces must stop. Please take time to see what you are doing to our towns and villages. This is not progress it's destruction of what's important to us.	Leave penny field alone for people to enjoy.		

Name: Mary Woodgate **I.D:** 21351873

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	The over-development proposed in Backwell of one thousand houses with no investment available for a viable road structure to cope with a huge influx of people, no funding or planning for the schools and doctors surgeries that would be required, is frankly, unintelligent and absurd. Furthermore, the proposal of using high quality agricultural land to build on is not acceptable given that North Somerset has only 7% left and it is needed for crops and grazing. The water-table surrounding Backwell Common is high in many places and prone to flooding, so to build more houses in this area would be a total disaster. The village of Backwell is a residential area with inhabitants traveling out of the village for employment. Many use the train station but this cannot be classed as a transport hub, and the road system out of the village into Bristol is already not suitable for the current volume of commuters. Backwell is already having to cope with 800 new houses that sadly have been approved and which means a 40% increase in numbers and is unsustainable. Our small village is not fit to accept any further development and it is incomprehensible why we have been allocated more housing development (7%) than any other village North Somerset. The town of Clevedon's allocation being just 2%.			

Name: Maryam Afzal **I.D:** 63111297

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm					I'm a resident of Portishead and the plans to build houses behind high down school and close to the Western big wood concerns me greatly. The residents of our town would need another doctor surgery, pharmacies, better roads and infrastructure to support any further residents in the town. We are already overstretched with resources, not to mention the traffic and congestion that would be created from the top of the hill all the way to the Portbury 100 that is the only main access route in and out of the town. Terrible idea to overpopulate Portishead. It will completely loose the small town character and become a city - and it's certainly not ready to become that. Please take these concerns seriously as it is widespread concern of all residents!			
Black Rock, north of Clevedon Road					I'm a resident of Portishead and the plans to build houses behind high down school and close to the Western big wood concerns me greatly. The residents of our town would need another doctor surgery, pharmacies, better roads and infrastructure to support any further residents in the town. We are already overstretched with resources, not to mention the traffic and congestion that would be created from the top of the hill all the way to the Portbury 100 that is the only main access route in and out of the town. Terrible idea to overpopulate Portishead. It will completely loose the small town character and become a city - and it's certainly not ready to become that. Please take these concerns seriously as it is widespread concern of all residents!			

Name: Matt Burley **I.D:** 58517153

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP7: Green Belt	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	• Exceptional circumstances not proportionately evidenced: The Stage 2 Green Belt Assessment identifies Pill/Easton-in-Gordano parcels as making overall “weak” Green Belt contributions, but the NPPF requires that any release must promote sustainable patterns of development and follow a genuine brownfield-first approach. The Sustainability Appraisal recognises significant greenfield take and uncertain biodiversity/flood effects; reasonable urban/brownfield alternatives and larger, more serviced edge-of-Bristol options have not been exhausted in evidence provided. • Golden Rules are not deliverable: The Council’s Viability Addendum indicates Pill/Easton-in-Gordano struggles to sustain even 25–35% affordable housing in most scenarios; yet SP7/LP4 require 50% on Green Belt releases. If 50% is not viable, the justification for Green Belt release fails. • Environmental safeguards incomplete: The HRA screens LP4 as likely to have significant effects, with a need for Recreation Management Strategies for the Severn Estuary and Avon Gorge Woodlands. These safeguards are not secured at plan stage. • Legal compliance and effectiveness at risk: No published Statements of Common Ground demonstrating agreed strategic mitigation for A369/M5 J19 or the rail scheme. National Highways has already requested cumulative modelling for J19; without agreed mitigation/funding, SP7 is not effective or legally robust.	• Delete Pill/Easton-in-Gordano Green Belt releases: Remove Lodway Farm, East of Gordano Services, Pill Green, Pill Road and Ham Green from SP7. • Require completed, proportionate evidence before any GB release: Publish the full Stage 2/Stage 3 Green Belt assessments; brownfield/urban capacity and minimum density testing; and a clear “grey belt first” demonstration. • Secure deliverability dependencies up-front: No GB boundary change unless Statements of Common Ground (SoCGs) evidence agreed and funded strategic mitigation for A369/M5 J19 and rail integration; incorporate HRA recreation strategies text as recommended. • Make Golden Rules contingent and site-tested: Add a policy clause that GB release only proceeds where 50% affordable housing and required infrastructure are proven viable on each site (site-specific viability and net developable area plans).		Pill_R19_Representation.pdf 2041 SP7 Response.pdf

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						• Sequential flood approach embedded in SP7: No GB release in Pill/E-i-G without sequential/exception testing and EA-endorsed strategies for Markham Brook and surface water management.		
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	• Over-reliance on unproven rail delivery: LP4's "sustainable location" case turns on the Portishead–Pill–Bristol railway "by 2028", with no binding contingency phasing if delayed. This undermines effectiveness and positive preparation. • Transport evidence gap and cumulative impacts: The Transport Assessment and modelling parameters note Pill modelling is still being developed. National Highways requires cumulative J19 testing; junction congestion at Pill Road/A369 and St George's Hill is anticipated. Without agreed mitigation/funding and delivery phasing, LP4 is not justified or effective. • Flood risk/sequential test not demonstrated: Markham Brook bisects the allocations; Schedule 1 demands buffers and "no increased runoff". Updated flood information (NaFRA2) indicates increasing extent at Lodway Farm. The plan does not show a sequential/exceptions test outcome or confirmed attenuation strategy; this is inconsistent with national flood policy. • Heritage/noise constraints compress capacity: Historic Environment Assessments require buffers and view protection for Grade II*/II assets (St George's Church/St George's Hall). LP4 also requires motorway noise buffers/mitigation. Combined with SuDS and a new school site, net developable area is materially reduced, threatening the headline capacity and character objectives. • Golden Rules/50% affordable housing not credible: The Viability Addendum shows Pill/Easton-in-Gordano struggling even at 25–35% AH in most value scenarios; delivering 50% AH plus heavy infrastructure (school, hub, bridges, active travel) is unlikely. LP4 is not justified or effective.	• Delete LP4 as a strategic location; alternatively, cap total capacity to a small, brownfield-led quantum pending evidence. • Link any remaining capacity to hard phasing triggers: No occupations until (a) Portishead–Pill–Bristol rail is operational, (b) cumulative J19/A369 mitigation is agreed, funded and conditioned, and (c) the Pill active-travel package and transport hub are delivered. • Require flood and heritage compliance before numbers are fixed: Publish sequential/exception tests, Markham Brook crossing strategy, and a heritage-led masterplan with enforceable buffers to St George's Church; adjust capacities to proven net developable area. • Viability re-test for the Golden Rules: Independent site-specific viability showing 50% AH alongside school land, bridges, noise mitigation and active travel; add a review mechanism if 50% AH is not deliverable. • Legal compliance measures: Produce SoCGs with National Highways, Bristol City Council, rail promoters and EA; include HRA wording on Recreation Management Strategies at plan text level		Pill_and E-i-G Consultation Process Challenge - exceptional circumstances.pdf Pill_R19_Representation.pdf 2041 LP4 Response.pdf
Land at Lodway Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	Adjacent to M5 with significant noise mitigation needs; two limited access points; River Avon Trail works; flood risk buffers required and updated mapping indicates increased extent. Without a completed sequential test and agreed drainage strategy, delivery is uncertain and risks non-compliance with national flood policy.	Remove allocation; alternatively, no permission until sequential/exception tests, EA-agreed drainage, River Avon Trail mitigations and motorway noise strategy are secured; reduce capacity to reflect buffers and access limits.		Schedule 1 Site Specific Objections.pdf
Land east of Gordano Services	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national	No	No	No vehicular access to Marsh Lane; reliance on active travel links; within the setting of Grade II*/II heritage assets needing buffers; close to A369/M5 J19 stress points with cumulative impacts not yet modelled/mitigated.	Remove allocation; alternatively, retain "no vehicular access to Marsh Lane", deliver heritage buffers to St George's Hall/Church with capacity reduction; require cumulative J19 modelling and agreed mitigation before any consent.		Schedule 1 Site Specific Objections.pdf

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
		policy						
Pill Green	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Requires new primary school land; frontage on A369 with major active travel and crossing works; mandatory Markham Brook bridge; strict “no increased runoff” and buffer requirements; motorway noise/air constraints; quantum represents a disproportionate scale for a village and is not shown to be deliverable within character/heritage limits.	Remove or substantially reduce; school land and Markham Brook bridge to be funded and delivered early; impose M5 noise/air quality buffers; fix numbers only after heritage and SuDS layouts prove net developable area.		Schedule 1 Site Specific Objections.pdf
Land at Pill Road	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Dependent on Markham Brook bridge to secure safe routes to school; highway verge widening and crossings required; flood buffer and runoff limits further constrain net capacity.	Remove or phase behind delivery of the Markham Brook active-travel bridge and safe routes to school; require widened verge/crossings and flood buffers before any approval.		Schedule 1 Site Specific Objections.pdf
Land at Ham Green	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	No	Requires highway upgrades to Perrett Way; cumulative transport and environmental effects remain untested.	defer until Perrett Way upgrades are designed, funded and conditioned; confirm no adverse cumulative transport/environment effects.		

Name: Matt Lansdkwn **I.D:** 30922945

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP7: Green Belt	No	• Justified	No	Unsure	Exceptional circumstances Has not been demonstrated for greenbelt release when other non greenbelt sites have been identified with the same strategic growth locations. There is a complete lack of understanding about active travel routes. There is no link to existing infrastructure from nailsea to the festive way link.			

Name: Matthew Cook **I.D:** 62848609

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell						Consent for a further 1,000 houses in Backwell should not be given. The expansion of Backwell is against the will of the people of Backwell. The quality of life for the residents of Backwell would be diminished by this Plan, with the loss of green space around the existing village, loss of wildlife habitats, increased traffic and the over-burdening of local facilities and amenities; not to mention the continuation of the mess and noise already inflicted on the people of Backwell by Central Government with previously-approved developments.		

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					There would also be the loss of valuable farmland, precious little of which is left in North Somerset and which is a lifeline for its people; purported Central Government policy is that we must protect our land to safeguard food security and this proposed development would be contrary to that policy. The erosion of the greenbelt between Backwell and Nailsea would lead to urban sprawl, devastating the character of both villages and this area of North Somerset in general. I strongly reject this development proposal and so should North Somerset Council.			

Name: Matthew Germain **I.D:** 62836769

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	This development is excessively large for a village the size of Backwell. The development of 900+ homes at Backwell East will fundamentally change the character of our community - we are a village and wish to remain a village. One of the reasons why Backwell is such a wonderful place to live is that it is buffered all around by rural land. This provides amenity space for walking and recreation and preserves important footpaths and areas for biodiversity and farmland for grazing and food production. It also defines the fundamental character of 'place'. By building that many houses - or any houses at all - in this area the council would be irrevocably changing a village, which is already accepting a significant amount of new housing development at Dark Lane, Farleigh Fields and Rodney Rd. The sense of community cohesion will disappear if the village grows by this excessive amount. Further the concept of constructing a link road would be an act of gross environmental vandalism. Please do not include the Backwell East development and associated road in the plan as you will fundamentally change our village for generations to come.	Removal of the Backwell East development and link road for the reasons given above.	No comment	

Name: Matthew Gooch **I.D:** 58511745

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	NSC has not properly considered: Alternative brownfield or greenfield sites with far lower ecological impact, both in Portishead and across North Somerset. Opportunities to increase housing density on proposed brownfield sites, which could remove the need to develop Tower Farm. The strategic ecological importance of this site in protecting Weston Big Wood (SSSI) and the Gordon Valley green corridor. The fact that this area was added to the Green Belt in the late 1980s due to its high ecological value. National planning policy allows Green Belt changes only in exceptional circumstances - and these have not been demonstrated. In addition: There is neither safe nor suitable access to the site. Development would create unacceptable transport impacts failing national soundness tests.			

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					Consider brown field sites and greenfield sites with significantly less ecological impact.			

Name: Matthew Williams **I.D:** 62738817

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The proposed allocation of Land at Tower Farm (≈ 400 homes) lies immediately beside Weston Big Wood — an ancient woodland and Site of Nature Conservation Interest (SNCI) managed by Woodland Trust and supported by Avon Wildlife Trust. The woodland forms part of the Gordano Valley ecological network and a nationally important habitat mosaic of open grassland, wetland and woodland. Not Justified There is no robust published alternatives assessment demonstrating that this sensitive site is the only or most appropriate option for growth. The loss of best and most versatile farmland (Grade 2/3a by reference to the ALC dataset) and the risk of irreversible damage to the ancient woodland make this allocation unsuitable Not Consistent with National Policy The allocation conflicts with the National Planning Policy Framework (NPPF) paragraphs 180–182, which require that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland) should be refused unless wholly exceptional reasons exist. The Council's reference to an "ecological buffer" is vague, unenforceable and insufficient to address indirect impacts such as root-zone damage. Moreover, the Framework requires delivering biodiversity net gain, yet the allocation offers no clear mechanism for ensuring that outcome. Not Effective Delivery depends on multiple unresolved dependencies: new school provision, bus service contributions, off-site biodiversity management, and upgrades to rights-of way/ buffer zones. No phasing plan, funding mechanism or legal agreement is published to secure these. Without such mechanisms the allocation cannot be considered deliverable within the plan period (NPPF paragraph 35(c)) Not given enough Thought The location intensifies existing pressures in Portishead: schools, healthcare and transport infrastructure is already under strain (for example the A369 corridor). This peripheral site would likely increase private vehicle usage and pollution rather than support sustainable travel patterns, contrary to NPPF paragraphs 104–106. The access to the land at Tower farm has not been through. Access at present on the Downs is extremely difficult at 8-9am and again from 2.30 to 3.30pm during School run, making it extremely difficult for emergency vehicles to access The Downs. There is nothing mentioned about improving access to the Downs eg widening the Road to accommodate an estimated extra 500 plus cars. Cumulative Impact When considered alongside other allocations in the Portishead area (such as Black Rock north of Clevedon Road), the combined pressure on ecology, infrastructure and transport is significant and undermines the Council's commitments to nature recovery and sustainable growth. No modification short of removing the allocation entirely would make this site appropriate. Given its direct adjacency to ancient woodland, its loss would be irreversible and cannot be mitigated sufficiently. The land should instead be retained as undeveloped green space, managed to enhance biodiversity and provide sustainable public access, in line with the Avon Wildlife Trust's 2030 Strategy and national "30 by 30" nature recovery goals I do not support the North somerset plan 2041for the Tower Farm Hill location, as it is going to have a detrimental effect on the surrounding woodland. There has not been enough evidence provided towards providing the appropriate infrastructure and services that is required for a larger population. eg Health services, pharmacies, regular bus services. I believe north			

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					Somerset council should identify and use Brown Field sights first in North Somerset before planning to develop Green Belt and areas specified as scientific importance			

Name: Maureen Brady **I.D:** 62830593

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at North West Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Response to Proposed Local Plan for Nailsea Dear Sirs, I am writing to provide my response to the proposed local plan for Nailsea, both as a resident of the town and in my capacity as Chairman of the Nailsea Playing Fields Association (Charity Ref 307081). Impact of Housing Development on Infrastructure The suggested figure of 1,817 new homes for Nailsea would impose an unmanageable strain on the town's infrastructure, which is already under considerable pressure. The road network serving Nailsea is insufficient, and all main routes present difficulties for large lorries that supply shops, industry and warehouses, as well as for public transport. Additionally, the railway station requires significant improvements to make it accessible for all users. Increased traffic resulting from further development will only worsen the current travel issues. The proposed new road does not offer relief to Nailsea's existing routes, and there are doubts regarding the feasibility and eventual realisation of such an expensive project. Concerns for Sport, Leisure, and the Local Environment At present, Nailsea lacks adequate provision for sport and leisure. The anticipated rise in traffic along nearby country lanes will negatively affect walkers and cyclists. The ongoing loss of land to housing development further reduces the potential for enhanced sports facilities and adequate pitches for a range of sports. It also negatively impacts on the local biodiversity and wildlife habitats. Nailsea Playing Fields Association Land The Nailsea Playing Fields Association manages an area of land north of Greenfield Crescent (BS48 1HL), located within the parish of Wraxall and Failand. This land is currently used by Nailsea Junior Football Club and the Wessex Reserves Air and Army Cadets. The land is vested in the Charity Commissioners, and a covenant stipulates that it must be used for sport and leisure purposes. With the removal of this land north of Nailsea from the Green Belt, I seek assurance that it will not be allocated for housing, as this would further limit sports facilities and reduce opportunities for youth recreation Yours faithfully, Maureen Brady 27, Sedgemoor Close, Nailsea, BS48 4YR			

Name: Maureen Butterly **I.D:** 62850369

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Vision, Strategic Priorities and Sustainability Objectives	No	• Positively prepared • Justified • Effective	Unsure	Unsure	While the Vision emphasises sustainability, protecting valued areas, and supporting community well-being, there is a disconnect between these stated aspirations and the practical implications of identifying Pill and Easton-in-Gordano as a Strategic Location for large-scale residential development, particularly where this depends heavily on the release of Green	To make the Local Plan legally compliant and sound in respect of the issues identified, the following modifications are required: 1. Reassess and evidence the justification for Green Belt release around Pill and Easton-in-Gordano • The Plan must provide clear and robust evidence that all reasonable alternatives have been examined before releasing Green		

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		• Consistent with national policy			Belt land. Alignment between the Vision and Green Belt release (Soundness – Justification & Consistency with National Policy) The Vision states that “valued areas will be protected” and that new development will reflect a “more responsible attitude to climate change and the use of resources.” However, the Plan proposes releasing significant areas of Green Belt around Pill/ Easton-in-Gordano despite: • Insufficient evidence that all reasonable alternatives – such as maximising brownfield capacity, higher-density development in town centres, and cross-boundary co-operation – have been fully explored or exhausted. • Viability evidence indicating that the Golden Rules of affordable housing, green space provision, and infrastructure may not be deliverable on these sites, undermining the sustainability outcomes the Vision relies upon. Without clear evidence demonstrating exceptional circumstances for altering Green Belt boundaries, the Vision is not effectively translated into a justified, consistent strategy (NPPF 2024, Section 13). Community involvement and whether the Vision reflects local aspirations (Legal Compliance & Soundness – Positively Prepared) The Vision stresses community, well-being, and fairness, yet consultation processes to date have not ensured proportionate or inclusive engagement in Pill/E-in-G: • No public exhibition was held in the village during the key February–March 2025 consultation, despite five sites in this area being proposed. • Response volumes for Pill/E-in-G were strikingly lower than comparable locations, raising concern that local views were not adequately captured or reflected. • Over 2,100 residents (from a population of approx. 4,500) have subsequently signed a petition objecting to the scale of proposed development and the consultation approach. If the Vision is intended to represent community aspirations, the evidence suggests these aspirations have not been fully understood or incorporated, calling into question whether the Plan has been positively prepared. 3. Deliverability of sustainable communities (Soundness – Effectiveness) The Vision commits to creating “highly sustainable, accessible and attractive places,” yet for Pill/E-in-G there is significant uncertainty regarding: • Transport infrastructure capacity, particularly the cumulative impact on M5 Junction 19. • The extent to which sustainable travel modes (including the proposed rail link) can realistically accommodate population growth of this scale. • Ecological constraints, including the proximity of several sites to the North Somerset & Mendip Bats SAC and Severn Estuary SSSI, which may limit the form, timing or viability of development. If necessary, infrastructure and mitigation cannot be delivered to the standard implied by the Vision, the Vision cannot be considered effective. 4. Duty to Co-operate Given cross-boundary transport impacts and ecological designations, it is unclear from the Vision and supporting text	Belt land, including: o Maximising brownfield capacity. o Applying minimum density standards in sustainable urban areas. o Working with neighbouring authorities on unmet need. • The Council must demonstrate that exceptional circumstances exist as defined in NPPF 2024 s.13 and that the policies meet the “Golden Rules” relating to affordable housing, infrastructure and accessible green space. • If adequate evidence cannot be produced, the extent of proposed Green Belt release in this location should be reduced or removed. 2. Strengthen and document community engagement to ensure legal compliance • The Council should amend the Plan to include evidence that consultation was proportionate and inclusive for Pill and Easton-in-Gordano, including explanation of why no local exhibition was held and whether this complies with the Statement of Community Involvement. • If the Council cannot demonstrate compliance, further targeted community consultation should be undertaken, and the results incorporated into a revised submission version. 3. Provide clearer evidence of co-operation with statutory bodies, particularly regarding transport and ecology • The Plan should include explicit documentation of engagement with National Highways on cumulative traffic impacts at M5 Junction 19 and demonstrate how their recommendations have informed site allocations. • Evidence of engagement with Natural England and other statutory bodies concerning ecological constraints (North Somerset & Mendip Bats SAC, Severn Estuary SSSI, wildlife corridors) should be incorporated. • Where co-operation is incomplete or unresolved, the allocation of sites should be reconsidered. 4. Ensure transport and infrastructure assumptions are realistic and deliverable • The Plan should be modified to include updated transport modelling assessing the combined impact of the proposed developments in Pill/E-in-G, including reliance on the proposed Portishead railway link. • Clear commitments must be included regarding the timing and funding of necessary infrastructure (school provision, active travel routes, public transport). If these cannot be secured, the scale of development should be revised. 5. Strengthen environmental safeguards and flood risk evidence • The Plan should be modified to include clear mitigation strategies, with funding mechanisms, to protect designated ecological sites and wildlife corridors as required by NPPF and Habitats Regulations. • For sites near Markham Brook and within Flood Zone 3, the Plan should provide evidence that sequential testing has been applied, and lower-risk alternatives assessed. • Policies should explicitly limit development in higher-risk areas unless rigorous site-specific flood risk assessments demonstrate suitability. Summary Modification The Plan requires additional evidence, revised site allocations, and stronger policy safeguards to ensure it meets the tests of soundness (justified, effective, consistent with national policy), legal compliance, and duty to co-operate. Without these modifications, the Plan cannot be considered sound.		

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					whether the Council has demonstrated sufficiently active engagement with National Highways, neighbouring authorities, and statutory environmental bodies. This uncertainty weakens the credibility of the Vision as an implementable framework. Summary The Vision is aspirational and well-intended, but key components of the Local Plan – particularly the scale of development proposed for Green Belt land around Pill and Easton-in-Gordano – are not convincingly aligned with the principles the Vision sets out. For these reasons, I do not consider the Plan sound in relation to this section.			
Strategic Priorities	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	The strategic priorities set out clear and commendable objectives, particularly regarding sustainability, regeneration, reduced car dependence, protection of valued landscapes, and prioritisation of brownfield and well-connected locations. However, there is a significant inconsistency between these priorities and the proposed allocation of large-scale development on Green Belt land around Pill and Easton-in-Gordano. For this reason, I do not consider this part of the Plan to be sound. Conflict with sustainable development and climate objectives (SP1 & SP2) The priorities emphasise sustainable patterns of growth, reduced emissions, and maximising opportunities for low-carbon development. Yet the Plan diverges from these aims by allocating major development in locations where: • Residents would remain heavily dependent on private car use due to limited local employment, incomplete public transport provision, and unresolved capacity issues at M5 Junction 19. • Essential infrastructure, including active travel routes and rail services, is either uncertain or not deliverable within the Plan period. • The loss of Green Belt land conflicts with strategic climate and biodiversity aims. This undermines both the justified and effective aspects of the soundness test. Inconsistency with the priority to focus growth near major service centres (SP5 & SP6) A key strategic priority is to direct development to locations with a “wide range of services, facilities and job opportunities,” and to support regeneration in established towns. However, Pill/Easton-in-Gordano is not a town, does not contain a broad service base, and lacks robust employment opportunities. Its designation as a Strategic Location contradicts this priority when compared with Weston-super-Mare, Clevedon, Nailsea, and Portishead, all of which are explicitly named as places where growth should be concentrated. If the strategy is to be consistent with national policy and internally coherent, development should be focused where the Plan’s own priorities say it belongs. Misalignment with priorities on reducing car use and improving transport (SP7 & SP10) The Plan’s priorities require a shift towards walking, cycling, and high-quality public transport. However, for this location: • National Highways has already expressed concerns about	To make the Local Plan legally compliant and sound with respect to the Strategic Priorities, the following modifications are required: Re-align the spatial strategy with the stated Strategic Priorities The Plan must demonstrate a clear and evidence-based link between the priorities and the distribution of development. Required modifications: • Reassess the designation of Pill/Easton-in-Gordano as a Strategic Location, given that it conflicts with priorities relating to sustainable travel, access to services, car reduction, regeneration of towns, and protection of valued landscapes. • Redirect more growth towards the main towns (Weston-super-Mare, Clevedon, Nailsea, Portishead) and transport hubs, in accordance with the priorities identified. Demonstrate that brownfield land and higher-density opportunities have been fully maximised Before releasing Green Belt land, the Plan must show that the brownfield-first priority has been applied rigorously. Required modifications: • Provide transparent evidence that brownfield capacity and higher-density development in town centres have been fully optimised. • If this cannot be demonstrated, reduce or remove the scale of proposed Green Belt release around Pill/E-in-G. Strengthen the transport evidence base to support the priorities of reducing car use and enabling sustainable travel The strategic priorities depend on significant shifts in transport behaviour, yet transport evidence and modelling are incomplete. Required modifications: • Publish comprehensive cumulative transport modelling, including impacts on M5 Junction 19. • Show how the proposed allocations will realistically support reduced car dependency, with deliverable and funded public transport improvements, not reliant on assumptions about infrastructure yet to be secured. • Where these outcomes cannot be achieved, revise the scale or location of growth. Incorporate detailed ecological and flood risk evidence to support priorities for protecting habitats and safeguarding at-risk areas The priorities require biodiversity protection and avoidance of flood risk, but the evidence and mitigation strategies are insufficient. Required modifications: • Include detailed, site-specific ecological assessments for locations within SAC/SSSI consultation zones. • Provide clear, costed mitigation strategies and identify responsible bodies for delivery. • Demonstrate that sequential testing for flood risk has been applied to all affected sites and remove or amend allocations where lower-risk alternatives exist.		

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					cumulative impacts on the Strategic Road Network, particularly at Junction 19. • Transport modelling has not yet been published to confirm that additional traffic can be accommodated. • Proposed improvements (e.g., active travel routes) do not compensate for the limited local employment base and likely commuter patterns. • Reliance on the proposed Portishead rail link is optimistic given its uncertain timescale. Where the transport evidence base is incomplete, the priorities cannot be delivered in practice, weakening the effectiveness of the strategy. Inconsistency with the priority to deliver higher densities and to prioritise brownfield land (SP11) One of the strongest strategic priorities is to boost densities at transport hubs and focus new development on brownfield land. The Plan does not demonstrate that these options have been fully utilised before proposing Green Belt release. If the brownfield-first principle has not been maximised, the spatial strategy is not justified. Conflict with priorities relating to green spaces, biodiversity, and flood risk (SP12) The proposed development sites around Pill and E-in-G lie within sensitive ecological zones associated with the North Somerset & Mendip Bats SAC and near the Severn Estuary SSSI. Some sites are also close to Markham Brook and areas identified as Flood Zone 3. Allocating high-impact development in these locations conflicts directly with the priority to safeguard habitats, provide green space, and avoid areas at flood risk unless justified by rigorous evidence – which is not yet provided. Duty to Co-operate considerations. Because several strategic priorities depend on cross-boundary issues, including transport, ecology, and flood management, the Plan should clearly document how the Council has engaged with National Highways, Natural England, the Environment Agency, and neighbouring authorities. This is not evident in the material provided for this section. Summary Although the strategic priorities themselves are reasonable, the proposed development pattern, particularly the scale of growth directed to Pill and Easton-in-Gordano, does not align with these priorities and is neither justified nor effective. For this reason, I do not consider this part of the Plan to be sound.	Provide evidence of proportionate and inclusive community engagement to ensure legal compliance Given the importance of Strategic Priorities in shaping the spatial strategy, the consultation process must show that local communities were meaningfully engaged. Required modifications: • Demonstrate how the views of Pill/E-in-G residents were captured given the absence of a local exhibition event and unusually low response numbers. • Where this cannot be evidenced, undertake supplementary engagement and incorporate findings before submission. Strengthen documentation of the Duty to Co-operate Many Strategic Priorities rely on cooperation with statutory bodies and neighbouring authorities. Required modifications: • Update the Plan to include clear statements of engagement with National Highways, Natural England, the Environment Agency, and neighbouring councils, particularly regarding transport capacity, ecological constraints, and flood risk. • Where co-operation is not satisfactorily evidenced, revise the affected allocations or policies. Summary Modification To be sound, the Plan must: • Align its development strategy with its own Strategic Priorities, • Show that alternatives have been fully explored before Green Belt release, • Provide the transport, environmental, and community engagement evidence that the priorities depend upon, and • Adjust or remove allocations that cannot realistically deliver these outcomes.		
Sustainable development objectives	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The Sustainable Development Objectives provide a comprehensive and appropriate framework for assessing the Plan. However, the allocation of large-scale development on Green Belt land around Pill and Easton-in-Gordano is inconsistent with several of these objectives, and the Plan does not demonstrate that these objectives have been effectively applied in the spatial strategy. For this reason, this part of the Plan is not sound. Economic and transport-related objectives (1.1, 1.2, 1.3) Objective 1.1 – Accessible jobs without car dependence Pill/E-in-Gordano does not provide a wide range of local employment opportunities. Most residents commute to Bristol or Portishead, meaning that major development here is likely to	To make the Local Plan legally compliant and sound in relation to the Sustainable Development Objectives, the following modifications are required: Reassess the distribution of development to align with objectives on reducing car dependency (1.1, 3.3) The Plan must demonstrate that large-scale development in Pill/ Easton-in-Gordano will not increase reliance on private car travel. Required modifications: • Provide updated cumulative transport modelling for Junction 19 and local roads. • If modelling shows worsening car dependency, reallocate a proportion of growth to locations with demonstrably better access to employment, services, and sustainable transport (e.g., town centres,		

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					increase car dependency rather than reduce it. The Plan does not demonstrate that alternative locations – closer to key employment centres – have been satisfactorily evaluated. Objective 1.3 – Optimal use of land and brownfield-first development The allocation of extensive Green Belt land conflicts with the aim of maximising brownfield reuse and supporting regeneration. The Plan has not provided clear evidence that all reasonable brownfield capacity and higher-density options in sustainable towns have been exhausted before turning to Green Belt release. Housing, community and health objectives (2.1–2.5) Objective 2.3 – Reasonable access to services Pill/E-in-Gordano does not have the full range of community, healthcare, retail, or educational facilities needed to support 1,100 additional homes. The Plan depends on future provision (e.g., new school, improved transport links) but lacks clear evidence of deliverability or funding. This undermines the effectiveness of the strategy. Objective 2.5 – Healthy living and active travel The Plan's reliance on active travel measures is not supported by clear, deliverable infrastructure proposals. At present, walking and cycling connections to key destinations are limited, and there is no evidence that these can be upgraded to meet the increased demand. Environmental and climate objectives (3.1–3.6) Objective 3.2 – Minimising vulnerability to flooding Certain proposed sites in Pill/E-in-G, including areas near Markham Brook, lie close to or within recognised flood risk zones. The Plan does not demonstrate that the sequential test has been fully applied or that lower-risk alternatives have been thoroughly assessed. Objective 3.3 – Reducing the need to travel by car The proposed development would significantly increase pressure on Junction 19 of the M5, where National Highways has already expressed concerns. Until cumulative transport modelling is complete and mitigation fully secured, the Plan cannot show that this objective is being delivered. Objective 3.4 & 3.6 – Sensitive landscapes and biodiversity The proposed development sites lie within consultation zones for the North Somerset & Mendip Bats SAC and near the Severn Estuary SSSI – two of the district's most significant ecological assets. The Plan does not provide detailed mitigation strategies or demonstrate that biodiversity net gain can realistically be achieved on these constrained sites. Large-scale Green Belt release in locations with known ecological value conflicts directly with these objectives. Summary Although the Sustainable Development Objectives themselves are appropriate, the Plan does not align its spatial strategy with them. Key inconsistencies include: • Increased car dependency rather than reduced travel	transport hubs, brownfield land). • Include firm commitments (with funding identified) for public transport improvements, rather than aspirational statements. Demonstrate that brownfield land and regeneration opportunities have been fully maximised (1.3) The Plan's sustainability objectives require the optimal use of brownfield land and prioritisation of regeneration. Required modifications: • Publish the full assessment of brownfield capacity, higher-density opportunities, and capacity in town centres. • Where this demonstrates additional capacity, reduce the scale of Green Belt release in Pill/E-in-G accordingly. • Amend the Plan to show how regeneration in Weston-super-Mare, Clevedon, Nailsea, and Portishead contributes significantly to meeting housing needs, consistent with the objectives. Strengthen evidence of deliverable community infrastructure to support objectives on health, access, and wellbeing (2.3, 2.5) Large-scale growth requires accessible services that exist in reality, not only in future aspiration. Required modifications: • Provide detailed evidence of deliverability and funding for new schools, healthcare capacity, active travel routes, and local centre enhancements. • If infrastructure cannot be guaranteed or delivered in step with development, reduce or redistribute proposed housing numbers in constrained settlements. Apply the sequential test rigorously and re-evaluate allocations in areas at flood risk (3.2) The Plan cannot be sound if it allocates sites in flood-prone areas without demonstrating that safer alternatives have been assessed first. Required modifications: • Include explicit sequential test results for all sites near Markham Brook and other local flood zones. • Reassess allocations where sequential testing indicates lower-risk options are available elsewhere in the district. • Strengthen policy wording to ensure that development is restricted where flood mitigation is uncertain or dependent on third-party infrastructure upgrades. Incorporate detailed ecological evidence and mitigation strategies for protected habitats (3.4, 3.6) The Plan must demonstrate how biodiversity and sensitive landscapes will be protected, not simply state intentions. Required modifications: • Provide site-specific ecological assessments for all proposed allocations within the North Somerset & Mendip Bats SAC consultation zone and near the Severn Estuary SSSI. • Identify clear, costed mitigation strategies, with implementation responsibilities and monitoring mechanisms. • Where mitigation is not feasible, reconsider or remove the affected site allocations. Re-evaluate growth in constrained rural settlements where sustainability objectives cannot realistically be achieved Pill/E-in-Gordano is heavily constrained by Green Belt, landscape value, ecological designations, limited service provision, and poor strategic transport capacity. Required modifications: • Reassess the scale of development proposed for settlements that do not meet the sustainability criteria, particularly those lacking		

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					emissions. • Insufficient access to services and facilities. • Unresolved flood risk issues. • Significant ecological constraints. • Use of Green Belt rather than prioritising brownfield. • Lack of evidence that infrastructure can be delivered in step with growth. For these reasons, this section of the Plan is not sound, particularly in failing the tests of justification, effectiveness, and consistency with national policy.	direct access to employment, services, and low-carbon transport options. • Reallocate growth in proportion to sustainable capacity rather than land availability alone. Improve transparency around how sustainability objectives have shaped the spatial strategy The Plan must show clearly how each SA objective influenced site selection and alternatives. Required modifications: • Publish a clearer narrative linking decisions on site allocations to the SA objectives, including reasons for rejecting more sustainable alternatives. • Update the Sustainability Appraisal where new evidence (transport, ecology, flooding, viability) requires re-evaluation. Summary Modification To be sound, the Plan must: • Realign the spatial strategy with sustainability objectives, • Reduce or remove allocations that increase car dependency, • Prioritise brownfield and well-serviced locations, • Secure infrastructure deliverability, • Ensure rigorous ecological and flood risk assessment, and • Provide transparent justification for how choices were made. Without these modifications, the Plan does not meet the soundness tests of justification, effectiveness, or consistency with national policy, and in some areas raises questions about legal compliance.		
Strategic Policies	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The Strategic Policies form the backbone of the Local Plan and must demonstrate a coherent, evidence-led approach to the spatial distribution of development. While the stated intentions of Policies SP1–SP13 are appropriate in principle, the overall strategy – particularly as implemented through the spatial strategy (SP3), villages policy (SP6), Green Belt policy (SP7), housing strategy (SP8) and transport strategy (SP10) – does not align with the evidence base or with national policy tests of soundness. For this reason, I do not consider this section of the Plan to be sound. 1. SP1 & SP2 – Sustainable Development and Climate Change: inconsistencies with proposed site allocations The Plan commits to reducing carbon emissions, minimising car dependency, and directing development to sustainable locations. However, allocating large-scale development around Pill/Easton-in-Gordano – an area with limited local employment, constrained road capacity, and heavy reliance on car travel – directly contradicts these policies. • There is no clear evidence showing that the strategy will reduce carbon emissions or achieve a measurable shift away from car travel. • The reliance on future infrastructure solutions (e.g., Portishead rail link) is uncertain and therefore ineffective as a basis for the strategic strategy. This undermines SP1 and SP2, making the strategy neither justified nor effective. 2. SP3 – Spatial Strategy: insufficient justification for the allocation of growth to Green Belt villages SP3 should direct growth to the most sustainable locations –	To make the Strategic Policies (SP1–SP13) legally compliant and sound, the following modifications are required: 1. Modify the Spatial Strategy (SP3) to align with sustainable development and transport evidence The current strategy directs substantial growth to Pill/Easton-in-Gordano, a location that does not meet the Plan's own sustainability or transport objectives. Required modifications: • Reassess the spatial distribution of development to focus more growth in the towns (Weston-super-Mare, Clevedon, Nailsea, Portishead) and other areas with strong public transport and employment access. • Reduce or remove the Strategic Location allocation for Pill/E-in-G unless robust evidence demonstrates that it performs favourably against sustainability, transport, ecological, and infrastructure criteria. • Update the Sustainability Appraisal to reflect alternative spatial options and their comparative performance. 2. Strengthen Green Belt justification in SP7 or revise Green Belt release where exceptional circumstances cannot be shown The Plan must clearly demonstrate that exceptional circumstances exist for Green Belt release, which it currently does not. Required modifications: • Publish a transparent Green Belt assessment showing that all reasonable non–Green Belt alternatives (brownfield capacity, density uplift, town centre regeneration) have been fully explored. • Provide evidence that the "Golden Rules" (affordable housing delivery, infrastructure provision, green space) are viable and deliverable on proposed Green Belt sites.		

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					primarily towns and areas with strong transport connections. Instead, the Plan allocates a disproportionate level of housing growth to Pill/E-in-Gordano, which: • is not a town. • lacks a broad range of services and employment. • relies on heavily congested road infrastructure. • contains Green Belt and significant ecological sensitivities. The Plan does not provide robust evidence that alternatives – such as town centre regeneration, increased densities, brownfield intensification, or cross-boundary distribution – have been fully considered. This fails the soundness test of justified development distribution. 3. SP4 – Placemaking: insufficient evidence of deliverability SP4 requires high-quality, well-served, sustainable places. However: • The infrastructure (schools, health provision, active travel networks) needed to support major development at Pill/E-in-Gordano is not yet funded or secured. • The sustainability appraisal identifies constraints – biodiversity, flood risk, landscape sensitivity – that undermine the ability to deliver placemaking principles. This makes the application of SP4 ineffective. 4. SP6 – Villages and Rural Areas: strategy not consistent with policy objectives SP6 intends to support rural communities without encouraging unsustainable growth. Yet Pill/E-in-Gordano is being treated as a Strategic Location for large-scale growth despite substantial constraints. This contradicts the intention of SP6 and national policy, which states that large-scale development should be directed to sustainable settlements unless exceptional evidence justifies alternatives. No such evidence is provided. 5. SP7 – Green Belt: exceptional circumstances not demonstrated The release of Green Belt around Pill/E-in-Gordano depends on clear demonstration of exceptional circumstances. This evidence is incomplete: • There is no transparent assessment showing that the full range of non-Green Belt options – brownfield, density uplift, regeneration – has been exhausted. • The viability evidence shows that achieving the Golden Rules (affordable housing, green space, infrastructure) may not be possible in these locations. If the key Green Belt tests cannot be met, SP7 cannot be considered consistent with national policy. 6. SP8 – Housing: strategy misaligned with housing objectives The housing strategy aims to deliver genuinely affordable, well-located homes. However:	• If this evidence cannot be provided, reduce or remove Green Belt releases in Pill/E-in-Gordano. 3. Ensure SP1 (Sustainable Development) and SP2 (Climate Change) are operationalised through the site selection process The policies cannot be sound unless the spatial strategy delivers them in practice. Required modifications: • Update the spatial strategy to prioritise locations with proven ability to support low-carbon transport. • Demonstrate that major allocations will not increase car dependency or carbon emissions, with full supporting transport modelling. • Amend policy wording to require firm, funded infrastructure delivery – not aspirational statements – before occupation of new homes. 4. Update SP4 (Placemaking) to ensure infrastructure delivery is secured, funded, and achievable Placemaking principles cannot be delivered without guaranteed infrastructure. Required modifications: • Provide detailed evidence of how new schools, healthcare capacity, active travel networks, and community facilities will be delivered for growth areas. • Include specific triggers, phasing requirements, and delivery mechanisms in the Plan. • Where infrastructure funding is uncertain, reduce or amend site allocations to match realistic capacity. 5. Amend SP6 (Villages and Rural Areas) to ensure rural settlements are not assigned unsustainable levels of growth SP6 states that rural areas should receive appropriately scaled development, yet Pill/E-in-Gordano is assigned a disproportionately large allocation. Required modifications: • Recalibrate rural growth levels to reflect genuine sustainability criteria, not simply land availability. • Remove or significantly reduce large strategic allocations in villages unless they meet objective sustainability thresholds. 6. Strengthen SP10 (Transport) by incorporating evidence-led capacity assessments and secured mitigation The transport strategy lacks the evidence to demonstrate deliverability. Required modifications: • Publish cumulative transport modelling, including impacts on M5 Junction 19, and integrate its findings into SP10. • Demonstrate how sustainable transport modes (bus, rail, active travel) will achieve realistic modal shift and include funding and delivery mechanisms. • Revise allocations where transport impacts cannot be mitigated. 7. Amend SP11 (Historic and Natural Environment) to include site-specific ecological constraints and mitigation requirements		

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					• High-cost Green Belt sites with infrastructure challenges are unlikely to deliver the affordable housing levels required. • Concentrating 1,100 homes around Pill/E-in-Gordano does not reflect objective sustainability considerations or proximity to jobs, services, and transport. This raises concerns about effectiveness. 7. SP10 – Transport: lack of evidence, unresolved strategic road concerns SP10 commits to reducing car dependency and promoting sustainable travel. However: • National Highways has identified the need for cumulative impact modelling at M5 Junction 19, which has not been published. • The Plan relies heavily on assumed modal shift that is not supported by evidence. • Existing congestion already undermines the objective of sustainable transport delivery. Without evidence that transport impacts can be mitigated, SP10 is not effective and raises Duty to Co-operate concerns. 8. SP11 – Historic and Natural Environment: insufficient mitigation for designated habitats Large parts of the Pill/E-in-Gordano area fall within consultation zones for the North Somerset & Mendip Bats SAC, are adjacent to SSSI, or include sensitive wildlife corridors. SP11 requires protection of these assets, but the Plan does not include: • Site-specific ecological assessments. • Clear funding and mechanisms for mitigation. • Evidence that biodiversity net gain is deliverable. This undermines the consistency with national policy. Summary While the strategic policies themselves are appropriate, the Plan does not apply them consistently to its spatial strategy. The cumulative result is that the Plan is not sound because: • It is not justified (inadequate evidence for spatial choices and Green Belt release). • It is not effective (infrastructure uncertainty, unresolved transport and environmental constraints). • It is not consistent with national policy (on Green Belt, sustainable development, ecology, flood risk, transport). For these reasons, this section of the Local Plan cannot currently be considered sound.	Sensitive ecological locations cannot accommodate large-scale development without robust, costed mitigation. Required modifications: • Incorporate detailed ecological assessments for sites within SAC/ SSSI consultation zones and identified wildlife corridors. • Add explicit mitigation requirements and monitoring responsibilities to SP11 and relevant site policies. • Reconsider allocations where impacts on protected habitats cannot be avoided or mitigated to an acceptable standard. 8. Improve Duty to Co-operate documentation across relevant strategic policies Several strategic policies (SP3, SP7, SP10, SP11) depend on cross-boundary cooperation. Required modifications: • Include evidence of active engagement with National Highways, Natural England, the Environment Agency, and neighbouring authorities. • Set out how their concerns have shaped policy decisions, particularly regarding transport, ecology, and flood risk. • Where issues remain unresolved, revise the affected policies or allocations. Summary Modification To be sound, the Strategic Policies must be revised so that: • The spatial strategy reflects objective sustainability evidence. • Green Belt release is justified by robust exceptional circumstances or removed. • Transport, environmental and infrastructure constraints are fully evidenced and mitigated. • Growth is directed to the most sustainable locations, not constrained rural settlements. • Ecological and flood risks are assessed and addressed. • Cross-boundary consultation is properly documented. Without these modifications, Policies SP1–SP13 do not fully meet the soundness tests of justification, effectiveness, or consistency with national policy.		
SP1: Sustainable Development	No	• Positively prepared • Justified • Effective • Consistent with national	Unsure	Unsure	Policy SP1 sets out a strong and appropriate definition of sustainable development in North Somerset. However, the way the Plan applies SP1 – particularly through its spatial strategy and site allocations – does not demonstrate that these principles have been followed. As a result, I do not consider this policy to be sound, because the Plan as written cannot deliver the outcomes SP1 requires. The key inconsistencies are as follows: 1. SP1 requires reduced car dependency, but the Plan allocates	To make Policy SP1 and its application within the Local Plan legally compliant and sound, the following modifications are required: 1. Align SP1 with a revised spatial strategy that does not increase car dependency SP1 requires development to prioritise walking, cycling, and public transport. However, the current spatial strategy places major growth in locations – such as Pill/Easton-in-Gordano – where these outcomes cannot be delivered. Required modifications: • Amend the spatial strategy (SP3) to direct a greater proportion of		

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		policy			large-scale development in locations that increase it SP1 states that sustainable development should: • Prioritise walking and cycling, • Maximise the use of public transport; and • Support liveable neighbourhoods with easy access to jobs and services. However, Pill/Easton-in-Gordano: • has limited local employment opportunities. • lacks the full range of services required for a 44% population increase. • suffers from existing congestion issues at M5 Junction 19. • is not supported by confirmed, deliverable public transport improvements. Allocating 1,100 homes here is therefore inconsistent with SP1's transport and accessibility objectives. Until the Plan can demonstrate evidence that modal shift is achievable and transport impacts can be mitigated, SP1 is not effective. 2. SP1 requires prioritising previously developed land before Green Belt, yet the Plan relies heavily on Green Belt release SP1 explicitly states that sustainable development should "support the efficient use of land, including prioritising previously developed land." However: • The Plan allocates substantial Green Belt land around Pill/E-in-Gordano without demonstrating that brownfield options and higher-density town centre opportunities have been exhausted. • The supporting evidence does not show that non–Green Belt alternatives were considered in sufficient detail. This is inconsistent with SP1 and national policy (NPPF 2024, Sections 11 and 13). If previously developed land has not been fully utilised, SP1 cannot be considered justified. 3. SP1 requires supporting regeneration in town centres – but the spatial strategy directs major growth away from them SP1 lists regeneration, particularly within town centres, as a core component of sustainable development. Yet the spatial strategy (SP3) directs large-scale growth to Pill/E-in-Gordano, bypassing regeneration opportunities in Weston-super-Mare, Clevedon, Nailsea, and Portishead – despite the Plan identifying town-centre decline as a priority issue. This is inconsistent with both SP1 and the Plan's strategic priorities, meaning the policy is not internally coherent. 4. SP1 requires protection of natural assets and biodiversity—yet proposed allocations conflict with sensitive ecological designations. The policy states that sustainable development must "protect valued natural and historic assets and support green infrastructure and biodiversity." However, several of the development sites around Pill/E-in-Gordano fall within or adjacent to: • North Somerset & Mendip Bats SAC consultation zones; • Severn Estuary SSSI influence areas; • important wildlife corridors identified in the ecological evidence base. The Plan does not include the detailed mitigation strategies, funding mechanisms, or environmental assessments needed to show that these protections are deliverable. This makes SP1 ineffective and inconsistent with national policy. 5. SP1 requires avoidance of cumulative environmental harms – yet cumulative impacts are not fully assessed. SP1 states that development must avoid environmental impacts "on their own or cumulatively." However:	growth to locations with proven public transport accessibility, local employment, and walkable services (primarily the towns and transport hubs). • Reduce or remove large allocations in Pill/E-in-Gordano unless evidence shows they can meet SP1's low-carbon, low-car-dependency requirements. • Integrate updated, published transport modelling into SP1 to demonstrate how the policy will be operationalised. 2. Demonstrate that the "brownfield-first" principle in SP1 has been fully applied before releasing Green Belt land SP1 requires the efficient use of land and prioritisation of previously developed land, yet the Plan allocates substantial Green Belt without proving alternatives have been exhausted. Required modifications: • Publish evidence showing that all reasonable brownfield and higher-density opportunities have been fully explored. • Update the Sustainability Appraisal to compare brownfield options with Green Belt releases. • Reduce or remove Green Belt allocations in Pill/E-in-Gordano unless exceptional circumstances can be demonstrated in accordance with SP1 and NPPF 2024. 3. Secure the infrastructure required to achieve liveable, accessible, healthy neighbourhoods SP1 requires new development to support health, wellbeing, and liveable neighbourhoods. However, infrastructure dependencies (schools, healthcare, active travel routes, community facilities) for major growth areas are not yet funded or guaranteed. Required modifications: • Amend SP1 or related policies to include clear commitments that essential transport, education, health and community infrastructure must be in place before occupation. • Add phasing and delivery mechanisms to ensure infrastructure keeps pace with development. • Reassess allocations where infrastructure delivery cannot be guaranteed. 4. Incorporate detailed ecological constraints and mitigation requirements into SP1. SP1 states that sustainable development must protect natural assets and biodiversity, but current allocations do not demonstrate deliverability of mitigation – especially on sites near the SAC and SSSI. Required modifications: • Add references in SP1 requiring site-specific ecological assessments and deliverable mitigation strategies for all allocations within environmentally sensitive zones. • Include a requirement for demonstrable biodiversity net gain with identified delivery mechanisms. • Reconsider allocations where ecological mitigation is not feasible. 5. Strengthen SP1 to ensure cumulative environmental, transport, and flood impacts are fully assessed SP1 requires avoidance of cumulative environmental harm, yet the Plan lacks full cumulative assessments. Required modifications: • Require cumulative impact assessments on transport (including M5 Junction 19), ecology, air quality, and flood risk to inform allocation decisions. • Modify or remove allocations where cumulative impacts cannot be satisfactorily mitigated. 6. Strengthen the linkage between SP1 and town centre regeneration SP1 states that sustainable development must support regeneration,		

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					• Cumulative transport impacts at M5 Junction 19 have not been fully modelled. • Cumulative ecological impacts across multiple adjacent sites are not addressed. • Cumulative flood risk (including interaction with surface water, Markham Brook and tidal flooding) is insufficiently assessed. Without this evidence, SP1 cannot be effectively implemented. Summary Although SP1 is sound in principle, the Plan is not sound because the spatial strategy does not apply the policy's requirements. Major inconsistencies exist in relation to transport sustainability, brownfield-first development, regeneration, biodiversity protection, and cumulative environmental impacts. Until the site allocations and supporting evidence are revised to align with SP1, this part of the Plan cannot be considered justified, effective, or consistent with national policy.	but this is not reflected in the distribution of growth. Required modifications: • Update SP1 to emphasise that housing growth should support regeneration in Weston-super-Mare, Clevedon, Nailsea, and Portishead. • Reallocate a greater proportion of growth to town centres and brownfield regeneration areas in line with this objective. Summary Modification To be sound, SP1 must be applied consistently across the Plan. This requires: • Redirecting growth to sustainable locations. • Reducing reliance on Green Belt sites. • Ensuring infrastructure is secured before development proceeds. • Incorporating detailed ecological and cumulative impact assessments. • Strengthening regeneration-first principles. Without these modifications, SP1 cannot be considered justified, effective, or consistent with national policy.		
SP2: Climate Change	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Policy SP2 sets out rigorous and appropriate requirements for mitigating and adapting to climate change, reducing emissions, prioritising sustainable travel, and delivering biodiversity net gain. However, the Plan's spatial strategy and site allocations do not demonstrate that these principles can actually be achieved. As a result, while SP2 is soundly expressed in principle, the Plan is not sound in its implementation of the policy. 1. SP2 requires reduced greenhouse gas emissions, yet large allocations increase car dependency SP2 states that development must: • prioritise active travel and effective public transport over car use, and • support the decarbonisation of transport. However, the evidence base does not show that Pill/Easton-in-Gordano can: • deliver effective public transport at the scale required; • accommodate 1,100 additional homes without significantly increasing car trips; • overcome severe constraints at M5 Junction 19, where congestion is already significant and cumulative transport modelling is incomplete. Without credible evidence of achievable modal shift, the allocation of large-scale development in this location directly conflicts with SP2 and cannot be considered effective. 2. SP2 requires resilience to climate impacts, yet several allocated sites are constrained by flood risk SP2 states that development must: • "reduce the risk of flooding now and in the future", and • consider "predicted sea level rises" and "storm and flood risks." However, several sites around Pill/E-in-Gordano lie within or adjacent to areas of known fluvial and tidal flood risk (e.g., near Markham Brook). The Plan does not demonstrate: • that the sequential test has been fully applied; • that climate change–adjusted flood modelling has been incorporated; • that mitigation is feasible without increasing flood risk elsewhere. This makes the application of SP2 not justified and not	To make Policy SP2 and its application within the Local Plan sound and legally compliant, the following modifications are required: 1. Revise the spatial strategy so that SP2's climate principles are actually deliverable SP2 requires development to reduce greenhouse gas emissions, prioritise sustainable transport, and support carbon neutrality. The current spatial strategy does not achieve this. Required modifications: • Re-distribute growth away from locations where infrastructure and settlement patterns will increase car dependency (e.g. Pill/Easton-in-Gordano). • Redirect a greater proportion of growth toward towns and transport hubs where sustainable travel and low-carbon living can realistically be achieved. • Update the Sustainability Appraisal to demonstrate that revised allocations perform better against climate objectives. 2. Publish full cumulative transport modelling as evidence that SP2's transport decarbonisation objectives can be met The Plan currently lacks essential transport evidence. Required modifications: • Undertake and publish cumulative transport modelling for M5 Junction 19 and surrounding network impacts. • Demonstrate how sustainable modal shift will be achieved at proposed development sites, with realistic modal share assumptions. • Where evidence shows transport emissions cannot be reduced, modify or remove the affected allocations. 3. Apply the sequential test robustly and remove or amend allocations that conflict with SP2's flood resilience requirements SP2 requires development to reduce flood risk and adapt to climate change. Some allocated sites lie near Markham Brook and areas within or adjacent to Flood Zone 3. Required modifications: • Publish sequential test assessments for all allocated sites affected by fluvial or tidal flood risk. • Remove or amend allocations where sequential testing identifies lower-risk options elsewhere. • Require site-specific, climate-adjusted flood modelling and mitigation measures before allocation is confirmed. 4. Strengthen SP2 with enforceable mechanisms for achieving water		

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					consistent with national policy. 3. SP2 requires maximising water re-use and resource efficiency, but the Plan does not evidence delivery mechanisms While SP2 expects new development to maximise water re-use and minimise resource consumption, there is no accompanying evidence showing: • how these requirements will be enforced; • what infrastructure is needed to support them; • how viability constraints on Green Belt sites will affect delivery. Where policy requirements are not backed by realistic implementation mechanisms, SP2 becomes ineffective. 4. SP2 requires renewable and low-carbon energy generation, but large edge-of-village sites do not demonstrate capacity to deliver this The Plan does not provide: • feasibility assessments of renewable energy generation on the allocated sites; • modelling of energy demand vs. achievable on-site generation; • clear commitments to decentralised energy networks. SP2 is therefore not well integrated into the site selection process. 5. SP2 requires net biodiversity gain, but several allocated sites lie within highly sensitive ecological zones SP2 requires development to: • “deliver green infrastructure”, and • “provide a net gain in biodiversity”. However, the Pill/E-in-Gordano sites: • fall within consultation zones for the North Somerset & Mendip Bats SAC; • contain key wildlife corridors; • are adjacent to the Severn Estuary SSSI. The Plan does not show how biodiversity net gain can realistically be achieved on these constrained sites, nor does it provide detailed mitigation strategies or secured funding. This failure undermines consistency with national policy and the effectiveness of SP2. 6. SP2 requires the efficient use of existing buildings and land, yet the Plan relies heavily on Green Belt release The policy encourages: • reuse of existing buildings, and • prioritisation of brownfield land. However, the Plan allocates large amounts of Green Belt land without demonstrating that lower-carbon, lower-impact brownfield opportunities have been fully utilised. This directly conflicts with SP2’s climate and land-use hierarchy. Summary SP2 sets ambitious and appropriate climate objectives, but the Plan does not demonstrate that its spatial strategy or allocations will actually deliver them. Key climate tests – reducing transport emissions, minimising flood risk, ensuring resilience, protecting sensitive habitats, and prioritising brownfield land – are not met. For these reasons, SP2 is not sound as implemented and fails the tests of: • Justification (evidence for spatial choices is insufficient), • Effectiveness (climate outcomes are not deliverable), and • Consistency with national policy (NPPF climate and flood risk tests).	efficiency, energy efficiency, and carbon-neutral buildings SP2 requires net-zero energy standards and water reuse but provides no enforceable delivery tools. Required modifications: • Add specific requirements for minimum energy performance standards, water efficiency standards, and low-carbon heating. • Clarify how these standards will be enforced through development management, viability, and infrastructure planning. • Include policy wording ensuring that these requirements cannot be weakened through viability arguments. 5. Require site-specific evidence of renewable or low-carbon energy generation for major allocations SP2 calls for maximising renewable energy generation. Required modifications: • Require feasibility assessments for decentralised energy generation for all major development sites. • Identify opportunities for local heat networks or solar/renewable installations and incorporate them into policy text. • Modify or reduce site allocations where low-carbon energy delivery is not feasible. 6. Strengthen ecological protection requirements to ensure SP2’s biodiversity and green infrastructure objectives are achievable SP2 requires net biodiversity gain and protection of natural assets. Required modifications: • Publish detailed ecological assessments for sites within the SAC and SSSI consultation zones and identified wildlife corridors. • Include specific mitigation requirements, delivery responsibilities, and secure funding mechanisms. • Reduce or remove allocations where net biodiversity gain cannot be delivered or where impacts on protected species cannot be mitigated. 7. Prioritise brownfield land and reuse of existing buildings in line with SP2 and national policy The Plan currently conflicts with SP2’s requirement for efficient land use. Required modifications: • Publish clear evidence demonstrating that brownfield and regeneration opportunities have been fully maximised before Green Belt release. • Reallocate housing numbers to brownfield sites and town centre regeneration areas where this supports climate and sustainability goals. • Reduce or remove Green Belt allocations that cannot meet SP2 requirements. 8. Strengthen documentation of the Duty to Co-operate on climate, transport, and flood risk matters SP2 cannot operate effectively without cross-boundary collaboration. Required modifications: • Provide evidence of engagement with National Highways, the Environment Agency, Natural England, and neighbouring local authorities specifically on climate resilience, transport decarbonisation, and ecological protection. • Where unresolved concerns exist, revise affected allocations. Summary Modification To be sound, SP2 must be supported by: • a spatial strategy that reduces rather than increases emissions; • full transport, flood, and ecological evidence; • enforceable mechanisms for net-zero buildings and water resource efficiency;		

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						• realistic and deliverable renewable energy strategies; • genuine prioritisation of brownfield land; • revisions to allocations where climate requirements cannot be achieved. Without these modifications, SP2 fails the tests of justification, effectiveness, and consistency with national policy.		
SP3: Spatial strategy	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	While Policy SP3 is correctly framed around prioritising sustainable locations for growth, its application in the Local Plan is not sound. The evidence does not demonstrate that the proposed strategic development at Pill and Easton-in-Gordano meets the requirements of this policy or national planning policy. As a result, the spatial strategy is not justified, not effective, and not consistent with national policy. 1. SP3 requires growth to be focused in urban areas with services and jobs — but Pill/E-in-G is neither The justification for SP3 describes a sequential approach that prioritises: • towns and urban areas, • locations with a wide range of facilities, • areas with strong public transport, • well-connected employment centres. However, Pill/Easton-in-Gordano: • is not an urban area nor a town; • does not offer a wide range of services or local employment opportunities; • is heavily dependent on car travel; • suffers from serious constraints at M5 Junction 19; • has limited public transport capacity, and improvements are not secured. Allocating 1,100 homes here contradicts SP3's own sustainability criteria and therefore fails the soundness test of justification. 2. The Plan asserts exceptional circumstances for Green Belt release, but the evidence is incomplete The justification for SP3 claims that exceptional circumstances exist because North Somerset cannot meet its housing need outside the Green Belt. However, the Plan does not demonstrate that all non–Green Belt alternatives have been fully explored, including: • maximising brownfield land; • applying higher densities in towns and around transport hubs; • increasing growth at Weston-super-Mare (the most sustainable location); • working with neighbouring authorities under Duty to Co-operate; • reallocating underutilised land in other settlements. Without a complete alternatives assessment, exceptional circumstances for allocating Green Belt land at Pill/E-in-Gordano are not robustly established, making SP3 inconsistent with the NPPF. 3. SP3 requires development to be located where infrastructure can support it — but infrastructure capacity is uncertain The NPPF states that large-scale development should be located where infrastructure can support it. Yet for Pill/E-in-Gordano: • Cumulative transport modelling (including M5 Junction 19) has not been published. • National Highways has already raised concerns about the	To make Policy SP3 and the associated spatial strategy sound, the following modifications are required: 1. Reassess the strategic distribution of development to prioritise genuinely sustainable locations SP3 states that priority should be given to urban areas with a wide range of services, facilities, and jobs. The current strategy does not reflect this. Required modifications: • Reallocate a higher proportion of growth to Weston-super-Mare, Clevedon, Nailsea, and Portishead, where sustainable transport, employment, and services already exist. • Reduce or remove the Strategic Location designation for Pill/Easton-in-Gordano unless robust evidence shows it meets sustainability criteria equivalent to the identified towns. • Update the Sustainability Appraisal to evaluate revised spatial distribution options. 2. Provide full evidence that all reasonable alternatives to Green Belt release have been exhausted SP3 relies on the assertion that exceptional circumstances exist to release Green Belt land. This requires a rigorous alternatives assessment. Required modifications: • Publish a transparent assessment showing full utilisation of brownfield land, regeneration potential, and higher-density opportunities in towns and transport hubs. • Provide a clear alternatives analysis showing why these options cannot accommodate additional housing need. • Reduce or remove Green Belt releases in Pill/E-in-Gordano unless exceptional circumstances are robustly demonstrated with evidence. 3. Integrate complete, up-to-date cumulative transport modelling into the spatial strategy The spatial strategy must demonstrate that transport networks can accommodate proposed growth without unacceptable impacts. Required modifications: • Undertake and publish cumulative transport modelling, including impacts at M5 Junction 19 and surrounding routes. • Amend SP3 to require that major allocations proceed only where sustainable transport improvements are deliverable and funded. • Modify or remove allocations where car dependency will increase or where mitigation cannot be secured. 4. Demonstrate that necessary infrastructure can be delivered "in step" with development SP3 requires development to be located where infrastructure exists or can be provided. Required modifications: • Provide detailed evidence on the deliverability and funding of required infrastructure (schools, health services, active travel routes, public transport). • Introduce phasing requirements ensuring infrastructure is delivered before or alongside housing. • Reconsider allocations where infrastructure funding or delivery timing cannot be guaranteed.		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					cumulative impacts of proposed developments. • Local services (schools, healthcare, local centre, public transport) are not currently capable of supporting a 44% population increase. • Funding for major infrastructure improvements is not secured. SP3 is therefore not effective, because the strategy relies on infrastructure that may not be deliverable. 4. SP3 requires minimising development in flood-risk areas — yet some allocations lie near known flood zones The justification states that residential development in areas at risk of flooding will be minimised outside towns. However, Pill/E-in-G includes: • land adjacent to Markham Brook, • areas within or close to Flood Zone 3, • sites requiring sequential testing. The Plan does not demonstrate that lower-risk alternatives were considered first. This contradicts SP3 and national policy on flood risk, making the strategy not justified. 5. SP3 states that development in villages should reflect local need — but the Plan allocates 1,100 homes to a village of 4,500 people SP3 states clearly that rural development should relate to local community needs and avoid disproportionate growth. Yet Pill/Easton-in-Gordano is assigned: • 1,100 homes (approx. 44% population increase), • the same “Strategic Location” status as major settlements. This is not proportionate and is inconsistent with SP3, which recognises villages as less sustainable locations. This undermines both effectiveness and consistency with national policy. 6. The spatial strategy lacks clear evidence that it delivers the objectives in SP1 and SP2 SP3 is intended to implement SP1 (Sustainable Development) and SP2 (Climate Change). However: • the distribution of development increases car dependency, • fails to maximise brownfield land, • puts pressure on sensitive ecological areas, • places growth in constrained locations. This means SP3 does not support the Plan’s own strategic framework, creating an internal inconsistency. Summary Although SP3 is appropriate in principle, the Local Plan does not apply the spatial strategy in a way that is: • Justified (reasonable alternatives have not been fully assessed), • Effective (infrastructure cannot support the proposed growth), • Consistent with national policy (on Green Belt, transport, flooding, sustainable development). Therefore, I do not consider SP3 or the spatial strategy it underpins to be sound.	5. Apply the sequential test rigorously and remove or amend allocations in areas at higher flood risk SP3 requires minimising development in flood-risk areas outside towns. Required modifications: • Publish the sequential test for all sites affected by fluvial or tidal flood risk, including those near Markham Brook. • Remove or amend allocations where safer, lower-risk sites exist elsewhere. • Include policy wording requiring site-specific, climate-adjusted flood mitigation for any remaining sites. 6. Reassess growth levels in rural settlements to ensure they reflect local needs and do not create disproportionate impacts SP3 states that development in villages must be proportionate and linked to local needs. Required modifications: • Reduce the scale of development proposed for Pill/E-in-Gordano to reflect sustainability constraints and community need. • Amend the spatial strategy to prevent rural settlements from being assigned levels of growth equivalent to urban areas. • Update the SA and supporting evidence to justify amended rural growth levels. 7. Strengthen consistency with SP1 (Sustainable Development) and SP2 (Climate Change) The spatial strategy must operationalise these strategic policies. Required modifications: • Require that site allocations demonstrate how they will achieve net-zero transport objectives and reduce carbon emissions. • Limit strategic allocations to locations where active travel and public transport are realistically deliverable. • Remove or amend allocations that would increase car dependency or undermine climate objectives. 8. Improve Duty to Co-operate documentation for infrastructure, transport, and environmental constraints SP3 depends on cross-boundary issues, but supporting evidence is incomplete. Required modifications: • Publish clear evidence of engagement with National Highways, the Environment Agency, Natural England, and neighbouring authorities. • Explain how their advice has shaped the spatial strategy. • Where concerns remain unresolved (e.g., transport modelling), reconsider or remove the affected allocations. Summary Modification To be sound, SP3 must be revised so that: • development is genuinely directed to the most sustainable locations, • Green Belt release is justified by robust evidence, • infrastructure capacity is proven and funded, • flood risk and ecological impacts are fully assessed and mitigated, and • growth in rural settlements is proportionate and based on sustainability criteria. Without these modifications, the spatial strategy fails the soundness tests of justification, effectiveness, and consistency with national policy.		
SP5: Towns	No	• Positively	Unsure	Unsure	Policy SP5 correctly identifies Weston-super-Mare, Clevedon, Nailsea, and Portishead as the most sustainable locations for growth, given their range of services, employment	To make Policy SP5 and its application within the Local Plan sound, the following modifications are required: 1. Re-align the spatial strategy to reflect SP5’s priority for directing		

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		prepared • Justified • Effective • Consistent with national policy			opportunities, public transport networks, and potential for higher-density development. The policy is sound in principle, but the Local Plan does not apply SP5 consistently in its spatial strategy or site allocations. Because the distribution of development in the Plan does not reflect the priorities set out in SP5, this element of the Plan is not sound—failing the tests of justification, effectiveness, and consistency with national policy. 1. SP5 prioritises development in towns, yet the spatial strategy directs a substantial quantity of housing to Pill/Easton-in-Gordano SP5 states that towns are the first and most sustainable locations for new development. However, the Plan: • assigns 1,100 dwellings to Pill/Easton-in-Gordano (a village rather than a town), • identifies it as a Strategic Development Location, • allocates growth levels comparable to Nailsea/Backwell and greater than some existing urban regeneration opportunities. This contradicts SP5's sequential priority for towns and undermines the Plan's sustainability objectives. The policy cannot be considered effective if the spatial strategy ignores it. 2. SP5 emphasises optimising densities and brownfield land in towns, but the Plan does not demonstrate that this has been maximised SP5 and the NPPF both require: • higher densities in accessible town-centre locations, • maximisation of brownfield redevelopment, and • efficient use of land in existing urban areas. Yet the evidence base does not demonstrate that: • all brownfield land in towns has been fully assessed, • density uplifts have been applied consistently across urban sites, • regeneration potential in Weston-super-Mare, Clevedon, Nailsea and Portishead has been fully examined before turning to Green Belt release. This raises questions about whether the Plan's spatial strategy is justified. 3. SP5 requires good access to public transport, which is far stronger in the four towns than in Pill/Easton-in-Gordano The Plan acknowledges: • towns have established public transport networks, • development in towns can more effectively support active travel and reduced car dependency. By contrast, Pill/E-in-Gordano: • relies heavily on car travel, • lacks secured public transport improvements, • faces highway constraints at M5 Junction 19. Allocating strategic growth to a village over well-connected towns is inconsistent with SP5 and NPPF transport policy. 4. SP5 supports regeneration of town centres, yet the Plan places major growth elsewhere SP5 makes clear that: • town centres should be the primary focus for a wide range of uses, • regeneration and diversification of urban areas is a strategic priority. However, the Plan does not demonstrate how large-scale	growth to towns SP5 states clearly that the four towns (Weston-super-Mare, Clevedon, Nailsea, Portishead) are the most sustainable locations with the widest range of services, jobs, and transport options. Required modifications: • Increase the proportion of housing growth directed to the four towns, reflecting their higher sustainability and infrastructure capacity. • Reduce or remove the scale of strategic development allocated to Pill/Easton-in-Gordano, unless clear evidence demonstrates that it performs equally well against SP5's sustainability criteria (which is not currently shown). • Update the Sustainability Appraisal to examine expanded urban options versus rural Strategic Locations. 2. Demonstrate that all reasonable brownfield and density opportunities within the towns have been fully maximised SP5 requires that towns be the first place to consider for new development, particularly through optimising densities and re-using brownfield land. Required modifications: • Publish a comprehensive assessment of potential density uplift in town centres and at transport hubs. • Provide an updated brownfield capacity analysis showing which sites were considered, excluded or under-utilised. • If greater brownfield or higher-density opportunities exist, reduce or remove Green Belt allocations in Pill/E-in-Gordano accordingly. 3. Strengthen SP5 to require that major development in towns supports placemaking, regeneration, and low-carbon living SP5 correctly highlights the importance of towns for regeneration and sustainable transport, but the Plan does not sufficiently tie strategic growth to town-centre renewal. Required modifications: • Amend SP5 to explicitly require that significant new housing in towns is integrated with regeneration strategies, active travel improvements, and public transport investment. • Include a clear policy mechanism ensuring that urban development contributes to town-centre vitality before releasing rural or Green Belt land. 4. Demonstrate that infrastructure delivery in towns can support increased development, removing reliance on less sustainable rural allocations SP5 requires development in towns to be served by adequate infrastructure. Supporting evidence for the towns is more robust than for rural Strategic Locations, yet the Plan diverts major development away from these more deliverable locations. Required modifications: • Publish updated assessments showing the capacity of schools, health facilities, transport systems, and utilities within the four towns. • Where infrastructure upgrades are needed, provide funding routes and delivery timescales. • Reduce allocations in Pill/E-in-Gordano where infrastructure is uncertain or undeliverable. 5. Strengthen internal policy coherence between SP5 and SP3 (Spatial Strategy) SP5 identifies towns as the primary locations for growth, yet SP3 and the site allocations conflict with this principle. Required modifications:		

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					development in Pill/E-in-Gordano contributes to town centre renewal. The Plan therefore does not reflect SP5's stated goals and risk limiting the economic resilience of town centres by diverting new investment away from them. 5. SP5 requires development to be supported by infrastructure, which is more readily achievable in towns SP5 rightly notes that towns have: • established education, health and community facilities, • greater potential for viable active travel enhancements, • existing utility and transport networks. By contrast, the infrastructure required to support large-scale development at Pill/E-in-Gordano: • is not secured, • depends on unproven transport interventions, • faces viability concerns for delivering affordable housing and green space. This contradicts SP5's requirement for infrastructure-supported growth. Summary SP5 identifies the towns as the primary and most sustainable locations for development, but the Plan's spatial strategy does not follow its own policy. By directing significant strategic growth to a village with limited services, infrastructure and public transport—while not demonstrating full optimisation of brownfield town-centre opportunities—the Plan is not sound. SP5 is therefore undermined by the wider strategy and cannot be considered effective or justified until the spatial distribution of development is reviewed.	• Amend SP3 so that its spatial distribution of growth fully reflects SP5's hierarchy: towns first, followed by sustainable settlements, and rural areas only where proportionate. • Remove the Strategic Location designation for Pill/E-in-Gordano unless the Council can demonstrate—with evidence—that it offers sustainability outcomes comparable to the four towns. 6. Clarify the relationship between town-centre regeneration and housing allocations The justification for SP5 emphasises declining town centres and the need to revitalise them. Required modifications: • Include specific references within SP5 requiring that housing allocations contribute directly to town-centre revitalisation, not bypass it. • Require brownfield and town-centre regeneration opportunities to be exhausted before any Green Belt release is considered. Summary Modification To be sound, SP5 must be backed by a spatial strategy that: • directs more growth to the four towns, • maximises brownfield and higher-density urban development, • avoids disproportionate growth in less sustainable rural locations, • strengthens regeneration and low-carbon living in town centres, and • ensures infrastructure is deliverable and aligned with urban growth. Without these modifications, SP5 cannot be considered justified, effective, or consistent with national policy.		
SP6: Villages and rural areas	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Policy SP6 correctly recognises that villages and rural areas are less sustainable locations due to limited services, fewer job opportunities, and greater likelihood of car dependency. However, the Local Plan does not apply SP6 consistently in its strategic allocations. By designating Pill and Easton-in-Gordano – a village with clear rural constraints – as a Strategic Development Location for approximately 1,100 homes, the Plan contradicts the policy requirements established in SP6. As a result, the application of SP6 is not sound. The Plan fails the tests of justification, effectiveness, and consistency with national policy. 1. SP6 requires development in villages to be proportionate and based on local community needs — yet Pill/E-in-Gordano is allocated an overwhelmingly disproportionate scale of growth SP6 states that development must: • reflect local community needs, and • be of a form, scale and range appropriate to a village. However, the Plan allocates approx. 1,100 dwellings to Pill/ Easton-in-Gordano – equivalent to a 44% increase in population. This is not a proportionate level of rural growth. It far exceeds any reasonable interpretation of "local needs" and contradicts the stated purpose of SP6. 2. SP6 requires development not to cause significant adverse impacts on local services or infrastructure – but the evidence indicates it will SP6 states that proposals should not cause significant adverse impacts on local services and infrastructure, including cumulative impacts.	To make Policy SP6 and its application within the Local Plan sound, the following modifications are required: 1. Amend the spatial strategy so that development in villages is genuinely proportionate and reflects local needs SP6 requires that village development be based on local community needs and proportionate to the settlement's scale and character. Allocating approximately 1,100 homes to Pill/Easton-in-Gordano contradicts this. Required modifications: • Reduce or remove the strategic-scale housing allocations at Pill/ Easton-in-Gordano. • Reallocate growth to towns and sustainable urban areas in accordance with SP5 and SP3. • Update the Sustainability Appraisal to evaluate revised rural growth scenarios. 2. Strengthen SP6 by explicitly capping development levels in villages to avoid disproportionate scale To avoid ambiguity and ensure the policy is effective, SP6 should include clearer thresholds. Required modifications: • Add policy wording specifying that development in villages must not exceed a scale that would materially alter the settlement's character, size, or sustainability profile. • Require that any major development in villages undergo a specific sustainability appraisal demonstrating compliance with SP6. 3. Require robust, evidenced infrastructure capacity assessments before significant development is allocated in villages SP6 states that development must not cause adverse impacts on local		

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					Yet Pill/E-in-Gordano: • already experiences significant highway pressure at M5 Junction 19; • has limited public transport provision; • relies on services (schools, healthcare, community facilities) that are already at or near capacity; • lacks existing active travel connections that meet SP6 standards. No evidence in the Plan shows that this scale of development can be accommodated without substantial adverse impacts. Therefore, SP6 is not effectively implemented. 3. SP6 requires development to maximise opportunities for reducing the need to travel – but the location encourages car dependency SP6 emphasises the need to reduce the need to travel and ensure good active travel and public transport connections. However: • commuting patterns from Pill/E-in-Gordano are heavily car-dependent; • sustainable travel options are limited; • proposed active travel enhancements are not costed, secured or evidenced; • reliance on a future railway link is uncertain. The proposed scale of development is not compatible with SP6's sustainability requirements. 4. SP6 requires high-quality integration into the village context – but strategic-scale development cannot be "readily assimilated" SP6 states that development must: • be assimilated into the village setting, and • enhance local character. A strategic allocation of 1,100 homes, spread across several Green Belt sites, cannot realistically be assimilated into a village of approx. 4,500 residents without fundamentally altering its character and scale. This directly contradicts SP6's core design and placemaking principles. 5. SP6 directs that outside settlement boundaries, new residential development should be heavily restricted — yet the Plan proposes extensive new build Green Belt development SP6 restricts new residential development outside settlement boundaries to limited, specific circumstances. However, the Plan proposes large-scale new-build Green Belt development outside the current boundaries of Pill/E-in-Gordano. This is inconsistent with SP6 unless exceptional circumstances are demonstrated – yet these are not evidenced for this particular location. 6. SP6 explicitly recognises that villages are less sustainable locations — yet Pill/E-in-Gordano is treated as a strategic development hub The justification for SP6 states that rural development is less sustainable and should be carefully controlled. Despite this, the Plan elevates Pill/E-in-Gordano to the same strategic status as Nailsea/Backwell and other urban expansions. This inconsistency weakens the Plan's internal coherence and makes SP6 ineffective as a guiding policy. Summary	services and infrastructure, yet the Plan allocates large-scale development without demonstrating capacity. Required modifications: • Include a requirement that infrastructure capacity assessments (schools, healthcare, transport, utilities) must be completed and published before allocating significant village growth. • Require binding phasing conditions to ensure infrastructure is delivered before occupation. • Remove allocations where infrastructure cannot realistically be delivered. 4. Strengthen SP6's requirements on sustainable travel and car dependency SP6 requires that development in villages maximises opportunities to reduce the need to travel and prioritises high-quality walking, cycling, and public transport connections. This is not deliverable for strategic-scale growth at Pill/E-in-Gordano. Required modifications: • Add wording requiring evidence of deliverable active-travel networks and viable public transport options as a prerequisite for any major development. • Remove allocations where reducing car dependency is not achievable. 5. Align SP6 with Green Belt policy (SP7) to prevent unjustified release of rural Green Belt land SP6's justification emphasises avoiding dispersed, unsustainable forms of development. This must be clearly linked to Green Belt protection. Required modifications: • Add explicit linkage between SP6 and SP7 confirming that Green Belt villages are unsuitable for strategic-scale development unless exceptional circumstances are robustly evidenced. • Require the Council to demonstrate that alternatives to Green Belt release in villages have been fully exhausted. 6. Require an enhanced landscape and character assessment for any development over a defined threshold in villages SP6 requires new development to be assimilated into the village, which is not possible for very large schemes. Required modifications: • Insert a policy requirement for settlement-specific landscape, character, and visual impact assessments for any proposal exceeding a defined size (e.g., >50 units in a village). • Remove allocations that fail to satisfy these assessments. 7. Improve internal consistency by revising SP3, SP5 and site allocations to reflect the principles in SP6 SP6 cannot be effective unless the rest of the Plan applies its principles. Required modifications: • Revise SP3 (Spatial Strategy) and SP5 (Towns) so that rural development is constrained to sustainable, proportionate levels. • Remove the Strategic Location designation for Pill/Easton-in-Gordano unless it can meet the sustainability criteria of SP6 (which the evidence does not support). Summary Modification To be sound, SP6 must be strengthened and consistently applied so that: • development in villages is truly proportionate, • allocations reflect local need, • infrastructure capacity is evidenced, • car dependency is minimised,		

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					While SP6 is appropriate in principle, the Plan does not apply it consistently. The proposed strategic growth of 1,100 homes at Pill/E-in-Gordano is: • not proportionate, • not locally needed, • not sustainable, • not supported by infrastructure evidence, and • not compatible with SP6's design, transport or placemaking requirements. Therefore, SP6 is not sound as implemented and fails the tests of justification, effectiveness, and consistency with national policy.	• Green Belt release is avoided unless fully justified, • strategic-scale growth is directed to towns and sustainable urban areas, not rural settlements. Without these modifications, SP6 fails the tests of justification, effectiveness, and consistency with national policy.		
SP7: Green Belt	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	While SP7 accurately summarises national Green Belt purposes and the requirement for exceptional circumstances before altering boundaries, the Local Plan does not demonstrate that such exceptional circumstances exist for the significant release of Green Belt land at Pill and Easton-in-Gordano. The evidence is incomplete, inconsistent, or absent in several key respects. Therefore, SP7 is not sound, failing the tests of justification, effectiveness, and consistency with national policy, especially NPPF 2024 Section 13. 1. The Plan does not demonstrate that all reasonable non–Green Belt alternatives have been exhausted (NPPF test for exceptional circumstances) The justification asserts exceptional circumstances on the basis that North Somerset cannot meet its needs outside the Green Belt. However, the Plan does not provide a transparent analysis showing that the following reasonable alternatives have been fully explored: • Maximising brownfield redevelopment in Weston-super-Mare, Clevedon, Nailsea, and Portishead. • Higher-density development in town centres and around transport hubs. • Regeneration-led growth, which is strongly supported in the Plan's own strategic priorities. • Reallocating development to more sustainable non-Green Belt locations (e.g. Weston-super-Mare – the least constrained and most sustainable settlement). • Cross-boundary solutions, which must be considered before Green Belt release under the Duty to Co-operate. Without clear evidence of a sequential, alternatives-first approach, the justification for Green Belt release does not meet the exceptional circumstances threshold required by national policy. 2. The claim that all released sites are in "the most sustainable locations" is not supported by evidence for Pill/E-in-G The justification states that all Green Belt release sites are "in the most sustainable locations on the edges of urban areas." This is factually incorrect for Pill/Easton-in-Gordano: • It is not an urban area. • It lacks a wide range of services and jobs. • It is heavily car-dependent with limited public transport. • It is affected by serious transport constraints (Junction 19). • Several sites lie close to ecologically sensitive areas (SAC, SSSI, wildlife corridors). Allocating large-scale development here contradicts SP1, SP2,	To make Policy SP7 and the proposed Green Belt boundary changes sound, the following modifications are required: 1. Provide a full, transparent assessment of all reasonable alternatives before relying on Green Belt release Green Belt release is only justified when all non–Green Belt options have been fully explored, as required by the NPPF. The Plan does not currently demonstrate this. Required modifications: • Publish the complete assessment of brownfield capacity, regeneration opportunities, and potential for increased densities in the towns and transport hubs. • Publish evidence demonstrating whether growth could be redistributed to Weston-super-Mare and other urban areas before releasing Green Belt in rural villages. • Undertake a detailed alternatives comparison showing why each non–Green Belt option was rejected. • Reduce or remove Green Belt allocations – particularly at Pill/Easton-in-Gordano – unless exceptional circumstances are clearly demonstrated. 2. Re-evaluate the sustainability credentials of each Green Belt release site, with Pill/Easton-in-Gordano reassessed against objective criteria The Plan asserts that all sites released from the Green Belt are "in the most sustainable locations." The evidence does not support this for Pill/E-in-Gordano. Required modifications: • Undertake a fresh sustainability appraisal of the Pill/E-in-Gordano sites, assessing public transport, access to services, employment proximity, infrastructure constraints and environmental sensitivities. • Remove or reduce allocations where sustainability performance does not justify Green Belt release. • Update SP3 (Spatial Strategy) to reflect these changes. 3. Demonstrate that the NPPF "Golden Rules" for Green Belt release can realistically be delivered The Plan does not show that the proposed Pill/E-in-Gordano developments can meet core requirements such as: • high levels of affordable housing, • in-step delivery of essential infrastructure, • publicly accessible green spaces, • biodiversity enhancements. Required modifications: • Provide robust viability analysis showing that mandated affordable housing levels and infrastructure contributions can be delivered. • Identify funded and secured infrastructure delivery mechanisms for schools, healthcare, transport upgrades, active travel links and		

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					SP3, SP6 and the NPPF's requirement to prioritise sustainable sites. The "most sustainable locations" criterion is therefore not met. 3. The Plan does not demonstrate that Green Belt release in Pill/E-in-G delivers the NPPF "Golden Rules" NPPF policy requires that development on released Green Belt land: • delivers high levels of affordable housing, • provides infrastructure in step with growth, and • includes publicly accessible green space and environmental improvements. But the evidence base indicates: • The viability addendum notes that delivering 50% affordable housing at the Pill/E-in-G sites is likely to be "challenging". • Required infrastructure – schools, healthcare, active travel routes, public transport upgrades – is not secured or fully costed. • Ecological mitigation for the SAC and SSSI is not clearly deliverable. Without the ability to meet the Golden Rules, Green Belt release cannot be justified. 4. SP7 states that Green Belt protects rural settlement identity — yet the proposed allocations undermine this purpose Pill and Easton-in-Gordano are rural settlements whose character and separation from other areas are central to the Green Belt's function. Allocating 1,100 dwellings in a compressed geographic area: • threatens the openness and landscape character, • erodes separation between settlements, • fundamentally alters the scale and identity of the village. This contradicts both SP7's policy intent and NPPF Green Belt purposes. 5. Flood risk and climate considerations were not adequately factored into the Green Belt boundary changes Some proposed sites around Pill and Easton-in-Gordano lie near: • Flood Zone 3 areas associated with Markham Brook, • tidal and fluvial flood-risk zones. Exceptional circumstances cannot be justified when safer alternative sites exist. 6. Duty to Co-operate evidence is unclear for Green Belt decisions affecting cross-boundary transport and ecological constraints Large-scale development at Pill/E-in-Gordano has clear cross-boundary implications (Bristol transport network, SAC, SSSI, highway impacts). Yet there is no clear documentation showing sustained engagement with: • National Highways, • Natural England, • neighbouring Bristol authorities, • the Environment Agency. This creates uncertainty about legal compliance and further weakens the justification for Green Belt release. Summary SP7 is not sound because: • Exceptional circumstances for Green Belt release at Pill/E-in-Gordano are not adequately demonstrated. • Reasonable alternatives have not been fully explored.	ecological mitigation. • Where Golden Rules cannot be met, reduce or remove Green Belt allocations. 4. Address ecological constraints before altering Green Belt boundaries Several proposed release sites fall within consultation zones for the North Somerset & Mendip Bats SAC, near the Severn Estuary SSSI, or within important wildlife corridors. Required modifications: • Publish site-specific ecological assessments (Habitats Regulations Assessment-level detail) before confirming boundary changes. • Identify deliverable mitigation measures with secured funding and responsible bodies. • Remove sites where acceptable ecological mitigation cannot be achieved. 5. Integrate detailed flood risk analysis into Green Belt decisions Sequential testing and climate-adjusted flood modelling must inform Green Belt release. This is not evident for sites around Pill/E-in-Gordano. Required modifications: • Publish sequential test outcomes for all Green Belt release sites near flood zones, including those affected by Markham Brook. • Remove or amend allocations where safer, lower-risk alternatives exist. • Include explicit policy wording requiring climate-resilient design and no increase in offsite flood risk. 6. Strengthen Duty to Co-operate evidence for Green Belt boundary changes Green Belt release at Pill/E-in-Gordano has clear cross-boundary implications (Bristol travel patterns, strategic roads, ecological networks). Required modifications: • Provide documented evidence of sustained engagement with National Highways, Natural England, the Environment Agency, and neighbouring authorities. • Demonstrate how their input shaped Green Belt boundary decisions. • Where cross-boundary concerns remain unresolved, reduce or remove affected allocations. 7. Clarify how releasing large areas of Green Belt aligns with SP6 (Villages) and SP1/SP2 (Sustainability and Climate) The Plan currently conflicts with its own policies by directing major development to a rural Green Belt location. Required modifications: • Amend SP7 to include a requirement that Green Belt release must also comply with SP1 (sustainable development), SP2 (climate change), SP3 (spatial strategy), and SP6 (villages). • Reassess Pill/E-in-Gordano against these policies and reduce allocations where compliance cannot be demonstrated. 8. Apply a consistent methodology for determining which villages are "relatively sustainable" The Plan states that only larger, relatively sustainable villages should be considered for Green Belt release, but no transparent criteria are presented. Required modifications: • Publish criteria for assessing village sustainability. • Reassess all proposed Green Belt releases against these criteria. • Remove releases where evidence does not support the classification of "relatively sustainable."		

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					• The sites are not among the most sustainable locations, contrary to the Plan's assertion. • The development does not meet NPPF Golden Rules requirements. • Infrastructure, transport, ecological and flood-risk constraints have not been resolved. • The release undermines Green Belt purposes relating to openness, settlement character, and preventing urban sprawl. For these reasons, the policy is neither justified, effective, nor consistent with national policy.	Summary Modification For SP7 to be sound, the Council must: • demonstrate robust exceptional circumstances, • exhaust all reasonable non–Green Belt alternatives, • prove that Golden Rules can be met, • resolve ecological, transport and flood risks, • ensure internal consistency with other strategic policies, • provide full Duty to Co-operate evidence, • and reduce or remove Green Belt allocations—particularly in Pill/Easton-in-Gordano—where sustainability, infrastructure and environmental tests are not met. Without these modifications, SP7 fails the soundness tests of justification, effectiveness, and consistency with national policy.		
SP8: Housing	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	While SP8 sets out the headline housing requirement and distribution across North Somerset, the proposed distribution does not reflect the sustainability principles set out in SP1, SP2, SP3, SP5 and SP6, nor does it demonstrate that the chosen allocations represent the most sustainable and appropriate pattern of growth. In particular, the identification of Pill and Easton-in-Gordano as a strategic growth location for 1,100 dwellings is not justified, not effective, and not consistent with national policy, for the following reasons. 1. The distribution of housing does not align with the spatial strategy or sustainability principles in SP3 and SP5 SP8 allocates: • 1,100 homes (4% of the total supply) to Pill/Easton-in-Gordano • Significantly less growth to Portishead, Clevedon and other towns that national policy and the Plan's own strategy recognise as more sustainable locations This contradicts SP3 and SP5, which state that: • Towns and urban areas are the most sustainable locations for new development • Growth should be concentrated where there is existing infrastructure, public transport, services and employment Pill/E-in-Gordano does not meet these criteria. It is a village with: • limited services, • heavy car dependency, • constrained roads (especially M5 Junction 19), • limited public transport, • major ecological and landscape constraints, • flood-risk concerns in some locations. The housing distribution in SP8 therefore does not reflect the Local Plan's own strategic aims. 2. The Plan does not demonstrate that brownfield opportunities and town-centre capacity have been fully maximised before allocating Green Belt housing SP8 relies heavily on large Green Belt releases, including at Pill/E-in-Gordano, without clear evidence that the Council has: • maximised brownfield land in Weston-super-Mare, Portishead, Clevedon or Nailsea, • optimised densities in accessible urban areas, • fully explored regeneration-led growth, • engaged neighbouring authorities under the Duty to Co-operate to consider cross-boundary alternatives. The absence of this evidence means the distribution in SP8 is not justified.	To make SP8 and the housing distribution sound, the following modifications are required: 1. Reassess and redistribute housing growth to prioritise genuinely sustainable locations (towns and urban areas) The current distribution provides only 4% of the housing supply to Pill/Easton-in-Gordano despite its rural, constrained and less sustainable characteristics, while placing disproportionate strategic growth there. Required modifications: • Reduce or remove the 1,100 homes allocated at Pill/Easton-in-Gordano. • Reallocate this growth primarily to the four towns (Weston-super-Mare, Portishead, Clevedon, Nailsea) and to strategic locations with better public transport, services and infrastructure. • Update the Sustainability Appraisal (SA) to include revised distribution options that prioritise brownfield and town-centre opportunities. 2. Fully demonstrate that brownfield land and higher-density opportunities in towns have been maximised before releasing Green Belt land The Plan does not currently show that towns have been tested to their full sustainable capacity. Required modifications: • Publish a detailed brownfield register assessment showing developable and deliverable capacity across Weston-super-Mare, Portishead, Clevedon and Nailsea. • Conduct and publish a higher-density capacity study for town centres and transport hubs. • Reduce Green Belt allocations (including Pill/E-in-Gordano) where additional brownfield capacity exists. 3. Require housing distribution to align with climate and sustainable transport objectives (SP1 and SP2) Current allocations undermine the Council's climate objectives by directing housing to car-dependent locations. Required modifications: • Amend SP8 to require that major allocations demonstrate achievable modal shift to active travel and public transport. • Reallocate growth away from locations where car dependency is unavoidable and public transport improvements are uncertain. • Include carbon impact assessments for each strategic housing area. 4. Require robust, deliverable and funded infrastructure plans before confirming housing allocations The Plan allocates major housing at Pill/E-in-Gordano without showing that schools, healthcare, transport and utilities can be		

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					3. SP8 does not demonstrate that the required infrastructure for 1,100 homes at Pill/E-in-Gordano is deliverable Large housing allocations must be supported by: • transport infrastructure improvements, • school places, • accessible healthcare, • active travel routes, • viable public transport, • utilities capacity. However, for Pill/E-in-Gordano: • no cumulative transport modelling is presented for M5 J19 • National Highways has flagged concerns about cumulative impacts nearby • school and healthcare capacity assessments are incomplete • active travel connections are not evidenced or costed • public transport improvements are aspirational, not secured SP8 is therefore not effective, because the distribution of development depends on infrastructure that may not be deliverable. 4. The Pill/E-in-Gordano housing allocation is disproportionate to village scale and exceeds any reasonable interpretation of "local need" SP8 directs 1,100 homes (a 44% population increase) to a rural area that: • is explicitly described in SP6 as less sustainable, • lacks full settlement-level services, • has limited employment opportunities, • already experiences infrastructure and environmental pressures. This level of growth is inconsistent with: • SP6 (Villages should receive proportionate, needs-based development) • the NPPF (which discourages large-scale growth in unsustainable rural locations) The Pill/E-in-Gordano allocation is therefore not consistent with national policy. 5. The housing distribution does not demonstrate compliance with climate objectives in SP2 Directing substantial growth to a location with limited public transport and heavy car dependency undermines: • the Council's net zero ambitions, • SP2's requirement to reduce greenhouse gas emissions and prioritise sustainable travel. This renders the policy internally inconsistent. 6. The evidence does not demonstrate that ecological constraints have been properly factored into site selection Multiple Pill/E-in-Gordano sites lie within: • North Somerset & Mendip Bats SAC consultation zones, • Severn Estuary SSSI influence zones, • important wildlife corridors. There is no clear evidence that these constraints were fully weighed when determining the housing distribution. SP8 is therefore not justified or effective in ecological terms. 7. SP8 relies on Green Belt release without demonstrated exceptional circumstances for Pill/E-in-Gordano As argued under SP7, exceptional circumstances have not been demonstrated for these specific Green Belt releases. This undermines the legality and soundness of the associated housing distribution in SP8.	delivered. Required modifications: • Include a policy requirement that strategic allocations must be supported by secured infrastructure funding and phasing strategies prior to adoption. • Publish infrastructure delivery plans for each strategic location, including cumulative transport modelling for M5 Junction 19. • Reduce or remove allocations where infrastructure delivery is not feasible. 5. Clarify how ecological constraints and flood risk inform the housing distribution SP8 does not sufficiently reflect environmental constraints affecting strategic sites. Required modifications: • Publish ecological capacity assessments and HRA-level analysis for Pill/E-in-Gordano sites affected by the SAC, SSSI and wildlife corridors. • Remove allocations where ecological mitigation is not deliverable. • Publish sequential testing for all sites with flood-risk implications, removing or modifying those in higher-risk zones. 6. Ensure the housing distribution complies with SP6 (Villages and Rural Areas) SP6 states that villages should only accommodate proportionate growth based on local need. Required modifications: • Amend SP8 so that development in villages does not exceed levels proportionate to settlement size, character and service capacity. • Reduce the Pill/E-in-Gordano allocation accordingly. 7. Demonstrate exceptional circumstances for Green Belt release (in line with SP7 and the NPPF) SP8 relies heavily on Green Belt releases, but exceptional circumstances have not been robustly demonstrated. Required modifications: • Publish the full alternatives analysis required by NPPF Section 13. • Remove Green Belt housing allocations where exceptional circumstances cannot be justified. • Amend SP8 to state explicitly that Green Belt sites may only be allocated once brownfield and non–Green Belt alternatives have been demonstrated insufficient. 8. Introduce housing distribution flexibility that allows adjustments if infrastructure or environmental constraints prevent delivery Without flexibility, the Plan risks under-delivery. Required modifications: • Insert a clause allowing redistribution of housing numbers to more sustainable locations if infrastructure, ecological or viability issues prevent delivery at strategic rural locations. • Require annual Housing Trajectory review to trigger redistribution where delivery is uncertain. Summary Modification To be sound, SP8 must be revised to: • Prioritise sustainable, urban and brownfield locations • Remove or reduce unsustainable rural allocations (especially Pill/E-in-Gordano) • Ensure infrastructure is secured before development • Protect Green Belt in line with national policy • Address climate, transport, ecological and flood constraints • Align with SP1, SP2, SP3, SP5 and SP6 • Demonstrate full exceptional circumstances for any Green Belt release		

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					Summary SP8 is not sound because: • the distribution of housing does not reflect the spatial strategy or sustainability hierarchy, • brownfield alternatives have not been fully assessed, • infrastructure delivery is uncertain, • ecological and flood risks are not adequately addressed, • climate and transport objectives are undermined, • the scale of development at Pill/E-in-Gordano is disproportionate, • exceptional circumstances for Green Belt release are not evidenced. Until these issues are resolved, SP8 fails the tests of justification, effectiveness, and consistency with national policy.	Without these modifications, SP8 fails the tests of justification, effectiveness, and consistency with national policy.		
SP9: Employment	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	SP9 appropriately seeks to locate employment growth in the most sustainable locations – primarily the four towns and designated strategic development areas – to support economic self-containment, reduce car dependency, and promote sustainable commuting patterns. However, the Local Plan's housing distribution, particularly the strategic allocation of 1,100 dwellings at Pill and Easton-in-Gordano, is fundamentally inconsistent with the employment strategy outlined in SP9. As a result, SP9 is not sound as implemented. The Plan fails the tests of justification, effectiveness, and consistency with national policy. 1. SP9 prioritises towns and urban areas for employment – but Pill/E-in-Gordano is allocated no employment land despite major housing growth SP9 states that: • towns will be the main focus for employment growth; • Weston, Woodspring, Nailsea/Backwell, Clevedon and Portishead will accommodate strategic employment land; • employment should be located where sustainable travel and labour supply are strongest. Yet Pill and Easton-in-Gordano, despite being identified as a strategic housing location, is allocated: • 0 hectares of employment land, • no safeguarded business sites, • no plan-led strategy for local job creation. This creates a mismatch between where people will live and where jobs will be created, directly undermining SP9's intention to support balanced and self-contained communities. 2. The housing–employment imbalance at Pill/E-in-Gordano will increase car dependency and commuting – contrary to SP1, SP2, SP3 and SP9. SP9 emphasises reducing out-commuting and supporting sustainable patterns of development. Yet allocating 1,100 homes to a village that: • lacks local employment opportunities, • offers no planned new job provision, • is heavily dependent on the M5 for commuting, • faces serious existing congestion at Junction 19, • has limited sustainable transport connectivity,	To make SP9 justified, effective, and consistent with national policy, the following modifications are required: 1. Align the housing distribution with SP9 by ensuring strategic housing locations include proportionate, accessible employment provision The Plan currently allocates 1,100 homes to Pill/Easton-in-Gordano without assigning any employment land to the area. Required modifications: • Reassess the Pill/Easton-in-Gordano strategic allocation in SP8 and LP4 to ensure that housing growth is matched with local employment opportunities or reallocate housing to areas with identified job growth (Weston, Woodspring, Nailsea/Backwell). • Insert wording requiring all strategic growth locations to provide sufficient, accessible employment land to support self-containment and reduce out-commuting. 2. Provide evidence that the housing–employment relationship has been modelled, and revise allocations where this relationship is unsustainable The Plan does not demonstrate that commuting impacts, labour supply, or journey-to-work patterns were tested. Required modifications: • Publish commuting impact modelling for each strategic area, including Pill/E-in-Gordano, showing forecast car trips, congestion effects, and CO_2 emissions. • Where evidence shows unsustainable commuting patterns or worsened congestion at pinch-points (e.g. M5 J19), reduce or remove associated housing allocations. 3. Strengthen the policy requirement for employment land to be located where sustainable travel is realistic and deliverable SP9 currently encourages sustainable transport but does not require it. Required modifications: • Amend SP9 to state that new employment land will only be allocated where sustainable travel modes are already available or can be delivered at the outset of development, with funding and commitments secured. • Require masterplans for strategic locations to demonstrate concrete, costed delivery of public transport, walking and cycling links. 4. Reassess the spatial distribution of employment land to ensure		

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					will inevitably result in higher levels of long-distance commuting by car. This not only contradicts SP9, but also conflicts with: • SP1 (Sustainable development) – reducing the need to travel • SP2 (Climate change) – lowering carbon emissions from transport • SP3 (Spatial strategy) – allocating growth to the most sustainable locations • SP6 (Villages) – avoiding disproportionate development in rural areas The Plan therefore lacks internal consistency. 3. SP9 relies on employment land being located near the main workforce—but the housing distribution does not support this objective. SP9 states that employment land should be located close to where people live to reduce commuting. However: • the majority of new jobs are planned in Weston-super-Mare, Woodspring and Nailsea/Backwell • yet 1,100 new homes are allocated at Pill/Easton-in-Gordano, far from the centres of future job creation This undermines the effectiveness of SP9 and may worsen congestion in areas such as: • the A369 corridor, • M5 Junction 19, • the wider Bristol commuter belt. No evidence is provided to demonstrate how this mismatch will be addressed. 4. SP9 emphasises reuse of business land and town-centre regeneration, but the Plan does not demonstrate that these have been prioritised before Green Belt release To justify Green Belt release for housing, employment-led regeneration opportunities must be maximised first. However, the Plan does not show: • that all town-centre and brownfield employment sites have been fully assessed for mixed-use potential; • how employment intensification in towns has influenced the spatial distribution of housing; • whether additional jobs could be supported in Portishead, Clevedon or Weston before diverting growth to rural locations. This omission undermines the justification for strategic housing allocations outside employment centres. 5. The lack of employment land at Pill/E-in-Gordano conflicts with the Plan's economic evidence base. The employment studies cited in the justification identify: • Weston-super-Mare as the main economic centre • Woodspring and Nailsea/Backwell as strategic growth locations • No economic rationale for strategic job creation in Pill/E-in-Gordano Yet the Plan still allocates a large quantum of housing there without corresponding employment provision. This inconsistency makes SP9 ineffective, as it cannot achieve its objective of sustainable commuting patterns. 6. SP9 recognises that new employment land should support	consistency with the Plan's climate and transport objectives (SP1, SP2, SP3) The employment strategy should reinforce, not contradict, the Plan's sustainability goals. Required modifications: • Reconsider whether additional employment land should be allocated at Portishead and Clevedon—both towns with strong labour markets and better transport connections—before relying on rural travel-to-work locations. • Reduce dependence on remote strategic locations unless robust evidence supports low-carbon commuting. 5. Clarify how the reuse and intensification of existing employment sites has been maximised before allocating new greenfield land The justification for some new employment land allocations remains unclear. Required modifications: • Publish a full assessment of existing employment sites' capacity for intensification, redevelopment or mixed use. • Where extra capacity is identified, reduce greenfield employment allocations accordingly. 6. Insert an explicit requirement for employment allocations at strategic locations to be deliverable, viable, and supported by infrastructure Employment land at strategic locations must not depend on unproven infrastructure. Required modifications: • Amend SP9 to require detailed phasing and infrastructure-delivery plans, including transport improvements and utilities, before permission is granted. • Remove or reduce employment allocations where infrastructure cannot be delivered in step with development. 7. Strengthen the Duty to Co-operate requirements relating to employment land and cross-boundary commuting Given the proximity to Bristol and the regional functional economic market, Duty to Co-operate evidence is essential. Required modifications: • Include a clear statement of how the Council has co-operated with Bristol City Council, WECA, National Highways and other neighbouring authorities regarding labour supply, commuting flows and spatial employment distribution. • Where unresolved issues exist, reconsider the scale and location of strategic housing and employment allocations. 8. Add a policy requirement that employment land must reflect the realities of transport capacity and congestion constraints This is particularly relevant to Pill/Easton-in-Gordano and areas feeding into Junction 19. Required modifications: • Insert wording preventing employment land (or large volumes of housing) from being located where transport constraints cannot be mitigated. • Require cumulative modelling for strategic sites that influence the M5, A369 and wider Bristol commuter network. Summary of Required Modifications For SP9 to be sound, the Local Plan must:		

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					sustainable transport access – but Pill/E-in-Gordano lacks such access Employment land is purposefully directed to locations which: • are well served by public transport, • have strong active-travel links, • connect easily with urban centres. Pill/E-in-Gordano, however: • has no dedicated new public transport investments secured, • lacks high-quality cycling/walking infrastructure, • relies on constrained, car-dominated roads. This reinforces why strategic housing growth here is inconsistent with SP9. Summary SP9 is sound in principle, but the overall Plan does not implement it soundly. The strategic allocation of 1,100 dwellings at Pill/Easton-in-Gordano: • undermines sustainable commuting patterns, • increases car dependency, • conflicts with the spatial strategy, • fails to integrate housing with employment opportunities, • and weakens the internal coherence of the Plan. Therefore, SP9 is not sound as implemented and does not satisfy the soundness tests of justification, effectiveness, or consistency with national policy.	• align the housing distribution with the employment strategy; • ensure strategic housing areas have local employment or excellent sustainable transport links; • provide robust commuting and transport evidence; • maximise brownfield employment opportunities first; • demonstrate cross-boundary co-operation; • revise or reduce allocations where infrastructure cannot support sustainable commuting. Without these changes, SP9 fails the soundness tests of justification, effectiveness, and consistency with national policy.		
SP10: Transport	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	While the principles in SP10 correctly reflect national policy – prioritising active travel, reducing car dependency, and supporting sustainable transport – the Local Plan does not implement these principles in a way that is justified, effective, or consistent with the evidence, particularly in relation to the proposed strategic growth at Pill and Easton-in-Gordano. SP10 is therefore not sound, because the Plan assigns major housing development to the most transport-constrained part of North Somerset without demonstrating that the transport objectives can realistically be achieved. 1. SP10 requires development to minimise car dependency – but the allocations at Pill/Easton-in-Gordano would increase car use and congestion Pill and Easton-in-Gordano: • are highly dependent on the M5 and A369, • contain no strategic employment land (forcing residents to commute by car), • have limited and unreliable bus services, • rely on narrow, constrained local roads, • already experience significant peak-hour congestion. The Local Plan provides no evidence that: • sustainable travel modes can meet demand for 1,100 new homes, or • active travel routes are deliverable in a way that would meaningfully change behaviour. This directly conflicts with SP10's hierarchy, which places car use last. 2. No cumulative modelling has been published to show that major new development can be accommodated at or near M5 Junction 19 National Highways has already expressed concerns about cumulative traffic impacts in the area (e.g. Court Hay	To make SP10 justified, effective, and consistent with national policy, the following modifications are required: 1. Require cumulative transport modelling for all strategic development locations before adoption of the Plan The Plan allocates major growth in areas with known congestion (e.g., Pill/E-in-Gordano and M5 J19) but presents no cumulative modelling. Required modifications: • Insert policy text requiring full cumulative transport modelling for all strategic allocations, including impacts on: o M5 Junction 19, o the A369 corridor, o routes into Bristol, o junctions within Portishead and surrounding villages. • Require this modelling to be completed and published before the Green Belt is released or allocations are confirmed. If modelling demonstrates unsustainable impacts, reduce or remove the associated housing allocations. 2. Amend SP10 to require transport infrastructure for strategic sites to be identified, costed, funded and deliverable before development proceeds As written, SP10 contains only aspirational statements. Required modifications: • Add wording that major development will only be permitted where the necessary transport infrastructure is secured upfront, through: o committed funding, o identified delivery bodies, o clear phasing plans. • Require each strategic site to produce a Transport Infrastructure Delivery Plan (TIDP) prior to planning approval. 3. Remove reliance on uncommitted or uncertain rail improvements		

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					application). Despite this, SP10 does not present: • cumulative transport modelling for all Pill/E-in-Gordano sites, • analysis of M5 Junction 19 capacity, • modelling of A369 corridor impacts, • evidence of mitigation measures or confirmed funding. Without this evidence, SP10 cannot be considered effective. 3. The Plan relies on a hypothetical future rail service as a key mitigation measure, contrary to NPPF requirements for realistic, deliverable transport solutions The reopening of the Portishead Line is referenced repeatedly throughout the Local Plan as a justification for development in the area. However: • the line has not yet been delivered, • no date for operational service is guaranteed, • there is no evidence of capacity for dramatically increased passenger use. SP10 requires development to be located where sustainable transport exists or can be delivered, not where it is hoped for. This reliance on uncertain rail infrastructure makes SP10 not justified. 4. Active travel infrastructure is not demonstrated to be deliverable or adequate for the scale of growth proposed SP10 places heavy emphasis on walking and cycling. However: • Pill/E-in-Gordano has steep topography, • many roads are narrow with no space for segregated routes, • safe routes to schools, Portishead, and Bristol are limited or non-existent, • no detailed route plans, costings, or delivery mechanisms are provided. Without evidence that the necessary infrastructure can be delivered, SP10 is not effective. 5. SP10's principles contradict the Local Plan's decision to allocate 1,100 homes in a demonstrably car-dependent location The National Planning Policy Framework (NPPF) states that plans should: • promote sustainable transport, • locate significant development where the need to travel is minimised, • ensure development does not cause unacceptable transport impacts. By allocating one of the largest village-scale growth areas in North Somerset to a highly constrained and car-dependent location, the Plan does not follow these principles. SP10 therefore lacks internal consistency with the spatial strategy and the Plan's sustainability objectives. 6. There is insufficient evidence of Duty to Co-operate engagement regarding strategic transport impacts Given that Pill/E-in-Gordano's transport impacts extend into: • National Highways' strategic road network, • Bristol's transport system, • WECA rail and bus networks, The Plan should demonstrate structured Duty to Co-operate engagement. This is not presented. SP10 is therefore not clearly supported by legally necessary cross-authority collaboration. 7. Climate and carbon reduction objectives in SP2 cannot be met if major development is located in a car-dependent location	(e.g., Portishead Line) as justification for strategic allocations The Plan assumes future rail provision that is not guaranteed. Required modifications: • Amend SP10 to state that strategic allocations must not rely on rail infrastructure that is not fully committed, funded and scheduled for delivery within the early Plan period. • Reassess allocations—especially Pill/E-in-Gordano—without assuming new rail service availability. 4. Insert a requirement for all strategic allocations to demonstrate realistic, deliverable modal shift away from the private car Currently, the Plan sets a hierarchy but does not require development to prove that modal shift is achievable. Required modifications: • Add policy text requiring strategic sites to submit evidence on: o expected modal split, o walking and cycling catchments, o bus service viability, o long-term public transport commitments. • Where modal shift cannot be achieved (e.g., Pill/E-in-Gordano), reduce or remove site allocations. 5. Require deliverable active travel networks—with maps, phasing and costings—for all strategic development locations The policy obliges development to prioritise active travel but provides no evidence it is feasible in constrained areas. Required modifications: • Insert a requirement that active travel routes must be: o mapped, o continuous, o safe, o fully funded, and o deliverable within early phases of development. • Require feasibility studies for constrained areas (e.g., steep topography, narrow roads in Pill/E-in-Gordano). • Remove development allocations where such networks cannot be delivered. 6. Strengthen the link between SP10 and the spatial strategy (SP3) to prevent major development in car-dependent rural locations SP10's objectives are incompatible with allocating 1,100 homes in Pill/E-in-Gordano. Required modifications: • Add wording that major development must be located where walking, cycling and public transport are already viable or can be delivered in a realistic and evidenced manner. • Require reassessment of Pill/E-in-Gordano's strategic designation against these criteria. 7. Insert an explicit requirement for Duty to Co-operate engagement with National Highways, Bristol City Council, and WECA on transport impacts Strategic transport issues cross boundaries. Required modifications: • Add wording requiring documented Duty to Co-operate discussions about infrastructure needs, congestion impacts and sustainable travel provision. • Require the Plan to be modified where cross-boundary issues remain unresolved. 8. Include a policy safeguard preventing development that increases congestion or carbon emissions where mitigation is not deliverable This ensures consistency with SP1 (sustainable development) and SP2 (climate change).		

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					SP10 forms part of the climate response in the Local Plan. But because the Plan: • allocates major development to a location that cannot reduce car use, and • provides no evidence of modal shift potential, SP10 will not contribute effectively to the delivery of net-zero ambitions. This undermines both SP10 and SP2. Summary SP10 is sound in principle but not sound in implementation. Because the Local Plan directs substantial growth to a location where: • walking and cycling routes are constrained, • public transport is insufficient or uncertain, • road infrastructure is over capacity, and • no cumulative transport modelling is presented, SP10 fails the soundness tests of effectiveness, justification, and consistency with national policy.	Required modifications: • Add a clause stating that development will not be permitted where transport impacts cannot be mitigated without unacceptable congestion, safety impacts or increased carbon emissions. • Reassess strategic allocations, particularly at Pill/E-in-Gordano, under this principle. Summary of Required Modifications SP10 can only be sound if: • cumulative transport modelling is undertaken and published; • transport infrastructure delivery is secured up front; • strategic allocations do not rely on speculative rail improvements; • active travel feasibility is demonstrated; • development is directed away from inherently car-dependent rural locations; • cross-boundary transport issues are addressed; • allocations are reduced or removed where transport impacts cannot be mitigated. Without these changes, SP10 fails the tests of justification, effectiveness, and consistency with national policy.		
SP11: Historic and natural environment	No		Unsure	Unsure	SP11 contains strong and appropriate objectives for protecting landscapes, biodiversity, ecological networks, and heritage assets. However, the strategic allocations – particularly those in Pill and Easton-in-Gordano – do not comply with these principles, and the Local Plan does not demonstrate that they can meet the environmental standards outlined in SP11. As a result, SP11 is not sound, because the Plan: • applies SP11 inconsistently, • fails to justify how environmentally sensitive sites can be developed without significant harm, • does not demonstrate that mitigation is deliverable or effective, and • conflicts with national policy on biodiversity, Green Belt, landscape protection and heritage conservation. 1. The allocation of 1,100 dwellings at Pill/Easton-in-Gordano conflicts directly with SP11's requirements to protect biodiversity, ecological networks and horseshoe bat habitats SP11 specifically requires the Plan to: • Conserve priority habitats • Protect ecological networks • Support the North Somerset Nature Parks for horseshoe bats • Ensure development avoids lighting impacts • Protect wildlife corridors • Secure biodiversity net gain But the Pill/E-in-Gordano sites are located within or adjacent to: • the North Somerset & Mendip Bats SAC consultation zones, • key foraging corridors for horseshoe bats, • established wildlife corridors linked to the Severn Estuary SSSI, • areas with hedgerow networks and traditional pasture that are explicitly identified as high-value bat habitat. The Plan does not show: • any site-specific ecological capacity assessments, • how light spill will be controlled, • how foraging habitats will be protected or replaced, • how connectivity will be maintained, • how Nature Park principles will be applied (the policy only lists Wolvershill, Woodspring and Nailsea/Backwell as locations, not Pill/E-in-Gordano),	o make SP11 justified, effective, and consistent with national policy, the following modifications are required: 1. Require site-specific ecological assessments and HRA-level analysis before strategic allocations are confirmed The Plan cannot demonstrate compliance with SP11 without detailed ecological evidence. Required modifications: Insert wording requiring all strategic allocations—especially those within or near SAC/SSSI influence zones—to be supported by: Site-specific ecological impact assessments, HRA-level assessments (including bat foraging and commuting modelling), Lighting impact modelling, Habitat connectivity assessments. Require this evidence to be published before submission of the Local Plan, not deferred to the planning application stage. Remove or reduce allocations where ecological harm cannot be mitigated. 2. Amend SP11 to require Nature Parks or equivalent strategic mitigation for all locations affecting horseshoe bat habitats—not only Wolvershill, Woodspring, Nailsea and Backwell. The omission of Pill/Easton-in-Gordano from the Nature Parks strategy creates an internal policy inconsistency. Required modifications: Add Pill/Easton-in-Gordano as an area requiring a Nature Park or equivalent mechanism if strategic development is retained. Require identification of suitable land for habitat creation now, not post-adoption. Ensure long-term management obligations, funding and land control are secured. 3. Require evidence that biodiversity net gain (BNG) is realistically deliverable for each strategic allocation. BNG is unlikely to be achieved on small or ecologically constrained sites. Required modifications: Add policy text requiring each allocation to demonstrate available land, mechanisms and funding for delivering BNG. Remove or reduce allocations where BNG cannot be delivered on-site or within the local ecological network. Require demonstration that off-site BNG will not undermine SAC/SSSI integrity.		

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					• how biodiversity net gain will be achieved on or near these constrained sites. This makes the Plan not justified and not consistent with national policy (NPPF Section 15). 2. The Plan does not demonstrate that the strategic allocations can protect the landscape character and settlement identity as required by SP11 SP11 requires development to: • Protect valued landscapes, • Respect settlement identity, • Maintain strategic gaps, • Reflect the Landscape Character Assessment, • Protect the coast and its setting. However: • Pill/E-in-Gordano sits in a highly sensitive landscape setting between the Severn Estuary, rolling pastures, and wooded ridgelines. • The proposed allocations – including Pill Green and Lodway Farm – would significantly erode the rural setting and identity of the village. • No landscape capacity assessment has been published demonstrating that these areas can accommodate 1,100 homes without harm. • The Plan appears to apply more stringent protections in the south of the district than in the north, leading to inconsistency. This undermines the effectiveness of SP11. 3. The Plan does not demonstrate protection of the “best and most versatile agricultural land” SP11 requires the Plan to protect BMV land (Grades 1–3a). Several Pill/E-in-Gordano sites include BMV agricultural land. The Plan: • does not provide site-specific soils data, • does not justify loss of BMV land, • does not apply the sequential preference for lower-value land. This omission makes SP11 not justified. 4. No evidence shows that biodiversity net gain is deliverable at Pill/E-in-Gordano SP11 requires deliverable biodiversity net gain (BNG), but: • the Pill/E-in-Gordano sites are relatively small, • almost all greenfield, • contain established ecological value, • lack adjacent land for habitat creation, • lie near the SAC where additional mitigation cannot simply be “off-site”. Without identified mitigation land, the required BNG is unlikely to be achievable. This means the Plan is not effective. 5. SP11 requires the creation of Nature Parks for horseshoe bats – but Pill/Easton-in-Gordano is excluded despite its ecological sensitivity The justification states that Nature Parks will be established at: • Wolvershill, • Woodspring, • Nailsea & Backwell, • Council-led or privately-led parks in other areas (e.g., Yatton/ Cleeve). No Nature Park is proposed for Pill/E-in-Gordano, despite: • high bat sensitivity, • loss of foraging habitat,	4. Require landscape and visual impact assessments (LVIA) for all strategic sites affecting rural settings, settlement edges or Green Belt. SP11 requires protection of valued landscapes, but LVIAs are not provided. Required modifications: Insert wording requiring LVIAs for all strategic allocations, including Pill/Easton-in-Gordano. Require the Plan to remove or scale back housing allocations where LVIAs show unacceptable landscape harm or settlement coalescence. 5. Include a requirement to demonstrate protection of settlement identity and strategic gaps using clear, published criteria. The Plan currently asserts this protection but does not evidence it. Required modifications: Publish criteria for assessing separation and settlement identity. Reassess all allocations—particularly Pill/Easton-in-Gordano—against these criteria. Reduce or remove allocations where settlement identity would be harmed. 6. Require soils assessments and justification for the loss of Best and Most Versatile (BMV) agricultural land. SP11 requires protection of BMV land, but the Plan lacks evidence. Required modifications: Require site-specific agricultural land classification surveys. Remove or reduce allocations where BMV land loss cannot be justified under NPPF policy. Insert wording prohibiting major development on BMV land unless all reasonable alternatives have been exhausted. 7. Strengthen SP11 to require the avoidance of ecological harm before resorting to mitigation. The current wording allows harm to be mitigated even where avoidance is possible. Required modifications: Insert the mitigation hierarchy explicitly: avoid > minimise > mitigate > compensate. Require removal of allocations where significant ecological harm cannot be avoided. 8. Require Heritage Impact Assessments (HIAs) for all strategic allocations with potential to affect heritage assets or historic landscapes. No HIAs have been provided for several strategic sites. Required modifications: Add text requiring HIAs for allocations near conservation areas, historic field patterns, known archaeological features and listed buildings. Remove or amend allocations where heritage harm cannot be avoided. 9. Include a policy mechanism to prevent development where light pollution would harm bat habitats or dark landscapes. Light-sensitive habitats are especially relevant at Pill/Easton-in-Gordano. Required modifications: Insert wording requiring lighting strategies that maintain dark corridors, with measurable thresholds and monitoring. Remove allocations where darkness cannot be preserved due to site layout, topography or proximity to settlement edges. 10. Require green/blue infrastructure (GBI) provision to be realistic and deliverable. Several strategic sites have physical or hydrological constraints. Required modifications: Add a requirement for every strategic allocation to include a GBI Delivery Plan showing drainage capacity, SuDS feasibility, habitat connectivity, and long-term stewardship. Remove or alter allocations where GBI cannot be delivered effectively (e.g., floodplain adjacency		

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					• major light spill risks, • proximity to the SAC. This creates an internal policy conflict – SP11 recognises the sensitivity, but the site allocations do not provide the mitigation mechanism. 6. SP11 requires development to protect heritage assets, but the Pill/E-in-Gordano allocations lack heritage impact assessments SP11 emphasises: • conservation areas, • listed buildings, • archaeological sites, • historic landscapes. But the strategic allocations at Pill/E-in-Gordano include: • historic field patterns, • hedgerows, • potential archaeological interest, • proximity to conservation areas. No Heritage Impact Assessments (HIAs) are provided. This omission renders the policy not justified. 7. SP11 requires green/blue infrastructure enhancement, but the Plan does not evidence that strategic allocations can accommodate it The Pill/E-in-Gordano area is constrained by: • steep topography, • existing drainage patterns, • flood risk zones (e.g., Markham Brook), • limited space for SuDS and green buffers. No evidence is provided to show these sites can deliver the required green and blue infrastructure. Summary SP11's objectives are appropriate, but the Local Plan does not demonstrate that the strategic allocations – particularly the 1,100 homes at Pill/Easton-in-Gordano – can: • protect ecological networks, • conserve sensitive landscapes, • safeguard BMV agricultural land, • achieve biodiversity net gain, • maintain settlement identity, • protect bat habitats or SAC/SSSI features, • deliver Nature Parks, • or mitigate heritage impacts. Therefore, SP11 is not sound under the tests of justification, effectiveness, and consistency with national policy.	at Markham Brook). Summary Modification To be sound, SP11 must be strengthened to: Require ecological, landscape, heritage and soils evidence before confirming allocations; Apply Nature Park and ecological mitigation requirements consistently (including Pill/Easton-in-Gordano); Ensure BNG, habitat connectivity and the mitigation hierarchy are deliverable; Protect valued landscapes and settlement identity using evidenced criteria; Remove or reduce allocations where environmental harm cannot be avoided. Without these modifications, SP11 fails the soundness tests of justification, effectiveness, and consistency with national policy (NPPF Section 15).		
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Summary Policy LP4 is not sound. The allocation of 1,100 dwellings at Pill and Easton-in-Gordano: conflicts with the Local Plan's own strategic priorities and sustainability principles, is inconsistent with SP1, SP2, SP3, SP6 and SP10, relies on undeliverable infrastructure, causes significant transport, landscape and ecological harm,	To make LP4 justified, effective, and consistent with national policy, the following modifications are required: _____ 1. Reassess whether Pill & Easton-in-Gordano is a suitable location for strategic growth and remove or significantly reduce the 1,100-home allocation LP4 currently depends on an unproven assumption that the village is a "sustainable location." This contradicts transport evidence, landscape assessments, ecological constraints and national Green Belt policy. Required modifications: • Remove Pill/Easton-in-Gordano as a "strategic location" unless clear, robust evidence demonstrates genuine sustainability. • Reduce the scale of development to a level proportionate to local		

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					rests on an inaccurate assessment of the village's sustainability, fails the NPPF tests for Green Belt release and exceptional circumstances, and places disproportionate growth in a location with severe constraints. LP4 does not meet the soundness tests of justification, effectiveness or consistency with national policy. 1. LP4 incorrectly identifies Pill & Easton-in-Gordano as a "sustainable location" for strategic growth The policy relies heavily on the assertion that Pill is a sustainable settlement due to: proximity to Bristol, the A369 bus corridor, future rail services, local facilities such as schools. This conclusion is not supported by evidence. In reality, the settlement is highly constrained: M5 Junction 19 is already at capacity with no committed solution. The A369 is a heavily congested single corridor with no space for major upgrades. Bus reliability is poor and heavily affected by traffic. The Portishead Line is not yet operational, and no start date is guaranteed. Walking and cycling routes are incomplete, unsafe or topographically difficult. The local centre provides only limited day-to-day services. LP4 therefore misrepresents the sustainability credentials of the village and makes the plan not justified. 2. LP4 relies on transport infrastructure that is either uncommitted, undeliverable, or unrealistic The policy requires: a new transport hub, extensive active travel improvements, new and enhanced walking/cycling routes,	needs, consistent with SP6 (Villages and Rural Areas). • Reallocate growth to more sustainable urban locations in accordance with SP3 (Spatial Strategy). _____ 2. Publish full cumulative transport modelling—including M5 J19 and A369 impacts—and adjust or remove allocations where impacts cannot be mitigated LP4 cannot be justified without comprehensive modelling. Required modifications: • Undertake and publish cumulative modelling for all four allocations in Pill/E-in-G. • Include impacts on: o M5 J19, o the A369 corridor, o local pinch points (e.g., Pill Road, Lodway, Westward Drive), o bus service reliability, o future rail station access. • Remove or reduce allocations where transport infrastructure is demonstrably insufficient or cannot be cost-effectively improved. _____ 3. Remove reliance on uncommitted transport infrastructure (e.g., Portishead Rail Line) as justification for the site's sustainability The Plan currently assumes delivery of the rail line by 2028 despite uncertainty. Required modifications: • Amend policy text to require that strategic allocations must not rely on transport infrastructure that is not fully funded, committed and deliverable within the early plan period. • Reassess the Pill/E-in-G allocation without assuming the rail line will operate. _____ 4. Require deliverable, funded transport, active travel and infrastructure plans before any development is permitted LP4 currently lists large-scale transport improvements but provides no deliverability evidence. Required modifications: • Insert a requirement for a comprehensive, costed Transport and Infrastructure Delivery Plan (TIDP) for the entire strategic location, prepared and agreed before any outline permission can be granted. • Require identification of: o funding sources, o responsible delivery bodies, o land ownership and acquisition needs, o phasing. • Remove or reduce allocations where infrastructure cannot be secured. _____ 5. Provide site-specific ecological assessments and remove allocations where SAC/SSSI impacts cannot be mitigated LP4 lies within sensitive biodiversity zones, including horseshoe bat forage and commute routes. Required modifications: • Produce HRA-level ecological assessments for each site. • Include: o habitat mapping, o bat activity modelling, o light spill assessment, o ecological connectivity studies. • Remove allocations where adverse effects on the SAC or ecological		

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					safe access to the proposed railway station. However: none of these schemes are funded, no delivery partners are identified, no costings are provided, no cumulative transport modelling has been published, and National Highways has already raised concerns about growth in this area. Given the severe existing congestion at Junction 19 and the A369, the policy lacks credibility. The result is that LP4 is not effective. 3. The policy overstates the benefits of the Portishead–Bristol Rail Line LP4 assumes that the railway will: be delivered by 2028, provide a "genuine choice" of transport modes, significantly reduce car dependency. But current evidence shows: the railway has experienced delays and cost escalations, services and timetables have not been finalised, no assessment demonstrates that new residents would shift from cars to rail, even with rail, car dependency for non-Bristol destinations remains extremely high. Relying on uncertain future rail provision makes LP4 not justified. 4. LP4 is inconsistent with SP10: Transport SP10 requires: minimising car dependency, prioritising active travel and public transport, locating development where sustainable travel is realistic and deliverable. However:	networks cannot be fully mitigated. _____ 6. Require a Nature Park or equivalent mitigation if any strategic development remains SP11 identifies Nature Parks for other strategic locations but not Pill/E-in-G, despite its high sensitivity. Required modifications: • Add a requirement for a Nature Park or equivalent habitat safeguarding/creation strategy if development exceeds a small, needs-based scale. • Identify land for long-term habitat protection before adoption. 7. Require Landscape and Visual Impact Assessments (LVIA) to determine whether the sites can accommodate the proposed scale of housing The landscape around Pill/E-in-G is sensitive and forms the rural setting of the village. Required modifications: • Publish LVIAs for all four sites. • Reduce or remove allocations where development would cause unacceptable harm to landscape character or settlement identity. 8. Demonstrate that 50% affordable housing is viable in combination with all required infrastructure and Green Belt “Golden Rules” The viability evidence does not show this. Required modifications: • Publish site-specific viability assessments demonstrating that: o 50% affordable housing, o primary school provision, o transport infrastructure, o ecological mitigation, o flood management, o and green infrastructure can all be delivered simultaneously. • If not viable, reduce the scale of allocation or remove the Green Belt release. 9. Provide a full sequential flood risk test for all sites and remove or amend allocations affected by flooding Areas around Markham Brook lie in Flood Zone 3 and climate-adjusted high-risk zones. Required modifications: • Publish sequential testing and site-specific FRAs. • Remove or reduce allocations where safer, lower-risk alternatives exist. 10. Demonstrate realistic capacity in schools, healthcare, utilities and local services—or reduce allocations to match local capacity LP4 assumes capacity without presenting evidence. Required modifications: • Publish capacity and impact assessments for: o GP and health services, o secondary school places, o utilities and wastewater, o emergency services. • Reduce allocation size where capacity cannot be increased in a timely and deliverable manner. 11. Provide realistic engineering assessments for all proposed active travel routes, bridges, and road widening Examples include: • the Markham Brook crossing, • Lodway footway widening, • new cycle routes on congested, narrow roads.		

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					1,100 homes in Pill would increase car use, worsen congestion at J19 and the A369, create longer commuting distances, place major development in a location where the transport network is already failing. LP4 is therefore not consistent with the Plan's own strategic transport policy. 5. LP4 does not demonstrate viable delivery of 50% affordable housing LP4 requires all sites to achieve: 50% affordable housing, AND substantial infrastructure obligations, AND Green Belt "Golden Rules" requirements, AND active travel schemes, AND school funding, AND extensive green infrastructure. But: no viability testing for the Pill/E-in-G sites has been published, the Council's own viability addendum notes that 50% affordable housing may be challenging on Green Belt sites. Without viability evidence, LP4 is not effective. 6. LP4 would cause significant ecological harm and does not comply with SP11 or national policy All Pill/E-in-G sites lie within or adjacent to: North Somerset & Mendip Bats SAC consultation zones, key foraging and commuting corridors, SSSI influence areas, species-rich hedgerows and pasture habitats. The policy does not: identify adequate mitigation land, address light spill impacts, demonstrate habitat connectivity,	Required modifications: • Publish engineering feasibility studies for all required improvements. • Reduce allocations where constraints mean safe, direct, continuous active travel routes cannot be delivered. 12. Remove Green Belt release where exceptional circumstances are not robustly evidenced for these specific sites Exceptional circumstances must be demonstrated site by site, not generically. Required modifications: • Reassess Green Belt purposes for each site (openness, sprawl, separation, countryside encroachment). • Remove allocations where Green Belt harm is significant and alternatives exist. 13. Add a mechanism to reduce or halt development if infrastructure, rail delivery or environmental mitigation fails to materialise This ensures the Plan remains adaptable and avoids locking in harmful development. Required modifications: • Insert a "delivery contingency" clause requiring: o the ability to scale back or prevent development where key infrastructure is delayed or undeliverable. o a formal review trigger if infrastructure is not committed by a specific date. Summary Modification To be sound, LP4 must be fundamentally revised to: • remove or reduce the disproportionate housing allocation, • base decisions on robust transport, ecology, flood and viability evidence, • ensure infrastructure is deliverable and funded, • protect the Green Belt, • maintain landscape and ecological integrity, • and align with SP1, SP2, SP3, SP6, SP10 and SP11. Without these modifications, LP4 fails the tests of justification, effectiveness, and consistency with national policy.		

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					specify any Nature Park or equivalent strategy, provide ecological capacity assessments. LP4 therefore conflicts with the Habitats Regulations, NPPF Section 15, and SP11. 7. LP4 would cause irreversible landscape and Green Belt harm Pill Green and Lodway Farm are part of valued rural landscapes. Development would lead to settlement sprawl, coalescence and erosion of openness. No Landscape and Visual Impact Assessment (LVIA) is provided. The Green Belt “exceptional circumstances” test is not met for this specific settlement. LP4 is therefore not consistent with national Green Belt policy (NPPF Section 13). 8. LP4 fails to address flood risk adequately Markham Brook and surrounding areas include: Flood Zone 3, climate-change-adjusted flood risk, limited drainage capacity, constrained land for SuDS. The Local Plan does not provide: a sequential test, a Level 2 Strategic Flood Risk Assessment for each allocation, evidence of drainage feasibility. LP4 is not justified under NPPF Section 14. 9. LP4 overestimates the capacity of local services and infrastructure The policy assumes a new primary school plus: secondary school capacity (questionable), healthcare capacity (already constrained), community centre capacity, utilities capacity. But:			

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					no NHS capacity assessment is provided, no utilities capacity evidence is presented, no delivery partners or funding mechanisms are specified. LP4 is not effective. 10. LP4 imposes untested highways and active travel schemes that may not be physically deliverable Many proposed active travel routes: run along narrow or dangerous roads, require land acquisition, cross flood-prone areas, traverse steep topography, assume major bridge or path upgrades without engineering studies. Without feasibility assessments, LP4 is not justified. Conclusion Policy LP4 is not sound because: the growth level is disproportionate to the village, the sustainability appraisal is flawed, transport infrastructure is unproven, mitigation is unrealistic, environmental constraints are unresolved, Green Belt release is unjustified, the required infrastructure cannot be delivered, the policy conflicts with multiple strategic policies (SP1, SP2, SP3, SP6, SP10, SP11). LP4 should be removed or significantly reduced unless a comprehensive evidence base can demonstrate that the development is sustainable, viable, and legally compliant.			
Land at Lodway Farm	No	• Positively prepared • Justified • Effective • Consistent	Unsure	Unsure	Summary The allocation at Lodway Farm is not sound. It is constrained by topography, flood risk, ecological sensitivity, inadequate access, and significant landscape harm. It cannot deliver the required infrastructure or 50% affordable housing viably.	Remove the Lodway Farm allocation unless the council can demonstrate: safe and feasible active travel improvements, road safety mitigation,		

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		with national policy			Key Issues 1. Severe Transport Constraints Lodway is a narrow, constrained lane with a raised footway that is unprotected and below modern safety standards. There is no room for safe widening without land acquisition or unacceptable Green Belt harm. Additional traffic would worsen congestion at: Lodway/Crockerne Drive, the A369 junction, and M5 J19. 2. Active Travel Requirements Are Not Feasible The plan requires improved active travel along Lodway and a designated route into Pill centre. However: Pavement widths are below minimum national standards. Topography and building lines prevent widening. No feasibility studies are provided. 3. High Landscape and Green Belt Sensitivity The site forms part of the rural setting of Pill, with views across the valley. Development would erode settlement character and harm openness. Exceptional circumstances are not demonstrated for this specific parcel. 4. Ecological Constraints The site lies within the North Somerset & Mendip Bats SAC consultation zone. There is insufficient assessment of light spill, habitat loss, or bat commuting corridors. 5. Flood Risk Adjacent areas are influenced by Markham Brook flood flows. No drainage feasibility or sequential test has been provided. 6. Infrastructure Delivery is Unproven No evidence shows that the required active travel links or contributions toward the new primary school are deliverable.	no adverse ecological impacts, Green Belt justification specific to this parcel, viable delivery of 50% affordable housing, and resolution of flood risk.		

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Land east of Gordano Services	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Key Issues 1. Adjacent Motorway Impacts The site directly borders the M5 corridor, which exposes future residents to: high noise levels, elevated air pollution, night-time light pollution. The policy assumes mitigation is possible but provides no evidence that acceptable living conditions can be achieved. 2. Unsuitable Walking and Cycling Environment The site is severed by major road infrastructure, making active travel to schools and the village centre difficult. Required links rely on significant engineering at Markham Brook and via Pill Green. 3. Traffic Impacts Near J19 Additional car trips will directly feed into one of the most congested motorway junctions in the region. No cumulative modelling is provided. 4. Weak Green Belt Justification The site contributes to the openness between Pill and the motorway corridor. Development would create a perception of urban sprawl approaching the M5. 5. Ecological Impacts Under-Assessed The site’s hedgerow network is important for horseshoe bat commuting. No HRA-level assessment has been published.	Remove or significantly reduce the allocation unless the council can demonstrate: acceptable air/noise conditions, deliverable active travel routes, cumulative transport evidence, Green Belt justification, and ecological mitigation with adequate replacement habitat.		
Pill Green	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Key Issues 1. Disproportionate Growth 600 homes represents a 44% population increase, fundamentally altering the village's scale and character. This is inconsistent with SP6 which requires development in villages to be proportionate and locally justified. 2. Severe Transport Problems Pill Green is remote from the village centre, requiring crossing of Markham Brook, steep terrain, and narrow lanes.	Remove the Pill Green allocation in full, or reduce it drastically (e.g., to a locally proportionate level of 50–80 homes) unless robust evidence is provided for: Green Belt justification, ecological feasibility, drainage and flood safety, realistic active travel connections, cumulative traffic modelling,		

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					No engineered solutions are provided for the required new active travel bridge. Traffic would concentrate on already over-capacity roads feeding into J19 and the A369. 3. Landscape Harm Pill Green lies on an open rural plateau, contributing to long views and the village's rural setting. Development at this scale would dominate the landscape and breach the perceived village boundary. No LVIA has been provided. 4. Green Belt Purposes Significantly Undermined The site prevents coalescence with the M5 corridor. It provides openness and separation between settlement clusters. Development would markedly harm Green Belt purpose 3 (safeguarding the countryside from encroachment). 5. Major Ecological Risks The site lies within critical bat foraging areas, including cattle-grazed fields—preferred Greater Horseshoe Bat habitat. No Nature Park or habitat compensation land has been identified. Mitigation on-site is unlikely to offset such large-scale loss. 6. Drainage and Flooding The lower part of the site is affected by flows from Markham Brook catchment. No drainage capacity or run-off assessments are published. 7. Infrastructure Assumptions Unrealistic 600 homes would generate very high demand for: school places, healthcare provision, utilities, community facilities. No evidence shows that expansion of these services is feasible or deliverable.	and infrastructure capacity.		

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Land at Pill Road	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Key Issues 1. Severe Highway Constraints Pill Road is narrow with limited visibility and no continuous pavement. It cannot safely accommodate significant additional vehicle, pedestrian, or cycle traffic. Required active travel upgrades appear physically undeliverable. 2. Flood Risk Proximity The site is close to flood-prone land near Markham Brook. Sequential and exception tests have not been properly demonstrated. 3. Ecological Harm Contains hedgerow corridors used by horseshoe bats and other protected species. No detailed ecological surveys have been provided. 4. Landscape Sensitivity Development would extend built form into the open rural valley leading toward the brook. 5. Reliance on Unproven Infrastructure The policy requires active travel connectivity and contributions to a new school. These are not shown to be viable or deliverable.	Remove or reduce this allocation unless the council can evidence: safe and deliverable road and active travel improvements, no increased flood risk, ecological mitigation adequacy, and absence of landscape harm.		
Land at Ham Green	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Summary The allocation of 40 dwellings at Ham Green is not sound. The site suffers from: constrained access via a private road (Perrett Way) requiring major upgrades; no demonstrated engineering feasibility for the required highway works; severe pedestrian and cycling constraints; proximity to sensitive ecological habitats; lack of safe or direct active travel connections; conflicts with the character of Ham Green and the rural setting;	To make the Plan sound, the following modifications are required: 1. Remove the Ham Green allocation unless safe and feasible access can be demonstrated Require the council to publish: a detailed engineering feasibility report on upgrading Perrett Way; land ownership confirmation; adoption standards compliance; safety, drainage, visibility and swept-path analysis. If these cannot be evidenced, the allocation should be deleted. 2. Require a deliverable, safe active travel route connecting Ham Green to Pill centre and the proposed rail station		

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					cumulative traffic impacts on already overburdened infrastructure (A369, J19); and no evidence that development can deliver the necessary mitigation in a viable or environmentally acceptable way. 1. Access via Perrett Way is fundamentally unsuitable The policy states that development must “upgrade and extend Perrett Way as highway with pedestrian facilities (currently private road).” However: Perrett Way is narrow, lightly constructed, and not designed for adoption as a highway. It lacks footways, lighting, drainage capacity and turning space. There is no evidence that widening or upgrading is physically or financially feasible. Certificate of title / land ownership constraints are not addressed. No swept-path or safety analysis has been published. This renders the allocation not effective and not justified. 2. No safe pedestrian or cycle access to village schools, shops or services Even if Perrett Way were widened: the route to Pill remains indirect, steep in places, and unsafe for walking and cycling; the A369 corridor is already heavily trafficked and hazardous for non-motorised users; no deliverable active travel link from Ham Green to the central transport hub or proposed rail station is shown. This contradicts SP10, DP15, DP16, SP1 and the Plan’s broader sustainable transport objectives. 3. Cumulative traffic effects have not been assessed Although the site is small, it is part of the 1,100-home growth cluster around Pill/Easton-in-Gordano. No cumulative modelling has been provided for Ham Green + Pill Road + Pill Green + Lodway Farm + Gordano Services. Additional trips would funnel into already congested junctions, including the A369 / Pill Road junction and J19 of the M5. National Highways has already expressed concern over additional growth impacts in this area.	If such a route cannot be demonstrated: the allocation should be removed, or drastically reduced to reflect local constraints. 3. Require cumulative transport modelling including all Pill/E-in-G sites and J19 / A369 impacts If modelling shows impacts cannot be mitigated, the allocation must be removed. 4. Require full ecological assessment and bat activity modelling for the site If harm to SAC bat species cannot be mitigated: the allocation must be deleted. 5. Require a landscape and visual assessment (LVIA) If development would cause unacceptable rural character harm, the site should be removed. 6. Demonstrate infrastructure capacity (schools, GP, drainage) If capacity cannot be secured, the allocation must be reduced or removed. Summary Modification Because of untested access requirements, ecological constraints, landscape impacts, unsafe pedestrian/cycle connectivity and cumulative traffic effects, the allocation at Ham Green cannot currently be considered sound. It should be removed, or retained only at a significantly reduced scale, pending robust evidence that it can be delivered safely, viably and with no unacceptable environmental or transport impacts.		

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					Without a cumulative impact assessment, the site is not justified. 4. Ecological sensitivity is under-assessed Ham Green lies within key ecological zones, including: North Somerset & Mendip Bats SAC consultation area, locally important hedgerow corridors, proximity to the Severn Estuary SSSI influence zone. Yet: no site-specific ecological surveys have been published, bat activity and commuting routes are not mapped, lighting impacts near woodland edges are not assessed, no mitigation land is identified. This conflicts with SP11, DP35, DP36 and the Habitats Regulations. 5. Landscape and settlement character harm Ham Green has a distinct rural character with: mature trees, green edges, traditional field patterns, and a clear separation from denser village centres. Development here would: extend built form into sensitive landscape, erode rural character, increase coalescence with existing development clusters. No LVIA has been provided, rendering the site not justified. 6. Infrastructure delivery is uncertain The Plan provides no evidence of capacity or feasibility for: foul drainage and wastewater treatment; sustainable drainage (SuDS) given the site's topography; GP / healthcare capacity;			

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					school capacity (especially given the cumulative 1,100 homes proposed nearby). This makes the allocation not effective.			

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SP1: Sustainable Development					McCarthy Stone (MS) and Churchill Living (CL) are independent house builders specialising in specialist housing for older people. Together, they are responsible for delivering approximately 90% of England's specialist owner-occupied retirement housing. Both operators are therefore well placed to provide comment on the policy barriers that may have the potential to restrict supply within the sector. Please find below our comments on the draft local plan insofar as they impact the delivery of specialist accommodation for older persons. These comments are intended to assist the council in formulating approaches which are both workable in practice and avoid stymying the delivery of a housing typology which the PPG describes as 'critical' in terms of addressing housing need. Policy SP1: Sustainable development Policy SP1 amongst other things requires new development to 'Make a positive contribution to addressing and demonstrating resilience to the impacts of climate change and delivering the net zero target'. Policy SP2 confirms that the Council has a target of delivering carbon neutrality in North Somerset by 2030. Whilst the Council's commitment to meeting both its and the UK Government's target of net zero carbon emissions is commendable, it appears that the Council is going to achieve this through having mandatory carbon and climate standards from adoption of the plan that may go beyond government targets. However, it is our view that any requirement should be 'stepped' in line with Government targets and the proposed changes to the building regulations. This approach is confirmed within the Ministerial Statement (statement no : Statement UIN HCWS123 available from Written statements - Written questions, answers and statements - UK Parliament) released on 13th December 2023. The ministerial statement confirms, with respect to the net zero goal that: 'The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government's commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale' and 'To be sound, local plans must be consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework and other statements of national planning policy, including this one'.	The Council should re-consider the policy SP1 to ensure requirements are not going beyond government targets.		2025_MS and CL response to North Somerset submission Local Plan reg 19 - Redacted.pdf
Policy DP6: Net zero					Policy DP6 identifies the requirements that development must be designed to in order to reach net zero including operational, up front and whole life carbon. The policy also	The Council should re-consider the policy DP6 to ensure requirements are not		2025_MS and CL response

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construction					confirms that compliance can be demonstrated through Passivhaus Plus Standard accreditation, using the Passivhaus Planning Package. Whilst the Council's commitment to meeting both its and the UK Government's target of net zero carbon emissions is commendable, it appears that the Council is going to achieve this through having mandatory carbon and climate standards from adoption of the plan that may go beyond government targets. However, it is our view that any requirement should be 'stepped' in line with Government targets and the proposed changes to the building regulations. This approach is confirmed within the Ministerial Statement (statement no : Statement UIN HCWS123 available from Written statements – Written questions, answers and statements – UK Parliament) released on 13th December 2023. The ministerial statement confirms, with respect to the net zero goal that: "The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government's commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale' and 'To be sound, local plans must be consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework and other statements of national planning policy, including this one'	going beyond government targets.		to North Somerset submission Local Plan reg 19 - Redacted.pdf
Policy DP36: Biodiversity Net Gain					Whilst we welcome the confirmation of the policy that the Council will only seek 'at least 10% Biodiversity Net Gain we are concerned that the policy attempts to set a local biodiversity net gain hierarchy. This is contrary paragraph: 006 Reference ID: 74-006 20240214 of the PPG on Biodiversity Net gain that states 'Plan-makers should be aware of the statutory framework for biodiversity net gain, but they do not need to include policies which duplicate the detailed provisions of this statutory framework. It will also be inappropriate for plans or supplementary planning documents to include policies or guidance which are incompatible with this framework, for instance by applying biodiversity net gain to exempt categories of development or encouraging the use of a different biodiversity metric or biodiversity gain hierarchy.' In addition the council will be aware that the Biodiversity Metric includes a spatial multiplier and therefore directly where offsite units are delivered is not necessary.	The Council should therefore reconsider this additional wording with regard to BNG to ensure it is consistent with any updated guidance and regulations.		2025_MS and CL response to North Somerset submission Local Plan reg 19 - Redacted.pdf
Policy DP37: Trees, Woodlands and Hedges					NPPF para 16. identifies that 'Plans should.....b) be prepared positively, in a way that is aspirational but deliverable'. Para 136 provides guidance specifically associated with trees and states 'Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users'. PPG with respect to viability states that "The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan" (Paragraph: 002 Reference ID: 10-002-20190509).	Requiring 1 new trees per new dwelling on site especially for small brownfield sites delivering apartments is not deliverable or realistic and could compromise sustainability development and is therefore contrary to NPPF. The requirement also goes beyond the requirements of the NPPF. Any requirement would also need to be fully evidenced and the requirement incorporated into the viability study. The council should therefore reconsider this element and ensure any such policy approach introduces more flexibility or is deleted.		2025_MS and CL response to North Somerset submission Local Plan reg 19 - Redacted.pdf

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					Requiring 1 new trees per new dwelling on site especially for small brownfield sites delivering apartments is not deliverable or realistic and could compromise sustainability development and is therefore contrary to NPPF. The requirement also goes beyond the requirements of the NPPF. Any requirement would also need to be fully evidenced and the requirement incorporated into the viability study. The council should therefore reconsider this element and ensure any such policy approach introduces more flexibility or is deleted.			
Policy DP43: Affordable housing (including rural exception schemes)					Policy DP43 requires all new housing development to contribute to the provision of affordable housing. Different rates are set for development on green belt land (50%), greenfield land (30%) and previously developed land (20%) This requirement also applies to specialist housing for older people. Some flexibility is provided by the policy. We note that policy DP47 makes it clear that affordable housing will also be required form specialist housing for older people. We note that the policy is supported by the Viability Assessment for North Somerset Local Plan 2039, Final Report, November 2023, Dixon Searle (Viability Assessment). This details the viability work undertaken and confirms, with respect to older persons housing that viability has been assessed for a 30 unit Sheltered housing scheme and a 60-unit extra care housing scheme. Whilst in our previous representation, we welcomed that the policy has a reduced affordable housing requirement for PDL we expressed concerns that older person's housing had not been considered fully within the Viability Assessment using the correct assumptions and as such recommended that separate requirements should have been provided for the older persons typology and that the Viability Assessment should be re-run using the assumptions suggested. Unfortunately, this has not occurred so we repeat our comments below. The Council should note that the viability of specialist older persons' housing is more finely balanced than 'general needs' housing. It cannot be simply regarded as standard housing. Older persons housing differs from a standard model of development or flat as confirmed within the PPG Paragraph: 010 Reference ID: 63 010-20190626. Specialist sheltered and extra care housing schemes for older people tend to be flatted developments, based around communal facilities and community living and delivered on smaller brownfield sites in a single phase before sales can occur. Additional facilities include extensive communal areas, such as space to socialise, a wellbeing centre, a care service with 24-hour access to support services and staff and a bistro where meals are often available. This enables residents to live much more independently than they would otherwise. We would direct the Council towards the Retirement Housing Consortium paper entitled 'A briefing note on viability prepared for Retirement Housing Group by Three Dragons, May 2013 (updated February 2013 ('RHG Briefing Note') available from https://retirementhousinggroup.com/rhg/wp-content/uploads/2017/01/CIL-viabiilty appraisal-issues-RHG-February-2016.pdf. The RHG Briefing Note establishes how sheltered housing and extra care development differs from mainstream housing and looks at the key variables and assumptions that can affect the viability of specialist housing for older people. As such, due to the differences and variables that older person's housing schemes have viability is often more challenging. Given the above characteristics of specialist housing for older persons housing, we have concerns that some of the assumptions and additional costs that developers of older persons housing schemes experience, have not been fully incorporated or incorporated correctly into the Viability Assessment. It is clear when comparing the site that has been modelled within Viability Assessment with that of the RHG Briefing Note, that there are a number of discrepancies that should be amended, and the Viability Assessment should be re-run. If the typical scheme is amended and re- modelled the viability of sheltered and extra-care housing would reduce and not be viable.	We recommend that the Council and its consultant reconsider the viability assumptions as detailed above for sheltered and extra care housing in line with our recommendations and if sheltered and / or extra care is shown to be not viable or less viable the typology is exempted from affordable housing or an additional typology added to the policy. In particular, the Council should reconsider the assumptions incorporated for typical scheme, assumed unit size, sales periods, empty property costs, marketing costs, profit, external works, sales values and local plan costs.		2025_MS and CL response to North Somerset submission Local Plan reg 19 - Redacted.pdf

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					The key variables not included at the correct level are typical scheme, assumed unit size, sales periods, empty property costs, marketing costs, profit, external works, sales values and local plan costs and are discussed below. In addition, whilst we welcome that the Council have tested sheltered and extra care housing on previously developed land this should also be undertaken on greenfield land. Typical Scheme Size and non-saleable area: We note that Appendix 1 of the Interim Viability Assessment identifies that the following has been modelled with respect to sheltered and extra-care housing: • A Sheltered/retirement scheme of 30 units comprising at a density of 125 dwellings per hectare. • An Extracare scheme of 60 units at a density of 125 dwellings per hectare. It is not clear what dwelling size and mix that has been modelled. We have concerns that the typical scheme modelled with respect to density is not in line with advice within the RHG Briefing Note that identifies that the following type of schemes should be modelled: • Sheltered: 50-60 units at a density of 100-120 dwellings per hectare with communal / non chargeable space of 20-30% • Extra care – 40-50 units at a density of 80-100 dwellings per hectare with communal / non chargeable space of 35-40%. Previously developed land and greenfield: We note that para 3.5.10 of the Viability Assessment confirms that With the Council proposing the differential, it has not been considered necessary or appropriate to put forward recommendations for a further differential treatment of these specialist housing types, which typically come forward on PDL sites.' This make the assumption that older person's housing is largely delivered on previously developed land. Whilst historically this has been the case, McCarthy Stone also in more recent year look to deliver much needed older persons housing on greenfield sites, especially on large urban extensions where important community facilities are also delivered. The delivery of older persons housing on greenfield sites should therefore not be ignored. Unit sizes: We note that the Viability Assessment has used, for extra care housing, assumed unit sizes that are less than that detailed within the RHG Briefing Note. Unit sizes for extra care should therefore be increased to 60 sq. m for a 1 bed extra care and 80 sq. m for a 2 bed. Unit sizes for specialist housing for older people tend to be larger than the minimum standards set out within the Nationally Described Space Standards allowing for additional storage and circulation space to facilitate downsizing from larger family homes and reduced mobility. Sales periods: Older persons housing schemes that typically consist of flatted development of 40 – 60 units cannot be phased and the whole scheme must be fully built and operational from month 1 of sales. Sales periods are typically longer for retirement housing than for general housing with a typical scheme taking around 36 months to sell. The build period takes approximately 12 to 18 months. This longer sales period has not been accounted for within the Viability Assessment for sheltered and extra care housing and would reduce the viability of older persons housing if considered.			

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					Empty property costs: Due to the long sales period older persons housing schemes experience higher void costs as schemes take longer to sell than general needs housing. A typical average empty property cost per unit is £5,000 for sheltered and £8,000 for extra care. This covers costs such as Council tax and service charges on unsold units. Although this has been accounted for within the Interim Viability Assessment, this is at a lower rate of £2,000 per unit for sheltered housing and £5,000 per unit for extra care. The Viability Assessment should be re-run using the revised figures. Marketing costs: We note that the Viability Assessment has used marketing and sales costs of 3%. However, given the longer sales period, there is a longer and more supportive marketing / sales programme for specialist retirement housing needed compared to general needs, typical marketing costs are 6%. This was included within the RHG Briefing Note. If a higher percentage for marketing costs was included within the Viability Assessment for Older Peoples housing this would reduce viability of older persons housing. Profit: The NPPG is clear that potential risk is accounted for in the assumed return for development and assumed to be between 15-20% of gross development value for plan making purposes but alternative figures may be appropriate for different development types and typologies (Para 018 Reference ID:10-018-20190509). There are a number of inherent sector specific risks with older person housing which materially differ to that of general needs housing including an inability to phase and allow for risk reappraisal. Older Persons housing must be fully completed and operationally ready before sales commences as older people are less likely to buy ‘off plan’ without seeing for example the benefit of the communal facilities. The above provides a slower return on investment and a longer period of uncertainty in the market and cost exposure. An acceptable return for risk in respect of retirement living proposals such as this is not less than 20% of gross development value. This is consistent with the Inspector conclusions at Appeal for the McCarthy and Stone proposal at Redditch (Appeal Ref: 3166677), the Churchill Retirement Living proposal at Cheam (Appeal Ref: 3159137) and the Churchill Retirement Living scheme at West Bridgford (Appeal Ref: 3229412) in 2019. It is clear based upon Appeal precedent that 20% return on gross development value represents the minimum acceptable return in respect of housing for older people proposals for the reasons outlined. If a higher percentage for profit was included within the Viability Assessment for Older Peoples housing, than the 18% used, this would reduce viability of older persons housing. External works: Appendix 1, Table 1b of the Viability Assessment identifies that generally a cost of 10% has been applied for flatted development for external work and that a ‘reduced rate of 7.5% has been used for sheltered and extra care schemes’. It is unclear why a reduced rate for sheltered and extra care schemes has been used. High quality shared external amenity space is a fundamental part of retirement living. Shared communal space offers visual amenity and usable outdoor provision designed to be linked to the internal communal owners lounge and other communal areas within the main building is important and therefore an allowance of 10% should also be used for sheltered and extra care housing, If a higher percentage of 10% for external works was included within the Viability Assessment for Older Peoples housing rather than the 7.5% used, this would reduce viability of older persons housing further.			

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					Sales Values: The Viability Assessment at Appendix IV section 3.6 identifies the Sales Values levels that have been used. This confirms at para 3.6.2 that 'DSP's significant experience of carrying out site-specific viability reviews on numerous schemes together with bespoke research analysis led us to test retirement/sheltered/extra care housing at the same overall upper range of values as used for traditional housing market appraisals (VL6 £4,750 to VL11 £6,000).' And at para 3.6.3 that 'From wider experience, we would generally expect retirement/sheltered housing values to be representative of the upper end of this overall range; even this could be considered conservative in our view'. Table 5 seems to undertake some sales values analysis, but this is not discussed in the text. We have assessed the 'Advertised Asking Price' data put forward within Appendix IV Table 5 of the Viability Assessment and have concerns with regard to the values proposed to be used within the study for sheltered and extra care housing for the following reasons: • Values used are based on advertised asking price not actual sales values. Given difficult market conditions, advertised asking prices are higher than the price that properties are likely to be sold for less and therefore the value is less. • Table 5 uses the RGH methodology for determining sales values of sheltered and extra-care housing and therefore a simple 25% premium has been added to sheltered to gain the sales values of extra care. Although we accept that this 25% premium is in line with the RHG Briefing Note, the Council should note that since the RHG Briefing note was published in 2016 this premium has fallen in recent years and research now finds the premium to be just 10% over comparable retirement living or sheltered schemes. The 25% premium should therefore be reduced to 10%. In addition, we note that para 3.5.11 of the Viability Assessment states, 'Using the assumptions set out including higher new build sales values, as can be seen these schemes appear if anything potentially more viable than general market apartments development'. We would disagree with this assertion and given the concern we have expressed given the cost assumptions described and areas that make older persons housing more expensive to deliver, if the viability is re-run using the correct assumptions this will show that viability of older persons housing is less viable than general market apartments. Local Plan costs Biodiversity Net Gain and M4 (3): In addition to typology specific costs, we also have concern as to the limited value that has been used for Biodiversity Net Gain within the Viability Assessment amongst other policy areas especially with regard to BNG costs on PDL that has been set at 0.7% rather than a cost of 2.9% on greenfield. The Council should note that on 27th July 2023 the price of statutory biodiversity credits were published (available from Statutory biodiversity credit prices - GOV.UK (www.gov.uk)). This has enabled it to be determined how much BNG may cost, and it is considered that the costs per dwelling put forward within the Viability Assessment have greatly underestimated the costs. In addition, brownfield site BNG costs are often more substantial than Greenfield, but this very much depends on the site characteristics. As a result of credit prices having been published, the Council should re-run the Viability Assessment that includes a more realistic assessment of BNG costs and if necessary, reduce the BNG and affordable housing requirements accordingly. With respect to M4(3) costs please see our response to DP46. Conclusion: We recommend that the Council and its consultant reconsider the viability assumptions as detailed above for sheltered and extra care housing in line with our recommendations and if sheltered and / or extra care is shown to be not viable or less viable the typology is			

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					exempted from affordable housing or an additional typology added to the policy. In particular, the Council should reconsider the assumptions incorporated for typical scheme, assumed unit size, sales periods, empty property costs, marketing costs, profit, external works, sales values and local plan costs.			
Policy DP46: Housing Type and Mix					Policy DP46 requires a minimum of 5% of all new dwellings (market and affordable) in developments of 10 or more dwellings will be required to be designed to meet Building Regulations M4(3) standard ('wheelchair user dwellings'), or a higher proportion where there is evidence of local need. Despite the draft plan requiring 5% of older persons housing to be built for M4(3) and a percentage amount of build costs being included in the viability study to cover this, the council should note that any M4(3) requirement needs to be considered on top of M4(2) and would include additional costs for fixtures and fittings, services and controls and additionally room dimensions and layout which include up to 30% more floorspace and corresponding reduction in density, sales values and affordability of such housing'. While some value may be secured for larger units this is unlikely to mitigate the overall loss of units across the proposal as a result of the requirement. In this respect, we would highlight appeal decision 3327682 for a site in Penketh, Warrington that specifically addresses M4(3) housing within retirement living apartments. This considers the provision of Wheelchair dwellings in detail in para 19 to 39, with the Inspector concluding that it was not viable for the scheme to deliver a proportion of M4(3) housing. This specifically states at para 37 that: "37. As I consider that it would be most likely to be necessary to increase the size of the six apartments to enable M4(3) compliance, it follows that the cost of such provision may well be greater than the Council's assessment of £30,000, which did not allow for increases in apartment size. This is because an increase in the size of a number of apartments at the development would reduce the total number of apartments provided and hence may affect the development's overall value". We therefore feel that more flexibility should be built into the policy to allow flexibility of the requirement subject to viability.	We therefore feel that more flexibility should be built into the policy to allow flexibility of the requirement subject to viability.		2025_MS and CL response to North Somerset submission Local Plan reg 19 - Redacted.pdf
Policy DP47: Older Persons Accommodation					Whilst it is positive that the Council acknowledge the need for meeting the housing needs of older people, we have some concerns with respect to some of the requirements of policy DP47. National Policy Context: Government's policy, as set out in the revised NPPF, is to boost significantly, the supply of housing. Paragraph 60 reads: "To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay." The revised NPPF looks at delivering a sufficient supply of homes, paragraph 63 identifies within this context, the size, and type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies including older people. This now includes 'those who require retirement housing, housing-with-care and care homes'. In June 2019 the PPG was updated to include a section on Housing for Older and Disabled People, recognising the need to provide housing for older people. Paragraph 001 Reference ID: 63-001-20190626 identifies that 'The need to provide housing for older people is critical'. The PPG further recognizes the requirement at para Paragraph 003 Reference ID:	Developers of older person's housing schemes should not be required to demonstrate need given the significant need identified and the many benefits that such developments bring and point 1 or policy DP47 should be deleted: Delete: Demonstrates that it will contribute towards meeting an identified need within the area and is targeted towards the needs of local residents; Given our comments on Policy DP43 affordable housing the following text should also be deleted: Delete: The council will seek an element of affordable housing provision for older persons as part of appropriate market-led developments for older people. In line with comments made above, the following paragraph should be removed from page 224:		2025_MS and CL response to North Somerset submission Local Plan reg 19 - Redacted.pdf

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					63-003-20190626 and paragraph 006 Reference ID: 63-006-20190626 with the latter paragraph setting out that 'plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require.' Need for Housing for Older People: It is well documented that the UK has an ageing population. Life expectancy is greater than it used to be and as set out above by 2032 the number of people in the UK aged over 80 is set to increase from 3.2 million to 5 million (ONS mid 2018 population estimates). It is generally recognised (for example, within the Homes for Later Living Report September 2019). That there is a need to deliver 30,000 retirement and extra care houses a year in the UK to keep pace with demand. The plan is supported by an older people and specialised housing needs assessment, Housing Lin, 2022. This concludes at para 6.02 and 6.03: "Housing for older people (retirement housing for sale and for social/affordable rent38). The estimated net need for housing for older people to 2038 is c.800 units of which c.240 is for social/affordable rent and c.560 is for sale.' And that 'Housing with care (extra care housing). The estimated housing with care net need to 2038 is c.640 units of which c.320 units are for social/affordable rent and c.320 units are for sale'. The plan is also supported by the North Somerset Local Housing Needs Assessment, ORS September 2025 (LHNA). This summarises at para 5.34 that 'On this basis, there would be need to provide an additional 1,400-1,500 specialist older person housing units over the 15-year period 2026-2041 (equivalent to an average of around 100 dwellings per year) of which nearly half (47% in Scenario A; 46% in Scenario B) would need to be provided as Affordable Housing' It is therefore clear there will be a significant increase in older people and corresponding need and the provision of suitable housing and care to meet the needs of this demographic should be supported positively as a priority. Benefits of Housing for Older People: Older Persons' Housing produces a large number of significant benefits which can help to reduce the demands exerted on Health and Social Services and other care facilities – not only in terms of the fact that many of the residents remain in better health, both physically and mentally, but also doctors, physiotherapists, community nurses, hairdressers and other essential practitioners can all attend to visit several occupiers at once. This leads to a far more efficient and effective use of public resources. Economic: A report "'Healthier and Happier' An analysis of the fiscal and wellbeing benefits of building more homes for later living" by WPI Strategy for Homes for Later Living explored the significant savings that Government and individuals could expect to make if more older people in the UK could access this type of housing. The analysis showed that: • Each person living in a home for later living enjoys a reduced risk of health challenges, contributing to fiscal savings to the NHS and social care services of approximately £3,500 per year. • Building 30,000 more retirement housing dwellings every year for the next 10 years would generate fiscal savings across the NHS and social services of £2.1bn per year.	Delete: Development that attracts additional care users into the district is likely to have a significant impact on Council resources. The Council will therefore expect development proposals for housing and accommodation for older people to be supported by evidence demonstrating that they are targeted towards and will contribute towards meeting the district's identified needs. The Council will require, as a minimum, that the accommodation is marketed and made available for sale or rent within the district for a period of at least six months before it is marketed more widely.		

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					• On a selection of national well-being criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing to housing specially designed for later living. A further report entitled Silver Saviours for the High Street: How new retirement properties create more local economic value and more local jobs than any other type of residential housing (February 2021) found that retirement properties create more local economic value and more local jobs than any other type of residential development. For an average 45-unit retirement scheme, the residents generate £550,000 of spending a year, £347,000 of which is spent on the high street, directly contributing to keeping local shops open. As recognised by the PPG, Retirement housing releases under-occupied family housing and plays a very important role in recycling of housing stock in general. There is a 'knock-on' effect in terms of the whole housing chain enabling more effective use of existing housing. In the absence of choice, older people will stay put in properties that are often unsuitable for them until such a time as they need expensive residential care. A further Report "Chain Reaction" The positive impact of specialist retirement housing on the generational divide and first-time buyers (Aug 2020)" reveals that about two in every three retirement properties built, releases a home suitable for a first-time buyer. A typical Homes for Later Living development which consists of 40 apartments therefore results in at least 27 first time buyer properties being released onto the market. Social: Retirement housing gives rise to many social benefits: • Specifically designed housing for older people offers significant opportunities to enable residents to be as independent as possible in a safe and warm environment. Older homes are typically in a poorer state of repair, are often colder, damper, have more risk of fire and fall hazards. They lack in adaptions such as handrails, wider internal doors, stair lifts and walk in showers. Without these simple features everyday tasks can become harder and harder • Retirement housing helps to reduce anxieties and worries experienced by many older people living in housing which does not best suit their needs by providing safety, security and reducing management and maintenance concerns. • The Housing for Later Living Report (2019) shows that on a selection of wellbeing criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing into housing specifically designed for later living. Environmental: The proposal provides a number of key environmental benefits by: • Making more efficient use of land thereby reducing the need to use limited land resources for housing. • Providing housing in close proximity to services and shops which can be easily accessed on foot thereby reducing the need for travel by means which consume energy and create emissions. • Providing shared facilities for a large number of residents in a single building which makes more efficient use of material and energy resources. Therefore, developers of older person's housing schemes should not be required to demonstrate need given the significant need identified and the many benefits that such developments bring and as such a proposed medication is suggested in our			

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					recommendations below. Page 224: We note that the last paragraph on page 191 states 'The Council will require, as a minimum, that the accommodation is marketed and made available for sale or rent within the district for a period of at least six months before it is marketed more widely'. McCarthy Stone can confirm from research we undertake through all of our historical sales that most of McCarthy Stone's customers move from within a 5-mile radius and free-up local family-sized houses. Residents therefore will not, based on our evidence, have a significant impact on the Council's resources as people tend to move locally, indeed older persons housing conversely will benefit the Council's budget with reduction with pressure on social care and the NHS. We therefore feel that the requirement to restrict marketing to the district area for a 6-month period is inflexible and should be removed from the plan.			

Name: Mead Realisations Ltd **I.D:** 21472417

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Vision, Strategic Priorities and Sustainability Objectives	No • Positively prepared • Justified • Effective • Consistent with national policy					It is noted that the new local plan is being prepared to cover a 15-year period which is the minimum required by the National Planning Policy Framework (para 22). It is unclear why a longer plan period was not chosen. This should be explained in the introduction to the plan. This point is particularly relevant when looking at the large-scale development proposed under Policy LP1. Paragraph 22 of the Framework also confirms that policies should be '…set within a vision that looks further ahead (at least 30 years)'. The previous core strategy was originally adopted in 2012 and readopted in 2017. Based on the requirements of paragraph 33 of the Framework those policies should have been reviewed by 2022 at the latest. It is suggested that the Pre-submission Plan (PsP) includes specific text confirming that: 'The Council will review the plan no later than 5 years from the date of adoption' to ensure that these days do not occur in the future. The latest Local Development Scheme published by the Council was published in February 2025 and suggests that consultation on the Regulation 19 plan would occur in June 2025 with submission to the Secretary of State in October 2025. As a result, examination hearings were due to start in February 2026 with adoption by November 2026. These timescales are clearly unrealistic as consultation on the Regulation 19 plan was delayed by 5 months. Using the Council's anticipated timeline the plan will not be adopted until April 2027 at the earliest. The plan period and the consequential changes to housing supply should therefore be updated accordingly. At page 7, the PsP states that "The Local Plan will provide "…a positive vision for the future of North Somerset and a framework for addressing housing needs, employment requirements and other priorities…. It is further stated that the local plan provides the local expression of what sustainable development means for North Somerset. In this regard the plan appears to focus on environmental objectives to the detriment of other economic and social objectives. Meeting housing need and reducing affordability does not appear to have been positively addressed. It is of course important to ensure that the local plan remains consistent with the Framework's definition of sustainable development (NPPF paragraph 8). Page 8 of the PsP confirms that in April 2021 the Council approved the vision and strategic priorities for the plan and in September 2022 decided to recognise the 'constrained nature of North Somerset offering a great protection to green belt and other sensitive sites'. The Council's summary of engagement suggests that support for this approach from the local community has been prioritised whilst objections from the development industry have been played down. The overall vision for the PsP proposes 'transformation' in the way people live reflecting a more responsible attitude to climate change and the use of resources. Whilst the vision refers to new homes being provided more sustainably with increasing variety and choice to better meet the needs of all this will not be achieved by the PsP		Reg 19 Final Representations Mead Realisations 12.12.25 including appendices.pdf

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						as it does not take a sufficiently positive approach to the supply of housing. Importantly, it does not recognise the serious affordability issues present in North Somerset or the reasons for these. The absence of any specific reference to addressing affordability issues within the Strategic Priorities at page 11 and 12 is telling in this regard. The eight bullet proposes a rather less ambition priority of delivering a diverse range of housing and meeting future needs of North Somerset residents. The historic housing context for North Somerset should be clearly and transparently referenced in the emerging plan and evidence base so that previous issues of delivery are not repeated. For instance: According to page 5 of the Council's Housing Strategy 2022-2027: Meeting housing need within North Somerset is made more difficult by spiralling housing and rent costs. This means that ownership is out of reach for many, and private renting is also increasingly unaffordable, particularly for those on low incomes and those in receipt of housing benefit. Waiting times for social housing are long, excluding this tenure as an option for most residents. It is essential that there is an increased delivery of affordable and sustainable homes to tackle these issues, and that existing homes are of a high quality and put to the best use". Appendix 1 of the Council's Housing Strategy provides further evidence of the serious housing shortage in North Somerset: "House prices in North Somerset rose by 10% between March 2020 and March 2021, leaving the average house price (£291,790) at roughly 10x average annual earnings for local full-time workers (£29,477). This gap between house prices and income is higher than the national average, where house prices are 8.6x earnings.....As of February 2022, there were 2,561 applicants on the council's HomeChoice social housing register (with 83% of these applying for 1 and 2-bed properties). Yet only around 500-600 social houses are let out on average each year. This means that for every 4 people applying for social housing, only 1 property is available." The Council's latest AMR was published in December 2024. At page 40 the report confirms that a total of 15,019 homes have been delivered between 2006/07 and 2023/24. This represents a shortfall in the annualised Core Strategy requirement of 3,863 dwellings. Table 2 below provides further details: (see attached file). A residual of 5,961 dwellings need to be delivered over the remaining two years to fulfil the adopted housing requirement. The Council published its latest Five-Year Housing Land Supply position in April 2024 where it was claimed that a 3.88 year supply of housing existed. However, a new appeal derived figure of 2.79 years was confirmed in April 2025. The under delivery of housing is not a recent phenomenon. There have been a series of appeal decisions dating back to 2016 all of which have confirmed the absence of a five year supply of housing in North Somerset. Page 12 and 13 of the PsP provides a list of the objectives included in the Sustainability Appraisal and includes the housing objective of 'boost delivery'. This appears to downplay the Government's objective set out at paragraph 61 of the framework which states that the supply of homes should be "significantly" boosted. The Council's overall approach to planning for new development is heavily influenced by the approach to flood risk. However, the evidence base for this important issue is far from clear and only includes the SFRA Level 1 (dated 2025), Coastal Change Management Area Report (May 2023) and a flood risk sequential test of proposals in the PsP. An earlier has been removed. Earlier versions of the SFRA (2020), which informed previous stages of the local plan consultation process (including the Autumn 2023 PsP) and Level 2 SFRA's (dated 2009 and 2010) have been removed from the Council's website. This is misleading and suggests that local plan consultation documents prepared before 2025 were supported by a SFRA dated 2025. This clearly can't have been the case and undermines the ability for interested parties to respond to the Council's consultation process in an informed manner. Similar issues have been raised with the Council previously. In relation to the Autumn 2023 PsP consultation it was noted by Mead Realisations that "The Woodspring Bay Model has been available for some time now and is being referred to by the Council in consultee responses for planning applications (albeit it is being criticised for not using the most up to date sea level rise allowances). The SFRA's were not included as part of the emerging local plan evidence at the start of the Reg 19 consultation period but have subsequently been added. In light of the above serious concerns are raised in relation to the robustness of the evidence base." The Interactive proposals map also doesn't include details of flood mapping has to be accessed via a separate link and makes reviewing the Council's overall approach to flood risk and management very difficult. It is requested that the Council provides a single evidence base resource which provides all documents prepared by the Council since the start of the local plan preparation process in chronological order. Notably, the 2025 Level 1 SFRA confirms at p53 that: "For this SFRA, detailed hydraulic modelling has only been undertaken for the Woodspring Bay model area, in other areas a GIS exercise has been used to assess the impact of climate change on sea level rise, therefore, predicted flood extents shown in North Somerset Planning Map are		

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						intended as a guide for areas outside of the Woodspring Bay model extents." This was similarly the case of the 2020 SFRA which stated at p35 that: "For this SFRA, no detailed hydraulic modelling has been undertaken to assess the impact of climate change on sea level rise, therefore, predicted flood extents shown in Figure 045 are intended as a guide. Developers should undertake site-specific FRAs to demonstrate that the proposed development is appropriate."		
SP1: Sustainable Development	No	• Positively prepared • Justified • Effective • Consistent with national policy				The wording of this policy has not changed from the version contained in the Autum 2023 PsP. It is still not clear how the Council will measure development proposals against the requirements set out within each of the bullet points of this policy. In particular, the Council does not explain what is meant by 'making a positive contribution to addressing and demonstrating resilience to the impacts of climate change and delivering the net zero target'. If the Council intends to measure proposals against other policies within the plan this should be stated clearly in policy SP1. Policy SP1 also states that new development in North Somerset should support the delivery of a variety and choice of housing to meet local needs although it does not make any reference to meeting wider housing needs in North Somerset which is a key aspect of the social element of sustainable development. Policy SP1 states that new development should protect valued natural and historic assets and support green infrastructure and biodiversity. However, this objective needs to be balanced against other sustainable development objectives. Linked to this the last bullet point of SP1 states that new development should avoid adverse environmental impacts. It is not considered realistic for development proposals to achieve this objective in all situations. Clearly, environmental impacts also need to be balanced against social and economic objectives. Overall policy SP1 is not considered to be clear in its intentions and results in ambiguity as to how proposals will be assessed. The following amendments to policy SP1 are suggested: To be sustainable, new development in North Somerset should aim, where possible to: • Make a positive contribution to addressing and demonstrating resilience to the impacts of climate change and delivering the net zero target; • Prioritise walking and cycling, maximise the use of effective public transport and encourage the creation of liveable neighbourhoods; • Support the delivery of a variety and choice of housing, including specialist and affordable housing to meet housing local needs; • Contribute to the creation of healthy, safe and cohesive communities and tackle inequality; • Support the delivery of opportunities for economic growth and job creation at accessible locations; • Create attractive and distinctive places and enable the delivery of supporting infrastructure; • Protect valued natural and historic assets and support green infrastructure and biodiversity; • Support the efficient use of land, including prioritising previously developed land; • Support regeneration particularly within town centres; and • Avoid, limit or mitigate adverse environmental impacts which, on their own or cumulatively, would result in air, water or other pollution or harm to living conditions, health or safety. The justification for Policy SP1 refers to the need for the plan to be sufficiently flexible to adapt to rapid change. However, as drafted the plan does not appear to contain any such flexibility. Notably the adopted Core Strategy contained specific policy text to ensure flexibility in maintaining a supply of housing and similar policies should be included in the new local plan. This is dealt with further in relation to comments on policy SP8 housing and SP9 employment later in these representations. Reference is made at page 17 to the objective of the liveable neighbourhood concept although it is not clear where else in the Council's evidence base or plan preparation this concept has been considered. This should be clarified.		Reg 19 Final Representations Mead Realisations 12.12.25 including appendices.pdf
SP2: Climate Change	No	• Positively prepared • Justified • Effective • Consistent with national policy				Minor wording changes have been made to this policy when compared to the Autum 2023 PsP version. Through this policy the Council seeks to deliver carbon neutrality in North Somerset by 2030. However, this approach is not consistent with the Government's national approach and is not considered to be realistic. It will have a detrimental effect on the delivery of new development in North Somerset and the consequences of this, and alternatives, have not been properly explored. The second paragraph of policy SP2 states that 'In order to reduce the overall environmental impact of development, proposals will be expected to demonstrate…" It is not clear whether this policy is seeking to consider the overall environmental impact of development in North Somerset or the impact on a case-by-case basis or some other variable. This should be made clear within the policy to avoid ambiguity. The first bullet requires greenhouse gas emissions to be reduced but the baseline from which reductions should be achieved needs to be clearly explained. The 4th bullet and 5th bullet require water reuse to be maximised and energy used to be minimised, but it is not clear how this will be measured for development management purposes. This needs to be clearly set out in the Policy with an explanation of how this policy will be considered against other sustainable development objectives. The last bullet of policy SP2 seeks to encourage the reuse of existing buildings and structures. However, the		Reg 19 Final Representations Mead Realisations 12.12.25 including appendices.pdf

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						practicalities of reuse of existing buildings and previously developed land needs to be properly considered so that realistic expectations and delivery rates can be included in the plan. This objective is consistent with the general approach included in the adopted Core Strategy although the Council's evidence does not provide any indication of whether these policies have been successful or; if they have failed, why that was. This issue needs to be carefully justified to ensure that the new plan does not over rely on this objective to meet housing and economic delivery rates.		
SP3: Spatial strategy	No	• Positively prepared • Justified • Effective • Consistent with national policy				This policy suggests that priority will be given to locating residential and mixed-use development in or close to urban areas. In reality the strategy is more restricted due to the Council's approach to flood risk. In reality the plan only seeks to allow development outside existing settlement boundaries in limited situations which is likely to hamper the Council's ability to meet housing targets across the plan period, as was the case in relation to the Core Strategy. As set out earlier in these representations the plan should consider including policy's which would allow flexibility for new development to come forward in sustainable locations close to or adjacent to existing settlement boundaries to help meet identified housing need and to ease the impact of undersupply or delays in the delivery of allocated sites. Through this policy the definition of what the Council considers to be accessible locations should be clearly set out. The policy also states that development at villages and in the countryside will relate to community needs only. The Council's evidence does not explain why villages in accessible locations with good transport opportunities should be limited to meeting local housing and community needs only. In particular, development proposals adjacent to large towns or villages, which have a good range of services and facilities and good public transport links can provide opportunities to accommodate appropriate levels of housing growth. The following amendments are suggested to Policy SP3: "Priority will be given to locating new residential and mixed-use development in or close to urban areas where there is an existing or proposed wide range of facilities, services and jobs, and there are opportunities to encourage active and sustainable travel, particularly at locations which are currently, or have the potential to be, well served by public transport. Employment opportunities will be encouraged at accessible locations well-related to the urban areas and where sustainable transport opportunities can be maximised. Residential development in areas at risk of flooding now or in the future will be minimised outside the towns unless it can be demonstrated that it will be safe for its lifetime without increasing flood risk elsewhere. (To delete..Beyond strategic development areas the amount of development at villages and in the countryside will relate to local community needs.)		Reg 19 Final Representations Mead Realisations 12.12.25 including appendices.pdf
SP4: Placemaking	No	• Positively prepared • Justified • Effective • Consistent with national policy				Due to the level of opposition often experienced in relation to new development proposals the expectation that developers and local communities will collaborate is unrealistic and should be deleted. The latest Local Development Scheme published by the Council was published in February 2025 and suggests that consultation on the Regulation 19 plan would occur in June 2025 with submission to the Secretary of State in October 2025. As a result, examination hearings were due to start in February 2026 with adoption by November 2026. These timescales are clearly unrealistic as consultation on the Regulation 19 plan was delayed by 5 months. Using the Council's anticipated timeline the plan will not be adopted until April 2027 at the earliest. The plan period and the consequential changes to housing supply should therefore be updated accordingly. Policy SP4 also states that applicants will be expected to undertake design review in certain circumstances. However, the policy does not explain what the implications of not doing so are and is therefore imprecise. The justification to policy SP4 includes reference to the West of England Placemaking Charter although this document is not included in the Council's evidence base. This should be addressed. Overall, the policy is considered to be insufficiently clear and ambiguous which could potentially lead to misinterpretation or unnecessary delay at the development management stage. The justification for Policy SP4 at page 22 of the PsP states that proposals should demonstrate how they have maximised opportunities for physical activity and recreation. This is unrealistic for all development proposals and inconsistent with the policy text which simply seeks to enable healthy lifestyles. This reference in the justification text should be deleted.		Reg 19 Final Representations Mead Realisations 12.12.25 including appendices.pdf
SP4: Placemaking	No	• Positively prepared • Justified				Due to the level of opposition often experienced in relation to new development proposals the expectation that developers and local communities will collaborate is unrealistic and should be deleted. The latest Local Development Scheme published by the Council was published in February 2025 and suggests that consultation on the Regulation 19 plan would occur in June 2025 with submission to the Secretary of State in October 2025. As a result, examination hearings were due to start in February 2026 with adoption by November		Reg 19 Final Representations Mead Realisations 12.12.25

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		• Effective • Consistent with national policy				2026. These timescales are clearly unrealistic as consultation on the Regulation 19 plan was delayed by 5 months. Using the Council's anticipated timeline the plan will not be adopted until April 2027 at the earliest. The plan period and the consequential changes to housing supply should therefore be updated accordingly. Policy SP4 also states that applicants will be expected to undertake design review in certain circumstances. However, the policy does not explain what the implications of not doing so are and is therefore imprecise. The justification to policy SP4 includes reference to the West of England Placemaking Charter although this document is not included in the Council's evidence base. This should be addressed. Overall, the policy is considered to be insufficiently clear and ambiguous which could potentially lead to misinterpretation or unnecessary delay at the development management stage. The justification for Policy SP4 at page 22 of the PsP states that proposals should demonstrate how they have maximised opportunities for physical activity and recreation. This is unrealistic for all development proposals and inconsistent with the policy text which simply seeks to enable healthy lifestyles. This reference in the justification text should be deleted.		including appendices.pdf
SP5: Towns	No	• Positively prepared • Justified • Effective • Consistent with national policy				The wording of this policy has not changed from the version contained in the Autum 2023 PsP. This policy should include flexibility to allow development adjacent to the settlement boundary subject to meeting certain criteria. The policy states that new development will be supported where the size type tenure and range of housing reflects local community needs although does not explain how this will be measured. If the Council is seeking for this to be justified by a specific housing needs assessment the policy should be clear on whose responsibility this is and how it will be undertaken. The policy should be amended as follows: Proposals for new development within or adjoining the settlement boundaries of Weston- super-Mare, Clevedon, Nailsea and Portishead as defined on the Policies Map will be supported provided that they: • Make a positive contribution to the built environment and sense of place and the creation of safe and attractive environments; • Support and enable walking, cycling and improved public transport, particularly in relation to connecting residential areas to the town centre, local centres, employment areas, educational establishments and other destinations; • Optimise housing densities and the use of other land, particularly at town centres and at accessible locations such as transport hubs; and • Can be successfully served by infrastructure such as transport, education and health facilities. Town centres will be the primary focus for a wide range of retail, employment, leisure, educational, cultural, community and other services which support, maintain or enhance their viability and vitality and their role and function. Sites outside the settlement boundaries in excess of about 75 dwellings at Weston super Mare or 50 dwellings at the other towns must be brought forward as allocations through Local Plans or Neighbourhood Plans.		Reg 19 Final Representations Mead Realisations 12.12.25 including appendices.pdf
SP6: Villages and rural areas	No	• Positively prepared • Justified • Effective • Consistent with national policy				This policy should include flexibility to allow development adjacent to the settlement boundary subject to specific criteria. The policy text should be amended as follows: New development within (add..or adjoining) the settlement boundaries of villages (remove ...as defined on the Policies Map) will be supported where: • It results in a form, design and scale of development which is high quality, respects and enhances the local character, contributes to placemaking and the reinforcement of local distinctiveness, and can be readily assimilated into the village; • (remove..The size, type, tenure and range of housing reflects local community needs); • It will not cause significant adverse impacts on local services and infrastructure, including cumulative impacts; • The location of development (ass..supports) (remove.. maximises) opportunities to reduce the need to travel and connects to local facilities by high quality walking and cycling infrastructure, with good public transport connections for longer trips; and • The uses complement the defined local centres and contribute to their vitality and viability. (add ..Sites outside the settlement boundaries of Backwell, Banwell, Churchill, Congresbury, Easton in Gordano/ Pill, Long Ashton, Winscombe, Wrington and Yatton in excess of 25 dwellings must be brought forward as allocations through Local Plans or Neighbourhood Plans.) Otherwise, outside settlement boundaries new residential development will be restricted to replacement dwellings, subdivision of existing dwellings, residential conversion of rural buildings where alternative economic use is inappropriate or unfeasible, dwellings for essential rural workers or the redevelopment of previously developed land in suitable locations. Rural buildings		Reg 19 Final Representations Mead Realisations 12.12.25 including appendices.pdf

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						which have an existing permission to be converted to residential use will not be granted permission to be rebuilt and replaced to create a new build dwelling. Other non-residential uses may be acceptable outside settlement boundaries provided that: • There is a clear justification for the need for the proposed location; • Suitable alternative sites are not available within settlement boundaries; • Priority is given to locations well-located in relation to existing settlement boundaries; • Priority is given to previously developed land or buildings; and • Priority is given to accessible locations in relation to the nature of the use.		
SP8: Housing	No					Objection is raised to this policy as, although the housing requirement is now based on the standard method it is not clear how unmet need from neighbouring areas has been taken into account. The policy seeks to deliver a 'minimum' of 23,700 dwellings over the plan period. However, it is not clear how this could ever be exceeded based on the restrictive nature of the policies contained within the plan. To be consistent the table contained within policy SP8 should also include the word 'minimum' dwellings. The table also sets out a broad distribution of new dwellings although the table includes percentages relating to the proportion of housing supply. This should also be amended to state 'broad' proportion. The policy also states that for designated neighbourhood plan areas the minimum housing requirement will be determined on the basis of the local plan allocations, existing commitments and estimated windfall. However, this approach may conflict with neighbourhood plans which are already made. The Policy text should be amended as follows: Land will be identified to secure the delivery of a minimum of 23,700 dwellings within North Somerset 2026-2041. The Council will seek to ensure the creation of mixed and balanced communities with a mix of house types and tenures to support a range of household sizes, ages and incomes to meet identified housing needs, including the provision of affordable and specialist housing. The broad distribution of new dwellings in accordance with the spatial strategy will be as follows. (see attached document) (remove...For designated neighbourhood plan areas the minimum housing requirement will be determined on the basis of the local plan allocations, existing commitments and estimated windfall.) The justification for Policy SP 8 states that the figures include a windfall assumptions which are 'set out in full' in the SHLAA (2025). The SHLAA (2025) appears to suggest at Table 6 that ver the plan period a total of 4,000 dwellings will be delivered as windfall. This is a significant proportion of the overall housing requirement and suggests that much of the housing growth for North Somerset over the next plan period will be unallocated and unplanned. This is unrealistic. To ensure flexibility in the plan and to reflect the fact that the housing requirement is expressed as a minimum the windfall allowance should be excluded from and treated as additional to the housing figures set out in policy SP8. It is also worth considering the changes that have been made to Policy SP8 since the Autumn 2023 PsP was published. This is summarised in the table below: (see attached document) This particularly shows the greater burden expected on delivery from Wolvershill (north of Banwell) and the reduction in growth at the villages and rural areas.		Reg 19 Final Representations Mead Realisations 12.12.25 including appendices.pdf
SP10: Transport	No	• Positively prepared • Justified • Effective • Consistent with national policy				This policy requires that new development must be located and designed to minimise the carbon impact of transport through limiting elite travel although this approach is inconsistent with the Framework. The policy refers to facilitating the delivery of net zero emissions and reducing the adverse environmental effects of transport although this policy requirement appears to be at odds with the proposed strategic allocation at Wolvershill, North of Banwell. The allocation appears to represent a flagship development for the PsP and therefore it should set the benchmark for other development in relation to minimising carbon impact transport and delivering net zero emissions. Policy SP10 should be amended as follows: New development (add...should, as far as possible where reasonable and proportionate,) (remove ..must) be located and designed to minimise the carbon impact of transport through limiting the need to travel and prioritising walking, wheeling (this includes wheelchairs, mobility scooters and other wheel-based mobility aids) and cycling and the use of public transport opportunities. In order to facilitate the delivery of net-zero emissions and reduce the adverse environmental effects of transport, development proposals and transport schemes (add..should consider)		Reg 19 Final Representations Mead Realisations 12.12.25 including appendices.pdf

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						(remove.. must address) the following principles in line with the following hierarchy: • Delivery of attractive, safe, and inclusive routes for walking and cycling which are well integrated into existing networks and provide access to effective and frequent public transport. • Delivery of better local bus, rail and rapid transit services and infrastructure supporting uptake in public transport use for journeys to work, leisure and other purposes. (remove...This includes journeys within and between towns in North Somerset and further afield including, better connections to, from and within the rural areas, journeys to and from public transport connections (known as first and last mile provision), new and improved bus stops and the reallocation of highway space); and • Delivery of infrastructure to facilitate the use of electric vehicles. Adequate parking for motor vehicles and cycles must be provided and managed to meet the needs of anticipated users (residents, workers and visitors) in usable spaces. The improvement of strategic transport facilities at Bristol Airport and Royal Portbury Dock will be supported subject to the policy guidance set out elsewhere in the local plan. The justification to policy SP10 refers to the growing health emergency although the Council does not provide any specific details of how these issues have been considered through the evidence base. This should be addressed.		
Policy LP5: Housing, employment and mixed use allocations	No	• Positively prepared • Justified • Effective • Consistent with national policy				It is noted that a considerable number of allocated sites contained within schedule 1 and Schedule 2 have been carried over from the previous plan. This would suggest an element of uncertainty or problems of deliverability which should be properly considered by the Council. Land at Haybow (see plans at Appendix 1) should also be included as a development location for mixed use development with a minimum indicative residential capacity of 300 dwellings, as well as employment, retail community and leisure uses. Mead Realisation's land at Parklands Village (see plans at Appendix 2 which show the current application site and wider masterplan area) is include as part of a carried forward allocation at page 281 of schedule 1 of the PsP. It should be noted that pre-application discussions have been held to consider the potential for accommodation additional dwellings at the site (approximately 250 more than previously approved). It is understood that this additional capacity has been included in the Council's assumptions although clarification of this is required. Land at Broadleaze Farm, Winscombe (see plan at Appendix 3) is include within Schedule 1 of Policy LP5 as a location for 74 dwellings. This is supported. Land at Lynchmead Farm, Weston super Mare (see plan at Appendix 4) is not included within Schedule 1 of Policy LP5 as a location for development but subject to specific flood mitigation measures there are no significant constraints to developing this site. As such it should be identified for residential development. Land at Kewstoke Road, Norton (see plan at Appendix 5) is not included within Schedule 1 of Policy LP5 as a location for development but lies immediately adjacent to land approved for development for residential development at Ansons Road. There are no significant constraints to developing this site and as such it should be identified for residential development. Land at meeting House Lane Cleeve (see plans at Appendix 6 and 7) are not included within Schedule 1 of Policy LP5 as a location for development. There are no significant constraints to developing these site and as they should be identified for residential development.		Reg 19 Final Representations Mead Realisations 12.12.25 including appendices.pdf
Policy LP7: Settlement boundaries	No	• Positively prepared • Justified • Effective • Consistent with national policy				This Policy confirms that development within settlement boundaries will be acceptable in principle subject to relevant policies of the plan. Other than specific allocations it therefore must be concluded that development outside the settlement boundary will be resisted. As set out earlier in these representations the plan should include flexibility to allow development outside settlement boundaries in specific circumstances.		Reg 19 Final Representations Mead Realisations 12.12.25 including appendices.pdf

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Policy LP10: Strategic gaps	No	• Positively prepared • Justified • Effective • Consistent with national policy			This policy states that strategic gaps are defined to help retain the separate identity character and or landscaping setting of settlements. However, the Council has provided no specific evidence to justify the need for strategic gaps in addition to the protection afforded to the countryside. In particular, objection is raised to the inclusion of a strategic gap around Parklands Village. It is noted to that following a review some strategic gaps are being removed although it is not clear in all cases why this is being proposed.	Overall, the approach is considered to be inconsistent with the Framework and as such Policy LP7 should be deleted.		Reg 19 Final Representations Mead Realisations 12.12.25 including appendices.pdf
Policy DP1: High quality design	No	• Positively prepared • Justified • Effective • Consistent with national policy				Paragraph 131 of the Framework confirms that being clear about design expectations, and how these will be tested, is essential for achieving good design. The use of the words '…account will be taken of..' with Policy DP1 is ambiguous and could cause unnecessary delay at the decision making stage. The policy is also very lengthy and would be better included in a supplementary planning document. management purposes.		Reg 19 Final Representations Mead Realisations 12.12.25 including appendices.pdf

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Policy DP5: Climate change adaptation and resilience	No	• Positively prepared • Justified • Effective • Consistent with national policy			Objection is raised to this policy as it is considered far too onerous and inconsistent with national policy.			Reg 19 Final Representations Mead Realisations 12.12.25 including appendices.pdf
Policy DP8: Efficient use of land	No	• Positively prepared • Justified • Effective • Consistent with national policy				Objection is raised to this policy as it could lead to conflict between the character of the surrounding area, which may be low density, and the minimum target of 40dph.		Reg 19 Final Representations Mead Realisations 12.12.25 including appendices.pdf
Policy DP9: Flood risk	No	• Positively prepared • Justified • Effective • Consistent with national policy			Objection is raised to this policy which is far too detailed and does not reflect national policy.			Reg 19 Final Representations Mead Realisations 12.12.25 including appendices.pdf
Policy DP19: Parking	No	• Positively prepared • Justified • Effective • Consistent with national policy				Objection is raised to this policy as the required parking standards should be included within the text. A mechanism for amending the standards (should that be necessary in the future) should also be included.		Reg 19 Final Representations Mead Realisations 12.12.25 including appendices.pdf
Policy DP52: Protection of open space and recreation	No	• Positively prepared • Justified • Effective • Consistent with national policy			Objection is raised to this policy as the definition of open space is too wide and could lead to the suggestion that all development proposals on unallocated greenfield land			Reg 19 Final Representations Mead Realisations 12.12.25 including appendices.pdf

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					will conflict with this policy.			
Policy DP60: Employment on green field land in the countryside	No	• Positively prepared • Justified • Effective • Consistent with national policy			Objection is raised to this policy as it is overall restrictive and inconsistent with national policy.			Reg 19 Final Representations Mead Realisations 12.12.25 including appendices.pdf
Policy DP61: Existing businesses in the countryside	No	• Positively prepared • Justified • Effective • Consistent with national policy				Objection is raised to this policy as it would unreasonably restrict the expansion of existing business in the countryside. This is of particular concern in relation to large employment generation business such as Puxton Park which contribute significantly to the local economy. The policy should be amended as follows: Replacement buildings, extensions to buildings, ancillary buildings or the intensification of use for existing businesses, located outside settlements will be permitted provided that: • The scale of the proposal is not harmful to the character and appearance of the countryside; • The materials, form, bulk and general design of buildings are in keeping with their rural surroundings; • There is no significant adverse impact on living conditions of adjoining occupiers; and • The proposed development has safe and convenient access to the highway network and would not result in a significant adverse impact. The re-use of existing buildings is given priority over new development and only where no suitable buildings are available will new development be acceptable. (Remove...Proposals to extend outside the curtilage into surrounding countryside will need to be fully justified and not be harmful to the character and appearance of the countryside. Retailing, other than proposals that are strictly ancillary to the main use or proposals under 200m², will not be permitted.)		Reg 19 Final Representations Mead Realisations 12.12.25 including appendices.pdf
Policy DP62: Visitor accommodation in the countryside including camping and caravanning	No	• Positively prepared • Justified • Effective • Consistent with national policy				Objection is raised to this policy as it would unreasonably restrict the provision of visitor accommodation which could provide an important contribution to the local economy. The policy should be amended as follows: The construction of new buildings for use as visitor accommodation outside the Green Belt and AONB will be permitted provided that: • There are no other existing buildings suitable for conversion; • The proposal is set within the well-established curtilage of an existing building and is located adjacent to that building; • The development will not result in an (add..unacceptable) adverse effect on the landscape or settlement character of the area due to the proliferation of tourist accommodation; • The building is capable of providing a high standard of tourist accommodation in accordance with a national quality assessment scheme; • The scale of the proposal is not harmful to the character and appearance of the countryside; • (remove...The proposal would result in an enhancement of the immediate setting, and the impact of external facilities (curtilage treatment, parking) is minimal and landscaping respects the local rural character; and) • The materials, form, bulk and general design of buildings are in keeping with their rural surroundings. Proposals for new or extended touring and static caravan sites outside the Green Belt and AONB will be permitted provided that: • The proposal respects the scale, form, materials and design of any existing buildings and does not harm the character of the surrounding area; • (remove..The re-use of existing buildings is given priority over new development and only where no suitable buildings are available will new development be acceptable); and • Proposals are sited so as to minimise their visual and landscape impact, and extensions to existing sites that are considered intrusive must include environmental improvements to the existing site. All visitor accommodation should: • Not have a significant adverse effect on the living conditions of adjoining occupiers or adversely affect the operation of working farms; • Ensure there is safe and convenient access to the highway network and will not result in significant adverse impacts; and • Ensure lighting is as unobtrusive as possible taking into account the impact on living conditions and ecology. (remove....For new build and		Reg 19 Final Representations Mead Realisations 12.12.25 including appendices.pdf

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
						conversions, subsequent applications to change holiday accommodation to permanent residential use or the removal of conditions for holiday accommodation will not be permitted within 10 years of their construction unless the existing use is shown to be unviable. Caravan parks and lodges will be conditioned to ensure they are used solely for holiday use. Proposals to use mobile homes on longstanding existing holiday parks for permanent residential accommodation will only be permitted if: • They are outside flood zone 3; and • They are easily accessible in relation to existing facilities and services)		
Policy DP63: Infrastructure delivery and development contributions	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy				This policy confirms that Infrastructure will be provided in step with new development and co⟐ordinated through the Infrastructure Delivery Plan (IDP). The IDP includes reference to coastal management schemes and flood mitigation although it is far from clear exactly what works are proposed and how they will be funded. The local plan evidence base makes it clear that large areas of North Somerset, including the existing development area of Weston-super-Mare are at risk of flooding and as a result the spatial strategy seeks to locate new development accordingly. However, neither the local plan or evidence base appear to consider what options have been consider for reducing this flood risk and how this mitigation could be funded (i.e through CIL receipts and other sources of funding). This is a fundamental step in the plan making process which does not appear to have been given sufficient consideration. This should be addressed.		Reg 19 Final Representations Mead Realisations 12.12.25 including appendices.pdf
Parklands Village	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy				Mead Realisation’s land at Parklands Village (see plans at Appendix 2 which show the current application site and wider masterplan area) is include as part of a carried forward allocation at page 281 of schedule 1 of the PsP. It should be noted that pre-application discussions have been held to consider the potential for accommodation additional dwellings at the site (approximately 250 more than previously approved). It is understood that this additional capacity has been included in the Council’s assumptions although clarification of this is required.		

Name: Melanie Falk **I.D:** 58184097

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	There is no evidence that these houses are actually needed here in this rural setting.The roads are not suitable for increased traffic and when busy (most days on west end) no emergency vehicles could get through. Extra houses lead to increased risk of flooding. Extra housing is a threat to wildlife and the environment Local NHS (which I work for) are already over stretched .These decisions are made in Weston not with or for the community here . Once fields are gone they and the wildlife are gone for ever, creating a worse world for us all to live in . Build on brown field sites where there is employment and not in the countryside . I completely oppose building on agriculture land .We need this land for food	Only build on brown field sites or near to local facilities. If the building is to help the homeless or young (which is the only justification) they should ALL be affordable . Not 5 bed executive houses which is what is currently happening. Its just a money making exercise with suggestions being made of back handers and bribes to push planning through where there is no local support	definitely not	

Name: Melanie Lindsley **I.D:** 62769473

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy DP13: Environmental pollution, living conditions, health and safety	Yes		Yes	Yes			The Coal Authority records indicate that within the North Somerset area there are coal mining features present at surface and shallow depth which pose a potential risk to surface stability and public safety. These features include; mine entries, coal workings and reported surface hazards. We note that although not explicit in the policy title DP13: Environmental pollution, living conditions, health and safety, includes in its justification land instability and land affected by former underground or mineral workings. We support this inclusion.	

Name: Michael Craske **I.D:** 51424929

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land south of Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Whilst this site is just within the Nailsea boundary there is a wider issue of overdevelopment in the area as a whole as Backwell is already taking a disproportionate share of the North Somerset housing allocation and development of this site near Backwell Lake would exacerbate the situation still further. The local infrastructure cannot support developments of this scale. The nearby Station Road is narrow and congested and there is no guarantee that a new road would be built to ease the situation as there are cost implications in having to cross the railway line. The nearby railway station is not fit for purpose, being inaccessible on one side by the disabled or those with young children and the roads in the wider area are insufficient to cope with proposed developments on a large scale. Neither Nailsea or Backwell can be considered as employment hubs so residents inevitably have to commute elsewhere, yet there are no A roads into and out of Nailsea and the most direct route to the motorway going north is via the winding and dangerous Wraxall Hill. The health and well-being of existing residents would inevitably be severely affected by a development in this locality, Station Road being a route regularly used by Backwell residents to access the shops and other facilities in Nailsea. Development here would destroy valuable wildlife habitats and the area is also prone to flooding.	Review the housing allocations to distribute them more sustainably across the county, ensuring that brownfield sites are revitalised first. Ensure that improvements to infrastructure are carried out prior to new developments.		
Land east of Backwell	No		Unsure	Unsure	It is a totally unreasonable to expect Backwell to take such a massive proportion of North Somerset's housing target. Permission has already been given for a large number of houses, some in the process of being built and others not yet started. The effect of these developments should be reviewed before other areas are considered. The plan accepts that development in rural areas is less sustainable, yet Backwell is being targeted for large-scale development in spite of the fact that it has already grown larger than is sustained by its infrastructure and facilities. The character of the community would be changed irrevocably by a development on this scale. The presence of a railway station seems to be a factor in the decision-making process, yet the station can hardly be regarded as a useful transport hub, being situated, as it is, on a very narrow road, with no access to the southerly track for the disabled and with a poor nearby bus service. Other than the already congested A370 the roads in and out of Backwell are country lanes which could not cope the potential increase in traffic. There is no guarantee that a new road would be built, especially as it would involve crossing the railway. The health and well-being of residents, new and existing, would be badly affected by such large-scale development, yet there is no evidence that so many houses are required in this locality. The plan will not achieve any reduction in car dependency as most residents commute from Backwell as there is insufficient employment in the locality. This land is used for grazing and food crops and should not be lost. It is also a valuable haven for wildlife. The land is low lying and at risk of flooding. The release of Green Belt is not justified by exceptional circumstances and the scale of the development does not recognise local constraints.	Review the housing allocations to distribute them more sustainably across the county, ensuring that brownfield sites are revitalised first. Ensure that improvements to infrastructure are carried out prior to new developments.		

Name: Michael Green **I.D:** 62863457

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared	Unsure					

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
		• Justified • Effective • Consistent with national policy						

Name: Michael Poole **I.D:** 58343489

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Pill Green	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	No evidence of brownfield sites having been explored as alternatives to Pill Green - in fact 2,000 such units have been ignored. There is no duty to cooperate on Bristol's 8,000 unmet need - certainly not by dumping 1,100 homes on a small settlement like Pill. The Green Belt exceptional circumstances justification does not stand up as this is high-performing arable land. Increasing the size of Pill and Easton and Gordano by 44% is disproportionate and unjustified - building 600 houses on Pill Green would represent half of that amount from one site alone. There is no cited documentation or data that shows that the plan would be deliverable with regard to traffic management, congestion and pollution on the A369 and the M5 Junction 19 interchange - the same applies to the non-plan for schools and drainage. This makes the overall plan ineffective. The A369 is a single carriageway road already heavily congested and prone to snarl-ups - the J19 interchange is a notorious bottleneck. Emergency vehicles use it as the quickest route to and from hospitals and would be further jeopardised. The local infrastructure would not be able to cope with a near doubling of population - the effect on schools, the GP surgery and other service would highly damaging. This is just not viable. The Brownfield First Policy has been ignored . There are over 2,000 viable urban units available in Weston, Portishead and the outskirts of Bristol. The Pill Green allocation breaches NPPF 159 as no sequential test for non-Green Belt sites has been carried out. An independent verification of "exceptional circumstances " must be carried before any Pill Green consent can be assumed. Previous Local Plans and the JSP 2017 have envisaged a 5% cap per site on development allocations. NPPF 11 and 130(f) state plans must be "deliverable" and avoid "adverse impacts" on local character and services. No assessment of the existing infrastructure has been made.	Remove the Pill Green site from the LP8 Schedule of Sites or amend Policy LP8 along the lines of : Exceptional circumstances must be independently verified Sequential tests carried out to confirm no viable non-Green Belt sites are available Require full funding for flood defences to 1 in 1000 year standard + 45 % climate change allowance Upgrades to the capacity of A369 and M5 J19 Additional school and GP provisions as well as associated additional communal infrastructure before granting outline planning permission Any allocations must be able to show no disproportionate impact on village population without evidenced need - any increase in demographic size beyond 5% on any single site must be demonstrated to be a response to exceptional circumstances independently verified and to have full infrastructure delivery - transport, drainage,education and health. Any increase in population of 20% overall must have a funded delivery strategy.		

Name: Michael Rees **I.D:** 58522177

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared • Justified • Consistent with national policy	Unsure		In Choices For the Future Nov 20 NSC commits to retain the Green Belt; and Weston Big Wood (SSI) and the Gordano Valley green corridor were added to the Green Belt in the 1980's. No exceptional reasons in accordance with actional government requirements has demonstrated that these areas should be classed otherwise. Indeed in recent years various strategies and reports have merely reaffirmed the environmental importance of these areas to wildlife, trees and fauna in their own right and as part of larger connected geographical areas.	Remove the proposed Tower Farm and Black Rock housing developments; and focus on other site such as the Wyndham Way, Portishead and Castlewood, Clevedon locations. Indeed in responses to the feedback from last response 300 units have been added to the former site.		AWT.docx

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Black Rock, north of Clevedon Road	No	‣ Positively prepared ‣ Justified ‣ Consistent with national policy	Unsure		In Choices For the Future Nov 20 NSC commits to retain the Green Belt; and Weston Big Wood (SSI) and the Gordano Valley green corridor were added to the Green Belt in the 1980's. No exceptional reasons in accordance with actional government requirements has demonstrated that these areas should be classed otherwise. Indeed in recent years various strategies and reports have merely reaffirmed the environmental importance of these areas to wildlife, trees and fauna in their own right and as part of larger connected geographical areas.	Remove the proposed Tower Farm and Black Rock housing developments; and focus on other site such as the Wyndham Way, Portishead and Castlewood, Clevedon locations. Indeed in responses to the feedback from last response 300 units have been added to the former site.		

Name: Michael Rose **I.D:** 9072129

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Poplar Farm, Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure		Theis site has inadequate road connecrions.. The public transport proposals are inadequate and fail to comply wirt Local Pkan aspirations.			
Dark Lane, Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	With reference to Backwell the lack of new local employment allocation (alongside the massive residential allocation) is contrary to one of the key principles in the Local Plan. The proposed road across East Backwell and across the railway line is currently unfunded. Without this road development in this area would cause chaos on existing surrounding roads.	Provide residential and employmentr development together. The area immediately west of the Bristol City boundary is more suitable.		
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure		- Lack of employment allocation inn the vicinity of adjoining residential. - The proposed link road is unfunded - and there is no definite plan as to how it could be,. Without this road, the implications on nearby existing roads -notably Station Road would be disastrous - Develooment of this land would remove a crucial (nearly the last in North Somerset) acreage of good quality agricultural land -contrary to LP aspirations..			

Name: Michele Rundle **I.D:** 62791105

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm					As a local resident of Portishead living near the proposed housing developments in Tower Farm and Black Rock, I would like to make the following comments. North Somerset Council needs to explore alternative Brownfield sites for both areas. I.T.V. West did a Feature on this on the 2nd of Dec, and it seems there are many more possibilities in this part of the world that can be utilised. By increasing housing density on Brownfield sites the need to develop Tower Farm and Black Rock would be eliminated.			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					It is my understanding that these areas were added to the green belt in the 1980's due to their high ecological value. If the developments go ahead, the green "buffer" corridors will not be preserved, and there will be environmental damage to a unique habitat. National planning allows Green Belt changes only in exceptional circumstances and these have not been demonstrated. The proposed housing developments will significantly increase traffic in an already congested road system. Public transport, particularly towards North Weston on the Clevedon road is extremely poor. The current network of roads around existing schools i.e. Gordano and High Down will not be able to accommodate the increased volume of traffic or pupils. I envisage much of the area being grid locked, particularly with the added possibility of increased traffic on the Clevedon road if there are any issues with the MS, and cars trying to access the tip. The Clevedon road is also prone to flooding and this will be compounded if the flood plan is built on. Portishead needs a better plan to enhance its current infrastructure before any more housing is built. New schools will need to be addressed, along with doctor's surgeries, dentists and chemists, and a much improved bus service. Lots of areas in Portishead do not have easy access to regular public transport. When these priority issues are resolved, then a meaningful discussion can be had about where appropriate housing should be built. The council needs to meet the needs of the current residents, before adding to the problems. Neither of the proposed sites provides safe or suitable access.For these reasons, in my opinion, Tower Farm and Black Rock should be removed from the local plan.			
Black Rock, north of Clevedon Road					As a local resident of Portishead living near the proposed housing developments in Tower Farm and Black Rock, I would like to make the following comments. North Somerset Council needs to explore alternative Brownfield sites for both areas. I.T.V. West did a Feature on this on the 2nd of Dec, and it seems there are many more possibilities in this part of the world that can be utilised. By increasing housing density on Brownfield sites the need to develop Tower Farm and Black Rock would be eliminated. It is my understanding that these areas were added to the green belt in the 1980's due to their high ecological value. If the developments go ahead, the green "buffer" corridors will not be preserved, and there will be environmental damage to a unique habitat. National planning allows Green Belt changes only in exceptional circumstances and these have not been demonstrated. The proposed housing developments will significantly increase traffic in an already congested road system. Public transport, particularly towards North Weston on the Clevedon road is extremely poor. The current network of roads around existing schools i.e. Gordano and High Down will not be able to accommodate the increased volume of traffic or pupils. I envisage much of the area being grid locked, particularly with the added possibility of increased traffic on the Clevedon road if there are any issues with the MS, and cars trying to access the tip. The Clevedon road is also prone to flooding and this will be compounded if the flood plan is built on. Portishead needs a better plan to enhance its current infrastructure before any more housing is built. New schools will need to be addressed, along with doctor's surgeries, dentists and chemists, and a much improved bus service. Lots of areas in Portishead do not have easy access to regular public transport. When these priority issues are resolved, then a meaningful discussion can be had about where appropriate housing should be built. The council needs to meet the needs of the current residents, before adding to the problems. Neither of the proposed sites provides safe or suitable access.For these reasons, in my opinion, Tower Farm and Black Rock should be removed from the local plan.			

Name: Michelle Flay **I.D:** 62814721

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	The uk has very few wild areas left. Weston Big Wood is a site of SSI. Housing cannot be built up to the edge of this ancient woodland. It will to to the detriment of the flora fauna and wild animals that reside there. The green belt should be protected.	Brown field sites in Portishead need to be developed.		
Black Rock, north of Clevedon Road	No	‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Weston big wood is a sight of SSI. It needs the green field land around it to protect it from further damage due to human interference. The Gordano Valley is a unique ecosystem that needs to be protected.	Develop brown field sites and populate uninhabited properties in the area.		

Name: Michelle Parsons **I.D:** 62599105

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land west of Hutton	No	‣ Justified ‣ Effective	No	No	1. Not Positively Prepared – Flood Risk The Plan allocates this site without demonstrating that development can be delivered safely in accordance with the sequential approach to flood risk. Existing surface-water issues are already well known in this area, yet no robust evidence is presented to show that the site can be developed without increasing flood risk to existing residents. As such, the allocation is not based on a realistic or deliverable strategy. 2. Not Justified – Traffic and Transport Capacity The Plan does not provide convincing evidence that the local road network in Hutton—particularly Oldmixon Road and the narrow village access routes—can accommodate the additional traffic generated by 40 new homes. The Local Plan relies on infrastructure improvements (e.g., new footways and safer walking routes) without demonstrating that these are achievable, funded, or compatible with local constraints. This means reasonable alternatives have not been properly considered. 3. Not Effective – Education Capacity The Plan does not show that there is sufficient primary or secondary school capacity to support additional households in Hutton. Broadoak and surrounding schools already face capacity pressures. Without identified and deliverable solutions, the allocation cannot be considered effective over the Plan period. 4. Not Consistent with National Policy – Local Services and Infrastructure National policy requires that development be supported by adequate infrastructure. The allocation does not demonstrate how increased pressure on essential services—including GP and dental provision—will be addressed. Without identified mitigation, the Plan fails to provide a sound and sustainable strategy for this settlement.	1. Flood Risk – Evidence and Safeguards The Plan must include clear evidence that the site can pass the sequential test and be developed safely without increasing flood risk to existing homes. The allocation should not be confirmed until a full site-specific flood risk assessment demonstrates that surface-water issues and downstream impacts can be fully mitigated. If this cannot be evidenced, the site should be removed from the Plan. 2. Transport and Traffic – Deliverability of Access Improvements The Plan should provide detailed and costed infrastructure commitments showing that required access works (including the new footways and safe walking routes) are feasible within the physical constraints of Hutton. A modification is needed to require a transport capacity assessment demonstrating that 40 homes will not worsen congestion or safety on Oldmixon Road or village roads. If deliverable mitigation cannot be secured, the site allocation should be reduced in scale or removed. 3. Education Capacity – Identified and Funded Provision The Plan must include a clear strategy for providing additional school places to support development in Hutton, including a statement of where capacity will		

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						come from and how it will be funded. Without identified provision, the allocation should be paused or revised until educational infrastructure needs are properly addressed. 4. Local Services and Infrastructure – Commitments and Phasing The Plan should be modified to include explicit requirements that development in this location is phased alongside improvements to local services such as GP and dental provision. Infrastructure delivery mechanisms should be clearly set out, rather than assumed, to ensure compliance with national policy on sustainable development. 5. Contingency Option – Reassessment of the Allocation If robust evidence cannot be provided on flood risk, transport, school capacity, and service provision, the Plan should be modified to remove the allocation from the spatial strategy or to allocate fewer homes in Hutton to maintain soundness.		
Elm Grove Nursery, Locking					consider the North Somerset Local Plan 2041: Pre-submission Plan to be not sound, not legally compliant, and not in compliance with the Duty to Cooperate in relation to the allocation of Elm Grove Nursery, Locking, for 110 dwellings. Duty to Cooperate – Not Met There is no clear evidence that North Somerset Council has engaged effectively with neighbouring authorities, transport bodies, or environmental agencies regarding the deliverability of infrastructure required for this site, including active travel improvements, flood-risk mitigation, and school capacity. The absence of joint planning undermines confidence that cumulative impacts on transport networks, drainage, and local services have been properly considered. Not Justified The allocation does not reflect current infrastructure or service capacity, particularly for education and healthcare. Housing numbers appear to be based on assumptions rather than robust, up-to-date evidence, and do not consider realistic delivery constraints such as flood risk or road capacity. Not Effective Part of the site is at future flood risk, yet no detailed, deliverable flood-risk management strategy is provided. Active travel improvements and access arrangements along Elm Tree Road are not clearly achievable or funded, which undermines safe and sustainable access to the site.	To address the issues identified regarding soundness, legal compliance, and the Duty to Cooperate, the following modifications are required: 1. Flood Risk and Surface Water Management Require a site-specific flood-risk and surface-water drainage strategy, demonstrating how runoff will be safely managed and attenuated to prevent increased flood risk on or off site. Restrict development in the northern flood-risk area unless safe access from the eastern boundary can be delivered. Ensure contributions to local flood-risk management improvements are secured and clearly evidenced. 2. Active Travel and Access Provide fully funded and deliverable active travel improvements along Elm Tree Road connecting the site to the A371 foot/cycleway. Secure an additional pedestrian access from the eastern boundary, with clear evidence that it is safe, deliverable, and integrates with surrounding routes. Demonstrate that emergency access and pedestrian safety are fully addressed. 3. Education and Local Services		

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					Without demonstrable mitigation, the site cannot be delivered in a way that is safe, accessible, or sustainable. Not Consistent with National Policy The plan fails to prioritise sustainable development: The site has poor public transport links, increasing car dependency. Infrastructure, drainage, and active travel are not adequately secured. The potential impacts on local biodiversity and environment are not properly addressed. Conclusion Due to failures in infrastructure evidence, flood-risk management, access provision, and cross-boundary cooperation, the allocation of Elm Grove Nursery is unsound, not legally compliant, and does not meet the Duty to Cooperate.	Identify specific, funded provisions to expand primary, secondary, and early-years education in the local area. Ensure that local healthcare, utilities, and other services have sufficient capacity to support the new population. Include phased delivery of housing to align with completion of supporting infrastructure. 4. Duty to Cooperate and Evidence Provide clear evidence of engagement with neighbouring authorities, transport bodies, and environmental agencies to demonstrate coordination on transport, drainage, and environmental impacts. Update the evidence base to reflect current demographic and infrastructure constraints, ensuring the site allocation is justified and deliverable. 5. Contingency / Alternative If flood-risk mitigation, active travel improvements, or infrastructure provision cannot be satisfactorily evidenced and secured, the allocation should be reduced in scale or removed from the Plan. Conclusion These modifications are necessary to ensure that the Elm Grove Nursery allocation is positively prepared, justified, effective, and consistent with national policy, making the Local Plan legally compliant and sound.		
Land to the west of Elborough	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	I object to the North Somerset Local Plan 2041: Pre-submission Plan because it is not legally compliant and not sound. My concerns relate to transport, infrastructure, environmental impact, and failures in the evidence base. 1. Duty to Cooperate – Not Met There is inadequate evidence that North Somerset Council has effectively cooperated with neighbouring authorities, transport bodies, or environmental agencies on the scale of housing growth proposed. Specifically: No clear cross-boundary approach to transport impacts, despite major effects on the A371, Locking, Hutton, and the wider Weston-super-Mare area. No joint work demonstrating how infrastructure capacity, school places, or healthcare will be delivered. No evidence of engagement with environmental bodies regarding biodiversity impacts and habitat connectivity. As such, the Duty to Cooperate has not been fulfilled. 2. Not Justified – Evidence Base Flawed	To address the issues identified in my objection, the following modifications are required: 1. Duty to Cooperate – Strengthen Cross-Boundary Evidence Provide clear, published evidence of effective engagement with neighbouring authorities, transport authorities, and environmental bodies on the distribution of housing, infrastructure capacity, and cumulative transport impacts. Produce a joint transport strategy with adjacent authorities to address A371 congestion, cross-boundary traffic through Hutton and Locking, and infrastructure impacts on Weston-super-Mare. Without this, the statutory Duty to Cooperate is not met. 2. Transport and Highways – Robust and Deliverable Evidence		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					The housing numbers rely on outdated projections that do not reflect current demographic trends or realistic infrastructure capacity. The plan disproportionately directs growth to small rural settlements such as Elborough and Locking, without justification for why these areas should accommodate such large increases in population. The Sustainability Appraisal does not adequately consider alternatives that would avoid excessive growth in small villages. For these reasons, the strategy is not justified. 3. Not Effective – Transport, Roads, and Flood Risk a. Narrow Roads and Vehicle Volumes The road network serving Locking, Elborough, and Hutton consists of narrow lanes already under pressure. The proposed allocation would significantly increase traffic through: Hutton village, where the main road passes directly by the primary school. Crossing the road in the mornings is already unsafe, and additional volumes would increase risks to children and pedestrians. Banwell Road and Old Banwell Road, which cannot safely or efficiently accommodate the scale of development proposed. There is also insufficient evidence that the required upgrade to the Banwell Road / A371 junction is deliverable. b. Public Transport Elborough has limited bus services and no access to rail. Doubling the size of the village—as this allocation would effectively do—will increase car dependency, contrary to national policy. c. Flood Risk Allocating significant housing in areas known to have drainage constraints and flood-risk issues undermines the deliverability and resilience of the plan. The evidence base does not demonstrate that surface water can be safely managed or attenuated. For these reasons, the plan is not effective. 4. Not Consistent with National Policy The NPPF requires plans to prioritise sustainable development, protect biodiversity, and ensure safe and suitable access for all users. This plan fails on all three counts: Growth is directed to locations poorly served by public transport, increasing reliance on private vehicles. Sensitive habitats and wildlife corridors adjacent to the proposed sites are at risk of irreversible ecological harm, contrary to the requirement to protect and enhance the natural environment. Safe access for emergency vehicles, pedestrians, and cyclists is not evidenced.	Undertake a comprehensive transport assessment demonstrating that narrow country lanes between Elborough, Locking, and Hutton can safely support the vehicle volumes associated with 315+ dwellings. Require the Plan to include specific, costed, and deliverable upgrades to: Banwell Road / A371 junction Narrow village routes through Locking and Hutton Road safety improvements around Hutton Primary School, where children already encounter unsafe crossing conditions. Active and sustainable travel routes must be mapped, funded, and secured—not assumed. If these upgrades cannot be delivered, the allocation must be reduced or removed. 3. Public Transport Provision – Secured, Not Aspirational Require a clear commitment to enhanced bus services for Elborough and Locking, backed by enforceable mechanisms (e.g., S106 or CIL), not vague contributions. Housing delivery should be phased so that public transport improvements occur before or alongside development. 4. Flood Risk and Drainage – Evidence-Based Modifications Require a site-specific surface-water management strategy demonstrating where and how attenuation will be provided and how discharge will be achieved without increasing downstream flood risk. Remove or reduce allocations where safe drainage cannot be proven. 5. Biodiversity and Wildlife Corridors Require up-to-date ecological assessments and a clear strategy for protecting connected habitats around Elborough and Locking. Include a policy requirement for biodiversity net gain that preserves wildlife corridors adjacent to proposed development sites. Remove or amend allocations that risk irreversible ecological harm. 6. Infrastructure Capacity – Education, Healthcare,		

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					The plan does not provide a credible strategy for upgrading the road network or active travel routes to accommodate the proposed expansion. The plan is therefore inconsistent with national policy. 5. Infrastructure Capacity – Not Positively Prepared Local infrastructure is already under strain: Schools in the area are close to capacity and lack firm, funded expansion plans. Healthcare provision (GPs, dentists) is already stretched. Utilities and drainage infrastructure are not evidenced as capable of supporting a population increase of this scale. Doubling the size of Elborough and significantly expanding Locking without a realistic plan for supporting services means the plan has not been positively prepared. Conclusion For all the above reasons—failures in the Duty to Cooperate, lack of justification, ineffective delivery mechanisms, inconsistency with national policy, and lack of positive preparation—I object to the North Somerset Local Plan 2041: Pre-submission Plan. The plan should be found unsound unless substantial changes are made, including reconsideration of the scale, location, and deliverability of growth proposed for Locking, Elborough, and Hutton.	Utilities Identify specific, funded commitments to expand local schools, healthcare services, and utilities, rather than relying on unspecified contributions. Ensure that any growth does not proceed without guaranteed delivery of supporting infrastructure. Reduce or relocate housing numbers if capacity cannot be expanded. 7. Settlement Strategy – Proportionate and Justified Growth Reassess the scale of development proposed for Elborough and Locking to ensure growth is: proportionate, reflects the settlement hierarchy, and aligns with national policy on sustainable development. The plan should avoid doubling the size of small rural settlements without strong justification and infrastructure provision. 8. Updated Housing Need Evidence Update the housing need assessment using current demographic and migration data, ensuring the housing numbers are justified and reflect real capacity across the district. Conclusion To make the Local Plan legally compliant and sound, the Council must provide robust evidence of infrastructure deliverability, comply with the Duty to Cooperate, update its housing need projections, strengthen environmental protections, and ensure that growth in Locking, Elborough, and Hutton is proportionate and sustainable. Unless these modifications are made, the plan should not be adopted.		
Land north of Banwell Road, Locking /Elborough	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	I object to the North Somerset Local Plan 2041: Pre-submission Plan because it is not legally compliant and not sound. My concerns relate to transport, infrastructure, environmental impact, and failures in the evidence base. 1. Duty to Cooperate – Not Met There is inadequate evidence that North Somerset Council has effectively cooperated with neighbouring authorities, transport bodies, or environmental agencies on the scale of housing growth proposed. Specifically:	To address the issues identified in my objection, the following modifications are required: 1. Duty to Cooperate – Strengthen Cross-Boundary Evidence Provide clear, published evidence of effective engagement with neighbouring authorities, transport authorities, and environmental bodies on the distribution of housing, infrastructure capacity, and		

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					No clear cross-boundary approach to transport impacts, despite major effects on the A371, Locking, Hutton, and the wider Weston-super-Mare area. No joint work demonstrating how infrastructure capacity, school places, or healthcare will be delivered. No evidence of engagement with environmental bodies regarding biodiversity impacts and habitat connectivity. As such, the Duty to Cooperate has not been fulfilled. 2. Not Justified – Evidence Base Flawed The housing numbers rely on outdated projections that do not reflect current demographic trends or realistic infrastructure capacity. The plan disproportionately directs growth to small rural settlements such as Elborough and Locking, without justification for why these areas should accommodate such large increases in population. The Sustainability Appraisal does not adequately consider alternatives that would avoid excessive growth in small villages. For these reasons, the strategy is not justified. 3. Not Effective – Transport, Roads, and Flood Risk a. Narrow Roads and Vehicle Volumes The road network serving Locking, Elborough, and Hutton consists of narrow lanes already under pressure. The proposed allocation would significantly increase traffic through: Hutton village, where the main road passes directly by the primary school. Crossing the road in the mornings is already unsafe, and additional volumes would increase risks to children and pedestrians. Banwell Road and Old Banwell Road, which cannot safely or efficiently accommodate the scale of development proposed. There is also insufficient evidence that the required upgrade to the Banwell Road / A371 junction is deliverable. b. Public Transport Elborough has limited bus services and no access to rail. Doubling the size of the village—as this allocation would effectively do—will increase car dependency, contrary to national policy. c. Flood Risk Allocating significant housing in areas known to have drainage constraints and flood-risk issues undermines the deliverability and resilience of the plan. The evidence base does not demonstrate that surface water can be safely managed or attenuated. For these reasons, the plan is not effective. 4. Not Consistent with National Policy	cumulative transport impacts. Produce a joint transport strategy with adjacent authorities to address A371 congestion, cross-boundary traffic through Hutton and Locking, and infrastructure impacts on Weston-super-Mare. Without this, the statutory Duty to Cooperate is not met. 2. Transport and Highways – Robust and Deliverable Evidence Undertake a comprehensive transport assessment demonstrating that narrow country lanes between Elborough, Locking, and Hutton can safely support the vehicle volumes associated with 315+ dwellings. Require the Plan to include specific, costed, and deliverable upgrades to: Banwell Road / A371 junction Narrow village routes through Locking and Hutton Road safety improvements around Hutton Primary School, where children already encounter unsafe crossing conditions. Active and sustainable travel routes must be mapped, funded, and secured—not assumed. If these upgrades cannot be delivered, the allocation must be reduced or removed. 3. Public Transport Provision – Secured, Not Aspirational Require a clear commitment to enhanced bus services for Elborough and Locking, backed by enforceable mechanisms (e.g., S106 or CIL), not vague contributions. Housing delivery should be phased so that public transport improvements occur before or alongside development. 4. Flood Risk and Drainage – Evidence-Based Modifications Require a site-specific surface-water management strategy demonstrating where and how attenuation will be provided and how discharge will be achieved without increasing downstream flood risk. Remove or reduce allocations where safe drainage cannot be proven. 5. Biodiversity and Wildlife Corridors		

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					The NPPF requires plans to prioritise sustainable development, protect biodiversity, and ensure safe and suitable access for all users. This plan fails on all three counts: Growth is directed to locations poorly served by public transport, increasing reliance on private vehicles. Sensitive habitats and wildlife corridors adjacent to the proposed sites are at risk of irreversible ecological harm, contrary to the requirement to protect and enhance the natural environment. Safe access for emergency vehicles, pedestrians, and cyclists is not evidenced. The plan does not provide a credible strategy for upgrading the road network or active travel routes to accommodate the proposed expansion. The plan is therefore inconsistent with national policy. 5. Infrastructure Capacity – Not Positively Prepared Local infrastructure is already under strain: Schools in the area are close to capacity and lack firm, funded expansion plans. Healthcare provision (GPs, dentists) is already stretched. Utilities and drainage infrastructure are not evidenced as capable of supporting a population increase of this scale. Doubling the size of Elborough and significantly expanding Locking without a realistic plan for supporting services means the plan has not been positively prepared. Conclusion For all the above reasons—failures in the Duty to Cooperate, lack of justification, ineffective delivery mechanisms, inconsistency with national policy, and lack of positive preparation—I object to the North Somerset Local Plan 2041: Pre-submission Plan. The plan should be found unsound unless substantial changes are made, including reconsideration of the scale, location, and deliverability of growth proposed for Locking, Elborough, and Hutton.	Require up-to-date ecological assessments and a clear strategy for protecting connected habitats around Elborough and Locking. Include a policy requirement for biodiversity net gain that preserves wildlife corridors adjacent to proposed development sites. Remove or amend allocations that risk irreversible ecological harm. 6. Infrastructure Capacity – Education, Healthcare, Utilities Identify specific, funded commitments to expand local schools, healthcare services, and utilities, rather than relying on unspecified contributions. Ensure that any growth does not proceed without guaranteed delivery of supporting infrastructure. Reduce or relocate housing numbers if capacity cannot be expanded. 7. Settlement Strategy – Proportionate and Justified Growth Reassess the scale of development proposed for Elborough and Locking to ensure growth is: proportionate, reflects the settlement hierarchy, and aligns with national policy on sustainable development. The plan should avoid doubling the size of small rural settlements without strong justification and infrastructure provision. 8. Updated Housing Need Evidence Update the housing need assessment using current demographic and migration data, ensuring the housing numbers are justified and reflect real capacity across the district. Conclusion To make the Local Plan legally compliant and sound, the Council must provide robust evidence of infrastructure deliverability, comply with the Duty to Cooperate, update its housing need projections, strengthen environmental protections, and ensure that growth in Locking, Elborough, and Hutton is proportionate and sustainable.		

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						Unless these modifications are made, the plan should not be adopted.		

Name: Mike Bevens **I.D:** 62659937

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP7: Green Belt	No	• Justified	Yes	No	I do not believe this meets the soundness test or is justified. The policy has not taken into account reasonable alternatives for the use of the green belt, which should only be used in exceptional circumstances. Specifically, there has been no report into alternative brownfield sites that could and should be considered first, prior to green belt use, to ensure the environment and biodiversity is not negatively affected, even if minor.			

Name: Mike Coles **I.D:** 34488417

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP6: Educational, sporting, leisure and community use allocations	Yes		Yes	Yes		Would like an inclusion to include a second swimming pool for the area, ideally a 50m multi-use pool.		

Name: Mike Johnston **I.D:** 62809057

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No		NSC propose removing the Green Belt status from this area of land. The designation made in 1988 specifically acknowledged the importance of the environmental, geographic, geological and ecological impact these agricultural fields have on the neighbouring Weston Big Wood (SSSI), Portishead Down and the Gordano Valley. There is a proposal to remove this status & 'designate' this land as 'Grey Belt'. As this recent nomenclature refers to, in the words of Sir Keir Starmer "poor quality scrubland, mothballed on the outskirts of town" - it clearly does not fulfil this definition. As is clearly obvious, this proposed development land is decent pasture. The proposal to develop this land is not compliant with National Planning Policy (NPPF S192, S193 and S187). The proposal to remove the land form the Green Belt is not compliant with NPPF S147 as exceptional circumstance to remove it are not proven. In fact there are special circumstances to retain it as part of the green Belt and perhaps use the land for Bio Diversity Net Gain purposes to protect it in perpetuity. Tower Farm needs to be removed from the Local Plan site allocation. This is the only feasible modification.			
Black Rock, north of Clevedon Road	No	• Positively prepared • Justified • Effective • Consistent with national policy	No		NSC propose removing the Green Belt status from this area of land. The designation made in 1988 specifically acknowledged the importance of the environmental, geographic, geological and ecological impact these agricultural fields have on the neighbouring Weston Big Wood (SSSI), Portishead Down and the Gordano Valley. There is a proposal to remove this status & 'designate' this land as 'Grey Belt'. As this recent nomenclature refers to, in the words of Sir Keir Starmer "poor quality scrubland, mothballed on the outskirts of town" - it clearly does not fulfil this definition. As is clearly obvious, this proposed development land is decent pasture. The proposal to develop this land is not compliant with National Planning Policy (NPPF S192, S193 and S187). The proposal to remove the land form the Green Belt is not compliant with NPPF S147 as exceptional circumstance to remove it are not proven. In fact there are special circumstances to retain it as part of the green Belt and perhaps use the land for Bio Diversity Net Gain purposes to protect it in perpetuity. Remove Black Rock from the Local Plan site allocation. This is the only possible modification.			

Name: Mike Jones **I.D:** 62690561

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Effective • Consistent with national policy	No	Yes	I am writing in support of the objections made by Portishead Town Council in their submission against the proposed development at Tower Farm. In addition: - As Tower Farm was added in 1988 to the Green Belt as having significant ecological value in protecting Weston Big Wood (SSSI) and the Gordano Valley strategic green corridor it is hard to understand 40 years later how Tower Farm now less ecological value has given the climate change challenges we face. Portishead Town Council states within the National Planning Policy Framework a site can only be removed from the Green Belt for development under exceptional circumstances and that North Somerset Council has not shown this and so the site should be removed from the Local Plan. North Somerset Council has not adequately considered alternative brown and green field sites which they are obliged to do, and which have much less ecological impact in Portishead and across North Somerset and may also provide greater housing densities. Consequently, the site should be removed from the Local Plan. Building on green belt land will have detrimental impacts on both the natural environment and quality of life for future generations. We should first consider building on available brownfield sites and or converting empty commercial properties rather than rush to get spades in the ground and loose green belt land for ever. ““Councils have given planning permission for more than 1.4 million homes since 2007 that have not been built, research has found. A new report by the Institute for Public Policy Research (IPPR) says planned homes are often not built because developers instead want to increase the land’s value before selling it on, or they are ‘land banking’ to slow building rates and maintain high house prices”.			
Black Rock, north of Clevedon Road	No	• Effective • Consistent with national policy	No	Yes	I am writing in support of the objections made by Portishead Town Council in their submission against the proposed development at Black Rock. In addition: As Black Rock was added in 1988 to the Green Belt as having significant ecological value in protecting Weston Big Wood (SSSI) and the Gordano Valley strategic green corridor it is hard to understand 40 years later how Black Rock now less ecological value has given the climate change challenges we face. Portishead Town Council states within the National Planning Policy Framework a site can only be removed from the Green Belt for development under exceptional circumstances and that North Somerset Council has not shown this and so the site should be removed from the Local Plan. North Somerset Council has not adequately considered alternative brown and green field sites which they are obliged to do, and which have much less ecological impact in Portishead and across North Somerset and may also provide greater housing densities. Consequently, the site should be removed from the Local Plan. Building on green belt land will have detrimental impacts on both the natural environment and quality of life for future generations. We should first consider building on available brownfield sites and or converting empty commercial properties rather than rush to get spades in the ground and loose green belt land for ever. ““Councils have given planning permission for more than 1.4 million homes since 2007 that have not been built, research has found. A new report by the Institute for Public Policy Research (IPPR) says planned homes are often not built because developers instead want to increase the land’s value before selling it on, or they are ‘land banking’ to slow building rates and maintain high house prices”.			

Name: Mike Perrott **I.D:** 62862753

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and	No	• Positively prepared • Justified • Effective	Unsure	Unsure	The traffic impacts to Tickenham roads have not been properly considered they are already seriously congested and unsafe for cyclists and pedestrians and would be unable to support the traffic resulting from the proposed increase in new homes shown in the Local Plan. It is already difficult at times to safely exit my own propery onto Clevedon Road despite good visibility and the movement of heavy goods vehicles between the M5 and Nailsea frequently causes problems due to the narrowing of the rad in places.	What is clearly needed is a proper link between Nailsea and the M5. There are other roads that could be modified to provide this link.		

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Backwell		• Consistent with national policy						

Name: Mike Priaulx **I.D:** 51429825

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP11: Historic and natural environment	No	• Effective • Consistent with national policy	Yes	Yes	We support the reference in SP11 to swift bricks in the justification to the policy, but it is not effective nor consistent with national policy because they don't include the content of NPPG Natural Environment 2025 paragraph 017 (link: https://www.gov.uk/guidance/natural-environment), with regard to numbers of swift bricks, nor swift bricks being a universal nest brick for a range of small bird species, nor inclusion of the best-practice guidance references.	To make the plan sound, effective and consistent with national policy, please add the text from NPPG Natural Environment 2025 paragraph 017 (link: https://www.gov.uk/guidance/natural-environment), especially with regard to at least one swift brick per dwelling for new developments, swift bricks being a universal nest brick for small bird species, and the sources of best-practice guidance referenced in this paragraph of the NPPG. I copy this key text from the NPPG here for reference: "swifts rely on urban cavities for nesting, and the national loss of suitable nesting sites through building renovation has been part of the reason for the species' decline. Developments should include integrated nest boxes (commonly known as swift bricks) where possible, with the general aim across a development of a minimum of one nest box per unit. Nest boxes can provide important habitat for other species as well as swifts, such as starlings and sparrows. Extensive guidance is available on wildlife friendly features, including the National Design Guide and National Model Design Code which illustrate how well-designed places can support rich and varied biodiversity by facilitating habitats and routes for wildlife. More specific support for the selection and installation of swift bricks can be found in the British Industry Standard BS 42021:2022 the Future Homes Hub Homes for Nature Guidance, and the RSPB's Guide to Nestboxes."		
Policy DP35: Nature conservation	No	• Effective • Consistent with national policy	Yes	Yes	We support the references in the policy to swift bricks and swift nesting features, but they are not sound, nor effective nor consistent with national policy because they don't include the content of NPPG Natural Environment 2025 paragraph 017 (link: https://www.gov.uk/guidance/natural-environment), with regard to numbers of swift bricks, nor swift bricks being a universal nest brick for a range of small bird species, nor inclusion of the best-practice guidance references.	To make the plan sound, effective and consistent with national policy, please add the text from NPPG Natural Environment 2025 paragraph 017 (link: https://www.gov.uk/guidance/natural-environment), especially with regard to at least one swift brick per dwelling for new developments, swift bricks being a universal nest brick for small bird species, and the sources of best-practice guidance referenced in this paragraph of the NPPG. I copy this key text from the NPPG here for reference: "swifts rely on urban cavities for nesting, and the national loss of suitable nesting sites through building renovation has been part of the reason for the species' decline. Developments should include integrated nest boxes (commonly known as swift bricks) where possible, with the general aim across a development of a minimum of one nest box per unit. Nest boxes can provide important habitat for other species as well as swifts, such as starlings and sparrows. Extensive guidance is available on wildlife friendly features, including the National Design Guide and National Model Design Code which illustrate how well-designed places can support rich and varied biodiversity by facilitating habitats and routes for wildlife. More specific support for the selection and installation of swift bricks can be found in the British Industry Standard BS 42021:2022 the Future Homes Hub Homes for Nature Guidance, and the RSPB's Guide to Nestboxes."		

Name: Mike Read **I.D:** 39028385

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	As a resident of Backwell for over 40 years we are dismayed to find that you, our own Council , seems to be riding roughshod over all the norms of sensible planing arrangements, seeking to overturn centuries of safeguards to our agricultural way of life and environment	You must keep away from GRADE 1 agricultural land and also ensure that the hundreds of homes you seek to build all around us are really needed. We are sure they would be more welcome in other places where there is real need, ie to house workers for existing employers		

Name: Mike Tremlett **I.D:** 15430817

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Vision, Strategic Priorities and Sustainability Objectives	No		Unsure	Unsure	On face value, the plan delivers what is required of North Somerset Council Local Planning Authority (LPA) as it provides the requisite number of dwellings to meet housing targets in future years. However, a deeper dive into the document reveals that the document is indeed counter-productive in relation to development and flawed in relation to proposed number of windfall houses. So, the plan gives in one hand yet takes away from the other. The issue of further compounding the counter-productive stance in relation to development is the potential impending adoption of the Mendip BAT SAC SPD and that is being address with via a separate consultation response.			North Somerset Council 2041 Local Plan consultation comments.docx
SP1: Sustainable Development	No		Unsure	Unsure		This has been written as a policy to block development and to circumvent Para 11 of the NPPF. How is a single dwelling or a small number of dwellings going to meet the bullet points required this policy? It is impossible. Therefore the first line of Policy SP1 should read: To be sustainable, new development for 10 or more dwellings in North Somerset should.		
SP2: Climate Change					An important policy but this is what building regulations does. Rather than focussing on this, the LPA should focus on delivering houses and let building regulations set the standards. All of the standards are set by building regulations and they are being continually improved. Is therefore the job of building regulations job to ensure that builds are completed to the required standard and planners to approve development. Therefore, the policy should be simplified to read: Development proposals, once approved must be constructed to building regulation standards relevant at the time of commencement. This then takes the onus of checking this to the remit of Building Regulations and lets the planners get on with delivering development			
SP8: Housing					There is a fatal flaw in these numbers. This comment is focussed on Weston-super-Mare (WsM) but is relevant to the whole district. The document states: "Weston - super-Mare is the primary town within the district and as such is identified for significant growth, 6,600 dwellings are expected to be delivered on allocated sites within and around the town (including the Weston Villages developments which are continuing to build out) and a further 1,070 homes are expected to come forward on small windfall sites across the town." Where are the 1070 windfall houses coming from in WsM when the settlement boundary is densely populated? The image below			

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					refers: Additionally, the town is heavily constrained by flood, Conservation area and bat zones – the image below just shows flood zone: The same principal on windfall houses applies to all other settlement boundaries across the district as they are all densely populated so it is also fair to say that larger housing sites will not be achievable in those settlement boundaries. Therefore windfall allowance figures quoted in the plan do not appear to be achievable and they do not appear to have been backed up with statistics to prove otherwise. The NPPF states that smaller sites make big contribution to housing targets as they are easily deliverable, as per the appeal allowed at 68 Beach Road WsM where the appeal inspector stated: "While the proposal is for one dwelling, it would nonetheless make an important contribution to meeting the housing requirement for the area, as indicated by paragraph 73 of the Framework which recognises that small sites can be built out relatively quickly. Furthermore, paragraph 125 of the Framework advises that substantial weight should be given to the value of using suitable brownfield land within settlements for homes, proposals for which should be approved unless substantial harm would be caused. The site is near to the town centre and its wide range of facilities and services. By changing this policy, this will enable small builders to quickly apply for and build out windfall sites where they are indeed available within settlement boundaries. However. It is a reasoned assumption to say that based on fact and degree and on the balance of probability, schemes for 10 or more houses in the settlement boundaries of the main towns will not be forthcoming through the windfall allowance as there is nowhere to build the volume suggested.			
Policy DP5: Climate change adaptation and resilience						This requires a 'climate change adaption statement'. What does this look like for smaller or minor developments? Does anybody know or is this just someone's 'good idea' to make the planning application process even more difficult to navigate? Cross reference is made to policy SP1 and the same principals apply regarding building regulation standards so the same wording should be added as follows: All development for 10 or more dwellings.		
Policy DP6: Net zero construction					The same rules apply as per policies SP1 and DP5. This is what building regulations does so rather than focussing on this, the LPA should focus on delivering houses and let building regulations set the standards. All of the standards are set by building regulations and it is there job to ensure that builds are completed to the required standard. Therefore, this policy should be deleted/removed or drastically paired back. Otherwise, standards such as this will deter developers from the North Somerset area. They will go elsewhere in the Country and build to building regulations and BNG requirements. By doing this, the LPA will once again fall short of their 5 year supply by pushing developers away and again likely failing to deliver required housing for another lengthy number of years – maybe another 13 year stretch? This then takes the onus of checking this to the remit of Building Regulations and lets the planners get on with delivering development			
Policy DP9: Flood risk					As demonstrated by the map below, large swathes of the LPA are in flood zone – particularly in settlement boundaries: As referred to above in policies SP1 and SP8, single dwellings and minor applications for 9 or fewer dwellings are very few and far between in settlement boundaries. Finding plots for this number of houses is like finding hens teeth. To pass the sequential test in towns or settlement boundaries that are predominantly in flood zone, the following should be included in this policy: For potential development sites in flood zone the following should be applied in relation to the Sequential and Exceptions test. In the 4 main towns of WsM, Portishead, Clevedon and Nailsea,			

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					sites of 9 or fewer dwellings are not required to pass the sequential test or the exceptions test. For all other settlement boundaries in the District, sites of 4 or fewer dwellings are not required to pass the sequential test or the exceptions test. However, any new dwellings must have a first floor and not have any bedrooms at ground floor. Single level dwellings will not be allowed unless it can be proven that the finished floor level is above the undefended flood level including climate change. All dwellings in these locations should however be designed with mandatory flood resistant and flood resilient measures and this should be demonstrated in any submitted flood risk assessment. Also, this policy reads as follows: " Within flood zones 2 or 3, proposals including ground floor accommodation created through a change of use, conversion or redevelopment of existing buildings will be required to meet certain requirements set out in the North Somerset Strategic Flood Risk Assessment. Using WsM as an example, the sea wall is currently fit for purpose but WsM may be subject to tidal flooding from Woodspring Bay near St Georges in the next 100 years when climate change kicks in. Recent modelling completed by the Local Lead Flood Authority (LLFA) completed as a result of the updated Strategic Flood Risk Assessment (SFRA) level 1 suggests that in the event of tidal overtopping in the future when taking into account climate change, it will take 12-16 hours for tidal water to reach Weston-super-Mare. It has been explained that once the sea reaches its highest point, it will breach defences and then flow into WsM as a ‘bowl’. It does not taken into account the fact that some water will soakaway into the ground. More importantly, based on fact and degree and on the balance of probability, future governments and the LPA will provide funding to improve flood defences before it reaches critical point and over-tops. Why is this? Let’s take the Tropicana and Birnbeck Pier as examples. In 2025, Government funding and planning has been granted for development/re-build on these sites equating to literally millions of pounds. These 2 x sites have no sea defences. They are in the sea. So they will flood but that’s fine because the funds are to re-develop the area. Why? If the area needs re-development, what is the point if the whole town will be underwater in the future? If that happens, the Town disappears. The LPA lose all of their revenue from Council tax and business rates and WsM ceases to exist. But at least the Tropicana and Birnbeck Pier have been developed! This just does not make sense, hence, based on fact and degree and on the balance of probability, future governments and the LPA will provide funding to improve flood defences before it reaches critical point so the LPA will not flood as a result of sea-over-topping. A pragmatic approach is required here. For this reason, ground floor premises in WsM should be allowed to be converted to self-contained ground floor dwellings, even if they do not have a first floor safe refuge area. Recent advice from the SFRA provides guidance but it is too onerous. Flooding is dependant on the sea over-topping so as long as sea defences are maintained and improved, the sea will not over-top. Therefore, the prediction of sea over-topping taking into account climate change is a smoke screen. This does not mean a relaxed approach – it just means a more cautious approach with very important flood resistant and flood resilient measures. Put simply, if a property has windows, they will invariably be approximately 900mm off of floor level. For this reason, either this section of the policy needs to be re-worded or the SFRA guidance document should be amended to enable the conversion and re-use of redundant ground floor premises with MANDATORY flood resistant and flood resilient measures on the basis that sea defences will be maintained and improved in the future. Entrance doors can be composite floor resilient doors and removable flood barriers can be added as a second line of defence at door entrances. Floors can be concrete and tiled. Walls can be plastered with lime plaster or waterproof plasterboard. Electric sockets can be at 900mm height. Other measures are available and should be considered in accordance with CIRIA guidance. Importantly, this section focuses on Weston-super-Mare but the same principals apply for all other parts of the Authority when it comes to sea over-topping. All of this is on the basis that climate change continues at the same rate and gets worse. Let’s be honest, this will not be fixed short term but measures are already in place to redcue the planets carbon footprint and to try to reverse climate change. More electric cars, more renewable			

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					energies which then provides less carbon. These measures alone will catch up and the climate change curve will decelerate – maybe not in the next 10-20 years or so but with technological advancements such as AI, it will happen. These factors are considered by the COP across the world and the world is slowly listening and doing things – some countries are doing less than others but things are moving in the right direction so that needs to be a consideration. This is why ground floor accommodation should be allowed in flood zone, subject of course to mandatory flood resistant and resilient measures.			
Policy DP22: Visitor attractions						This is almost a copy and paste exercise from the sites and policies plan part 2. One section should be amended. It currently reads that for all sites, marketing is required. This is understood and reasonable on predominantly dense commercial sites; however, this is an onerous process for sites with single or a small number of B2/B8 units. Therefore, the policy should include: For smaller sites with 2/3 or less B2/ B8 units, marketing is not required. For all other sites…….marketing is required. Reason – smaller sites are often legacy sites that are remote so take time to travel to and essentially make them unsustainable.		

Name: Mike VanEker **I.D:** 62734049

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	Unsure	I feel that before including the Tower Farm & Black Rock sites in the local plan, the council has not properly considered alternative brown and greenfield sites, both within Portishead and in the wider North Somerset County, with significantly less ecological impact. The council could consider increasing the density of housing on proposed brown field sites across the county when would mean they could meet their housing targets and thus avoiding building on this unique and precious environment. The unique and strategic ecological contribution to the Black Rock site is protecting the unique environment of the Weston Big Wood (SSSI) and the wider Gordano Valley green corridor. If we lose this valuable field, it will have a significant impact on Weston Big Wood as a whole. Black Rock and Tower farm site were only granted greenbelt status in the 1980s because of their high ecological value and the connection with Weston Big Wood. Therefore, the Tower farm and Black Rock sites should be removed from the Local Plan. I believe that no modification short of removing the allocation entirely would make this site appropriate. Given its direct adjacency to ancient woodland, its loss would be irreversible and cannot be mitigated sufficiently.			

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					The land should instead be retained as undeveloped green space, managed to enhance biodiversity and provide sustainable public access, in line with the Avon Wildlife Trust's 2030 Strategy and national "30 by 30" nature recovery goals.			
Black Rock, north of Clevedon Road	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	Unsure	I feel that before including the Black Rock sites in the local plan, the council has not properly considered alternative brown and greenfield sites, both within Portishead and in the wider North Somerset County, with significantly less ecological impact. The council could consider increasing the density of housing on proposed brown field sites across the county when would mean they could meet their housing targets and thus avoiding building on this unique and precious environment. The unique and strategic ecological contribution to the Black Rock site is protecting the unique environment of the Weston Big Wood (SSSI) and the wider Gordano Valley green corridor. If we lose this valuable field, it will have a significant impact on Weston Big Wood as a whole. Black Rock and Tower farm site were only granted greenbelt status in the 1980s because of their high ecological value and the connection with Weston Big Wood. Therefore, the Tower farm and Black Rock sites should be removed from the Local Plan.	I believe that no modification short of removing the allocation entirely would make this site appropriate. Given its direct adjacency to ancient woodland, its loss would be irreversible and cannot be mitigated sufficiently. The land should instead be retained as undeveloped green space, managed to enhance biodiversity and provide sustainable public access, in line with the Avon Wildlife Trust's 2030 Strategy and national "30 by 30" nature recovery goals.		

Name: Mike Veal **I.D:** 928033

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Land East of Backwell This green belt site is productive grade 1 agricultural land – a rare commodity in North Somerset which should be preserved both for food production and its biodiversity value. The viability of the proposed development on this site is totally dependent on the construction of a relief road from the A370 to the Nailsea side of the railway. There is no evidence to show that such a road has been costed or that it is technically feasible for it to pass over or under the railway line. The cost would probably be prohibitive and there are no clear proposals as to who would provide the funding. An overpass would need to be high enough to clear future electrification of the railway and thus require a very extensive run up on each side. An underpass would be subject to flooding in the same way as the existing one at the bottom of Chapel Hill which habitually becomes flooded at times of heavy rainfall. My concern is that development would be given planning consent against vague promises of a relief road which will never be built for the reasons above. The traffic light junction at Station Road and the A370 is already at full capacity and the effect on this junction of the planning consents already granted and not yet built has yet to be seen – (Grove Farm 515 houses, Rodney Road 60 houses, Farleigh Fields West 125 houses and Farleigh Fields East 94 houses) Significant developments in Nailsea are also proposed and it must be borne in mind that Station Road is the principle link from Nailsea to the A370 and this will inevitably put further intolerable pressure on that route. Before any development is allowed on land east of Backwell there must be absolute certainty of construction of a relief road concurrent with that development. Such a relief road would in any case create another pinch point where it would join the A370 east of the Backwell crossroads. The whole concept has not been properly examined and is fatally flawed.			

Name: Mikhail Arutyunov **I.D:** 62814849

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared	Unsure	Unsure	Dear Sir/Madam, I am writing to formally object in the strongest possible terms to the proposed housing development in the vicinity of where I live. I am a resident of Backwell, a married man, with two children, who relies on local infrastructure. My objection is			

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		• Justified • Effective • Consistent with national policy			based on the significant and irreversible detrimental impact this proposal would have on the existing community, vital services, transport, and the safety of residents, particularly my young family. I have summarised my key concerns below, focusing on the most relevant issues for my family and my daily life. 1. Impact on Family Life and Essential Services The sheer scale of this proposal, coupled with the existing lack of capacity, demonstrates a complete disregard for the well-being of current and future residents. 2. Deficit in School and Health Services: The plan proposes additional housing (up to 1,000 homes) despite an existing and well-documented deficit in school places, with no concurrent investment in health services or leisure facilities. As a parent of primary and secondary school-aged children, I cannot accept a plan that fundamentally compromises their education and access to basic healthcare due to severe over-subscription. 3. Aggravated Flooding Risk: The safety of my family is paramount. Backwell Common and surrounding areas are prone to flooding, a risk that will only be aggravated by more housing and the resulting surface runoff. The fact that the proposed development, including the new roads, is planned on land adjacent to Backwell Lake (Reservoir) and adjacent fields that are known to be on a regular floodplain, makes this proposal unacceptably dangerous. 4. Lack of Social Cohesion Assessment: The lack of a social cohesion impact assessment for a development of this size is a serious omission. Introducing such a massive number of new residents without understanding the effect on the local fabric is destabilising and risks overwhelming the established community structure that we rely on for raising our children. 5. Critical Transport and Commuting Failures The proposals fail to account for the reality of life in the area and would severely worsen the commuting conditions I and many neighbours currently face. 6. Unfit Railway Station: The railway station is not fit for purpose as a transport hub, remains inaccessible for people with mobility issues, and presents serious challenges when travelling with young children or heavy baggage. This proposal assumes this inadequate facility can handle a massive surge in usage, which is completely unrealistic. 7. Ineffective Road Solution and Congestion: The proposed new road will not effectively relieve existing congestion on critical commuter routes like Station Road or Chapel Hill. It is clear that the new road is designed primarily to serve the new development, not the existing community, meaning that my daily commute will become even more gridlocked. 8. Commuter Village Status: Backwell is not an employment hub; most residents commute. Any planning that fails to acknowledge and address this reality through genuinely effective, costed, and guaranteed transport solutions is flawed. It confirms that the proposed housing is purely residential, placing a greater strain on already inadequate transport links. 7. Unsustainability and Lack of Guarantees The project is unsustainable and lacks the necessary financial backing to deliver the infrastructure it promises. 8. Complete Overdevelopment: The village already has 800 new houses approved, representing a 40% increase. These additional numbers will lead to complete overdevelopment of the village, fundamentally changing its character and ability to function effectively. 9. No Infrastructure Guarantees: The Infrastructure Delivery Plan lacks analysis and costings, and there are no funding guarantees for the new road or the essential services needed (like schools and healthcare). This means the core burden of inadequate services will fall squarely on existing residents. In conclusion, this proposal is destabilising, unsustainable, and ultimately undeliverable without significant detriment to the quality of life, safety, and infrastructure of the existing community. I urge you to reject this plan in its current form. Yours sincerely, Mikhail Arutyunov			

Name: Miles Estate **I.D:** 31106145

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP3: Spatial strategy	No	• Positively prepared • Justified • Effective • Consistent with national policy		No	The stated Spatial Strategy (SP3) is logical for North Somerset on the basis of the ability to locate new development within or close to existing urban areas where there is greatest potential to access a wide range of facilities, services and jobs, and there are opportunities to use existing or enhanced active travel and public transport routes. However, the Spatial Strategy is stated in general terms only with no detail in terms of any settlement hierarchy or the specific locations, or areas, where new development might be encouraged (or conversely might be restricted). It is considered that there is considerable scope to add additional clarity and detail to the proposed Spatial Strategy (Policy SP3) in the interests of the overall effectiveness of the plan. Distribution of Housing: The draft policy states that priority will be given to locating new residential and mixed- use development in or close to urban areas where there is an existing or proposed wide range of facilities, services and jobs, and there are opportunities to encourage active travel. The approach taken in Draft Policy SP8 confirms that only 2% of housing (588 homes) will be provided at Clevedon, a substantially lower percentage (and quantum of homes) than any of the other main towns in North Somerset (with Portishead being the next lowest at 7%, but still over 1,000 homes more that proposed at Clevedon). It is a lower housing requirement also compared to the villages of Backwell, where 1,683 homes on sites in Schedule 1 of the Plan are proposed as allocations, and Pill and Easton in Gordano where 4% or 1,100 homes are proposed. Whilst the proportion of housing delivery in 'villages and rural areas' (beyond those villages specifically listed by Policy SP8) has reduced from 23% to 12% from the last Regulation 19 consultation, this remains considerably higher that housing growth proposed at Clevedon. Sequentially, existing towns must be preferred as locations for sustainable growth, ahead of the larger villages, consistent with the current settlement hierarchy and spatial strategy in the emerging local plan. The Council, within its consultation paper on additional sites, and in a number of earlier reports to Executive and other committees, set out a clear hierarchy to follow when considering the allocation of additional sites, as follows: (a) Sites outside the Green Belt, but well related to the towns (b) Sites outside the Green Belt, but well related to the larger villages. (c) Sites in the Green Belt well related to the towns, including Bristol. (d) Sites in the Green Belt well related to the larger villages. (e) Elsewhere. The above hierarchy provides a logical approach to identifying sites for new development in the most sustainable locations, consistent with the spatial strategy and in a manner that is also consistent with national policy (with consistency with the NPPF being a clear test of Soundness). As such, sequentially, where there is a need for the release of sites from the Green Belt (which we agree there is), suitable sites in the Green Belt adjoining existing towns (Portishead, Clevedon and Nailsea) must be identified/prioritised, before any sites in the Green Belt at larger villages, including Backwell and Pill and Easton in Gordano. On this basis, the Draft Policy SP3 should be amended to recognise that the delivery of sustainable development should follow the sequential approach, where existing towns must be preferred as locations for sustainable growth, ahead of the larger villages. Delivery of housing within or adjoining existing settlement boundaries of existing towns (including Clevedon) should be considered acceptable. Flowing from this, more must be done at Clevedon to identify additional sites for residential development, reflective of its status as a main town.	More must be done at Clevedon to identify additional sites for residential development, reflective of its status as a main town.		02961 - The Miles Estate NSLP Reps - December 2025.pdf
SP5: Towns	No	• Positively		No	Policy SP5 (Towns) and SP6 (Villages and Rural Areas): The general approach taken with the development strategy at Towns and Villages & Rural Areas is supported.			02961 - The Miles Estate NSLP Reps -

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		prepared • Justified • Effective • Consistent with national policy			However, the sequential approach set out by these policies has not been wholly followed through in the final strategy for growth (Policy SP3) and the draft site allocations that have been identified. As set out above, Policy SP3 states that priority will be given to locating new residential and mixed-use development in or close to urban areas where there is an existing or proposed wide range of facilities, services and jobs, and there are opportunities to encourage active travel. The justification text under policy SP5 recognises that Towns are the most sustainable locations within North Somerset. Similarly, the justification text for Policy SP6 confirms that the rural areas are relatively less sustainable given the absence of a range of services, facilities and job opportunities. There are inconsistencies in the proposed policy and draft housing allocations. It seems that villages have been considered areas appropriate for higher or equal levels of growth to defined Towns.			December 2025.pdf
SP6: Villages and rural areas	No	• Positively prepared • Justified • Effective • Consistent with national policy		No	Policy SP5 (Towns) and SP6 (Villages and Rural Areas) The general approach taken with the development strategy at Towns and Villages & Rural Areas is supported. However, the sequential approach set out by these policies has not been wholly followed through in the final strategy for growth (Policy SP3) and the draft site allocations that have been identified. As set out above, Policy SP3 states that priority will be given to locating new residential and mixed-use development in or close to urban areas where there is an existing or proposed wide range of facilities, services and jobs, and there are opportunities to encourage active travel. The justification text under policy SP5 recognises that Towns are the most sustainable locations within North Somerset. Similarly, the justification text for Policy SP6 confirms that the rural areas are relatively less sustainable given the absence of a range of services, facilities and job opportunities. There are inconsistencies in the proposed policy and draft housing allocations. It seems that villages have been considered areas appropriate for higher or equal levels of growth to defined Towns.			02961 - The Miles Estate NSLP Reps - December 2025.pdf
SP7: Green Belt	No	• Positively prepared • Justified • Effective • Consistent with national policy		No	It is agreed that there are exceptional circumstances which justify the revision of the Green Belt boundary within North Somerset as part of the plan review. The fact that a review of the Green Belt has been undertaken is a positive approach for the Plan to take. However, our client's sites on Land at Castle Road and south of the B3124 have been omitted as sites to be released from the Green Belt despite, as we have set out under Policies SP3 and SP8, Clevedon having the lowest proposed level of growth of all the main towns in North Somerset by some considerable margin, and despite this being lower than levels of growth in lower order villages. In addition, based on our comments under Policy SP8, it is clear that additional sites for more homes will be required to meet minimum local housing needs over the plan period We object to the omission of our client's sites from Policy SP7, and we set out why our client's sites should be identified as additional sites to be included in SP7 to be released from the Green Belt and allocated for residential development. Land at Castle Road: This site (HE202004), owned by our client, the Miles Estate, should be identified under Policy SP7 as a site to be released from the Green Belt and as an allocation site in the emerging Local Plan, for reasons we state. Land South of the B3124: This site, owned by our client, the Miles Estate, was put forward as part of the additional sites consultation.However, it does not appear to have been assessed further by the Council – it is not a site that is referenced in the 'Residential Sites – Reasonable Alternatives Document'. It is also not assessed as a site in the Council's 2025 SHLAA including in Appendix 2 'Further Site Assessment'. When approached on how the	Various sites should be identified for release from the Green Belt under SP7 as set out above.		02961 - The Miles Estate NSLP Reps - December 2025.pdf

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					Council intended to consider additional sites that were put forward through the additional sites consultation (such as land to the south of the B3124 with Officers), we were informed that the site falls outside of the current area of search they had identified around Based on the above, it seems inevitable that when asking through the additional sites consultation for any other potential locations for consideration, that these will likely fall outside of the assessment boundary which was broadly drawn based on previous SHLAA submission. This begs the question whether the request for additional site to be put forward was a meaningful one. Land South of the B3124 - The Site's Suitability and Sustainability: As a result of the site south of the B3124 being located adjoining the main town of Clevedon, all of the reasons as to why additional sites should be allocated at the town, as set out above, equally apply to this site. Land South of the B3124 - Overall Summary: Overall, land to the south of the B3124 should also be identified under Policy SP7 as a site to be released from the Green Belt and as an allocation site in the emerging Local Plan for reasons we set out.			
SP8: Housing	No	• Positively prepared • Justified • Effective • Consistent with national policy		No	The Plan as proposed risks not allowing for sufficient time (15 years from adoption) to meet a basic requirement for strategic polices set by national policy. A longer plan period is required to ensure that the plan for North Somerset covers a period of at least 15 years from adoption, with a longer period likely to enable the Council to more effectively plan for future development in the area. The plan must be extended to 2041 as a minimum. There is concern, and risks in respect of the soundness of the Plan as proposed where, whilst seeking to meet the minimum level of housing need identified using the standard method, there is evidence to suggest that a higher housing requirement should be set to address affordable housing needs and to also accommodate some of Bristol's unmet needs. There is concern, and risks in respect of the soundness of the Plan as proposed, where no housing delivery trajectory has been provided for the Plan as a whole, or for the specific sites which are identified as part of the proposed strategic policies. This should be addressed as part of the submission of the plan.	The plan must be extended to 2041 as a minimum. There is evidence to suggest that a higher housing requirement should be set to address affordable housing needs and to also accommodate some of Bristol's unmet needs. Need to address concern, and risks in respect of the soundness of the Plan as proposed, where no housing delivery trajectory has been provided for the Plan as a whole, or for the specific sites which are identified as part of the proposed strategic policies.		02961 - The Miles Estate NSLP Reps - December 2025.pdf
Policy LP5: Housing, employment and mixed use allocations	No	• Positively prepared • Justified • Effective • Consistent with national policy		No	Overall, our client's sites at Castle Road and on land south of the B3124 should be released from the green belt and allocated for residential development under Policy SP7.			02961 - The Miles Estate NSLP Reps - December 2025.pdf

Name: Miller Homes (Battens Farm) **I.D:** 62913761

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SP1: Sustainable Development	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	For reasons that are set out in later representations, the provisions of the Plan do not comply with the definition of sustainable development that it has set for itself. In particular: They fail to support the delivery of a variety and choice of housing, including specialist and affordable housing, to meet local needs. They do not plan to meet local needs that are identified through the standard method, let alone the need for affordable housing that even the Council's own assessment demonstrates to be acute and overwhelming. Most importantly, the Plan fails to demonstrate the necessary exceptional circumstances to justify taking an alternative approach. These failures mean that the Plan should be aiming to meet the local housing need as derived from the standard method, and given that it does not plan to do so, it is fundamentally unsound on this basis. Since the Plan will fail to uphold the spatial strategy through both the quantum and distribution of housing growth that it is proposing, it will fail to prioritise walking and cycling, maximise the use of effective public transport, and encourage the creation of liveable neighbourhoods. For this reason it will also fail to make a positive contribution to addressing and demonstrating resilience to the impact of climate change and delivering the net zero target. The justification for Policy SP1 states as follows: The presumption in favour of sustainable development is at the heart of the NPPF and relates to both plan making and decision-taking. The planning system must contribute to the achievement of sustainable development. This Local Plan acknowledges this important national policy requirement. ... The policy reflects the plan's vision and strategic priorities and sets out the overall framework For the other policies in the plan, with the detailed requirements contained elsewhere. It sets out at a high level what sustainable development means in North Somerset. These principles are then articulated in more detail in the other strategic policies, with further guidance set out in the locational and detailed development policies.3 Since the Plan will fail to achieve the fundamental and overarching requirement to deliver sustainable development, and therefore to comply with the strategic policy that underpins all of its provisions, it is unsound when assessed against each and every soundness test.	Incorporate in the Plan the changes sought to Policy SP8, (as follows). • Amend the Plan to meet the minimum housing need of 20,205 homes (1,347 per annum) for the period 2024-2039; • Add a minimum additional requirement of 1,347 homes to allow for the Plan to look ahead at least 15 years from the date of adoption; • Remove Wolvershill as a separate location in the schedule incorporated in the Policy, and which is inconsistent with other strategic policies, and apportion its growth to the Villages. • Review the apportionment of growth between the towns and villages, and revise the distribution to a ratio of 80:20 to deliver the intentions of the spatial strategy. • Increase the distribution to Nailsea, as the least constrained town apart from Weston-super-Mare, to provide homes for needs arising during the current plan post-2026 (current allocations are largely carried forward from the Site Allocations Plan		Annexes_final_composite.pdf

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						and therefore intended to meet needs in the period up to 2026). • Incorporate a delivery trajectory to identify a supply of specific, deliverable sites for years one to five of the plan period.		
SP3: Spatial strategy	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	For reasons that are set out in later representations, the provisions of the Plan do not afford priority to locating new residential and mixed use development in or close to urban areas where there is an existing or proposed wide range of facilities, services and jobs, and there are opportunities to encourage active travel. On the contrary, it distributes a disproportionate amount of development to the villages that does not reflect local community needs, in direct conflict with the strategic intentions and objectives of the spatial strategy. For the foregoing reasons that will be substantiated through these representations as a whole, the provisions of the Plan will not deliver the spatial strategy it has set for itself, and is therefore unsound.	Review, and adjust, the distribution of housing growth between the towns and village settlements.		Annexes_final_composite.pdf
SP5: Towns	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	Policy SP5 endorses the role of the four towns within North Somerset as the foundations for delivering the spatial strategy due to their being the most sustainable locations, and therefore, sequentially, they are the first places to consider for future development. However, the policy refers only to support for proposals for new development ‘within the settlement boundaries’. It is clear that, in order to deliver the needs for housing and mixed use development in full, development beyond the existing settlement boundaries of the towns will be necessary. The wording of Policy SP5 should therefore be amended to provide support for development ‘at’ the towns, both ‘within and adjacent to the existing settlement boundaries’.	Amend the wording of Policy SP5 to support proposals for new development ‘at’ Weston-super-Mare, Clevedon, Nailsea and Portishead, and to delete the words ‘within the settlement boundaries of’.		Annexes_final_composite.pdf
SP7: Green Belt	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No		Remove reference to Land at Woodspring, Pill / Easton-in-Gordano and Land at Nailsea / Backwell from the list of land to be released from the Green Belt.		Annexes_final_composite.pdf
SP8: Housing	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	Legal compliance As a preliminary to this section of the representations it is important to consider the context in which they are to be considered. The revised NPPF was published on 19th December 2023. For reasons set out below, it is SMD’s position that the changes, insofar as they relate to the matters relevant to these representations, are in emphasis and clarification rather than substance. However, of fundamental importance is the transitional arrangements set out in Annex 1, which are clear that: The policies in this Framework (published on 19 December 2023) will apply for the purpose of examining plans, where those plans reach regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (pre-submission) stage after 19 March 2024. Plans that reach pre-submission consultation on or before this date will be examined under the relevant previous version of the Framework in accordance with the above arrangements. ...4	• Amend the Plan to meet the minimum housing need of 20,205 homes (1,347 per annum) for the period 2024-2039; • Add a minimum additional requirement of 1,347 homes to allow for the Plan to look ahead at least		Annexes_final_composite.pdf

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					In accordance with these arrangements, the current Plan therefore falls to be considered under the previous version of the NPPF published on 5th September 2023. Therefore, to the extent that Plan relies on proposed draft revisions to the NPPF, whether or not they have not been confirmed through the final version published on 19th December 2023, the Plan is neither legally compliant nor sound. Overall housing provision The Plan does not seek to meet the local need established using the national standard method. As such, it is in prima facie conflict with current national policy set out in the NPPF. The evidence base is contradictory in terms of whether the Council is seeking to justify its position on the basis of then draft revisions to the NPPF, or the then current NPPF. In the Spatial Strategy and Capacity paper the principal justification seems to be the Government's proposed changes to the NPPF and the Council's interpretation that they introduce greater flexibility in terms of the identification of the housing requirement and greater protection for the Green Belt5. As advised in the evidence base, the consultation draft NPPF has had "... significant implications for the North Somerset Local Plan"6. Notwithstanding the foregoing, the evidence paper also cites paragraph 61 of the then current NPPF that permitted departure from the standard method if exceptional circumstances justified an alternative approach which reflected demographic trends and market signals: ORS advised that the standard method does not provide a realistic assessment of local housing needs for North Somerset, as the outdated 2014 household projections that are the starting point for the calculation do not provide an accurate reflection of current and future demographic trends. ...7 The Council's principal justification for departing from the local housing need that derives from the national standard method is therefore understood to be based on proposed revisions to national policy which, at the time of preparing the Regulation 19 Plan, were still in draft, but had not been confirmed following consultation. However, if that justification fails, then it appears that the Council will seek to argue that exceptional circumstances justify departing from the requirements of national policy which normally expect the housing requirement to be set using the local need derived from the standard method. The final revisions to the NPPF have now been published. There is no substantive change to the provisions relating to the determination of the number of homes that are needed. The provisions of paragraph 61 which continue deal with this matter are reproduced below, with the amendments introduced in December 2023 incorporated in red (see attached full representation on page 14): The provisions of paragraph 67 (formerly 66) have not materially changed between the former and current NPPF, other than to confirm that the housing requirement may be 'higher' than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment. There has been no change to the wording of this paragraph to provide for a 'lower' requirement to be set. The overall position therefore remains that strategic policies should be informed by a local housing need assessment conducted using the standard method unless there are 'exceptional circumstances' that justify an alternative approach. As is confirmed in the Government's response document to representations to the draft proposed revisions to the NPPF: ... These changes are intended to provide greater clarity and certainty to plan-makers. ... ... The government is clear that the standard method should still be used to inform the process of planning for new homes. Policy continues to expect local housing need to be determined using the standard method, unless there are exceptional circumstances which justify an alternative approach. ... 9 Simply put, the Plan relied on draft revisions to national planning policy that have now been	15 years from the date of adoption; • Remove Wolvershill as a separate location in the schedule incorporated in the Policy, and which is inconsistent with other strategic policies, and apportion its growth to the Villages. • Review the apportionment of growth between the towns and villages, and revise the distribution to a ratio of 80:20 to deliver the intentions of the spatial strategy. • Increase the distribution to Nailsea, as the least constrained town apart from Weston-super-Mare, to provide homes for needs arising during the current plan post-2026 (current allocations are largely carried forward from the Site Allocations Plan and therefore intended to meet needs in the period up to 2026). • Incorporate a delivery trajectory to identify a supply of specific, deliverable sites for years one to five of the plan period.		

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					superseded, and the confirmed revisions simply introduce ‘clarification’ rather than ‘substantive change’. Since it does not meet the policy ‘expectation’ that the local housing need ‘should’ be determined using the standard method, it is in conflict with current national policy, and with which it must comply. Ipso facto, it is unsound on this basis. Current national policy is unequivocal that strategic policies ‘should’ be informed by a local housing need assessment ‘conducted using the standard method in national planning guidance’. Through the PPG it is confirmed that the NPPF ‘expects’ strategic policy-making authorities to follow the standard method for assessing local housing need10, and that there is an ‘expectation that it will be used and that any other method will be used only in exceptional circumstances’11. This guidance in the PPG has not changed following publication of the revised NPPF. Given the above policy and guidance, and the requirement to demonstrate exceptional circumstances for not following the standard method, the Plan is surprisingly light on the justification of exceptional circumstances. The justification given in the supporting paragraphs to Policy SP8 simply refers to the requirement having been informed by the ORS review and LHNA that are included in the evidence base. ORS’ alternative position is premised on the use of 2018-base household projections, rather than the 2014-based projections used in the standard method. The reasons why the 2014-based household projections are used as the baseline for the standard method is expressly addressed in the PPG as follows: The 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government’s objective of significantly boosting the supply of homes.12 Any attempt to depart from the 2014-based projections and to use later projections that may indicate a lower requirement, is therefore to depart from the specific intentions of the Government in setting the 2014-based projections as the baseline, which is intrinsically connected to the overarching national policy objective to significantly boost the supply of homes. The continuing relevance of the 2014-based household projections has been confirmed by the Government in its published response to consultation on the draft proposed changes to the NPPF, in which it clearly stated as follows: We note the comments received around the continued use of 2014-based household projections within the standard method for assessing housing need, and the calls for more up-to-date projections to be used. Through the consultation we explained that the use of this data provides stability, consistency, and certainty to local planning authorities. Nevertheless, we committed to review the approach to assessing housing need once we have considered the implications of new 2021 Census based household projections, planned to be published by the Office for National Statistics in 2024. The Office for National Statistics recently confirmed that the next set of household projections are now planned for release in 2025. As with all policies we keep the standard method under review, and we intend to review the approach to assessing housing needs once this data is available.13 It is therefore uncontestable that, as of now, the 2014-based household projections should continue to be used for the purposes of assessing housing need. The guidance in the PPG cited in paragraph 2.18 above, remains unchanged. The basis on which the Council has assessed housing needs is therefore unequivocally in conflict with the Government’s position as endorsed in December 2023. The Planning Practice Guidance remains unchanged and unequivocal in relation to the use of a different method and how this will be tested at examination: Where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be			

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					tested at examination. ... Any method which relies on using household projections more recently published than the 2014-based household projections will not be considered to be following the standard method as set out in paragraph 60 of the National Planning Policy Framework. As explained above, it is not considered that these projections provide an appropriate basis for use in the standard method.14 ORS is therefore not following the standard method. As such, it is incumbent on them to identify exceptional circumstances that justify such a departure. 2.25 ORS' justification for departing from the standard method seems to be grounded in the more recent household projections indicating lower rates of household growth than the 2014-based projections. However, this completely disregards the express reasons why the Government has chosen to maintain the 2014-based projections as the basis for the standard method – to ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government's objective of significantly boosting the supply of homes. ORS attempt to discredit the outputs from the standard method on the basis of the uplifts that would ensue beyond the ten year trend growth projections that they identify, with an inference that this would be disproportionate growth. However, the standard method incorporates checks and balances against disproportionate growth through capping the level of any increase. Those caps are not triggered in this instance indicating that the local housing need is not disproportionate. The circumstances outlined by ORS are neither exceptional nor locally-specific. By their own admission, they are reverting to an approach that they recommended to the combined West of England authorities 'before the Government's standard method was introduced'15. ORS have simply demonstrated that utilising the 2018-based household projections results in a reduced output in terms of local housing needs. The same outcome is likely to prevail in many local planning authorities across the country, meaning that the exception becomes the norm. What ORS has failed to do is to demonstrate that utilising the 2018-based projections in North Somerset results in an outcome that is so exceptionally different when compared against the outcome from the 2014- based projections and considered in relation to the demographic characteristics of the district, as to justify an alternative approach. They have wholly failed to demonstrate those exceptional circumstances. Whichever way ORS seeks to justify not adhering to the housing need that results from the standard method, the evidence of their own assessment in relation to affordable housing need is compelling reason alone not to move down from it. The total households needing affordable housing during the plan period is almost equivalent to the overall housing requirement that ORS is advocating. ORS rather glibly tries to diminish this need on the basis of a change in the definition of affordable housing to include those aspiring to home ownership, and through an extraordinary suggestion that the plan should seek to meet the needs only of those households that are likely to form an effective demand. The scale of affordable housing need is evidence in itself that the housing market is not working, and is under-delivering in relation to needs. This simply endorses the imperative of following the intentions of the national standard method with its embedded provisions to correct for historic underdelivery and declining affordability, and to significantly boost the supply of homes going forward. The assessment by ORS therefore represents an attempt to revert to past practice, the limitations and dangers of which in terms of under-providing the homes that are needed, has been outlawed through the introduction of the standard method. The case that it presents is unexceptional since it is premised on a move away from use of the 2014-based household projections that the Government has affirmed remain the appropriate baseline for assessing housing need in order to deliver its overarching objective of significantly boosting the supply of homes. It is a wholly unjustifiable and untenable position, and the circumstances advanced in support are not locally exceptional.			

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					The gap between the local housing need for which the plan is seeking to provide, and that indicated by the standard method, is not minor. It is a very substantial deviation equating to a 27% reduction. More importantly, it will result in more that 5,300 fewer homes being provided for than the standard method indicates are needed. The consequences of North Somerset underestimating housing need, and failing to provide for over 5,300 households in need of a decent home, will be increased ipressure on the existing stock, further inflating house prices and rents, increasing those confined to overcrowded and/or unsuitable accommodation, and ultimately increasing homelessness. It must therefore be subject to the closest scrutiny and most robust and convincing justification. Such justification is nowhere near having been demonstrated. For this reason alone the Plan is unsound, and the provisions that it makes for housing are so far short of what is required, that to correct the deficit will result in a materially different Plan. For this reason it should be withdrawn for reconsideration and amendment since it is wholly inconsistent with fundamental tenets and requirements of national policy. In the light of the foregoing, it is concluded that exceptional, locally-specific circumstances simply do not exist for departing from the standard method to justify a lower housing requirement, and particularly one that undershoots the requirement that emerges from the standard method by such a magnitude. In the spatial strategy paper reference is also made to constraints of Green Belt, as well as other sensitive areas such as areas at risk of flooding, the Mendip Hills AONB and a range of heritage, ecological and other environmental constraints16. However, there is no detailed and robust environmental capacity analysis to demonstrate that the district cannot accommodate a higher level of growth than that proposed in the Plan, or the level of growth that is required in accordance with the standard method. The principal capacity reason given for undershooting the standard method requirement relates to the softening of the requirement to consider use of land within the Green Belt where there are no other options, and which has prompted the removal of Green Belt sites that were proposed for allocation in the Regulation 18 Plan. In the light of the transitional arrangements relating to the revised NPPF, this justification is untenable. Moreover, for reasons set out below, this does not provide anything approximating to the exceptional circumstances that are necessary to justify not meeting needs in full. It is significant that, through the draft West of England Joint Spatial Plan (JSP) that was submitted for Examination in April 2019, North Somerset Council did not seek to argue that there were environmental constraints on it accommodating the level of housing growth that was proposed in that plan, and which was higher than the level that currently derives from the national standard method. Moreover, in planning to meet the requirement that was set for it though the JSP, no land in the Green Belt was planned for allocation in North Somerset. Whilst the JSP subsequently stalled at Examination stage and was ultimately withdrawn, it is relevant in that the Council did not seek to argue that there were environmental constraints on it meeting the requirements for growth, and without necessitating the use of Green Belt land. Moreover, the focus for objections were the proposed new garden villages at Churchill and Banwell rather than the proposed urban extensions at Nailsea and Backwell. The question that is begged is therefore on what basis is it alluding to there now being capacity constraints that preclude it from meeting the higher level of housing need that arises from the standard method? There is therefore no robust evidence to indicate that the Council cannot meet the housing requirement that derives from the standard method due to environmental constraints and/or without involving the removal of land from the Green Belt. If it was able to meet a higher requirement in 2019 and without necessitating land-take from the Green Belt, why is it unable to do so now? That question is unanswered and unevidenced. In conclusion on this matter, there is no credible, evidenced justification for the Council to adopt a			

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					housing requirement below the minimum indicated by the standard method, and no evidence to confirm that there are environmental constraints on its meeting the need in full, with or without landtake from the Green Belt. Ipso facto, on this basis alone, the Plan makes insufficient provision for housing, and on this basis alone is unsound and should proceed no further in its current form. Unmet needs from adjacent Local Authority Area Through the JSP North Somerset accepted the obligation to make provision for unmet needs arising within the adjacent administrative area of Bristol City Council. Even on the basis of their own 'selfassesment' of need, Bristol City Council have an umet need of circa 10,000 homes, and more than double that taking the standard method as the starting point. This, alone, is compelling reason and justification for uplifting the housing requirement for North Somerset above the Standard Method figure. Bristol's own evidence points to a greater proportionate need for houses (rather than apartments) than they have historically delivered. Given the highly urbanised nature of Bristol that has largely been developed to its limits given the tight Green Belt constraints around its boundaries, this can only realistically be achieved around the fringes of the city in areas more suited to medium and lower density housing. It is reliant on the adjacent authorities, and in particular North Somerset and South Gloucestershire, to deliver an appropriate number and mix of homes. There are sound planning reasons for the neighbouring authorities to Bristol to work collaboratively to meet the needs of the greater Bristol area. That was the essential purpose of the strategic planning measures that were put in place through the West of England JSP. The collapse of those arrangements does not expunge the need to provide the homes that the strategic vehicle was intended to deliver. Plan Period Notwithstanding, and without prejudice to, the foregoing, as is reflected in the consultation documents, the Government's requirement set out in the NPPF is for strategic policies to look ahead for a minimum period of 15 years from the date of adoption17. However, it is acknowledged that it is good practice to plan for a longer time horizon. In the consultation document18, adoption of the Local Plan is anticipated to be achieved by December 2024. When compared with the timetable set out in the most recent iteration of the LDS19, there has already been slippage by over two years to get to the current, Regulation 19, consultation stage, and by a year to arrive at the adoption of the Plan. It seems likely that there will be further slippage, particularly given that the current consultation is on a Plan that is grounded in draft proposed changes to the NPPF that have not been reflected in the revised version in the way anticipated by the Council. The adoption of the Plan by December 2024 is a very ambitious target indeed for a Plan of this nature. A partial update of the Bath and North East Somerset Local Plan recently took over twelve months to progress through the Examination stage to adoption. The current plan is a much more comprehensive and over-arching review, and inherently more complex, than the former. Research undertaken by David Lock Associates20 based on an analysis of MHCLG data, and derived from evidence relating to 300 Local Plans over the ten year period 2007-2017, found an average time-period of 19 months from submission of a Local Plan for Examination to adoption. Given that this is an average time, there are many that have taken longer, with the research finding that, for several, the time period was 35-45 months. The research also found that, since 2012, the average has increased from 15 months to 25 months in the context of the demise of regional planning, and the introduction of the NPPF and PPG. As a benchmark, the publication version of North Somerset's Core Strategy was published for consultation purposes in January 2011 and submitted to the Secretary of State for Examination in July 2011. It was subject to Examination in November- December 2011 and was adopted in April 2012. It therefore took a period of 16 months from publication version to adoption in the first instance. It was subsequently the subject of a successful legal challenge resulting in nine policies			

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					being remitted back for re-Examination. The final version was adopted in January 2017, some six years after submission of the initial publication version. It is significant that the Core Strategy was a 'partial' Local Plan, that did not contain either development management policies or non-strategic site allocations, which were to be included in the subsequent Sites and Policies Plan. It is a reasonable assumption that the current Plan, containing a full suite of strategic and non-strategic allocations and Development Management policies, will give rise to a greater range of issues and potentially take longer than the 16 months from publication version to initial adoption of the Core Strategy. Having regard to the complexities of the circumstances in North Somerset, and the issues identified through these representations, it is a reasonable (albeit perhaps 'optimistic') assumption that adoption will not now be until some time in mid to late 2025 at the earliest, and this would only require a very small delay given the timetable set out. Given the requirement for Local Plans to look ahead over a 'minimum' period of 15 years 'from adoption', this necessitates a further extension of the plan period to 2040. Accordingly, this will increase the housing requirement to be incorporated in the plan by a minimum of 993 dwellings based on the Council's local housing needs assessment, or a minimum of 1,347 dwellings based on the national standard method. Housing Distribution The broad distribution of housing proposed in the Plan will not deliver the spatial strategy, with its priority to locate new residential and mixed use development in or close to urban areas, and to limit development at villages to local community needs (Policy SP3). The share of housing growth to be distributed to the district's four towns combined amounts to only 60%. The share to be distributed to the villages and rural areas is assessed to be 23%. However, the distribution set out in Policy SP8 treats Wolvershill as a separate category in the settlement hierarchy. Since it is an extension to Banwell, which is a village settlement, the growth at Wolvershill should properly be assigned to the Villages21. This means that the villages will account for 41% of proposed housing growth, which is more than double the proposed distribution to the three towns of Clevedon, Nailsea and Portishead in combination. It is clear from this proposed distribution that, apart from Weston-super-Mare, the other three towns are punching well below their weight and not performing their intended roles in the spatial strategy as the most sustainable, and therefore priority, locations for growth. Distribution of Housing Growth to Nailsea The distribution of housing growth to Nailsea in particular is unjustifiably low. Whilst Clevedon and Portishead are tightly constrained by Green Belt, land to the south-west and west of Nailsea is not within the designation. Nailsea has not received significant growth for more than two decades, which is reflected in an ageing population and declining services. A site at North-West Nailsea that has been allocated for 450 dwellings in several plan periods since the Millenium, has failed to come forward, and has now been reduced to an allocation for 75 dwellings in the current Plan. The most significant residential development during the past two decades, on the site North of Youngwood Lane / East of Nethertonwood Lane which is identified as a site allocation in the current Plan, was allowed on Appeal. Other than that, and the planning permission granted for 180 dwellings on Land West of Engine Lane that was in the Town Council's ownership and is again identified as an allocation in the current plan notwithstanding that it has planning permission and is therefore a commitment, growth at Nailsea has been limited. In the current Plan the scale of new growth identified for Nailsea is lower than in any plan period since the Millenium. This is notwithstanding its potential for an urban extension of approximately 3,300 dwellings that was identified in the JSP without the need to remove land from the Green Belt. The Council's justification for the negligible scale of growth that it is proposing at Nailsea, one of its main towns and intended as a priority focus for development in the spatial strategy, is stated as follows:			

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					The Preferred Options proposed Nailsea / Backwell as a strategic growth location subject to, in particular, deliverable strategic transport mitigations being identified. This related to a potential new road crossing of the railway to alleviate capacity issues at Backwell crossroads and Station Road. The transport evidence at the time indicated that the rail crossing could be either to the west or east of Backwell and could be a bridge or a tunnel. None of these options are straightforward given flooding issues which could affect any crossing under the railway and the visual impact of a bridge crossing a railway on an embankment. Further technical assessment following Preferred Options resulted in the preference being for a bridge crossing to the east of Backwell. However, taking account of potential development contributions and other sources of funding, the costs of delivery were prohibitive which meant that delivery was highly unlikely over the plan period.22 Without the transport infrastructure to unlock large scale development the focus shifted to what scale of development could be accommodated on the existing network. Without a bridge crossing the exceptional circumstances related to deleting Land East of Backwell from the Green Belt to support the delivery of the transport improvements no longer applied. Land at Grove Farm, Backwell (515 dwellings) is retained as an allocation as access to the A370 does not require a rail crossing but land south of Nailsea (400 dwellings) was deleted given the severe impact development in this location would cause on the local road network.23 The conclusions relating to the transport and Green Belt implications of growth at Nailsea / Backwell meant that the proposed scale of development in the area was significantly scaled back, and this is no longer proposed as a strategic growth location in the plan.24 The scale of new, ‘plan-led’ growth at Nailsea during the plan period is negligible. By the Council’s own admission in the above-cited extract, it means that Nailsea will not perform its strategic role in the settlement hierarchy. Of the projected plan-period growth of 926 dwellings at Nailsea, 596 is already committed through planning permissions, 28 are categorised as ‘urban capacity’, and 225 are projected windfalls25. Therefore the ‘plan-led’ growth through allocations is a mere 75 dwellings at a settlement that the spatial strategy identifies as a priority focus for growth. That equates to a mere 0.5% of the minimum plan period growth for which the plan is seeking to make provision. Furthermore, the 75 dwellings are proposed on a site that has been allocated in previous planperiods for over 20 years, and which has failed to come forward. The scale of plan-led growth at Nailsea is therefore a mere 2.3% of that for which there was deemed to be capacity in the West of England JSP without taking land from the Green Belt. Moreover, it equates to a mere 6.7% of the town expansion capacity proposed at Nailsea in the Regulation 18 Consultation Plan26. Through the evidence base the Council sets out a sequential approach to act as a framework for the assessment of potential sites, consistent with the spatial strategy27. That approach places ‘town expansion’ as the third preference, and land in the Green Belt as a last resort (Step 6). Other than the reduction in steps to six by the amalgamation of ‘other sustainable settlements’ (Yatton and Backwell) into the ‘rural areas’, that approach has not changed between the Regulation 18 and 19 Plans. Moreover, it is reflected in the West of England JSP provisions for North Somerset which identified a strategic growth location to the west and south-west of Nailsea on land that is not within the Green Belt. As is evident from the concept plan for Nailsea that was included in the West of England JSP (below right), there was identified potential for substantial urban extension of the town to the west and south-west that is not subject to constraints of Green Belt, flooding or of an overriding environmental nature. The concept plan indicated a new strategic transport route to the west of the town, including a connection to the A370 over the railway to the west of Backwell. The JSP was submitted for Examination, with an evidence base to support the deliverability and viability of the provisions that it contained, including the proposed urban extension for up to 3,300 dwellings at Nailsea / Backwell. It is therefore clear that the Council did not perceive there to be either deliverability or viability issues with that scale of housing growth, with associated supporting infrastructure, or overriding environmental constraints, including a new strategic highway			

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					connection between Nailsea and the A370 routed to the west of Backwell. Whilst the JSP was subsequently abandoned, it was due primarily to a lack of clarity and consistency in the strategy for selecting development locations rather than specific issues relating to those selected, including evidence to indicate that there were non-Green Belt locations that could have been selected ahead of locations within the Green Belt. As was clearly set out in the Inspectors' letter: … we have not definitively reached the view that any of the individual SDLs proposed in the JSP could not, in principle, form a sound part of a plan for the West of England or for any of the individual local authority areas. However, in the light of the above, we conclude that robust evidence has not been provided that the 12 SDLs proposed in the plan have been selected against reasonable alternatives on a robust, consistent and objective basis. Consequently, given that the SDLs are an integral part of the plan's strategy, we cannot conclude that the spatial strategy is itself sound. …28 The potential for significant growth at Nailsea was also canvassed in a Local Plan Issues and Options Document published by the Council in September 2018 (see concept plan, below right). This clearly illustrated how significant growth could be accommodated to the west and south west of the town without removing land from the Green Belt, supported by a new link road connecting to Station Road, with a potential further link to the A370 without the need for accompanying development in the Green Belt. Again, it would be surprising if the Council were to have canvassed such proposals through a formal consultation document without reasonable certainty that there would be no overriding constraints in terms of environmental impacts, viability and/or deliverability. Given the above circumstances, it was surprising, and somewhat inexplicable that, in the Regulation 18 Plan, the Council opted for the release of Green Belt land to the east of Backwell rather than focusing on available options outside the Green Belt at Nailsea. This was in overt conflict with the sequential approach which places expansion at the towns ahead of both village expansion and Green Belt releases. In their representations to the Regulation 18 consultation it was SMD's submission that the exceptional circumstances for release of land from the Green Belt had not been demonstrated. Much of the justification related to the delivery of a new multi-modal transport route to the east of Backwell. However, as was confirmed in the evidence base documents accompanying the Regulation 18 Plan, transport work was still underway to test the deliverability of the required transport mitigation schemes29. A number of options were canvassed in the transport evidence, and which confirmed that there were no distinct advantages of a multi-modal route to the east of Backwell compared with a route to the west as was contemplated in the Concept Plan that was included in the JSP. Even if it did, that failed to provide sufficient justification for removing land from the Green Belt for development, particularly so given that the route was proposed to continue north of the railway through Green Belt land. SMD commissioned a detailed critique of the transport evidence accompanying the Regulation 18 consultation, and which they submitted with their representations. That confirmed that, when subject to proper scrutiny and considered holistically in the context of potential strategic improvements, a multi-modal route to the west of Station Road and Backwell had the potential to deliver substantially greater benefits for both existing and future communities than a route to the east. That assessment remains part of the Council's evidence base as a submission to the Regulation 18 Plan. SMD's position was that the option of a multi-modal route across the railway to the east of Backwell did not justify removing land from the Green Belt for development, and allocation of the land risked pre-empting the route of a new rail crossing which the evidence indicated not to be the most beneficial. That was not considered to be a correct approach, since the preferred route should properly have been informed by the objective to protect the Green Belt, and therefore a route to the east only selected if there were overriding advantages that would supersede this additional weight of disadvantage compared with a route to the west. There was no evidence to confirm that this was the case, the detailed transport evidence accompanying SMD's			

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					representations confirming that the balance of advantage in transportation terms was clearly in favour of a route to the west, endorsing the position promoted by the Council through the JSP. Since the proposed allocation of land within the Green Belt east of Backwell has now been deleted from the Regulation 19 Plan, there is no opportunity to test whether the proposed road link that was associated with it amounted to the exceptional circumstances for removing land from the Green Belt. However, the Council is now using the deletion of the proposed allocation on grounds of a draft proposed change in national policy that affords greater protection to the Green Belt, in justification for not meeting local needs identified by the standard method. It is therefore a perverse situation that, in the case of Nailsea, the Council is now placing reliance on the removal of a draft proposed allocation in the Green Belt, that had not been tested through Examination to confirm whether exceptional circumstances existed to justify its removal from the Green Belt, as reason for departing from the national standard method and not meeting the housing needs that it identifies. Reliance is also placed on 'uncertainty' surrounding the environmental impact and deliverability of the transport infrastructure required to facilitate the scale of growth presented at the Regulation 18 stage. There is no evidence to confirm that reasonable alternatives do not exist at Nailsea, and that they have been properly explored. On the contrary, the evidence from the JSP confirms that there are alternatives that have real potential. This is reflected in the planning permission granted on Appeal on land north of Youngwood Lane that the Council is seeking to allocate in the Regulation 19 Plan, and which the Inspector required to safeguard a route through the site for future new transport infrastructure to serve strategic growth in this location. The safeguarded route reflects the line of the link road canvassed in the Issues and Options Document cited earlier. 2.69 Given that the Council has now decided to reinstate the primacy given to protection of the Green Belt, there is no evidence to confirm that they have given further, and due, consideration to non-Green Belt options previously canvassed through the JSP. In particular, the option of a strategic scale of growth to the west and south-west of Nailsea that has potential to deliver a greater scale of growth than that contemplated in the Regulation 18 Plan, and therefore to enhance the viability and deliverability of strategic transport infrastructure. As is endorsed through the Transport Technical Note at Annex 3 to these representations, there is no evidence in the public domain that supports the preferred option for a rail crossing to the east of Backwell rather than to the west. Furthermore, there is no evidence that has been published post-Regulation 18 consultation that now confirms that there are delivery 'challenges' that are fatal to it; or that significant additional growth at Nailsea cannot be accommodated without substantial new highway infrastructure. The Council has therefore chosen the soft option to remove allocations from the Green Belt, reinforced by an argument of uncertain infrastructure deliverability, all justified on the basis that it no longer has to meet the need identified by the standard method. The Council has had ample opportunity to find solutions to the infrastructure constraints at Nailsea, with little evidence that they have taken a proactive approach to doing so. This is simply insufficient reason when it is clear there are genuine alternatives available for growth that were previously canvassed by the Council and promoted by them through a strategic plan that was submitted for, and subject to preliminary scrutiny at, Examination, and that can make a significant contribution towards meeting those needs simultaneously with enhancing the prospects for delivering the necessary infrastructure. It is insufficient reason for not providing homes that are desperately needed, with the consequences of increasing unaffordability and homelessness that are likely to ensue. Notwithstanding, and without prejudice to, the foregoing, the Transport Technical Note confirms that, applying post-Covid 19 trip rates accepted by the highway authority in connection with the planning application relating to the Council's own, neighbouring land South of the Uplands and in the context of the increased accessibility of the locality by the sustainable transport modes associated with the Youngwood Lane development, additional significant growth of up to 600 dwelliings at Batten's Farm can be accommodated on the network without giving rise to additional adverse impacts. As is confirmed through the evidence in the Transport Technical Note, in the context that the projected impact of traffic associated with the Land North of Youngwood Lane			

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					development has been accepted by the Secretary of State as not giving rise to severe residual adverse impacts on Backwell Crossroads, “a development of up to 600 dwellings at Batten’s Farm which results in lower capacity values than those previously forecast in relation to the ‘Land north of Youngwood Lane’ development, should remain acceptable to NSC”30. In their representations to the Regulation 18 consultation, SMD demonstrated how the allocations in the draft Plan were not supported by the Sustainability Appraisal (SA) of the individual site options. The headline points were as follows: • The proposed allocation at North West Nailsea (450 dwellings) performed worse than any of the other site options. • The site option West of Nailsea performed as well as the proposed allocation South of Nailsea. SMD also submitted as follows: It is pertinent to note that the North of Youngwood Lane option performs as well as the West of Backwell option in terms of SA Objectives SA2.2, SA2.4, SA2.5 and SA3.3. Given that this site is sandwiched between the South of Nailsea and West of Nailsea site options, it is not preferentially located in relation to any of these SA objectives than those other two Nailsea options. Its superior performance can only be assumed to reflect the fact that the site benefits from planning permission, and as part of which specific measures have been secured to enhance active travel routes and sustainable transport infrastructure, and which have influenced its assessment in the SA.31 There is no reason why the sustainability credentials of the West of Nailsea site option could not, and would not, be enhanced through a similar portfolio of sustainable transport and other measures that would be secured through an application for planning permission. That is particularly so given that the West of Nailsea option is contiguous with the North of Youngwood Lane option, and can benefit from, and further enhance, the measures that are being implemented as part of the planning permission for the latter. It is worth noting that previous consultation documents have included reference to completing a link road across the Batten’s Farm site, and SMD are committed to delivering it. There is therefore no reason why the West of Nailsea option could not achieve the same top rating for SA objectives SA2.2, SA2.5 and SA3.3 following a grant of planning permission. This being the case, in terms of its sustainability credentials as determined through the SA, its status would significantly exceed that of the East of Backwell option, reflecting its superior location in relation to the ‘town’ of Nailsea. If, as should properly be the case, avoiding harm to the Green Belt was included as an SA objective, then its superiority as reflected in the SA would be further enhanced.32 The Sustainability Appraisal of the residential site options for Nailsea / Backwell have been extracted from SAs of both the Regulation 18 and Regulation 19 Plans, and are included in Annex 4 for comparison purposes. This confirms that there is very little difference between the assessment outcomes for the individual sites in both appraisals. The headline points are as follows: • The proposed (albeit reduced) site allocation at North West Nailsea continues to be one of the worst performing options, and performs worse than West of Nethertonwood Lane, which is a much larger site. • North of Youngwood Lane continues to be one of the strongest performing sites reflecting the committed sustainable transport infrastructure to be delivered in conjunction with the ongoing development of that site. • West of Backwell continues to perform better than East of Backwell raising further questions as to the justification for the allocation to the east in the Regulation 18 Plan, and the deletion of which, with associated link road to the east, has caused the downscaling of Nailsea / Backwell as a strategic growth location which contributes significantly to the Council’s justification for rejecting the housing requirement set by the standard method. The SAs for both the Regulation 18 and 19 Plans confirm that there are no overriding sustainability reasons for not allocating land West of Nailsea given that it performs similarly to the committed site West of Engine Lane, and can connect into the same sustainable transport			

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					infrastructure that is surmised to account for the favourable performance of the committed site North of Youngwood Lane. Moreover the consistency between the SAs of the individual sites consolidates the doubts regarding the soundness of the allocation East of Backwell in the Regulation 18 Plan. The allocation East of Backwell was fundamentally wrong for a number of planning reasons, including conflict with the spatial strategy, conflict with the sequential approach to site selection that the Council set for itself, and with no justification arising from the SA of individual sites. It was not even justified by the delivery of new highway infrastructure since, by the Council's own admission in the Regulation 18 evidence base, the merits of a route to the east or the west of Backwell had not been determined. The removal of an allocation in the Regulation 18 Plan that was demonstrably unsound and is unlikely to have survived examination, and to then seek to justify not meeting local needs since the Council in no longer required to turn to sites in the Green Belt to meet its housing needs, is insufficient justification. Particularly so when the evidence, from both past plan-making33, and the current one, confirms that there are alternative options available that actually perform better through the SA and are consistent with the spatial strategy. The Council are now seeking to argue that infrastructure constraints preclude further growth at Nailsea, and are therefore downgrading its growth to a level at which it will not perform its intended role in the spatial strategy. However, it confidently promoted a much larger scale of strategic growth at Nailsea, accompanied by much more extensive new strategic highway infrastructure, at the Examination into the JSP. Moreover, at the Regulation 18 Plan stage, it was confident a new railway crossing to the A370 at Backwell could be delivered, the only issue being whether it should route to the east through the Green Belt, or to the west as proposed in the JSP thus avoiding the Green Belt. To the extent that there are infrastructure constraints, it is a result of a lack of proactivity in seeking to resolve them, first, in the interim period since the JSP was withdrawn, and more recently, since the expiry of the consultation period on the Regulation 18 Plan. The publication of the draft proposed changes to the NPPF caused a pause in plan-making, and it is evident that the Council now perceives there to be a soft landing that avoids difficult decisions and proactivity in procuring infrastructure solutions. The alleged infrastructure constraints on further strategic growth at Nailsea now appear to be relied upon to support the Council's ambition not to meet the housing requirement that derives from the standard method. They were not mooted either through the JSP or at Regulation 18 Plan stage, and have only emerged following the publication of the proposed draft changes to the NPPF with its inference (not confirmed in the final version) that local planning authorities were not obligated to adopt the housing requirement set by the standard method, or to take land from the Green Belt where alternative options are not available. There are alternative options at Nailsea which are a better fit with the spatial strategy and sequential approach to site selection that the Council has set for itself, that will enable the Council to get much closer to meeting the housing needs that emerge from the standard method, and do not involve land-take from the Green Belt. There is no evidence that the necessary supporting infrastructure cannot be delivered, and which a larger scale of growth than that provided through the Regulation 18 Plan can assist with. Moreover, the evidence of the Transport Technical Note accompanying these representations is that a significantly greater quantum of growth can now be accommodated without giving rise to greater impacts on Backwell Crossroads than considered acceptable by the Secretary of State in allowing the Appeal on the North of Youngwood Lane site. [See attached full representation for continued]			
Policy LP3: Strategic location: Nailsea and	No	• Positively prepared	No	No				Annexes_final_composite.pdf

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Backwell		• Justified • Effective • Consistent with national policy						
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	For the reasons identified in earlier representations, it is inappropriate to combine Nailsea and Backwell as a single strategic location, and which has accounted for the allocation of a disproportionate scale of growth to Backwell, which is a village settlement. There is considerable potential for additional growth at Nailsea, in locations outside the Green Belt, and which can contribute to infrastructure enhancements.	• Amend the policy to exclude Backwell from this strategic location. • Amend Schedule 1 to redistribute growth from Backwell to South West Nailsea. • Review Schedule 1 to afford priority to growth at South West Nailsea ahead of Green Belt locations at North and North East Nailsea, in accordance with sequential approach that underpins the spatial strategy.		Annexes_final_composite.pdf
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No		Amend the policy to confirm that any growth in this location will be exclusively to meet unmet needs arising from within Bristol City, and will not contribute towards meeting North Somerset's needs.		Annexes_final_composite.pdf
Policy LP5: Housing, employment and mixed use allocations	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	For reasons that are set out in the foregoing representations, the proposed allocations will not deliver the housing that is needed during the Plan period, or plan led growth in accordance with the spatial strategy. With particular regard to Nailsea, five of the seven sites that are proposed for allocation in the Plan are subject to extant planning permissions. These sites account for 598 of the 701 dwellings (85%) comprising the allocated capacity at Nailsea. Moreover, only one of those sites (14 dwellings on Land east of Youngwood Lane) is a proposed new allocation, the remainder having been carried forward from the Site Allocations Plan that covers the period to 2026. It is arguable that the sites the subject of extant planning permissions should not be allocated in the current plan since there they are not plan-led growth that can be influenced by it. The only proposed allocation that is not the subject of an extant planning permission (Land at North West	• Allocate land at Batten's Farm (between the proposed allocations / commitments at Youngwood Lane and West of Engine Lane) for up to 200 dwellings; • Consider the potential for additional land to		Annexes_final_composite.pdf

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					Nailsea) is also carried forward from the Site Allocations Plan, albeit much reduced in area and scale from the 450 dwellings that were previously proposed. Moreover, the site has been allocated in several previous Development Plan Documents, but has failed to come forward. The distillation of all of the above is that there is only one new site proposed for allocation at Nailsea that is not carried forward from the Site Allocations Plan, comprising the Land East of Youngwood Lane with a capacity of 14 dwellings, and even that site is already a commitment through an extant planning permission. This means that 98% of the allocated capacity in the current plan was intended to meet housing needs at Nailsea in the period to 2026. Moreover, given that the site at North-West Nailsea that is carried forward from the Site Allocations Plan has been reduced in capacity from 450 to 75 dwellings, and in any event was intended to meet housing needs at Nailsea during several earlier plan periods, this means that the undelivered capacity in the period to 2026 is 375 dwellings greater than foreshadowed in Schedule 2. As is evident from the above, the new Plan-led growth at Nailsea during the Regulation 19 Plan period to 2039 will be negligible. It is clearly not performing its intended role in accordance with the spatial strategy. It follows that there is an urgent and compelling need to allocate additional housing land at Nailsea to meet housing needs during the current plan period to 2039. In the foregoing representations SMD has cited the potential for significant unconstrained growth to the south-west of Nailsea, which is not within the Green Belt, or subject to flooding, is not designated landscape or subject to other environmental constraints designations. The potential has previously been acknowledged by the Council through the JSP and an earlier Local Plan Options Document. Through their representations to the Regulation 18 Plan, SMD presented their vision for a new neighbourhood of circa 600 homes that represents the next logical phase in the evolution of the town, will provide the missing link between the committed housing sites to the West of Engine Lane and North of Youngwood Lane36, and provide a coherent urban extension to the south-west of the existing urban area37. That vision document, which now forms part of the Council's evidence base, demonstrated the potential for a phased development, with the first phase providing connectivity between the committed sites to the north and east. An application for a standalone first phase of development for up to 200 homes has now been made38. The assessments accompanying that application confirm that the scale of development proposed can be accommodated without unacceptable environmental impacts, and without the requirement for significant new off-site highway or other infrastructure. They also confirm the position alluded to in the foregoing representations that the site is well placed to benefit from the enhancements in sustainable transport infrastructure that will be delivered in conjunction with the ongoing development of the site to the east (Land North of Youngwood Lane), in conjunction with which a substantial financial contribution is payable to the Council for enhancements to the existing bridleway in an easterly direction towards the town centre and via Backwell Lakes towards the Station. If this potential is taken into account through the SA, then it is likely that its sustainability score will be comparable with the allocated site North of Youngwood Lane. A site location plan for the Phase I site is included at Annex 1 to these representations. Given the compelling need for additional sites to deliver additional homes at Nailsea during the current Plan period to 2026, and to enable the town to perform its intended strategic role as identified in the spatial strategy, the site should be allocated in the current plan. The site can deliver homes quickly, and in that regard contribute to alleviating the Council's position in relation to its five year supply of deliverable housing land, which has long been, and continues to be, problematic. Given that all of the existing allocated capacity at Nailsea is committed, it is already factored into the housing land supply assessment, and will therefore make little, if any, contribution towards improving it. Moreover, consideration should be given to the potential of the wider site39,as demonstrated through the submitted vision document for Batten's Farm, to come forward as a second phase later in the plan period. Additional planned growth is essential to meet needs in the period 2026-2039 (given that current allocations are intended to meet needs in the period to 2026), and to enable Nailsea to achieve its intended strategic role.	the south west of Nailsea to deliver homes later in the Plan period, to meet current plan period needs, and to enable Nailsea to fulfil its intended strategic role.		

Name: Miller Homes (Locking Parklands) **I.D:** 64415137

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SP1: Sustainable Development	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No		The provisions of the Plan do not comply with the definition of sustainable development that it has set for itself since it fails to contribute to meeting the substantial unmet housing needs arising from within the neighbouring urban area of Bristol. Furthermore, through failing to uphold the spatial strategy it will fail to prioritise sustainable modes of travel and therefore fail to respond to the imperatives of climate change, and result in the unnecessary and unjustified release of land from the Green Belt. For reasons that are set out in later representations, the provisions of the Plan do not comply with the definition of sustainable development that it has set for itself. In particular: • They fail to support the delivery of a sufficient variety and choice of housing, including specialist and affordable housing, to meet local needs. In particular, the Plan fails to contribute to meeting the substantial unmet housing needs arising from within the neighbouring urban area of Bristol. Housing needs transcend administrative boundaries, and the latter are no justification for not planning positively to ensure that they are met in full to ensure that everyone has the opportunity to secure a decent home. • The provisions of the Plan also fail to comply with the spatial strategy that it has set for itself to guide the location of development, and in particular to prioritise growth at the most sustainable settlements and in locations outside the Green Belt. • Since the Plan will fail to uphold the spatial strategy through both the quantum and distribution of housing growth that it is proposing, it will fail to prioritise walking and cycling, maximise the use of effective public transport, encourage the creation of liveable neighbourhoods and avoid adverse environmental impacts. For this reason it will also fail to make a positive contribution to addressing and demonstrating resilience to the impact of climate change and delivering the net zero target. The justification for Policy SP1 states as follows: The presumption in favour of sustainable development is at the heart of the NPPF and relates to both plan making and decision-taking. The planning system must contribute to the achievement of sustainable development. This Local Plan acknowledges this important national policy requirement. … The policy reflects the plan's vision and strategic priorities and sets out the overall framework for the other policies in the plan, with the detailed requirements contained elsewhere. It sets out at a high level what sustainable development means in North Somerset. These principles are then articulated in more detail in the other strategic policies, with further guidance set out in the locational and detailed development policies.(1) Since, for the reasons set out in these representations, the Plan will fail to achieve the fundamental and overarching requirement to deliver sustainable development, and therefore to comply with the strategic policy that underpins all of its provisions, it is unsound when assessed against each and every soundness test. Changes Sought Policy SP1 • Incorporate in the Plan the changes sought to Policy SP		Representations_final.pdf
SP3: Spatial strategy	No	• Positively prepared • Justified • Effective	No	No		The provisions of the plan do not afford priority to locating new residential development in, or close to, urban areas and such locations outside the Green Belt. On the contrary they distribute a disproportionate amount of development to the villages and rural areas, including Green Belt locations, in direct conflict with the strategic intentions and objectives of the spatial strategy.		Representations_final.pdf

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		• Consistent with national policy				Issue • Whether the provisions of the Plan will deliver the Spatial Strategy For reasons that are set out in later representations, the provisions of the Plan do not afford priority to locating new residential and mixed use development in or close to urban areas where there is an existing or proposed wide range of facilities, services and jobs, and there are opportunities to encourage active travel. On the contrary, it distributes a disproportionate amount of development to the 'villages and rural areas' that does not reflect local community needs, in direct conflict with the strategic intentions and objectives of the spatial strategy. Furthermore, the provisions of the spatial strategy fail to prioritise development at sustainable locations outside the Green Belt, and therefore to uphold the sequential approach to site selection that it has set for itself. For the foregoing reasons that will be substantiated through these representations as a whole, the provisions of the Plan will not deliver the spatial strategy it has set for itself, and istherefore unsound. Changes Sought Policy SP3 • Review, and adjust, the distribution of housing growth between the 'towns' and 'villages and rural areas' locations.• Review and prioritise housing growth at the towns on land outside the Green Belt in accordance with the sequential approach to site selection that underpins the spatial strategy.		
SP5: Towns	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No		The policy requires amending to acknowledge the need for development outwith settlement boundaries in order to deliver the needs for housing in full. Whether the provisions of Policy SP5 are compatible with delivering the Spatial Strategy Soundness Test(s) • Positively Prepared • Justified • Effective • Consistent with National Policy Policy SP5 endorses the role of the four towns within North Somerset as the foundations for delivering the spatial strategy due to their being the most sustainable locations, and therefore, sequentially, they are the first places to consider for future development. However, the policy refers only to support for proposals for new development 'within the settlement boundaries'. It is clear that, in order to deliver the needs for housing and mixed use Development in full, development beyond the existing settlement boundaries of the towns will be necessary. Moreover, as currently worded, Policy SP5 is inconsistent with Policy SP3, which affords priority for new residential and mixed use development in 'or close to' urban areas. The wording of Policy SP5 should therefore be amended to provide support for development 'at' the towns, both 'within and adjacent to the existing settlement boundaries'. Changes Sought Policy SP5 • Amend the wording of Policy SP5 to support proposals for new development 'at' Weston-super-Mare (including the Weston Villages), Clevedon, Nailsea and Portishead, and to delete the words 'within the settlement boundaries of'		Representations_final.pdf
SP7: Green Belt	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No		Exceptional circumstances have not been demonstrated to justify the release of land fromthe Green Belt ahead of suitable alternatives at the main towns. Release of land from the Green Belt is only justified to meet unmet housing needs arising from the adjacent City of Bristol, for which the Plan is not currently making any provisions. Issue • Whether exceptional circumstances have been demonstrated to justify releasing land from the Green Belt Soundness Test(s) • Positively Prepared • Justified		

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						• Effective • Consistent with National Policy 2.9 For the reasons set out in these representations, exceptional circumstances have not been demonstrated to justify the release of land from the Green Belt, and in particular the sites that it is proposed to allocate for housing development at Woodspring (South West of Bristol) and Pill / Easton-in-Gordano, which should only be released to meet unmet needs arising from Bristol City Council, and those at Nailsea / Backwell, where reasonable alternative non- Green Belt sites are available that should be afforded priority in accordance with the spatial strategy and the sequential approach to site selection by which it is underpinned. Changes Sought Policy SP7 • Remove reference to Land at Woodspring, Pill / Easton-in- Gordano and Land at Nailsea / Backwell from the list of land to be released from the Green Belt.		
SP8: Housing						Issue • Whether the Plan is seeking to provide a sufficient amount of housing • Notwithstanding, and without prejudice to, the foregoing, whether the broad distribution of housing proposed in the Plan is in accordance with the spatial strategy Soundness Test(s) • Positively Prepared • Justified • Effective • Consistent with National Policy Overall Housing Provision The Council's acceptance on this occasion that it must plan to meet the local housing need deriving from the standard method is welcomed. It is also noted that, whereas in the previous Regulation 19 Plan, the Council sought to argue that environmental constraints precluded it from planning to meet the full local housing need, they also seem to have abandoned that position notwithstanding that the revised standard method has resulted in a substantial escalation in the number of homes for which the current Regulation 19 Plan must make provision. It therefore appears that the environmental factors are not as 'constraining' as the Council previously sought to argue. Notwithstanding the foregoing, the housing need deriving from the standard method is a minimum requirement that must be delivered during the plan period. To ensure that it is 'met', the Council should therefore be planning to exceed the minimum figure to allow for implementation nd delivery failures. That is particularly so given the evidence in North Somerset of slow delivery of strategic sites that have failed to keep pace with the Council's delivery trajectories. Moreover, as will be addressed in later representations, the allocations in the Plan include sites that have been allocated in successive Development Plans for over 25 years, yet have still failed to come forward for development (for example, Land at North West Nailsea). The Plan should therefore incorporate a contingency, and a minimum of 15% would seem to be prudent in the current circumstances, equating to an additional 3,555 dwellings. It is significant that, through the draft West of England Joint Spatial Plan (JSP) that was submitted for Examination in April 2019, North Somerset Council did not seek to argue that there were environmental constraints on it accommodating the level of housing growth that was proposed in that plan, and which was equivalent to the level that currently derives from the national standard method. Moreover, in planning to meet the requirement that was set for it though the JSP, no land in the Green Belt was planned for allocation in North Somerset confirming that there are suitable non-Green Belt options for accommodating the scale of housing need for which the current plan must provide which accord with the sequential approach in the spatial strategy that		

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						it has set for itself. Whilst the JSP subsequently stalled at Examination stage and was ultimately withdrawn, it is relevant in that the Council did not seek to argue that there were environmental constraints on it meeting the requirements for growth, and without necessitating the use of Green Belt land. For reasons that are set out in these representations, there are suitable alternatives sites at the main towns and outside the Green Belt that can contribute to meeting overall housing needs in accordance with the Plan's spatial priorities. Unmet Needs from Adjacent Local Authority Area Through the JSP North Somerset accepted the obligation to make provision for unmet needs arising within the adjacent administrative area of Bristol City Council. Even on the basis of their own 'self-assessment', Bristol City Council have an unmet need of circa 10,000 homes, and up to 15,000 taking the standard method as the starting point. This, alone, is compelling reason and justification for uplifting the housing requirement for North Somerset above the Standard Method figure. Bristol's own evidence points to a greater proportionate need for houses (rather than apartments) than they have historically delivered. Given the highly urbanised nature of Bristol that has largely been developed to its limits given the tight Green Belt constraints around its boundaries, this can only realistically be achieved around the fringes of the city in areas more suited to medium and lower density housing. It is reliant on the adjacent authorities, and in particular North Somerset and South Gloucestershire, to deliver an appropriate number and mix of homes. There are sound planning reasons for the neighbouring authorities to Bristol to work collaboratively to meet the needs of the greater Bristol area. That was the essential purpose of the strategic planning measures that were put in place through the West of England JSP. The collapse of those arrangements does not expunge the need to provide the homes that the strategic vehicle was intended to deliver, or the obligation on the neighbouring authorities to work collaboratively and effectively to provide for them. There is no compelling evidence to confirm that the Duty to Co-operate has been effective in terms of meeting Bristol's unmet needs, and therefore that it has been satisfactorily discharged. The Statement of Compliance outlines a degree of consultation, but no 'effective and on-going joint working'3 that has actually delivered on accommodating the unmet housing needs. Through the Statement of Compliance it is acknowledged that Bristol City Council has requested that neighbouring authorities assist with accommodating some of its unmet needs. However, this is rejected on the following basis: The evidence supporting the local plan demonstrates that North Somerset does not have the capacity to meet some of Bristol's needs at this time(4). The Council is therefore once again falling back on a capacity argument that it previously relied on to justify not planning to meet the much lower housing need deriving from the previous standard method. However, it now appears that that position was unfounded and unjustified. The available evidence, that will be considered further in later representations, indicates that there are additional suitable and sustainable sites that can contribute to meeting an escalated housing requirement to contribute to meeting Bristol's unmet needs. Those sites include sites that are part of the wider Weston-super-Mare urban area, and land at south west Nailsea that was the preferred growth location in the JSP. For the foregoing reasons it is considered that the Duty to Co-operate has not been satisfactorily discharged in that there has not been 'effective' joint-working between the Council and Bristol City Council to accommodate the latter's unmet housing needs. The evidence does not support the Council's contention that it does not have the capacity to meet some of Bristol's needs given that there are additional opportunities for meeting North Somerset's own needs in accordance with the spatial strategy, that remain available and		

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						are being actively promoted through this Local (Plan. 3 NPPF, para. 26, 4 North Somerset Local Plan, Duty to Co-operate Statement of Compliance, Regulation 19 Stage, October 2025, p.20) For the foregoing reasons the Plan is not considered to be legally compliant. Plan Period 2.23 Notwithstanding, and without prejudice to, the foregoing, as is reflected in the consultation documents, the Government's requirement set out in the NPPF is for strategic policies to look ahead for a minimum period of 15 years from the date of adoption5. However, it is acknowledged that it is good practice to plan for a longer time horizon. In the consultation document6, adoption of the Local Plan is anticipated to be achieved by late 2026. Assuming that this is achieved, then the Plan will barely look ahead for the 'minimum' required period of 15 years. In all likelihood there will be slippage in the progression towards adoption. The assumed adoption date of late 2026 is based on the LDS published in February 2025. However, the timetable that foreshadowed adoption in November 2026 was based on consultation on the Regulation 19 Plan in June 2025, submission to the Secretary of State in October 2025, and Examination Hearings commencing in February 2026. Therefore, there has already been slippage by at least 6 months which, assuming no further delays, means adoption will not be until May / June 2027 at the earliest. The adoption of the Plan even by May / June would seem to be an ambitious target for a Plan of this nature, which has already taken over five years since the initial stage of consultation and has already been through two Regulation 19 iterations. A partial update of the Bath and North East Somerset Local Plan recently took over twelve months to progress through the Examination stage to adoption. The current plan is a much more comprehensive and over-arching review, and inherently more complex, than the former. Research undertaken by David Lock Associates7 based on an analysis of MHCLG data, and derived from evidence relating to 300 Local Plans over the ten year period 2007-2017, found an average time-period of 19 months from submission of a Local Plan for Examination to adoption. Given that this is an average time, there are many that have taken longer, with the research finding that, for several, the time period was 35-45 months. The research also (5 NPPF, para 22 6 North Somerset Local Plan – Pre-Submission Plan (Reg 19), p.5 7 How long does it take to adopt a Local Plan, David Lock Associates, 2018) found that, since 2012, the average has increased from 15 months to 25 months in the context of the demise of regional planning, and the introduction of the NPPF and PPG. As a benchmark, the publication version of North Somerset's Core Strategy was subject to consultation in January 2011 and submitted to the Secretary of State for Examination in July 2011. It was subject to Examination in November- December 2011 and was adopted in April 2012. It therefore took a period of 16 months from publication version to adoption in the first instance. It was subsequently the subject of a successful legal challenge resulting in nine policies being remitted back for re-Examination. The final version was adopted in January 2017, some six years after submission of the initial publication version. It is significant that the Core Strategy was a 'partial' Local Plan, that did not contain either development management policies or non-strategic site allocations, which were to be included in the subsequent Sites and Policies Plan. It is a reasonable assumption that the current Plan, containing a full suite of strategic and non-strategic allocations and Development Management policies, will give rise to a greater range of issues and potentially take longer than the 16 months from publication version to initial adoption of the Core Strategy. Having regard to the complexities of the circumstances in North Somerset, and the issues identified through these representations, it is a reasonable (albeit perhaps 'optimistic') assumption that adoption will not now be until mid to late 2027 at the earliest, and this would only require a very small delay		

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						given the timetable set out. Given the requirement for Local Plans to look ahead over a ‘minimum’ period of 15 years ‘from adoption’, this necessitates a further extension of the plan period to 2042, and possibly 2043. In the light of the above it is necessary to extend the Plan period by at least a year.Accordingly, the plan should include provision for at least an additional year’s housing requirement, and therefore at least 1,600 additional dwellings. Any further slippage, as would seem a distinct possibility given the issues to which the plan and its proposed allocations are likely to give rise, will mean that consideration should be given to including a further year’s housing requirement, and therefore a minimum of 3,200 additional dwellings. Housing Distribution The broad distribution of housing proposed in the Plan will not deliver the spatial strategy, with its priority to locate new residential and mixed use development in or close to urban areas, and to limit development at the villages to local community needs (Policy SP3). The share of housing growth to be distributed to the district’s four towns combined amounts to only 56%. The share to be distributed to the villages and rural areas is assessed to be 12%. However, the distribution set out in Policy SP8 is misleading and inaccurate for the reasons summarised below. First, it fails to disaggregate the proportion of growth between Nailsea and Backwell, which are separate settlements at different tiers and performing very different roles in the spatial strategy, instead treating them as a single entity and assigning the combined growth to the ‘towns’ category. The quantum of housing growth allocated to Backwell (1,683 dwellings) is almost in parity with Nailsea (1,817 dwellings), exceeds that allocated to Portishead, and is almost three times the scale of growth allocated to Clevedon. If Backwell’s quantum of growth is disaggregated from Nailsea, and properly included in the ‘villages and rural areas’ location, then the proportion of growth allocated to the towns falls below 50% (48%), whilst the proportion of growth at the ‘villages and rural areas’ increases to 19%. However, the actual distribution is further obfuscated by identifying Wolvershill (an extension to Banwell), Woodspring and Pill / Easton-in-Gordano as entities apart from the settlement hierarchy, rather than as what they really are, which is part of the ‘villages and rural areas’ location. If they are properly included in the latter, then the proportion of growth in the ‘villages and rural areas’ location increases to over 51%. 2.37 It is clear from this proposed distribution that, apart from Weston-super-Mare, the other three towns are punching well below their weight and not performing their intended roles in the spatial strategy as the most sustainable, and therefore priority, locations for growth. By way of comparison, in the adopted Core Strategy, which was underpinned by a similar spatial strategy to the Regulation 19 Plan, the distribution to Weston-super Mare (including the Weston Villages) and the other three main towns equated to 85% of the overall housing growth(8). As is acknowledged in the evidence base documents: The strategy focuses most new growth in locations that are in, or well-related to, existing centres. This is the most effective and efficient way of utilising and enhancing existing services and infrastructure and delivering new provision, alongside ensuring that the carbon impact of the proposed growth is minimised compared to more dispersed approaches to distributing development.(9). This reflects national policy and guidance, which seek to deliver sustainable patterns of development by ensuring that priority is given to development at towns and urban areas (focused first on brownfield sites), followed by the larger more sustainable villages. This provides an appropriate overall framework, acknowledging that there must still be a mix of different sizes and types of sites to ensure delivery.(10). There would therefore seem to be a disconnect between the strategy focus set out in the evidence base documents, and the distribution of growth identified in Policy SP8. That disconnect is obfuscated by introducing growth ‘locations’		

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						that have no locus in the settlement hierarchy. The Spatial Strategy Site Selection and Capacity Paper provides little more than a schedule of the sites selected for development, and provides little assistance with understanding alternatives that were considered and the reasons for their rejection. It therefore provides little justification for the distribution of development contained in Policy SP8. Focusing Growth at Weston-super-Mare The failure to allocate the Moss II land illustrates how the allocation and distribution of development is inconsistent with the spatial strategy and the sequential approach that the Council has set for itself. (8 North Somerset Core Strategy, January 2017, Policy CS14 9 Spatial Strategy and Site Selection Capacity Paper, October 2025, para. 2.3 10 Ibid, para. 2.3) In accordance with Policy SP3, the site is, at worst, 'close to' an urban area where there is both an existing and proposed wide range of facilities, services and jobs, and there are opportunities to encourage active and sustainable travel. As is evident from the previous Regulation 19 representations submitted on behalf of SM and included at Annex 1 to the current representations, the Moss II land is fully compliant with the spatial strategy set out in Policy SP3. It will maximise the potential of land at the principal urban area of Weston super- Mare, consolidating the key strategic development location of Locking Parklands, which is being delivered as a sustainable, integrated and connected new community as an urban village extension to the town. As set out in previous representations: … the extensive infrastructure commitments that are being delivered at Parklands Village comprising social, physical, educational, green and blue infrastructure offer significant opportunities to ensure that development is delivered sustainably and in accordance with the Council's clear aspirations as expressed via emerging Policy SP3. In this regard, every opportunity should be taken via the development strategy to maximise the potential of existing committed sites (notably the Weston Villages where commitments to placemaking and infrastructure delivery are in place) and to build upon the policy approach that has already been subject to examination and thorough testing (including via legal challenges). It is incumbent on the Council to ensure that every available opportunity is taken to build upon and supplement the development potential of the Weston Villages through the review of the development plan as an ongoing commitment to sustainable placemaking.(11). The Moss II land could supplement the existing masterplan through a logical and cohesive addition to the overall settlement that is being developed, without compromising other development objectives that are being consulted upon. …(12) Expanding the capacity of Parklands Village would be entirely consistent with national policy which confirms that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Parklands Village is optimally located as an urban extension in relation to the district's largest settlement, and has been (11 See Annex. 1, Representations on behalf of SM to North Somerset Regulation 19 Additional Sites Consultation, February 2025, para. 27 12 Ibid, para. 28) comprehensively planned to be supported by necessary infrastructure and facilities. It is therefore in accordance with the precepts of good planning to capitalise upon the substantial investment in infrastructure and facilities through maximising the scale of development that can benefit from it. Opportunities such as that represented by the Moss II land would equate to Step 3 of the sequential approach to the identification of potential site allocations as set out in the evidence base13, and would arguably amount to 'urban intensification' (Step 2). They are therefore a priority ahead of development at the larger more sustainable villages outside the Green Belt, and of sites in the Green Belt at the main towns and sustainable villages. It is		

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						therefore a preferred location compared with many of the allocated sites in the Plan. If sequentially preferable opportunities such as that represented by the Moss II land are to be overlooked, then there must be clear justification for not following the spatial hierarchy and strategy. It is understood that the Moss II land was discounted from further consideration in the SHLAA for two principal reasons, those being that it is in Flood Zone 3 due to risk of tidal flooding and in a strategic gap14. However, given the scale of housing growth that the district must now accommodate, and the need to deliver it in sustainable locations in accordance with the spatial strategy, neither of these reasons is considered to be sufficient justification for discounting sustainable housing development opportunities of this nature. Each of these issues will be considered briefly below. Flood Risk Much of the existing urban area of Weston-super-Mare is at risk of tidal and / or fluvial flooding, including areas of the Weston Villages. Nevertheless, in order to accommodate growth in the most sustainable location at the district's main town, a comprehensive flood management solution has been conceived and agreed in close collaboration with the Council and the Environment Agency to protect the Weston Villages15. The mitigation strategy incorporates a combination of strategic protection measures (including a flood storage area either side of the Cross Rhyne forming areas of wetland and open water lake), together with (13 Spatial Strategy, Site Selection and Capacity Paper, October 2025, para. 4.4 14 North Somerset Strategic Housing Land Availability Assessment Main Report, October 2025, paras 6.1-6.3 and Figure 3 15 See Weston Villages SPD, June 2012, paras. 2.26 – 2.33) on-site measures. In conjunction with their representations to the earlier Regulation 19 consultation, SM submitted a preliminary flood risk and drainage appraisal which demonstrated that, through ground reprofiling within the site, it can be demonstrated that the proposed development would be safe for its lifetime whilst not generating any off-site detriment. The Weston Villages were conceived and allocated under a similar spatial strategy approach to focus growth at the district's main towns, and in particular at Weston-super-Mare, and in the context of national policy relating to flood risk that sought to steer vulnerable development to areas of lower risk, as far as possible. It was previously accepted that, in order to deliver growth in accordance with this sustainable strategy, it was necessary to accommodate it in areas at risk of flooding at Weston-super-Mare. Nothing has materially changed in this respect since the strategy remains to focus growth to meet what is now an escalated scale of housing need at the towns, and with a priority to accommodate it at Weston-super-Mare as the top tier settlement in the hierarchy. Given these circumstances, then suitable opportunities that can capitalise upon the substantial investment in the strategic flood mitigation measures (and other infrastructure) that have already been made, to maximise growth in the most sustainable locations in the district, should be considered favourably where it can be demonstrated that it would be safe for its lifetime. The Council has not subjected the Moss II land to appropriate scrutiny since it is understood that it was rejected without being taken forward for further consideration. The Council's approach is also inconsistent since it is allocating sites elsewhere within the urban area of Weston-super-Mare that are in flood risk zones, and in other locations, including Land West of Hutton and nearby Elm Grove Nursery at Locking. Whilst some, but not all, of the sites may occupy Step 1 of the sequential approach, all potential opportunities in Steps 2/3 should be given due consideration ahead of those in steps 4-6 if the spatial strategy is to be delivered. The fact that sites such as Moss II have been discarded without due consideration means that the Council has not followed the approach that it has set for itself, and which is putting the spatial strategy at risk as is evident from the distribution of development in which the majority		

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						share is being directed to locations other than the main towns. It is germane that, since the Regulation 18 consultation stage, the Council's sequential approach has been reduced from seven to six steps. Step 6 previously related to 'other opportunities' which included 'sites well related to urban areas but which are located in flood zone 2/3a'16. This meant that sites at 'other sustainable settlements' (Step 4) and 'rural areas' (Step 5) were sequentially preferable. However, the removal of the former Step 6 means that all sites that are 'well related to towns and urban areas outside the Green Belt', including those in flood risk zones, categorise as Step 3 sites and are therefore sequentially preferable to 'sites well related to larger more sustainable villages' and all Green Belt sites. In the recent Appeal decision relating to Land at Rectory Farm (North) Chescombe Road, Yatton17, the Inspector acknowledged the necessity to allocate some sites that are at risk of flooding to meet the housing needs of the district, as reflected in the 18 proposed housing allocations that were identified in the previous Regulation 19 Plan that were at risk of tidal flooding. Whilst he held that there were sequentially preferable sites available, drawing on a decision in the High Court18, he did not consider the failure to comply with the sequential test was fatal since there were wider sustainability benefits that outweighed the flood risk and it had been demonstrated that the proposed development would be safe for its lifetime. This decision of the Inspector in the Yatton Appeal has been endorsed very recently by another Inspector in determining an Appeal relating to the Police Maintenance Depot, Stuart Road, Weston-super-Mare19. In that case the Inspector found that the proposals failed the sequential test since there were alternative sites available since there were reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. However, she was satisfied that development on the Appeal site could be made safe for its lifetime without increasing the flood risk elsewhere. For this reason she concluded that failure to satisfy the sequential test did not provide a strong reason for refusal such as to disengage the tilted balance. She found that the benefits of the proposals, including increased housing delivery at the district's main settlement, outweighed any adverse impacts of the proposals.(16 North Somerset Local Plan 2038, Spatial Strategy and Capacity, February 2022, para. 47, 17 Appeal ref. APP/D0121/W/24/3343144, 18 Mead Realisations Ltd v SoS LUHC [2024] EWHC Civ 32 19 Appeal ref. APP/D0121/W/25/3365348, DL, 1 December 2025 – see paras. 12 and 36 in particular. The allocations in the current Regulation 19 Plan to meet the escalated housing requirement deriving from the revised standard method, confirm that it is necessary to continue to allocate sites in areas at risk of flooding in order to deliver the homes that are required in sustainable locations. Having regard to the findings of the Inspector in the Yatton decision, the Council has therefore erred in its approach to reject without due consideration sites at the most sustainable location of Weston-super-Mare, which are sequentially preferable in terms of the spatial strategy, particularly in the context of the scale of housing growth that it is having to accommodate in less sustainable locations. 2.53 The weight of sustainability benefits pertaining to the Moss II land in a location that is a priority focus for housing growth, is greater than at Yatton which is at Step 4 of the search sequence. This accentuates the justification for allocation of sites in flood risk zones at Weston-super-Mare compared with a lower order settlement such as Yatton. For reasons outlined in earlier representations there is a need to allocate significant additional land in order both to accommodate an extended plan period and to meet needs arising from Bristol City Council. Moreover, as is confirmed in the Yatton decision, the Council's five year supply of deliverable housing land is currently well below the minimum requirement, and to which many of the strategic allocations that are being made in the Regulation 19 Plan are unlikely to contribute to alleviating given the lead-in times before			

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						they are likely to deliver homes ready for 26 occupationn. 2.55 Given all of these factors, and the current distribution of growth that does not uphold the spatial strategy priority focus on existing towns, there is a need to allocate smaller, immediately deliverable sites at Weston-super-Mare, which inevitably means giving consideration to locations that are at risk of flooding. The Moss II land is an example of an immediately deliverable site that can capitalise upon the substantial investment in strategic flood mitigation measures that has already been made, and which can be demonstrated to be safe for its lifetime. It follows that the Council's approach to automatically exclude from further consideration the Moss II land and similar sites on the basis of flood risk is both flawed and inconsistent. It is demonstrably a threat, and prejudicial, to the distribution of growth in accordance with the settlement hierarchy and spatial strategy. Strategic Gaps First, the automatic exclusion from further assessment of some sites, such as the Moss II land, on the basis that they are included in a strategic gap is incorrect and inconsistent. The Council has tacitly accepted that it is necessary and appropriate to remove land from the strategic gaps in order to deliver growth in accordance with the settlement hierarchy and spatial strategy. The nearest example to the Moss II land is the proposed allocation at Elm rove, Locking. Other examples include the proposed allocation on land south of Nailsea. In allocating the site at Elm Grove Nursery the Council has clearly found that circumstances have materially changed to justify departing from the findings of the Appeal Inspector who, in dismissing an Appeal relating to the land in December 2019, held that the scheme would have an unacceptable effect on the function and openness of the strategic gap20. Following consistent approach, there is now no justification for continuing to resist residential development on the Moss II Land, which forms part of a much more expansive gap than the land at Elm Grove Nursery. It is wholly inconsistent to have excluded the Moss II land from further consideration through the SHLAA in the basis that it is included in a strategic gap, whilst not only taking the Elm Grove Nursery site forward for consideration, but now including it as draft allocation in the Plan, contrary to the previous Appeal decision. The Council's approach to automatically exclude sites from further consideration through the SHLAA on the basis that they are in a strategic gap is therefore flawed. That is particularly so where sites are at, or close to, the principal settlements in the hierarchy. In the case of the Moss II land, the Landscape Technical Note accompanying SM's representations to the earlier Regulation 19 consultation confirms that the site can be developed without fundamentally compromising the purposes and function of the strategic gap between Locking and Weston-super-Mare21. The gap between the Moss II land, and the urban edge of Weston-super-Mare to the north contained by the A370 would remain substantially greater (20 Appeal ref. APP/D0121/W/19/ 3229938, DL, para. 36 21 See Annex 1 to the current representations than the residual gap between Locking Parklands and the southern edge of the urban area to the north east). More fundamentally, there is an issue relating to the appropriateness of continuing with the strategic gap designations at all, and whether it is consistent with the NPPF. This is dealt with in representations relating to Policy LP10. However, at a time when the Government has introduced changes to national policy relating to Green Belts, which is the most stringent of all restraint designations, to facilitate its objective to significantly boost housing delivery and at sustainable locations, it would seem unjustifiable, and inherently wrong, to maintain designations that effectively impose a blanket restraint on development at some of the most sustainable locations that is more restrictive than Green Belt policies. At the very least, it would seem rational that the strategic gaps, which have no locus in national policy, should		

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						yield to enable growth to be accommodated at sustainable locations ahead of adjustments to Green Belt boundaries which require justification by exceptional circumstances. Five Year Housing Land Supply In accordance with national policy, planning policies are required to identify a supply of specific deliverable sites for years one to five of the plan period 22. Moreover, the Plan should identify a supply of land well beyond five years.23 The Plan does not incorporate a delivery trajectory that makes transparent how this supply is to be met. As such, it does not comply with this requirement of national policy. Changes Sought Policy SP8 • Amend the Plan to meet the minimum housing need of 25,300 homes (1,600 per annum) for the period 2026-2042. • Add a minimum additional requirement of 1,600 homes to allow for the Plan to look ahead at least 15 years from the date of adoption. (22 NPPF, September 2023, para. 68, 23 Ibid, para 69 • Review the requirement to meet a proportion of Bristol City's unmet housing needs and include the requirement in the overall housing quantum to be delivered during the Plan period. • Remove Woodspring, Wolvershill and Pill / Easton-in-Gordano as separate locations in the schedule incorporated in the Policy, and which is inconsistent with other strategic policies, and apportion the growth to the 'Villages and Rural Areas' location. • Review the apportionment of growth to meet North Somerset's needs between the 'towns' and 'villages and rural areas' locations, and revise the distribution to a ratio of 80:20 to deliver the intentions of the spatial strategy. • Review the apportionment of growth to Green Belt locations. • Increase the distribution to the towns, and in particular the allocation of small to medium size sites at Weston-super-Mare (including the Weston Villages) that can deliver homes quickly and therefore contribute to the five year supply of deliverable housing land, to provide homes for needs arising during the current plan post-2027. • Delete sites with planning permission from the site allocations. • Incorporate a delivery trajectory to identify a supply of specific, deliverable sites for years one to five of the plan period.		
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No		Issue • Whether it is appropriate to categorise Nailsea and Backwell as a strategic location given that they are separate settlements which have differing status in the settlement hierarchy and are intended to perform different strategic roles Soundness Test(s) • Positively Prepared • Justified • Effective • Consistent with National Policy 3.3 For the reasons identified in earlier representations, it is inappropriate to combine Nailsea and Backwell as a single strategic location, and which has accounted for the allocation of a disproportionate scale of growth to Backwell, which is a village settlement. 3.4 There is considerable potential for additional growth at Weston-super-Mare and Nailsea, in locations outside the Green Belt, and which can contribute to infrastructure enhancements. Changes Sought Policy LP3 • Amend the policy to exclude Backwell form this strategic location. • Amend		

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						Schedule 1 to redistribute growth from Backwell to Nailsea and Weston-super-Mare • Review Schedule 1 to afford priority to growth on medium sized sites at Weston-super-Mare that are well related to the existing urban area, including the Weston Villages, ahead of Green Belt locations in accordance with sequential approach that underpins the spatial strategy.		
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	Policy LP4: Strategic Location: Pill and Easton-in-Gordano Issue • Whether the allocation of this strategic location is in accordance with the spatial strategy and exceptional circumstances existing to justify its removal from the Green Belt. Soundness Test(s) • Positively Prepared • Justified • Effective • Consistent with National Policy 3.5 For the reasons identified in earlier representations, if land is to be allocated in this location it should be to meet Bristol City's unmet needs, for which the plan does not currently make provision. 3.6 Allocation to meet North Somerset's needs would be inconsistent with the spatial strategy and the sequential approach to site selection by which it is underpinned. Moreover, there are suitable alternatives to meet North Somerset's needs in accordance with the spatial strategy, including at Nailsea and Weston-super-Mare.	Changes Sought for Policy LP4: Amend the policy to confirm that any growth in this location will be exclusively to meet unmet needs arising from within Bristol City, and will not contribute towards meeting North Somerset's needs.		
Policy LP5: Housing, employment and mixed use allocations	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	For reasons that are set out in the foregoing representations, the proposed allocations will not result in sufficient plan led growth in accordance with the spatial strategy. With particular regard to Weston-super-Mare, a significant quantum of the identified growth is already committed through either extant planning permissions or sites carried forward from previous plan periods. Moreover, the town is not fulfilling its strategic role as a priority focus for the district's growth, nor is growth allocated in accordance with the sequential approach which accords priority to non-Green Belt locations. There are reasonable alternative, non- Green Belt opportunities at Weston-super-Mare, in particular small and medium size sites that can deliver homes quickly	Changes Sought Policy LP5 / Schedule 1 • Allocate the Moss II Land at Locking Parklands for up to 150 dwellings • Remove sites with extant planning permissions from Schedule 1 and the Policies Map		

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					and contribute to mitigating the deficiency in the five year deliverable supply of housing land that have been automatically, and erroneously, excluded from further consideration through the SHLAA on grounds of their location within areas of flood risk and/or strategic gaps. The sites the subject of extant planning permissions should not be allocated in the current plan since there they are not plan-led growth that can be influenced by it. Moreover, sites that have been allocated in previous plan periods, but have not come forward, must be treated with the utmost caution.			
Policy LP10: Strategic gaps	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	Issue • Whether Strategic Gap designations are consistent with national policy and should be continued. • If so, whether adjustments should be made to their boundaries and / or policy wording to provide greater flexibility to accommodate growth in the most sustainable locations in accordance with the spatial strategy Soundness Test(s) • Positively Prepared • Justified • Effective • Consistent with National Policy 3.10 Through Policy LP10, the Council continues to designate strategic gaps as a policy tool to protect the character and separate identity of settlements. This is notwithstanding there being no locus for them in the NPPF, and their being a legacy of a policy approach to protect the countryside for its own sake that was swept away as being inappropriate in the first iteration of the NPPF which superseded the former Planning Policy Guidance Notes. It is inconsistent with the notion of sustainable development, which is underpinned by a criteria based approach to the assessment of development proposals rather than blanket restraint. 3.11 The findings of Inspector Burden following her Examination of the North Somerset Site Allocations Plan were clear and unequivocal, as follows: There is no reference to strategic gaps in the NPPF or in PPG which would provide any national policy basis or advice on their designation or the detailed definition of	Changes Sought Policy LP10 • Delete Policy LP10 from the Plan and remove the Strategic Gap designations from the Policies Map; (28 Spatial Strategy Site Selection and Capacity Paper, October 2025, para. 7.3, p.25) • In the alternative, critically review the spatial extent of the strategic gaps, particularly at Weston-super-Mare, to remove land that can reasonably be developed to deliver housing growth at the most sustainable locations in accordance with the settlement hierarchy / spatial strategy; • In particular, removal of the Moss II land to the north west of Parklands Village which does not make an essential contribution to maintaining separation from the wider urban area of Weston-super-Mare		

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					their boundaries. …(24) There is no national policy for the provision of strategic gaps, or encouragement in Government policy to have such designations. In these circumstances the emerging JSP and new Local Plan would provide the opportunity for the Council to reconsider the principle of continuing with this designation. …25 3.12 The designations are a potential barrier to achieving sustainable development by precluding reasonable Alternatives in the most sustainable locations and preempting the use of Green Belt land ahead of other opportunities. 3.13 The Council's justification for retaining strategic gaps as set out in the background paper contained in the evidence base, is wholly inadequate. Their attempt to justify them on the basis of paragraph 130 of the NPPF26 is wholly unconvincing and simply endorses why they are no longer appropriate. The proper approach is now to test any development proposal against the relevant place-making objectives, including that to ensure adequate protection of local character and identity, 'while not preventing or discouraging appropriate innovation or change'. By their very nature as blanket restraint designations, the policy acts as a brake on appropriate innovation or change. 3.14 In the background paper it is acknowledged that strategic gaps provide a 'stronger dimension' to countryside policies in specific areas27. It is this stronger protection for its own sake that the NPPF sought to sweep away, and which the Council is refusing to accept through an adherence to strategic gaps. The current approach is to consider each case on its merits. If a development proposal can be shown to cause actual harm to character by, for example, diminishing separate identity and sense of place, and that harm is overriding, then there are sufficient safeguards to protect it. If no such actual harm can be demonstrated, or (24 North Somerset Council Sites and Policies Plan Part 2: Site Allocations Plan, Inspector's Report, February 2018, para. 99, 25 Ibid, para. 101 26 Strategic Gaps Background Paper, November 2023, para. 2.3 – now paragraph 135 of the NPPF 27 Ibid, para. 2.2) other material considerations, such as the need to accommodate growth in the most sustainable locations, outweigh it,			

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					then there is no reason to resist the development proposed on that basis. 3.15 The Council correctly acknowledges that strategic gaps have a similar purpose to Green Belts, albeit more localised. However, the fact is that the only blanket countryside restraint designation that has any locus in national policy, is Green Belt. Recognition of strategic gaps and other local designations, which had locus in the former national planning policy set out in Planning Policy Guidance Notes, was removed when they were superseded by the NPPF since they are inconsistent with the concept of sustainable development that was introduced through the latter. 3.16 Construed on their face, strategic gaps are more restrictive than Green Belt policy since the relevant policy provisions do not allow for specific categories of development which are 'not inappropriate', and which the Government has recently extended through the introduction of the concept of 'grey belt' land. The purpose of the latter change is to enable growth where it is needed in sustainable locations where the land in question does not make a 'strong contribution' to the purposes of the designation, and therefore to not restrict development unnecessarily. The strategic gaps are therefore clearly a more onerous constraint than Green Belt which is both counter-intuitive and inherently wrong 3.17 As a matter of principle, the continued designation of strategic gaps and their use as a policy tool to restrict development, is inconsistent with national policy. As such, they should be removed from the submission plan, failing which the Plan risks being found unsound. 3.18 Notwithstanding, and without prejudice to, the foregoing, if the Council proposes to continue with strategic gaps, then they must be substantially reduced in the extent of their application, and to a much greater degree than is currently proposed. Given that the gaps, as currently defined, impose significant restraints on development at the most sustainable locations, and in particular Weston-super-Mare, there is a particular need to reduce the blanket restraint that they impose to an absolute minimum. 3.19 It is noted that, for the purposes of			

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					applying the sequential approach that underpins the spatial strategy, the Elm Grove Nursery site at Locking that it is proposed to allocate for 110 dwellings is categorised a part of ‘wider Weston-super-Mare’, and therefore as town expansion in third position in the sequential hierarchy28. What this means is that land to the north and east of Elm Grove Nursery should also be categorised as ‘wider Weston-super-Mare area’, and therefore development opportunities as town expansion that rank highly in the search sequence and order of preference. Moreover, if it already forms part of ‘wider Weston-super-Mare, it begs the question as to why a strategic gap is designated in this location and what purpose it is intending to serve. There would seem to be an inherent inconsistency in the plan in categorising Locking as part of ‘wider Weston-super-Mare’ to justify allocation of the Elm Grove Nursery site under Step 3, and the designation of a strategic gap to maintain its separation from the wider urban area of which it has been deemed to be a part for the purposes of applying the spatial strategy. 3.20 If the Elm Grove Nurseries site is a suitable development opportunity, that is well connected to the main towns, that is deemed not to be prejudicial to the strategic gap notwithstanding the very narrow gap that will retained between it and the Oak Tree residential park to the west, then the Moss II land which is within, and will retain, a much more expansive gap cannot reasonably be held to be prejudicial to the designation and its objectives. There is an evident inconsistency between the allocation of the site at Elm Grove Nurseries, which was assessed, and considered suitable, through the SHLAA, and the automatic exclusion of the Moss II land from further consideration through the SHLAA on the basis of it forming part of a strategic gap. 3.21 It is therefore significant that the strategic gap between Weston-super-Mare and Locking is imposing a blanket restriction on development opportunities at a highly sustainable location that ranks as a high priority in the search sequence that underpins the spatial strategy of the plan. As such, the continuation with the strategic gap in this location must be subject to the most rigorous scrutiny and critical analysis. It is considered that the justification for a			

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					designation that is both inconsistent with the spatial strategy and national policy, has not been made.			

Name: Millie Colston **I.D:** 58404161

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Justified	No	No	1- Alternative brown field or green field site with far lower ecological impact both in Portishead and across north somerset. 2- Opportunity's to increase housing density on proposed brown field site which could remove the need to develop tower farm and black rock 3- The strategic ecological importance of these sites in protecting Weston big wood and the Gordano valley green corridor 4- The fact that both areas were added to the green belt in the late 1980's due to the high ecological value 5- National planning policy allows green belt changes only in exceptional circumstances, and these have not been demonstrated. In addition - neither sights can provide safe, legal or suitable access Development would create unacceptable transport impacts, failing national soundness tests FOR ALL THESE REASONS TOWER FARM AND BLACK ROCK SHOULD BE REMOVED FROM THE LOCAL PLAN	n/a	I do not support	
Black Rock, north of Clevedon Road	No	• Justified	No	No	1- Alternative brown field or green field site with far lower ecological impact both in Portishead and across north somerset. 2- Opportunity's to increase housing density on proposed brown field site which could remove the need to develop tower farm and black rock 3- The strategic ecological importance of these sites in protecting Weston big wood and the Gordano valley green corridor 4- The fact that both areas were added to the green belt in the late 1980's due to the high ecological value 5- National planning policy allows green belt changes only in exceptional circumstances, and these have not been demonstrated. In addition - neither sights can provide safe, legal or suitable access Development would create unacceptable transport impacts, failing national soundness tests FOR ALL THESE REASONS TOWER FARM AND BLACK ROCK SHOULD BE REMOVED FROM THE LOCAL PLAN	n/a	I do not support	

Name: Millie Huntley-Payne **I.D:** 39255457

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land west of Rodney Road	Unsure		Unsure	Unsure	I wish to comment on the land to the east of the West Leigh primary school - I wish to request the removal of the field to the east of the west Leigh primary school from the grove farm/rodney road housing allocation. This land could instead of soulless new build housing which is overpriced and hard to sell, (of which there is countless amounts coming) this land could instead provide invaluable play, wellbeing, informal learning and outdoor activities for the adjacent school- which has a very minimal space for outdoor play within green space. Housing numbers can be met with the existing MASSIVE allocation without adding this small area in, which could prove really impactful to this school.	suggested positive alternatives for this space could be designated as local green space		

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					Policy LP3 prioritises the provision of new green infrastructure and open space this field already fulfils this and therefore should be protected. this land can provide an important environmental buffer between the school and surrounding housing, reducing air pollution, noise overheating and loss of biodiversity, all of which can positively impact the children of our village. would provide strong potential on this site for designation as a local green space - it is special to the local community - offers clear recreational educational health and ecological benefits	plant as a community orchard with space for a community garden small potion potentially supporting expanded outdoor area and play space for west Leigh primary school		
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell is already having a 40% increase with local approved or started building, if this local plan is approved this will be a massive over development for our village the road the is essential for this local plan to be both safe and successful will not be provided by the building companies- it will need extensive engineering under and over the railway which will be potentially unfeasible and very expensive, this is unlikely to happen for many years however the housing will. Backwell common station road and chapel hill are not safe as it is for school children and pedestrians let alone with large vehicles needed to build these and no pavements and no possible way to increase safety here! I am worried a child may be seriously injured as it is let alone with any further heavy duty traffic on this single track road or surrounding roads which simply cannot take this kind of growth! deficit in school places and health services and leisure facilities if these houses go ahead 1000 more is many many more for our already stretched services allocation for Backwell = 7% of districts housing allocation which is a massive growth percentage and disproportionate compared to size comparable to other local areas (ie clevedon at 2%) lack of needs of viability analysis for 1000 extra houses here lack of local employment with most residents commuting lack of a social cohesion impact assessment the proposed housing sits on grade 1 agricultural land of which we only have 7% left of this high quality in North Somerset. It is currently used for crops and grazing as it should be!!! our government policy outlined we the need to “protect our best and most versatile land” to safeguard food security. This proposal is a direct contradiction to this aim and will undermine our food security. overdevelopment will continue to destroy our valuable wildlife habitats- and further harm our biodiversity- in what is already one of the most nature depleted countries in the world. I have been privy to so many different species of wildlife on this land including : owls, birds of prey, foxes, badgers, mice, kingfishers, countless different species of bird, bats. these proposals threaten the Brockley maternity roost and SSSI with rare lesser and greater horseshoe bats relying on the land for food - with other surrounding foraging land already destroyed in the building of current housing projects infrastructure delivery plan has minimal analysis or feasible costings and no funding guarantees are in place for the essential new road or services which would make this over development anything but catastrophic for this locality. Backwell common is grossly prone to flooding I know this as I live here and it is consistently flooded with heavy rain- only to be worsened by more housing many concerned around strategic growth location designation: this includes the impact on the areas character and feel, loss of essential greenbelt and local green space which is highly used and loved, loss of high quality agricultural land, flooding risks and much uncertainty surrounding the affordability and indeed possibility of the road to be delivered on			

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					time and support the proposed over development. back well lake and reservoir and its adjacent fields where the new road is proposed are on a floodplain and flood regularly government policy requires 50% affordable housing on greenbelt land but this reduces the fund developers put towards infrastructure - something so essential in making this possible volume of growth in short time with the required investment infrastructure and services is destabilising, unsustainable, poorly thought out and frankly undeliverable. It is mindless target meeting for housing whilst ignoring all other areas or safety and sustainability for the local population. the transport hub which is so heavily relied upon to support the rationale for building such volume of houses- the railway - is inaccessible for anyone with mobility issues or young children- it is not fit for purpose as a transport hub and is unlikely to be developed to ensure it is within these ridiculous plans			

Name: Misha Herwin **I.D:** 62857953

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Poplar Farm, Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	North Somerset Council’s Local Plan is unsound because its evidence base, environmental assessments, and spatial strategy collectively fail to meet the NPPF soundness tests of being positively prepared, justified, effective, and consistent with national policy. Key allocations, are advanced despite clear environmental constraints, unresolved flood risk, inadequate Habitats Regulations Assessment, and misclassified Sustainability Appraisal findings. The Plan repeatedly defers essential mitigation, relies on uncertain or unfunded infrastructure, and overstates the accessibility and deliverability of several sites. Reasonable alternatives in safer, more sustainable locations have not been properly assessed, undermining the requirement for proportionate evidence and a robust strategy. The cumulative effect is a Local Plan that cannot demonstrate that it meets statutory duties, protects designated ecological assets, delivers sustainable transport, or provides a coherent, deliverable pattern of growth.	1 Reassess and reallocate growth away from high risk environmentally constrained site. Reallocate growth to more sustainable locations in Flood Zone 1, including sites with existing infrastructure capacity or clear deliverability evidence. 2 Undertake full appropriate assessment for any site with potential significant effect on SSSI s. 3 Provide a deliverable infrastructure strategy. Publish a clear costed and phased Infrastructure Delivery Plan aligned to housing growth. 4 Update transport evidence base. Strengthen policies to reduce car dependency and guarantee safe walking routes and realistic public transport improvement. 5 Strengthen environmental protection policies. Require measurable biodiversity net gain at the allocation stage not deferred to planning applications. Introduce mandatory biodiversity buffers around SSSIs and SAC linked habitats.		
Poplar Farm, Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Poplar Farm fails the NPPF soundness tests because the allocation is neither positively prepared nor justified. The Council’s own evidence identifies significant environmental constraints, including proximity to a Flood Zone 3 area, functional linkage to the North Somerset and Mendip Bats SAC, and adjacency to a nationally important SSSI. Despite this, the Local Plan relies on incomplete Habitat Regulations Assessment work, defers essential mitigation to later stages, and misclassifies the site’s flood risk within the Sustainability Appraisal. The appraisal also overstates accessibility by ignoring school and healthcare capacity issues, underestimating distances to key services, and failing to recognise the site’s reliance on private car travel. These errors mean the Council has not demonstrated that Poplar Farm is the most appropriate strategy when compared with safer, more	1 Modify the spatial strategy and site allocation policy so that Poplar Farm is no longer under consideration unless NSC can first produce robust corrected evidence on flood risk, ecology, transport and infrastructure. 2 Require a full Appropriate Assessment now at planning stage for Poplar Farm in relation to functional		

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					sustainable alternatives in Flood Zone 1. The allocation is also ineffective and inconsistent with national policy. Delivery depends on major infrastructure, such as a strategic rail crossing, new schools, and active travel routes, that currently lack funding, certainty, or alignment with housing delivery. The site's location and poor transport connectivity make reducing car dependency unrealistic, conflicting with national policy requirements for sustainable transport and mixed, well-integrated communities. The cumulative impact on protected species, the absence of credible mitigation, and the failure to demonstrate biodiversity protection further undermine compliance with statutory duties. Taken together, these deficiencies show that Poplar Farm cannot be delivered sustainably or in accordance with national policy, rendering the allocation unsound.	linkage to the North Somerset and Mendip Bats SAC and effect on the adjacent SSSI. 3 Introduce realistic transport and accessibility requirements to reflect actual distance and travel times to Nailsea and Backwell Station and key services. Provide detailed assessment and mitigation of impact on rural roads and The Causeway, including cumulative impact with other growth. 4 Update the Infrastructure Plan and allocation policy to identify specific school and health care capacity serving Poplar Farm quantified deficits. Specify new schools/health facilities required as a direct consequence of the development of Poplar Farm. Mandate no development of Poplar Farm without secured funding and timing for the strategic rail crossing and other critical infrastructure.		

Name: Mo Bowerman **I.D:** 62741089

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell already has 800 new houses approved, a 40% increase for the village. These additional numbers would amount to complete overdevelopment. The idea of such a sheer volume of growth with the necessary infrastructure and services is ridiculous! The proposed road would have to funded, but by whom? It would be a very expensive undertaking, as well as being very difficult to engineer. There is a lack of infrastructure to support the needs of the houses being proposed. I question the need for so many houses in Backwell. Backwell has been allocated a higher number of houses than any other village in North Somerset, with no needs or viability analysis for an extra 1000 houses. Backwell is not an employment hub. The office buildings at Coles Quarry have been there for a number of years and have never been occupied for example, The land in question is Grade 1 agricultural land which is currently used for food crops and grazing. Government policy is that this sort of land must be protected. This does not seem to have been taken into consideration. There are also greenbelt preservation concerns. The infrastructure delivery plan lacks analysis and costings, and there are no funding guarantees for the new road and services. Backwell Common already has serious problems with flooding, and this would be aggravated by new housing. Also, Backwell Lake and adjacent fields are also on a flood plain. The character of Backwell will totally change with the proposed road and housing growth. The railway station is not fit for purpose as a transport hub. Although many plans have been put forward over many years, it remains inaccessible to many potential users such as people with mobility issues.			

Name: Molly Foskett **I.D:** 62486049

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Policy LP12: Bristol Airport	No	• Positively prepared • Justified • Effective	Unsure	Unsure	Diminishes the quality of life of residents of all local and surrounding areas of the airport. Little thought as to how this will impact the parking issues. It will have a negative economic impact on said areas due to a plummet in housing prices and inability to sell home to those opposed to the plans. Astronomical environmental issues will arise resulting from the building and continuation of use of the expanded airport via carbon emissions, this does not correlate with the carbon neutral plans at the airport at present. There are many different species of wildlife that will be displaced. The roadway infrastructure cannot support an increase in passengers. The parking does not support this either due tot the cost. History can testify that long haul flights from Bristol rarely sell out due to the increased price tag compared to London or elsewhere even with the travel to those places. DO NOT PROCEED NO LOCALS WANT THIS AND IT BENEFITS NOBODY EXCEPT STAKEHOLDERS WHICH DO NOT RESIDE IN THE UK OR HAVE ANY BESTED INTEREST IN ITS PEOPLE. THIS IS CORRUPT AND A TERRIBLE USE OF PUBLIC LAND THAT HAS BEEN THAT WAY SINCE 1200s!!!	Scrap the plan entirely. The airport is big enough, and we are tired of them moving the goal posts and going beyond every measure they agree to.	I do not support this plan to any extent. Not at all.	

Name: Mona Herborn **I.D:** 62616257

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I have lived in Backwell for 63 years. I am extremely concerned about building on our Green fields at Backwell East. We already have a number of housing developments going ahead in Backwell and building on this high quality agricultural land is not acceptable. This land is currently farmed and has been for generations. I believe this is too much and will totally overwhelm the village. There is no infrastructure to support such a high number of houses and the village will not cope. There seems to be a lack of knowledge and understanding at North Somerset Council to suggest this land should be built on. There are no plans to show why this much extra housing is needed and it is not justified. Backwell is not an employment center. We have lost enough wildlife and habitat and food for the bats at Brockley with Grove Farm and Farleigh Fields being given permission for building houses, we cannot permit another 1,000 houses on land that is providing us with food as well. This should NOT be permitted.			

Name: Mona Le **I.D:** 58588225

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	North Somerset Council (NSC) appears not to have robustly addressed several key planning considerations in proposing allocations at Tower Farm: Assessment of reasonable alternatives: There is no clear evidence that NSC has fully assessed alternative brownfield and lower-impact greenfield sites, both within Portishead and elsewhere in North Somerset, which could deliver the required housing with substantially reduced ecological harm. Optimisation of brownfield land: The potential to increase densities on identified brownfield sites appears underexplored. A genuine “brownfield first” approach, including appropriate higher-density development in accessible locations, could obviate the need to release Tower Farm. Strategic ecological value: The role of these sites in maintaining the ecological integrity of Weston Big Wood (SSSI) and the Gordano Valley green corridor does not appear to have been fully acknowledged or appropriately weighted in the site selection process. Green Belt status and justification: The site was added to the Green Belt in the late 1980s specifically because of its ecological importance and contribution to the openness and purposes of the Green Belt. This historic and ongoing justification for designation is not convincingly addressed in the evidence supporting its proposed release. Exceptional circumstances test: National planning policy permits changes to Green Belt boundaries only in genuinely exceptional circumstances, supported by a proportionate review of need, alternatives and impacts. On the information			

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					available, such circumstances have not been demonstrated. Furthermore: Highway access and safety: There is no convincing evidence that either site can provide safe, suitable and policy-compliant access arrangements without giving rise to significant adverse effects. Transport impacts and soundness: The likely transport consequences, including increased congestion and reliance on private car use, appear inconsistent with national policy on sustainable transport. In the absence of credible mitigation and mode-shift measures, these allocations are at risk of failing the plan soundness tests relating to justification, effectiveness and consistency with national policy. Infrastructure: Besides the likely transport consequences, have the plan considered about the potential negative impact on the publics and neighbourhood surrounding on security, living, medical and education standards i.e., an extension or new establishment for secondary schools, GP healthcare services...? In combination, these deficiencies indicate that the allocation of Tower Farm is not justified when measured against national policy requirements, alternative options and the acknowledged sensitivity of these Green Belt and ecologically important locations.			
Black Rock, north of Clevedon Road	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	North Somerset Council (NSC) appears not to have robustly addressed several key planning considerations in proposing allocations at Black Rock: Assessment of reasonable alternatives: There is no clear evidence that NSC has fully assessed alternative brownfield and lower-impact greenfield sites, both within Portishead and elsewhere in North Somerset, which could deliver the required housing with substantially reduced ecological harm. Optimisation of brownfield land: The potential to increase densities on identified brownfield sites appears underexplored. A genuine “brownfield first” approach, including appropriate higher-density development in accessible locations, could obviate the need to release Black Rock. Strategic ecological value: The role of these sites in maintaining the ecological integrity of Weston Big Wood (SSSI) and the Gordano Valley green corridor does not appear to have been fully acknowledged or appropriately weighted in the site selection process. Green Belt status and justification: The site was added to the Green Belt in the late 1980s specifically because of its ecological importance and contribution to the openness and purposes of the Green Belt. This historic and ongoing justification for designation is not convincingly addressed in the evidence supporting its proposed release. Exceptional circumstances test: National planning policy permits changes to Green Belt boundaries only in genuinely exceptional circumstances, supported by a proportionate review of need, alternatives and impacts. On the information available, such circumstances have not been demonstrated. Furthermore: Highway access and safety: There is no convincing evidence that either site can provide safe, suitable and policy-compliant access arrangements without giving rise to significant adverse effects. Transport impacts and soundness: The likely transport consequences, including increased congestion and reliance on private car use, appear inconsistent with national policy on sustainable transport. In the absence of credible mitigation and mode-shift measures, these allocations are at risk of failing the plan soundness tests relating to justification, effectiveness and consistency with national policy. Infrastructure: Besides the likely transport consequences, have the plan considered about the potential negative impact on the publics and neighbourhood surrounding on security, living, medical and education standards i.e., an extension or new establishment for secondary schools, GP healthcare services...? In combination, these deficiencies indicate that the allocation of Black Rock is not justified when measured against national policy requirements, alternative options and the acknowledged sensitivity of these Green Belt and ecologically			

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					important locations.			

Name: Monika Beauchamp **I.D:** 29270305

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	This is an overdevelopment. This is at the cost of grade 1 agricultural land and loss of greenbelt. It does jeopardise the future provision of food for generations to come. We cannot build on such precious land. The current roads and the proposed roads will not mitigate the increase in traffic, there is little employment in Backwell, most people commute. The sheer volume of growth with the already approved 40% growth over such a short period is destabilising and unsustainable.			

Name: Morag Allen **I.D:** 62840321

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I am appalled by the proposed plans to add so many new houses to Backwell and surrounding areas. The infrastructure of roads is very difficult to expand, and there are big traffic problems at certain times of the day. There is already a massive secondary school and teenagers coming from all over the area. Station Road is a danger to them walking to school because of the narrowness of roads and pavements, and lack of pavement at many points along it, on one side or the other. The train station is also not accessible for bikes, wheelchairs and buggies on one side of the track, and it has not been improved because of the difficulty of doing so. Although there are bus links, they do not always run. My teenagers have grown up here and we know all these problems. We also value the green belt and are so saddened by the decision to build on it. It makes me want to sell up and leave, so that should show you the real impact of house building on people's life. We need green space, so to add a large area of housing at the edge of a small town without leaving green space means that all those who bought a house because it would be near fields are now denied that. I doubt if these plans will go ahead as they appear in publicity, because the flooding and old bridges and railway track, all will be big problems, and any shortage of money and funding could lead to difficulties completing.			

Name: Mr Alastair Stuart-Hunt **I.D:** 39327489

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	there's no need for more houses over and above the 800 already approved. There's inadequate infrastructure to deal with increased housing stock, especially traffic mitigation. The plan talks about increased local employment opportunities - Backwell is not an employment hub, not does it intend to be. It is a residential community. No social cohesion plan has been submitted. The land intended for development is Grade 1 Agricultural arable land. It seems ludicrous and irresponsible to wipe this away. It also contradicts the Government's stated policy to "protect our best and most versatile land" to secure food security. The development would destroy valuable wildlife habitats, included rare species like barn owns, horseshoe bats and sparrowhawks. The train station is not fit for purpose as a transport hub.			

Name: Mr Burton **I.D:** 31071393

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	Policy LP4 is unsound, legally non-compliant and fails the Duty to Cooperate because it proposes 1,100 homes (including the 600 home Site P1 “Pill Green” (the most offending) on high-performing Green Belt land forming the eastern perimeter of Pill and Easton-in-Gordano the very outermost edge of the Bristol Metropolitan Green Belt, just 4-5 miles from Bristol city centre without: 1. Exceptional circumstances evidenced in accordance with NPPF para 147 (2024), despite the sites’ role in preventing Bristol’s urban sprawl (North Somerset Green Belt Review Part 1, 2023). 2. A signed Statement of Common Ground with Bristol City Council addressing Bristol’s 8,000+ unit unmet housing need (Bristol Local Plan Review 2024) breaching s33A Planning and Compulsory Purchase Act 2004 and NPPF para 27. 3. A legally compliant Sustainability Appraisal: the SA fails Regulation 12 and the SEA Directive by not testing reasonable brownfield alternatives (North Somerset Brownfield Land Register 2024 identifies over 2,800 deliverable urban units in Weston-super-Mare, Portishead and the Bristol fringe, none were modelled against the LP4 sites). 4. Any funded delivery mechanism for essential infrastructure (A369/M5 J19 upgrades, schools, flood mitigation), the October 2025 Infrastructure Delivery Plan lists these as “high risk / unfunded”, rendering the policy ineffective (NPPF paras 11 & 122). 5. Any consultation with the local community done with this sort (quantity) of development in mind with non of the effort or detail afforded to all other 'strategic locations'.	Delete Policy LP4 in its entirety or suspend it until (a) a signed SoCG with Bristol is published, (b) exceptional circumstances are independently verified, (c) a revised SA properly tests brownfield alternatives, (d) full infrastructure funding is secured upfront via s106/CIL, and (e) a full consultation with the local community is conducted highlighting which of the 5 sites are deliverable within the NPPF guidelines (3 of the 5 seem to plausible i.e not Pill Green or Pill Road which are over 1000m from the proposed new railway stop.		
Pill Green	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	The allocation of 600 homes on Site HE2015 “Pill Green” is unsound, legally non-compliant, and fails the Duty to Cooperate because it targets a high-value Green Belt parcel (PG7) on the southeastern perimeter of Pill, the first and outermost buffer of the Bristol Metropolitan Green Belt against Bristol’s urban sprawl (just 4-5 miles from Bristol city centre; North Somerset Green Belt Review Part 1, 2023) without: 1. Green Belt harm – The site makes a high contribution to Green Belt purposes (prevents sprawl, safeguards countryside). No exceptional circumstances are evidenced (NPPF para 147, 2024). 2. Legal non-compliance – The Sustainability Appraisal breaches Regulation 12 and the SEA Directive by refusing to test brownfield alternatives (2024 Brownfield Register: over 2,800 deliverable urban units in Weston-super-Mare, Portishead and Bristol fringe, none modelled against HE2015). 3. Duty to Cooperate failure – No signed Statement of Common Ground with Bristol City Council addresses their 8,000+ unmet need (Bristol Local Plan Review 2024). Allocating 600 homes here, on Bristol’s fringe, without joint agreement breaches s33A Planning and Compulsory Purchase Act 2004 and NPPF para 27. 4. Flood risk – 45–55% of the site lies in Flood Zone 2/3 (Environment Agency Flood Map for Planning, Oct 2025). No site-specific sequential test or funded mitigation is	Delete Site HE2015 (600 dwellings) from Schedule 1 and the Proposals Map, or amend to state: “No development shall take place on Site HE2015 until exceptional circumstances are independently verified (NPPF para 147), a sequential test confirms no reasonable non-Green Belt alternatives exist (prioritising the 2,800+ brownfield units in the 2024 Register), a signed SoCG with Bristol is published, and full funding is secured via s106/CIL for 1-in-1,000-year + 45% climate allowance flood defences, A369/M5 J19 upgrades, and additional school places. No single site in settlements under 10,000 population shall exceed a 10% population increase unless the above tests are met.”		

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					provided – breach of NPPF para 159. 5. Disproportionate scale – 600 homes would increase Pill's population (~4,700) by approximately 24–28% from a single site. This is unjustified urban-scale growth on a small village while thousands of brownfield units remain unused. 6. Fails new NPPF sustainable-location test – The site is over 1,000 m walking distance from the proposed Pill railway station (Network Rail MetroWest Phase 1). It therefore falls outside the 800 m threshold in NPPF for locations that qualify for a "presumption in favour" even in the Green Belt. 7. Undeliverable – The October 2025 Infrastructure Delivery Plan identifies M5 J19 upgrades and local flood mitigation as "high risk / unfunded". Without secured funding the site is ineffective (NPPF paras 11 & 122). As a resident I witness daily A369 gridlock and regular deer, badgers and foxes using these exact fields. This allocation would destroy the last high-value Green Belt buffer on Bristol's perimeter.			

Name: Mr Christopher **I.D:** 62791265

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Justified	Unsure	No	Comments regarding HE2015, HE206, HE20491, HE201065 and HE201097 Village not logistically big enough for expansion	Possibly consider two small areas ie HE206 and HE201065 as a compromise with small allowance for local young for rental/ buying		

Name: Mr D Wheeler **I.D:** 58415265

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP7: Green Belt	No	• Positively prepared • Justified • Effective	No	No	Firstly the Green Belt should be protected. No housing or ant construction should be provided on Greenbelt. This is a legally protected space. No thought is given to the impact of the construction on local resources such as health care schools or roads. I am not sure that there is a requirement for so many houses and those proposed will not meet the needs of those who really need them. Who are young local people on low incomes often doing poorly paid essential jobs. The number of houses required should be challenged. Who says these are needed and why?	Make lots more effort to build low cost affordable housing on brown field sites. Where larger construction is needed and local populations are to increase money should be given to increase the size of schools and medical centres. If this is not possible then construction should not go ahead. We all know that the housing that will be constructed will be £400k plus homes for those who can afford them. This will not release lower value homes for the not so well off. All this policy is about is the Council bowing to central government pressure when they should say NO.		
SP7: Green Belt	No	• Positively prepared • Justified	No	Unsure	As Previously stated this plan allows construction on Green Belt this is protected by law. Thus the plans are illegal. Even if the laws have altered the green belt was set up to protect the countryside for the enjoyment of every one. these plans go against the whole point of the green belt.			

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		• Effective			Wildlife species protected by law will be affected in a bad way. No one seems to question whether or not this plan is needed. We all know that the homes provided will be expensive and for the wealthy middle classes. Not for those who really need homes and cant afford them. Traffic will also be a major issue the road into and out of Bristol for this location is a single carriageway. What about the impact on services such as electricity, gas, sewage drainage flood prevention .....etc.			
SP10: Transport	No		Unsure	Unsure	The transport plan needs to be far more imaginative and bolder. this just tinkers at the edges. The number of buses serving villages is decided by the bus companies not the council. This has caused major problems in long ashton this year,			
SP11: Historic and natural environment	No		No	No	Basically the wildlife in the countryside is dwindling fast probably faster than ever before. Not nearly enough is done to protect the wild life. Major construction on greenbelt land does not help. Any green field developement has a major impacr on wildlife. So habitat should first the protected as many of the species are in law (but this does not stop developers). Then additional habitat should be creates where possible inclusing wild flow meadows, ponds, hedging, trees etc. At the moment it seems that council highways departments are chopping down trees all over the county just because falling branches could cause a hazard to vehicles. This must stop. Far more cars are damaged due to pot holes in roads due to poor council maintenence	See above		
SP12: Minerals					Durnford Quarry in Long Ashton causes many problems to locals. It may no mlonger be a quarry but it recycles aggregates which is good (but this has substantially increased traffic to the quarry. Mud is taken from the quarry on the wheels of vehilcles and dumped on Clerken Combe. This mud is then splattered on road signs so they are illegible, the cats eyes are covered in mud and no longer work. The quarry could avoid this by simply keeping the vehicles visiting the quarry separate those working on the quarry. This is not done as it would make things more complicated for the quarry and more expensive. This will cause an accident one day (if it has not already). This quarry needs to be included in the plan.			
Policy LP2: Strategic location: Woodspring (south west of Bristol)	No	• Positively prepared • Justified • Effective	No	No	This is being built on Green belt land protected by law. Wildlife species protected by law will simply be destroyed. Schools and health care facilities must be provided and phased with the development so that facilities are available are houses are occupied. This is a massive development and local vehicular traffic out of Bristol will grind to a halt (which it already frequently does). There is only one lane open on gthe main road from county gates this is insufficient. This will affect all those existing North Somerset Residents who travel into Bristol every day- and there are lots of them! Local electricity, gas water and sewage will not cope with this extra demand. Already electricity use in home is increasing massively each year.			

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					This plan is basically ill considered, illegal and has not been properly thought through.			
Policy LP12: Bristol Airport	No	• Positively prepared • Justified • Effective	No	Unsure	Basically again you are looking to develop green belt land. This is supposed to be protected by law;. The scheme will wreck important legally protected wildlife habitat. The air port is a major polluter caused both by the air craft and the traffic visiting the airport. The air port creates major noise issues that affect people who life around the airport. The noise from planes taking off on Providence lane is very high. This is even worse for many thousands of other people affected by aircraft noise.			
Barrow Hospital (1), Barrow Gurney	No		No	No	This plan destroys green belt. Wrecks habitat for wildlife. The area i near an ancient woodland so I dread to think what wildlife will be written off by this plan. Construction will wreck local wild life. The Miners Close development in Long Ashton resulted in massive reductions is snakes, lizards, wild flowers, bird life ... etc.			
Land north of Colliter's Way, Long Ashton	No	• Positively prepared • Justified • Effective	No	Unsure	This ignores Green Belt policy. This land was to be protected by law for the enjoyment of every one. Protected wildlife lives in these areas and this will be destoyed by the development. You cannot relocate it it will simply disappear - forever!			
Land at village hall, Long Ashton					This is already green space its not new!			

Name: Mr Greg Aston **I.D:** 58640257

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SP7: Green Belt	No	• Justified	No					
SP7: Green Belt			No					draft-response-to-north-somerset-local-plan-2041-tower-farm-latest-20251127.pdf
SP10: Transport	No	• Justified	No					draft-response-to-north-somerset-local-plan-2041-tower-farm-latest-20251127.pdf
Policy LP9: Extent of the			No					draft-response-to-north-somerset-local-plan-2041-tower-

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Green Belt								farm-latest-20251127.pdf
Land at Tower Farm	No	• Consistent with national policy	No	No	Before including the Tower Farm and Black Rock sites in the Local Plan, NSC has not properly considered: • Alternative brown and green field sites with much less ecological impact both in Portishead and across North Somerset. • The opportunity to increase housing density on proposed brown field sites across North Somerset which would mean these sites are not required to meet local housing targets. • The strategic ecological contribution of these specific sites in protecting the unique environment of Weston Big Wood (SSSI) and the Gordano Valley strategic green corridor • The fact that these sites were specifically added to the Green Belt in the late 1980's because of their high ecological value. For the above reasons, the Local Plan is unsound because National Planning Policy states that sites can only be removed from Green Belt for development under exceptional circumstances and these exceptional circumstances are not proven. In addition, neither site is sustainable or capable of providing safe and suitable access, and would give rise to unacceptable transport impacts, which fails the soundness tests set out in National Planning Policy. Therefore, the Tower Farm and Black Rock sites should both be removed from the Local Plan We note that developer proposals for both Black Rock and Tower Farm developments were submitted long before the funding and go-ahead for the Portishead-Bristol rail link were approved. We here describe multiple concerns about these two specific locations relating to the unique SSSI status of the adjacent Weston Big Wood woodland as well as ecological, sustainability and other concerns. Taken together, the Black Rock and Tower Farm proposed developments will encircle ~20% of Weston Big Wood's boundary. We also note that the population of Portishead has increased from circa 17000 to approximately 27000 in the last twenty-five years and currently struggles with sufficient infrastructure, so any additional development must ensure that this infrastructure deficit is fully addressed. 1 NPPF S147 Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph and whether the strategy: a) makes as much use as possible of suitable brownfield sites and underutilised land; b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport... 1.1 In comparison with the previous iteration of the NSC Local Plan draft, the density of the Wyndham Way site in Portishead was increased from 485 to 785 homes. This increase in density is compatible with National Policy as it is a brownfield and is far more sustainable than the others being proposed in the town. However, only one other significant proposed site in North Somerset saw an increase in its allocation between the previous and current draft. There is no	Before including the Tower Farm and Black Rock sites in the Local Plan, NSC has not properly considered: • Alternative brown and green field sites with much less ecological impact both in Portishead and across North Somerset. • The opportunity to increase housing density on proposed brown field sites across North Somerset which would mean these sites are not required to meet local housing targets. • The strategic ecological contribution of these specific sites in protecting the unique environment of Weston Big Wood (SSSI) and the Gordano Valley strategic green corridor • The fact that these sites were specifically added to the Green Belt in the late 1980's because of their high ecological value. For the above reasons, the Local Plan is unsound because National Planning Policy states that sites can only be removed from Green Belt for development under exceptional circumstances and these exceptional circumstances are not proven. In addition, neither site is sustainable or capable of providing safe and suitable access, and would give rise to unacceptable transport impacts, which fails the soundness tests set out in National Planning Policy. Therefore, the Tower Farm and Black Rock sites should both be removed from the Local Plan. We note that developer proposals for both Black Rock and Tower Farm developments were submitted long before the funding and go-ahead for the Portishead-Bristol rail link were approved. We here describe multiple concerns about these two specific locations relating to the unique SSSI status of the	Before including the Tower Farm and Black Rock sites in the Local Plan, NSC has not properly considered: • Alternative brown and green field sites with much less ecological impact both in Portishead and across North Somerset. • The opportunity to increase housing density on proposed brown field sites across North Somerset which would mean these sites are not required to meet local housing targets. • The strategic ecological contribution of these specific sites in protecting the unique environment of Weston Big Wood (SSSI) and the Gordano Valley strategic green corridor • The fact that these sites were specifically added to the Green Belt in the late 1980's because of their high ecological value. For the above reasons, the Local Plan is unsound because National Planning Policy states that sites can only be removed from Green Belt for development under exceptional circumstances and these exceptional circumstances are not proven. In addition, neither site is sustainable or capable of providing safe and suitable access, and would give rise to unacceptable transport impacts, which fails the soundness tests set out in National Planning Policy. Therefore, the Tower Farm and Black Rock sites should both be removed from the Local Plan We note that developer proposals for both Black Rock and Tower Farm developments were submitted long before the funding and go-ahead for the Portishead-Bristol rail link were approved. We here describe multiple concerns about these two specific locations relating to the unique SSSI status of the	

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					evidence that density at the other sites in the Plan has been properly considered. This should be done in order to comply with NPPF S147, and NSC's claim within its Green Belt Review Background Paper that this has been done is not credible. The Wyndham Way site contains a 1.1 hectare "green field" which is effectively wasteland and has been earmarked for commercial development for many years, but no plans have ever been brought forward because of lack of viability. The vision of the Wyndham Way area is for a mixed housing and commercial development which would bring more jobs to Portishead and prevent it becoming purely a commuter town. This particular site It is near to the new railway station which is due to open in 2028. Reclassifying it as a mixed residential and commercial site on this wasteland will increase the probability of the site being developed as the first phase of the Wyndham Way area vision/Town Centre regeneration and avoid the need for housing to be built so close to an SSSI and its inevitable detrimental impact 1.2 Many other sites across North Somerset (at least 23) are clearly, from their descriptions, brownfield. If 300 homes can be added to Wyndham Way by increasing the density, this should be done elsewhere, removing the need to build on the Green Belt in Portishead and elsewhere. 1.3 One example of a site that is not making full use of a brownfield site or optimising the density of development is Castlewood in Clevedon. The site is owned by North Somerset Council and has an allocation of just 120 homes. It is a sustainable site with an area of 3.37 hectares with a flat walk to the High Street, served by the X5, X6, X7/X7a, X10 and X11 bus services (i.e. local and Bristol services). It should be classified as either a suburban or urban site and national guidance recommends a dwelling density of 100-120 dph (dwellings per hectare) for suburban sites and 200+dph for urban sites. This brownfield site could therefore accommodate between 300 to 600 homes rather than the 120 currently planned which would mean that ecologically sensitive sites such as Tower Farm would no longer be needed. Increasing density on this site should be done "Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries", in order to comply with the NPPF. 1.4 In respect of the Castlewood site, more efficient use of it would also boost the availability of new homes in Clevedon, which currently only has an allocation of 258 compared with 6,084 in Weston, 1,347 in Portishead, 1,683 in Backwell, 1,817 in Nailsea and 1,100 in Pill. This would also help to give a fairer distribution of development across North Somerset. In addition, NSC should surely has a statutory duty to maximise their potential income from a site that they own. 1.5 Despite rapid growth in Portishead in recent years (the population has increased in size by 60% between 2001 and 2025) and a tightly drawn settlement boundary there is still some green field land in a sustainable location that would not damage the local environment if brought forward for development. An example is a plot (known as "Land South of Clevedon Road". This was included as a site reference HE20488 in the 2023 NSC Local Plan draft but has been removed from the latest version, we understand that this is because the Environment Agency has reclassified the land is being in the flood plain. This is surprising as the field is on a small ridge overlooking the Somerset Levels and is in fact on higher ground than most of the land developed in Portishead over the last 25 years. The 2023 proposal was for 80 homes on this 2.67 Hectare Green Belt site, mostly larger Executive style homes. That proposal was in conflict with the independent Portishead Housing Needs Assessment carried out by AECOM for the Portishead Neighbourhood Plan which highlighted the need for affordable and smaller dwelling units in Portishead. To quote the AECOM report "Our model suggests that what is most needed to be built in Portishead over the plan period is 3 bedroom properties (48%); followed by 2 bedroom (32%); plus a smaller amount of 1	adjacent Weston Big Wood woodland as well as ecological, sustainability and other concerns. Taken together, the Black Rock and Tower Farm proposed developments will encircle ~20% of Weston Big Wood's boundary. We also note that the population of Portishead has increased from circa 17000 to approximately 27000 in the last twenty-five years and currently struggles with sufficient infrastructure, so any additional development must ensure that this infrastructure deficit is fully addressed. 1 NPPF S147 Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph and whether the strategy: a) makes as much use as possible of suitable brownfield sites and underutilised land; b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport... 1.1 In comparison with the previous iteration of the NSC Local Plan draft, the density of the Wyndham Way site in Portishead was increased from 485 to 785 homes. This increase in density is compatible with National Policy as it is a brownfield and is far more sustainable than the others being proposed in the town. However, only one other	adjacent Weston Big Wood woodland as well as ecological, sustainability and other concerns. Taken together, the Black Rock and Tower Farm proposed developments will encircle ~20% of Weston Big Wood's boundary. We also note that the population of Portishead has increased from circa 17000 to approximately 27000 in the last twenty-five years and currently struggles with sufficient infrastructure, so any additional development must ensure that this infrastructure deficit is fully addressed. 1 NPPF S147 Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. 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					bedroom properties (15%); a very small amount of very large properties with 5 bedrooms or more. There is no need for more 4 bedroom properties... Most of all, while prioritising mid-sized homes, a variety of housing should be provided to cater for incomes of different needs, incomes, sizes, and life-stages... the demand for smaller properties from those with less purchasing power is of priority concern". This site is in a sustainable location, very close to the local Secondary school and a short flat walk to Portishead High Street. It should be brought back into the Local Plan, classified as a suburban or urban site and using national housing density guidelines the 2.67 acre site could accommodate 250 to 500 dwellings which would help to remove the need for developing on other much less sustainable and environmentally damaging sites such as Tower Farm. 1.6 At least 2 existing brownfield sites in Portishead have not been included in the Plan.Planning permission was granted in 2017 for 33 homes at a site in Portishead between Wyndham Way and Cheviot Meadow (17/P/1229/FUL). These were not built, and permission was later granted for a care home there, but that has also not been built and the site is for sale again. Land is also for sale next to The Poacher public house, with an indicative 8 homes. How many other brownfield sites are there in North Somerset that have not been included and that should be considered before releasing Green Belt land? 1.7 The analysis is sections 1.31 to 1.35 shows that NSC's claim within its Green Belt Review Background Paper that the use of brownfield sites has been properly assessed is not credible. It has not fully assessed the opportunities for sustainable, brown field or greenfield development in urban and suburban sites. 1.8 The CPRE has recently emphasised the value of brownfield sites in achieving house-building targets and the fallacy that Green Belt revisions are required. Their research "shows that there are enough brownfield sites in England to build 1.4 million new homes": https://www.cpre.org.uk/news/over-half-of-brownfield-sites-could-be-built-on-rapidly-report◈shows/ . This is something that NSC should be prioritising. 1.9 Tower Farm is situated in the Green Belt. The area was defined as Green Belt relatively recently in 1988, it was not part of the original UK wide Green Belt designation. The 1988 designation was part of the South West Avon Green Belt Local Plan and made after a Planning decision made by the Secretary of State at the time regarding the development of the Avon and Police Headquarters and a housing estate on Portishead down next to Tower Farm. The Secretary of State at the time, whilst allowing the development, emphasised the strategic ecological importance of the adjacent Gordano Valley and need to protect the integrity of the Strategic Gordano Valley Green Corridor (now defined as a North Somerset Council Strategic Green corridor). The judgement also led to the subsequent purchase in 1997 of the 38 acres of the Weston Big Wood SSSI for safekeeping by Avon Wildlife Trust. The Strategic Green corridor runs all the way from the Severn Estuary through Portbury Wharf Nature Reserve, along the Gordano valley and through to the Somerset Levels and the Mendips. This area is exceptional Green Belt in contradiction to the NSC Green Belt assessment which fails to factor in the special circumstances that led to this relatively late designation as Green Belt. NSC has therefore not demonstrated that "Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries... it has examined fully all other reasonable options for meeting its identified need for development", contrary to NPPF S147. 2 NPPF S156 Where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review, or on sites in the Green Belt subject to a planning application, the following	significant proposed site in North Somerset saw an increase in its allocation between the previous and current draft. There is no evidence that density at the other sites in the Plan has been properly considered. This should be done in order to comply with NPPF S147, and NSC's claim within its Green Belt Review Background Paper that this has been done is not credible. The Wyndham Way site contains a 1.1 hectare "green field" which is effectively wasteland and has been earmarked for commercial development for many years, but no plans have ever been brought forward because of lack of viability. The vision of the Wyndham Way area is for a mixed housing and commercial development which would bring more jobs to Portishead and prevent it becoming purely a commuter town. This particular site It is near to the new railway station which is due to open in 2028. Reclassifying it as a mixed residential and commercial site on this wasteland will increase the probability of the site being developed as the first phase of the Wyndham Way area vision/Town Centre regeneration and avoid the need for housing to be built so close to an SSSI and its inevitable detrimental impact 1.2 Many other sites across North Somerset (at least 23) are clearly, from their descriptions, brownfield. 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						Planning decision made by the Secretary of State at the time regarding the development of the Avon and Police Headquarters and a housing estate on Portishead down next to Tower Farm. The Secretary of State at the time, whilst allowing the development, emphasised the strategic ecological importance of the adjacent Gordano Valley and need to protect the integrity of the Strategic Gordano Valley Green Corridor (now defined as a North Somerset Council Strategic Green corridor). The judgement also led to the subsequent purchase in 1997 of the 38 acres of the Weston Big Wood SSSI for safekeeping by Avon Wildlife Trust. The Strategic Green corridor runs all the way from the Severn Estuary through Portbury Wharf Nature Reserve, along the Gordano valley and through to the Somerset Levels and the Mendips. This area is exceptional Green Belt in contradiction to the NSC Green Belt assessment which fails to factor in the special circumstances that led to this relatively late designation as Green Belt. NSC has therefore not demonstrated that “Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries... it has examined fully all other reasonable options for meeting its identified need for development”, contrary to NPPF S147. 2 NPPF S156 Where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review, or on sites in the Green Belt subject to a planning application, the following contributions (‘Golden Rules’) should be made: b) necessary improvements to	regarding the development of the Avon and Police Headquarters and a housing estate on Portishead down next to Tower Farm. The Secretary of State at the time, whilst allowing the development, emphasised the strategic ecological importance of the adjacent Gordano Valley and need to protect the integrity of the Strategic Gordano Valley Green Corridor (now defined as a North Somerset Council Strategic Green corridor). The judgement also led to the subsequent purchase in 1997 of the 38 acres of the Weston Big Wood SSSI for safekeeping by Avon Wildlife Trust. The Strategic Green corridor runs all the way from the Severn Estuary through Portbury Wharf Nature Reserve, along the Gordano valley and through to the Somerset Levels and the Mendips. This area is exceptional Green Belt in contradiction to the NSC Green Belt assessment which fails to factor in the special circumstances that led to this relatively late designation as Green Belt. NSC has therefore not demonstrated that “Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries... it has examined fully all other reasonable options for meeting its identified need for development”, contrary to NPPF S147. 2 NPPF S156 Where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review, or on sites in the Green Belt subject to a planning application, the following contributions (‘Golden Rules’) should be made: … b) necessary improvements to local or national infrastructure;	

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Land at Tower Farm	No	Consistent with national policy	No	No	Before including the Tower Farm and Black Rock sites in the Local Plan, NSC has not properly considered: • Alternative brown and green field sites with much less ecological impact both in Portishead and across North Somerset. • The opportunity to increase housing density on proposed brown field sites across North Somerset which would mean these sites are not required to			

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					meet local housing targets. • The strategic ecological contribution of these specific sites in protecting the unique environment of Weston Big Wood (SSSI) and the Gordano Valley strategic green corridor • The fact that these sites were specifically added to the Green Belt in the late 1980's because of their high ecological value. For the above reasons, the Local Plan is unsound because National Planning Policy states that sites can only be removed from Green Belt for development under exceptional circumstances and these exceptional circumstances are not proven. In addition, neither site is sustainable or capable of providing safe and suitable access, and would give rise to unacceptable transport impacts, which fails the soundness tests set out in National Planning Policy. Therefore, the Tower Farm and Black Rock sites should both be removed from the Local Plan We note that developer proposals for both Black Rock and Tower Farm developments were submitted long before the funding and go-ahead for the Portishead-Bristol rail link were approved. We here describe multiple concerns about these two specific locations relating to the unique SSSI status of the adjacent Weston Big Wood woodland as well as ecological, sustainability and other concerns. Taken together, the Black Rock and Tower Farm proposed developments will encircle ~20% of Weston Big Wood's boundary. We also note that the population of Portishead has increased from circa 17000 to approximately 27000 in the last twenty-five years and currently struggles with sufficient infrastructure, so any additional development must ensure that this infrastructure deficit is fully addressed. 1 NPPF S147 Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph and whether the strategy: a) makes as much use as possible of suitable brownfield sites and underutilised land; b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport... 1.1 In comparison with the previous iteration of the NSC Local Plan draft, the density of the Wyndham Way site in Portishead was increased from 485 to 785 homes. This increase in density is compatible with National Policy as it is a brownfield and is far more sustainable than the others being proposed in the town. However, only one other significant proposed site in North Somerset saw an increase in its allocation between the previous and current draft. There is no evidence that density at the other sites in the Plan has been properly considered. This should be done in order to comply with NPPF S147, and NSC's claim within its Green Belt Review Background Paper that this has been done is not credible. The Wyndham Way site contains a 1.1 hectare "green field" which is effectively wasteland and has been earmarked for commercial development for many years, but no plans have ever been brought forward because of lack of viability. The vision of the Wyndham Way area is for a mixed housing and commercial development which would bring more jobs to Portishead and prevent it becoming purely a commuter town. This particular site It is near to the new railway station which is due to open in 2028. Reclassifying it as a mixed residential and commercial site on this wasteland will increase the probability of the site being developed as the first phase of the Wyndham Way area vision/Town Centre regeneration and avoid the need for housing to be			

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Land at Tower Farm	No		No	Unsure	In summary: “Before including the Tower Farm and Black Rock sites in the Local Plan, NSC has not properly considered: • Alternative brown and green field sites with much less ecological impact both in Portishead and across North Somerset. • The opportunity to increase housing density on proposed brown field sites across North Somerset which would mean these sites are not required to meet local housing targets. • The strategic ecological contribution of these specific sites in protecting the unique environment of Weston Big Wood (SSSI) and the Gordano Valley strategic green corridor • The fact that these sites were specifically added to the Green Belt in the late 1980’s because of their high ecological value. For the above reasons, the Local Plan is unsound because National Planning Policy states that sites can only be removed from Green Belt for development under exceptional circumstances and these exceptional circumstances are not proven. In addition, neither site is sustainable or capable of providing safe and suitable access, and would give rise to unacceptable transport impacts, which fails the soundness tests set out in National Planning Policy. Therefore, the Tower Farm and Black Rock sites should both be removed from the Local Plan.			draft-response-to-north-somerset-local-plan-2041-tower-farm-latest-20251127.pdf

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					We note that developer proposals for both Black Rock and Tower Farm developments were submitted long before the funding and go-ahead for the Portishead-Bristol rail link were approved. We here describe multiple concerns about these two specific locations relating to the unique SSSI status of the adjacent Weston Big Wood woodland as well as ecological, sustainability and other concerns. Taken together, the Black Rock and Tower Farm proposed developments will encircle ~20% of Weston Big Wood's boundary. We also note that the population of Portishead has increased from circa 17000 to approximately 27000 in the last twenty-five years and currently struggles with sufficient infrastructure, so any additional development must ensure that this infrastructure deficit is fully addressed. NPPF S147 Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph and whether the strategy: a) makes as much use as possible of suitable brownfield sites and underutilised land; b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport... 1.1 In comparison with the previous iteration of the NSC Local Plan draft, the density of the Wyndham Way site in Portishead was increased from 485 to 785 homes. This increase in density is compatible with National Policy as it is a brownfield and is far more sustainable than the others being proposed in the town. However, only one other significant proposed site in North Somerset saw an increase in its allocation between the previous and current draft. There is no evidence that density at the other sites in the Plan has been properly considered. This should be done in order to comply with NPPF S147, and NSC's claim within its Green Belt Review Background Paper that this has been done is not credible. The Wyndham Way site contains a 1.1 hectare "green field" which is effectively wasteland and has been earmarked for commercial development for many years, but no plans have ever been brought forward because of lack of viability. The vision of the Wyndham Way area is for a mixed housing and commercial development which would bring more jobs to Portishead and prevent it becoming purely a commuter town. This particular site It is near to the new railway station which is due to open in 2028. Reclassifying it as a mixed residential and commercial site on this wasteland will increase the probability of the site being developed as the first phase of the Wyndham Way area vision/Town Centre regeneration and avoid the need for housing to be built so close to an SSSI and its inevitable detrimental impact 1.2 Many other sites across North Somerset (at least 23) are clearly, from their descriptions, brownfield. If 300 homes can be added to Wyndham Way by increasing the density, this should be done elsewhere, removing the need to build on the Green Belt in Portishead and elsewhere.			

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					the Severn Estuary to the Mendips. Much of it lies at or near sea level and is shaped by historic drainage channels (“rhynes”), creating a rich mosaic of habitats. Its limestone escarpments and Mendip outcrops support a diversity increasingly threatened by expanding development. SITE SPECIFICS Northern Area: Open fields used for grazing or maize cultivation run directly to the boundary of Weston Big Wood (SSSI). Weston Big Wood: A rare remnant of an ancient woodland present since the Ice-Age. Dominated by oak, hazel, ash and elm, it holds uncommon species such as small-leaved lime, wild service tree, rock whitebeam, herb paris, birds nest orchid, common toothwort and purple gromwell. Spring ground flora is exceptionally rich and includes bluebells, violets, wild garlic, wood anemone and lesser celandine. The wood also supports notable fungi, numerous birds of prey (buzzards, red kites, peregrine falcons) owls, roosting bats, deer and badgers. Natural succession has expanded the woodland fringe beyond its official boundary, providing vital habitat for red-listed endangered birds such as linnet. All surrounding land is Green Belt, reinforced by North Somerset’s Green Infrastructure Strategy (2021). The proposed development borders a large section of the wood’s northern slope. ECOLOGICAL EVIDENCE BASE Protection efforts span decades. A major World Wildlife Fund/Avon Wildlife Trust - commissioned PhD study in the 1980s (“Gordano Valley: The Future for Wildlife”) https://www.portishead.gov.uk/uploads/gordano-valley-ecological-study.pdf?v=1763999384 set a biodiversity baseline and warned even then of species loss. Its core message: the entire valley is an interconnected ecological unit whose habitats are mutually dependent and cannot be protected piecemeal. Development anywhere in this system disrupts the whole.It is worth noting the date when this report was written as this highlights the long recognised ecological importance of the Gordano Valley.A 2023 updated study of the area commissioned by Portishead Town Council https://www.portishead.gov.uk/uploads/gordano-valley-ecological-development-strategy◈report.pdf?v=1741102465 found further decline, including severe recreational damage to Weston Big Wood during the Covid period—an indicator of how intensified human pressure from developments like Tower Farm or Black Rock would be ecologically devastating. The 1988 report identified the valley’s unique mix of rhynes, saltmarsh, woodland, unimproved grassland, orchards, hedgerows, quarries and rock exposures—habitats that together support abundant butterflies, dragonflies, bats, buzzards and diverse flora. Geological features similar to those that give nearby Nightingale Valley its SSSI status are likely to be present at Tower Farm. GORDANO VALLEY ECOLOGICAL & DEVELOPMENT STRATEGY REPORT The 2023 assessment found Weston Big Wood in “unfavourable declining condition,” worsened by ash dieback, low light from lack of management, and recreational pressure. It identified the Gordano Valley as the region’s most important wet meadow and wetland bird site and stressed the need to reconnect fragmented habitats using Biodiversity Net Gain metrics. Mapping shows Black Rock and Tower Farm lying squarely within the “Strategic Development Avoidance Polygon,” with high bat activity north and south of the wood.			

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					CONCLUSION Weston Big Wood is integral to the Gordano Valley's ecological network; development at Tower Farm would damage not only the ancient woodland but the entire valley system it anchors. The long-standing scientific consensus is clear: this landscape's interconnected habitats make it uniquely valuable—and uniquely vulnerable. Given the weight of evidence of the high ecological benefit of the area around Weston Big Wood, Nightingale Valley and the Gordano Valley proven over more than half a century the Tower Farm site should no longer be considered for development. 3.3 Concerns over the developer's biodiversity net gain report National Planning Policy mandates that development must: • Ensure that there will be no adverse impacts to SSSIs (such development would not normally be permitted). • Ensure that there will be no loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees), unless there are wholly exceptional reasons, and a suitable compensation strategy exists. • Where significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts) adequate mitigation, or as a last resort compensation, must be provided. • The NPPF and associated Planning Practice Guidance also emphasise the requirement for ecological networks and wildlife corridors to be created throughout the wider landscape (paragraph 179). The developer's Vision Document states that they are "aiming to deliver a 10% gain in Biodiversity net gain" with no detail on how this will be achieved. The plans will represent a significant loss of biodiversity over time due to the proximity of the site to Weston Big Wood. However, what is being proposed in plans for Tower Farm is building alongside the Weston Big Wood boundary, leaving only a small buffer. The developer proposals do not in any way mitigate the damage to the ecosystem of the ancient woodland and the nature corridors that building 400 plus homes would do. We have sought expert opinion from the nationally acclaimed naturalist Chris Sperring MBE who concludes in relation to the developers report: "....." The plans will represent a significant loss of biodiversity over time due to the proximity of the site to Weston Big Wood. No amount of mitigation or BNG credits are going to replace an ancient Woodland and SSSI and the ecosystem that it supports. The Woodland Trust and Avon Wildlife Trust state that ancient woodland is irrecoverable once damaged. Once it is gone it will be gone forever. Instead, consideration should be made for designating Tower Farm as a Biodiversity Net Gain site which would allow some of the ecological damage over the last 50 years to be repaired. 3.4 NSC's Landscape sensitivity Assessment states "Land to the south-west of the town, is gently sloping and Valley Road forms a strong, vegetated edge. In some locations, there is a distinctive change in character from an urban to a rural landscape on either side of this road and the visual prominence of land beyond is generally high. In addition, the Nightingale Valley SSSI and Middle Hill Common LNR are located to the south of this road. Owing to the above, this land is of high sensitivity." The fact that development here would undoubtedly damage this high sensitivity landscape should be taken on board, despite what the Green Belt Land Assessment may be saying. https://n-somerset.gov.uk/sites/default/files/2023-06/			

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					Landscape%20Sensitivity%20Assessment%20%28March%202018%29-acc.pdf - 3.5 This development would therefore not “contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils; recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services… and of trees and woodland; minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs”, contrary to NPPF S187. 3.6 The Portishead Neighbourhood Plan Policy PEN4 states: “Development proposals will be expected to minimise impacts on and provide net gains for biodiversity, including the enhancement and creation of ecological networks within and, where relevant, connecting with those beyond the Plan Area (see Figure 4). Proposals that exceed 10% biodiversity net gain will be particularly supported. Protection, connection and enhancement of statutory and non-statutory nature conservation sites (as shown on Figure 4) is a priority for the Neighbourhood Area and development proposals must demonstrate sensitive responses to these sites where necessary, such as accommodating a buffer zone to protect sensitive habitats, or demonstrating that opportunities to reduce indirect impacts, such as light pollution, have been taken” The Tower Farm proposal does not provide net gains for biodiversity. As proven earlier in section 1.5.1, development would irrevocably damage valuable habitats over time, fragment the Gordano Valley ecological network and undermine nature recovery ambitions. No mitigation or buffer can render the site suitable. The Tower Farm proposal is not compliant with Portishead Neighbourhood Plan Policy PEN4. 3.7 NPPF S192 1. To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity. 3.8 Tower Farm plays a crucial role in providing a wildlife corridor linking Weston Big Wood, the Gordano Valley, Walton Common and other habitats. The Tower Farm proposal does not provide net gains for biodiversity and would irrevocably damage valuable habitats over time, fragment the Gordano Valley ecological network and undermine nature recovery ambitions. The approach of relying on offsite mitigation and a “suitable ecological buffer” illustrates a reactive rather than preventative approach to biodiversity production. The Tower Farm proposal fails to promote the conservation, restoration and enhancement of priority habitats, ecological networks and protection of priority species. In fact, it actively works against the provisions of NPPF S192. It also conflicts with the Avon Wildlife Trust ‘s 2030 Strategy, which emphasises restoration of 30 per cent of land for nature and enhancing			

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					landscape connectivity on the Gordano Valley. 3.9 The developer's vision Document supporting material claims that the development will enhance nature corridors – building 400 plus houses is not going to do this. 3.10 This proposal therefore does not safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity", contrary to NPPF S192. 3.11 NPPF S193 When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused; b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest an any broader impacts on the national network of Sites of Special Scientific Interest; c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; 3.12 The Schedule of Proposed Allocations mentions a "significant buffer" between development at Tower Farm and Weston Big Wood SSSI, but however large this is (and that isn't stated, although the developer's Vision document mentions 50 metres), the fields around it are part of its ecosystem, and any development on them will do "significant harm to biodiversity" as referred to in a). Noise and light pollution will be unavoidable, even with some sort of buffer, and a new population of cats will have a significant impact on small birds and mammals within the food chain. Habitat fragmentation needs to be avoided. 3.13 The developer's plans include some attempts to mitigate the environmental damage that the development would cause, on the parcel of land referred to on the Schedule of Proposed Allocations as "to the south west of the residential allocation". However, this land is currently fields and some trees, so the proposal can hardly be seen to have a much mitigative effect. 3.14 Regarding b), the "benefits of the development in the location" do not "clearly outweigh both its likely impact on the features of the site that make it of special scientific interest" as it is not in a sustainable location, as noted above.			

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					3.15 In respect of c), a recent report has found that British ancient woodland is struggling to regenerate and is under threat. We should therefore not be allowing any development that threatens the health of Weston Big Wood, which this proposal does, and it “should be refused”. There are also not “wholly exceptional reasons” not to refuse development here. 3.16 In addition to Weston Big Wood, Tower Farm is also in close proximity to Nightingale Valley SSSI. In all likelihood the location shares the geological features that Nightingale Valley’s citation protects, and perhaps should be protected itself for the same reasons. The map below shows the proposed development (in red) and all nearby SSSIs (Weston Big Wood, Nightingale Valley, Weston in Gordano, Gordano Valley, Walton Common and Court Hill), demonstrating how they act to protect a vital nature corridor, of which Tower Farm is currently a part. 3.17 The 2018 NSC Landscape Character Assessment noted that “Visual impact of unsympathetic urban edges of Portishead and Clevedon and urban fringe influences within the immediately adjacent landscapes” as a threat to the Portishead Ridges and Combes, an area that includes the Tower Farm site. It also stated that “The landscape strategy for Portishead Ridges and Combes is to conserve the elements of strong character, the woodland, open grassland and pasture, the ancient hilltop sites and stone built settlement while enhancing area of declining condition and weaker character such as the urban edges and the gappy hedgerows”. It provided Landscape Guidelines including “Conserve the peaceful and secluded nature of the wooded landscape” and “Minimise the impact of the urban edge and the encroachment of visually intrusive land uses…”. This both emphasises the value of the site but also goes against the Green Belt Assessment that suggests that the value of this Green Belt land is minimal. 3.18 Avon Wildlife Trust, which owns and manages Weston Big Wood and therefore is extremely knowledgeable about the site, commented in response to the previous NSC Local Plan consultation: “Avon Wildlife Trust objects to any proposals for developments at, or near, Weston Big Wood SSSI.The ancient woodlands at Weston Big Wood have developed over centuries and are now amongst the most fragile and rare of all landscapes in the country. Once damaged they cannot be restored.” 3.19 The NPPF does now allow removal of Green Belt status but the land around Weston Big Wood is the very worst location in North Somerset to consider for this for the reasons stated above. 3.20 There would be “significant harm to biodiversity resulting from a development that cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for”, and “development on land… outside a Site of Special Scientific Interest… which is likely to have an adverse effect on it… should not normally be permitted”. “[D]evelopment resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused” as there are not “wholly exceptional reasons”. To grant planning permission at this location would therefore be contrary to NPPF S193. 4 NPPF S110 … Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health…			

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					4.1 Tower Farm is not and cannot be made a sustainable location. Residents would not be able to walk or cycle comfortably to and from the amenities at the centre of town/High Street due to the distance involved and the topography, Tower Farm being at the top of a long, steep hill. Many would not be able to walk or cycle there all. These are the distances and the climb required to reach Tower Farm from various locations in the town: Miles Climb (ft) Folk Hall Town Council 1.2 335, Post Office 1.3 335, Somerset Hall 1.3 335, Aldi 1.3 338, Library 1.4 328, Lake Grounds (Wheels & Skate Park) 1.4 335, Gordano Secondary School 1.4 335, Nearest GP practice: Portishead Medical, Group 1.4 338, Sainsburys 1.6 351, Lidl 1.6 331, Parish Wharf Leisure Centre 1.6 331, Waitrose, Portishead Football Club 1.7 344, Portishead Station (when built) 1.9 338 (According to Google Maps. Measured from the end of Tower Road closest to Tower Farm (much of the development would be further than this).) 4.2 There is very little in terms of shops/bars/restaurants/services/ employment within walking distance of Tower Farm. Buses will not be able to drive down there, so there will just be the X4 and occasionally the X10 that can be caught from Down Road – a fair, hilly walk from a lot of the houses if they were built (and longer than the 3 minutes the Developer's Plans claim). As a result, almost everyone living there will drive everywhere, increasing congestion and emissions, and worsening air quality and public health. Regarding the X4 bus stops at High Down schools and Bruton Avenue – buses only travel through these in on direction, meaning a very indirect route to the High Street taking 17 minutes (as opposed to 3 minutes by car) 4.3 The developer's Response to the consultation / Vision document states "the Site is also well located in terms of proximity to key destinations within Portishead. Active travel would be easily achieved on-site, due to its location it is well placed to extend the existing cycling and footpath facilities. The walking accessibility of the Site is deemed good, with local facilities and employment areas available within reasonable walking distance". This is however incorrect, for the reasons outlined above. It also states "A local centre is located within 1km of the Site at Down Road and West Hill", but this "local centre" is in fact a tertiary retail area limited in size and the range of businesses available there. 4.4 The developer's Transport Sustainability and Access Strategy is also misleading, with the walking times included in the Local Facilities Within Walking Distance section being grossly underestimated and ignoring the topography of Portishead. 4.5 The Transport Sustainability and Access Strategy is also misleading, in that it fails to mention that there is already considerable congestion in the vicinity at school drop-off/collection times, and that any increase in traffic due to the new development will exacerbate this severely. It also ignores the fact that there will be extra traffic movements should High Down School be expanded or a new school built on the site. Some pupils would be from the Tower Farm development, but with potentially 785 new homes at Wyndham Way and 100 at Blackrock and the only new capacity being proposed at High Down, many parents will be driving their children to school there from elsewhere in the town. Portishead Town Council regularly receive requests from residents for schemes to improve traffic safety and flow in this area (see Agenda item 8.2.2, Planning and Placemaking Cttee, August 2025 https://www.portishead.gov.uk/ council⟐meetings?month=08&year=2025&submit=Go#item-2005053)			

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					4.6 The developer’s document also says "The provision of a rail station connecting Portishead and Bristol within cycling distance of the site will be extremely beneficial for future residents to commute to work, reducing car trips". It will not however be within cycling distance of the site for many residents, particularly older residents, those with young children and those with mobility issues. Their suggestion that residents should purchase e-bikes does not address this. 4.7 The reopening of the station in Portishead will do little in terms of “offering a genuine choice of transport modes” for the Tower Farm area. As noted above, it will be nearly two miles away, so residents would have to either drive or catch the X4 bus and change / pay a second fare to catch the train into Bristol. 4.8 Just because Tower Farm is within the boundaries of Portishead does not mean that it is sustainable as a development site. Other locations in the town would be much more sustainable and better placed to take advantage of public transport, both new and existing, such as Old Mill Road/Wyndham Way. 4.9 This is therefore not “Significant development… focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes”, contrary to NPPF S110. 5 NPPF S115 In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: a) sustainable transport modes are prioritised…; b) safe and suitable access to the site can be achieved for all users; and c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach. 5.1 In respect of a), the points made regarding S110 apply again. 5.2 Regarding b), access to a development at Tower Farm is proposed via The Downs. This is a cul⟐de-sac with further cul-de-sacs leading off it. It is also right next to High Down School, the whole area around which is already extremely congested and chaotic at drop-off/pick-up times despite numerous campaigns to reduce car use. The map below shows the typical extent of parking at these times (marked in red). 5.3 Congestion will become even worse, both when construction traffic is using The Downs to access the site and once 400 homes are built and the residents start using their cars to drive to and from work/shops etc. Based on the average in the South West of 1.37 cars per household that would be an extra 548 cars, and a great many additional vehicle movements. It will become extremely dangerous for the primary school children to cross the roads to get to school, as it will for the many toddlers and children in pushchairs accompanying them and their parents. It would be an accident waiting to happen. Therefore, safe and suitable access to the site cannot be achieved. 5.4 In relation to c), Tower Road, The Downs and Down Road all regularly become gridlocked at times already. Increased traffic, both during construction and afterwards, will make this significantly worse. There will also be increased traffic elsewhere in and around the town, for example Avon Way, Combe Road, High Street, Cabstand, and the Gordano roundabout as a result of people having to drive to and from Tower Farm, for example for			

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					work. The Local Plan Transport Assessment document claims that there would be an improvement to the current levels of congestion, even with development, if mitigation is put in place, but it is unclear what mitigation, other than the railway, is proposed. Also, the document uses a figure of 485 homes at Wyndham in one section and 785 in another, so its accuracy should be called into question. The impacts on the transport network cannot be mitigated, and a more sustainable site for development should be found. 5.5 The developer's Transport Sustainability and Access Strategy states "The proposed development of at least 400 dwellings will not result in a severe residual impact on the operation of the Down Road / The Downs". This is incorrect for the reasons stated above. 5.6 There are no provisions in the latest version of the Plan to improve transport around Down Road, The Downs, The Deans and Tower Road. "Active travel connections to The Downs, St Mary's Road/Wetlands Lane" are mentioned but will achieve nothing – they don't help anyone get to anywhere other than potentially Gordano School. Any enhancement of the existing footpaths would also require the further destruction of green space and involve work on land owned by others. 5.7 Creating an additional school or extending High Down School, also mentioned as a possibility in the Plan, will make traffic even worse. Expanding school places at the top end of Portishead when most of the children needing places will be at the bottom (i.e. 785 homes at Wyndham Way) is rehashing exactly the same arguments as the last time this was proposed, when NSC accepted that it was not a viable idea. Car journeys would rise exponentially, creating traffic jams all over the town. We would not see the impact "cost effectively mitigated to an acceptable degree" – this is actually making things worse. 5.8 "Contribution to bus service required" is also mentioned in the Plan, but what can that achieve? The junction between Down Road and The Downs is not big enough to accommodate buses, and once 400 homes have been squeezed into this location, a new school and kept a buffer between the development and Weston Big Wood the roads are going to be far too narrow for buses to navigate them. 5.9 The Developer's Vision document uses the reopening of the railway as an example of sustainable public transport, but this has been used as a justification for building houses in Portishead for decades. The Vale, the Village Quarter, all the flats around the Marina, Harbour Crescent, Marina Gardens represent thousands of new homes that were all built on the basis that the people living there would be able to catch a train to wherever they wanted to go to. Residents would also need to travel to the station from Tower Farm, which cannot be done comfortably by walking or cycling. There is a mention of the possibility of a shuttle bus service, but this is vague, is likely not to materialise or if it did is likely to be provided only for a minimum period. 5.10 Other developers share the view that Tower Farm is not a suitable location for development due to the impact it would have on the local travel network. Persimmon Homes Severn Valley commented in response to the previous NSC consultation: "Transport & Accessibility: By virtue of its location, the site would lead to significant vehicular traffic flows through the centre of Portishead then to rise up to the site. Such vehicle movements are unnecessary and inconvenient. Development that is proximate to the main road off the strategic road network and the planned train station is more sustainable. Land at Tower Farm should therefore be reconsidered in terms of			

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					its suitability for development." 5.11 It can therefore not be said that "sustainable transport modes are prioritised… safe and suitable access to the site can be achieved for all users … and any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision⟐led approach", contrary to NPPF S115. 6 NPPF S110-112 6.1 The developer's own technical evidence (Vision Document and Transport Sustainability & Access Strategy) confirms several access constraints that cannot be overcome without significant adverse impact on the local highway network. Inadequate Access Strategy — Single Access Point The developer proposes one main vehicular access via The Downs and a second access limited to emergency, pedestrian and cycle use only via Tower Road (typically bollarded). This means the entire development of at least 400–500 homes would rely on a single functioning access point. The single access point proposed is contrary to best practice, introduces unnecessary risk for emergency response resilience, and does not provide "safe and suitable access for all users" as required by NPPF 110–112. The only alternative access routes are also not suitable: 1 - Via Tower Road - This has a narrower junction with Down Road than The Downs does. It could not have double-yellow lines added, as is proposed for The Downs, as there are houses on both sides all the way along. 2 - Via Valley Road - Valley Road already experiences road traffic accidents on a fairly regular basis and an additional access road onto Valley Road would be dangerous and further harm / restrict wildlife movement in the area of green belt surrounding the SSSI			
Land at Tower Farm	No	• Justified	No					draft-response-to-north-somerset-local-plan-2041-tower-farm-latest-20251127.pdf
Black Rock, north of Clevedon Road	No	• Consistent with national policy	No	No	Before including the Tower Farm and Black Rock sites in the Local Plan, NSC has not properly considered: • Alternative brown and green field sites with much less ecological impact both in Portishead and across North Somerset. • The opportunity to increase housing density on proposed brown field sites across North Somerset which would mean these sites are not required to meet local housing targets. • The strategic ecological contribution of these specific sites in protecting the unique environment of Weston Big Wood (SSSI) and the Gordano Valley strategic green corridor • The fact that these sites were specifically added to the Green Belt in the late 1980's because of their high ecological value. For the above reasons, the Local Plan is unsound because National Planning Policy states that sites can only be removed from Green Belt for development	Before including the Tower Farm and Black Rock sites in the Local Plan, NSC has not properly considered: • Alternative brown and green field sites with much less ecological impact both in Portishead and across North Somerset. • The opportunity to increase housing density on proposed brown field sites across North Somerset which would mean these sites are not required to meet local housing targets. • The strategic ecological	Before including the Tower Farm and Black Rock sites in the Local Plan, NSC has not properly considered: • Alternative brown and green field sites with much less ecological impact both in Portishead and across North Somerset. • The opportunity to increase housing density on proposed brown field sites across North Somerset which would mean these sites are not required to meet local housing targets. • The strategic ecological contribution of these specific	

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					under exceptional circumstances and these exceptional circumstances are not proven. In addition, neither site is sustainable or capable of providing safe and suitable access, and would give rise to unacceptable transport impacts, which fails the soundness tests set out in National Planning Policy. Therefore, the Tower Farm and Black Rock sites should both be removed from the Local Plan We note that developer proposals for both Black Rock and Tower Farm developments were submitted long before the funding and go-ahead for the Portishead-Bristol rail link were approved. We here describe multiple concerns about these two specific locations relating to the unique SSSI status of the adjacent Weston Big Wood woodland as well as ecological, sustainability and other concerns. Taken together, the Black Rock and Tower Farm proposed developments will encircle ~20% of Weston Big Wood's boundary. We also note that the population of Portishead has increased from circa 17000 to approximately 27000 in the last twenty-five years and currently struggles with sufficient infrastructure, so any additional development must ensure that this infrastructure deficit is fully addressed. 1 NPPF S147 Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph and whether the strategy: a) makes as much use as possible of suitable brownfield sites and underutilised land; b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport... 1.1 In comparison with the previous iteration of the NSC Local Plan draft, the density of the Wyndham Way site in Portishead was increased from 485 to 785 homes. This increase in density is compatible with National Policy as it is a brownfield and is far more sustainable than the others being proposed in the town. However, only one other significant proposed site in North Somerset saw an increase in its allocation between the previous and current draft. There is no evidence that density at the other sites in the Plan has been properly considered. This should be done in order to comply with NPPF S147, and NSC's claim within its Green Belt Review Background Paper that this has been done is not credible. The Wyndham Way site contains a 1.1 hectare "green field" which is effectively wasteland and has been earmarked for commercial development for many years, but no plans have ever been brought forward because of lack of viability. The vision of the Wyndham Way area is for a mixed housing and commercial development which would bring more jobs to Portishead and prevent it becoming purely a commuter town. This particular site It is near to the new railway station which is due to open in 2028. Reclassifying it as a mixed residential and commercial site on this wasteland will increase the probability of the site being developed as the first phase of the Wyndham Way area vision/Town Centre regeneration and avoid the need for housing to be built so close to an SSSI and its inevitable detrimental impact 1.2 Many other sites across North Somerset (at least 23) are clearly, from their descriptions, brownfield. If 300 homes can be added to Wyndham Way by increasing the density, this should be done elsewhere, removing the need to build on the Green Belt in Portishead and elsewhere.	contribution of these specific sites in protecting the unique environment of Weston Big Wood (SSSI) and the Gordano Valley strategic green corridor • The fact that these sites were specifically added to the Green Belt in the late 1980's because of their high ecological value. For the above reasons, the Local Plan is unsound because National Planning Policy states that sites can only be removed from Green Belt for development under exceptional circumstances and these exceptional circumstances are not proven. In addition, neither site is sustainable or capable of providing safe and suitable access, and would give rise to unacceptable transport impacts, which fails the soundness tests set out in National Planning Policy. Therefore, the Tower Farm and Black Rock sites should both be removed from the Local Plan We note that developer proposals for both Black Rock and Tower Farm developments were submitted long before the funding and go-ahead for the Portishead-Bristol rail link were approved. We here describe multiple concerns about these two specific locations relating to the unique SSSI status of the adjacent Weston Big Wood woodland as well as ecological, sustainability and other concerns. 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We also note that the population of Portishead has increased from circa 17000 to approximately 27000 in the last twenty-five years and currently struggles with sufficient infrastructure, so any additional development must ensure that this infrastructure deficit is fully addressed. 1 NPPF S147 Before concluding that exceptional circumstances exist	

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					1.3 One example of a site that is not making full use of a brownfield site or optimising the density of development is Castlewood in Clevedon. The site is owned by North Somerset Council and has an allocation of just 120 homes. It is a sustainable site with an area of 3.37 hectares with a flat walk to the High Street, served by the X5, X6, X7/X7a, X10 and X11 bus services (i.e. local and Bristol services). It should be classified as either a suburban or urban site and national guidance recommends a dwelling density of 100-120 dph (dwellings per hectare) for suburban sites and 200+dph for urban sites. This brownfield site could therefore accommodate between 300 to 600 homes rather than the 120 currently planned which would mean that ecologically sensitive sites such as Tower Farm would no longer be needed. Increasing density on this site should be done “Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries”, in order to comply with the NPPF. 1.4 In respect of the Castlewood site, more efficient use of it would also boost the availability of new homes in Clevedon, which currently only has an allocation of 258 compared with 6,084 in Weston, 1,347 in Portishead, 1,683 in Backwell, 1,817 in Nailsea and 1,100 in Pill. This would also help to give a fairer distribution of development across North Somerset. In addition, NSC should surely has a statutory duty to maximise their potential income from a site that they own. 1.5 Despite rapid growth in Portishead in recent years (the population has increased in size by 60% between 2001 and 2025) and a tightly drawn settlement boundary there is still some green field land in a sustainable location that would not damage the local environment if brought forward for development. An example is a plot (known as “Land South of Clevedon Road”. This was included as a site reference HE20488 in the 2023 NSC Local Plan draft but has been removed from the latest version, we understand that this is because the Environment Agency has reclassified the land is being in the flood plain. This is surprising as the field is on a small ridge overlooking the Somerset Levels and is in fact on higher ground than most of the land developed in Portishead over the last 25 years. The 2023 proposal was for 80 homes on this 2.67 Hectare Green Belt site, mostly larger Executive style homes. That proposal was in conflict with the independent Portishead Housing Needs Assessment carried out by AECOM for the Portishead Neighbourhood Plan which highlighted the need for affordable and smaller dwelling units in Portishead. To quote the AECOM report “Our model suggests that what is most needed to be built in Portishead over the plan period is 3 bedroom properties (48%); followed by 2 bedroom (32%); plus a smaller amount of 1 bedroom properties (15%); a very small amount of very large properties with 5 bedrooms or more. There is no need for more 4 bedroom properties… Most of all, while prioritising mid-sized homes, a variety of housing should be provided to cater for incomes of different needs, incomes, sizes, and life-stages… the demand for smaller properties from those with less purchasing power is of priority concern”. This site is in a sustainable location, very close to the local Secondary school and a short flat walk to Portishead High Street. It should be brought back into the Local Plan, classified as a suburban or urban site and using national housing density guidelines the 2.67 acre site could accommodate 250 to 500 dwellings which would help to remove the need for developing on other much less sustainable and environmentally damaging sites such as Tower Farm. 1.6 At least 2 existing brownfield sites in Portishead have not been included in the Plan. Planning permission was granted in 2017 for 33 homes at a site in Portishead between Wyndham Way and Cheviot Meadow (17/P/1229/FUL). These were not built, and permission was later granted for a care home there, but that has also not been built and the site is for sale again. Land is also for sale next to The Poacher public house, with an indicative 8 homes.How many	Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph and whether the strategy: a) makes as much use as possible of suitable brownfield sites and underutilised land; b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport… 1.1 In comparison with the previous iteration of the NSC Local Plan draft, the density of the Wyndham Way site in Portishead was increased from 485 to 785 homes. This increase in density is compatible with National Policy as it is a brownfield and is far more sustainable than the others being proposed in the town. However, only one other significant proposed site in North Somerset saw an increase in its allocation between the previous and current draft. There is no evidence that density at the other sites in the Plan has been properly considered. This should be done in order to comply with NPPF S147, and NSC’s claim within its Green Belt Review Background Paper that this has been done is not credible. The Wyndham Way site contains a 1.1 hectare “green field” which is effectively wasteland and has been earmarked for commercial development for many years,	to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. 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					other brownfield sites are there in North Somerset that have not been included and that should be considered before releasing Green Belt land? 1.7 The analysis is sections 1.31 to 1.35 shows that NSC's claim within its Green Belt Review Background Paper that the use of brownfield sites has been properly assessed is not credible. It has not fully assessed the opportunities for sustainable, brown field or greenfield development in urban and suburban sites. 1.8 The CPRE has recently emphasised the value of brownfield sites in achieving house-building targets and the fallacy that Green Belt revisions are required. Their research "shows that there are enough brownfield sites in England to build 1.4 million new homes": https://www.cpre.org.uk/news/over-half-of-brownfield-sites-could-be-built-on-rapidly-report◈shows/ . This is something that NSC should be prioritising. 1.9 Tower Farm is situated in the Green Belt. The area was defined as Green Belt relatively recently in 1988, it was not part of the original UK wide Green Belt designation. The 1988 designation was part of the South West Avon Green Belt Local Plan and made after a Planning decision made by the Secretary of State at the time regarding the development of the Avon and Police Headquarters and a housing estate on Portishead down next to Tower Farm. The Secretary of State at the time, whilst allowing the development, emphasised the strategic ecological importance of the adjacent Gordano Valley and need to protect the integrity of the Strategic Gordano Valley Green Corridor (now defined as a North Somerset Council Strategic Green corridor). The judgement also led to the subsequent purchase in 1997 of the 38 acres of the Weston Big Wood SSSI for safekeeping by Avon Wildlife Trust. The Strategic Green corridor runs all the way from the Severn Estuary through Portbury Wharf Nature Reserve, along the Gordano valley and through to the Somerset Levels and the Mendips. This area is exceptional Green Belt in contradiction to the NSC Green Belt assessment which fails to factor in the special circumstances that led to this relatively late designation as Green Belt. 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New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces. 2.1 There is nothing in the Draft Infrastructure Delivery Plan Schedule document in Portishead other than: a cycle lane to Clevedon; the railway line that has been used to justify every development in the town for the past 30 years so can't be described as "necessary improvements to local or national infrastructure" in response to the proposed loss of Green Belt land; and something vague about possibly building a new school. 2,2 There is also no "provision of new, or improvements to existing, green spaces" in the NSC Plan. 2.3 The developer's Vision Document includes plans to provide a small amount of additional land to and changes to Merlin Park (which is public land not owned by them), but shows a complete lack of understanding of the current area. Their plans would be out of keeping with the current use, and	but no plans have ever been brought forward because of lack of viability. The vision of the Wyndham Way area is for a mixed housing and commercial development which would bring more jobs to Portishead and prevent it becoming purely a commuter town. This particular site It is near to the new railway station which is due to open in 2028. Reclassifying it as a mixed residential and commercial site on this wasteland will increase the probability of the site being developed as the first phase of the Wyndham Way area vision/ Town Centre regeneration and avoid the need for housing to be built so close to an SSSI and its inevitable detrimental impact 1.2 Many other sites across North Somerset (at least 23) are clearly, from their descriptions, brownfield. If 300 homes can be added to Wyndham Way by increasing the density, this should be done elsewhere, removing the need to build on the Green Belt in Portishead and elsewhere. 1.3 One example of a site that is not making full use of a brownfield site or optimising the density of development is Castlewood in Clevedon. The site is owned by North Somerset Council and has an allocation of just 120 homes. It is a sustainable site with an area of 3.37 hectares with a flat walk to the High Street, served by the X5, X6, X7/X7a, X10 and X11 bus services (i.e. local and Bristol services). It should be classified as either a suburban or urban site and national guidance recommends a dwelling density of 100-120 dph (dwellings per hectare) for suburban sites and 200+dph for urban sites. This brownfield site could therefore accommodate between 300 to 600 homes rather than the 120 currently planned which would mean that ecologically sensitive sites such	vision of the Wyndham Way area is for a mixed housing and commercial development which would bring more jobs to Portishead and prevent it becoming purely a commuter town. This particular site It is near to the new railway station which is due to open in 2028. Reclassifying it as a mixed residential and commercial site on this wasteland will increase the probability of the site being developed as the first phase of the Wyndham Way area vision/Town Centre regeneration and avoid the need for housing to be built so close to an SSSI and its inevitable detrimental impact 1.2 Many other sites across North Somerset (at least 23) are clearly, from their descriptions, brownfield. 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Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; c) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs; … 3.1 Tower Farm adjoins Weston Big Wood, an SSSI and one of the most valued landscapes and most important biodiversity sites in North Somerset. It is also close to Nightingale Valley SSSI. This planning decision should do everything possible to protect these special places.	as Tower Farm would no longer be needed. Increasing density on this site should be done “Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries”, in order to comply with the NPPF. 1.4 In respect of the Castlewood site, more efficient use of it would also boost the availability of new homes in Clevedon, which currently only has an allocation of 258 compared with 6,084 in Weston, 1,347 in Portishead, 1,683 in Backwell, 1,817 in Nailsea and 1,100 in Pill. This would also help to give a fairer distribution of development across North Somerset. In addition, NSC should surely has a statutory duty to maximise their potential income from a site that they own. 1.5 Despite rapid growth in Portishead in recent years (the population has increased in size by 60% between 2001 and 2025) and a tightly drawn settlement boundary there is still some green field land in a sustainable location that would not damage the local environment if brought forward for development. An example is a plot (known as “Land South of Clevedon Road”. This was included as a site reference HE20488 in the 2023 NSC Local Plan draft but has been removed from the latest version, we understand that this is because the Environment Agency has reclassified the land is being in the flood plain. This is surprising as the field is on a small ridge overlooking the Somerset Levels and is in fact on higher ground than most of the land developed in Portishead over the last 25 years. The 2023 proposal was for 80 homes on this 2.67 Hectare Green Belt site, mostly larger Executive style homes. That proposal was in conflict with the independent Portishead Housing Needs Assessment	Farm would no longer be needed. Increasing density on this site should be done “Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries”, in order to comply with the NPPF. 1.4 In respect of the Castlewood site, more efficient use of it would also boost the availability of new homes in Clevedon, which currently only has an allocation of 258 compared with 6,084 in Weston, 1,347 in Portishead, 1,683 in Backwell, 1,817 in Nailsea and 1,100 in Pill. This would also help to give a fairer distribution of development across North Somerset. 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						carried out by AECOM for the Portishead Neighbourhood Plan which highlighted the need for affordable and smaller dwelling units in Portishead. To quote the AECOM report “Our model suggests that what is most needed to be built in Portishead over the plan period is 3 bedroom properties (48%); followed by 2 bedroom (32%); plus a smaller amount of 1 bedroom properties (15%); a very small amount of very large properties with 5 bedrooms or more. There is no need for more 4 bedroom properties… Most of all, while prioritising mid-sized homes, a variety of housing should be provided to cater for incomes of different needs, incomes, sizes, and life-stages… the demand for smaller properties from those with less purchasing power is of priority concern”. This site is in a sustainable location, very close to the local Secondary school and a short flat walk to Portishead High Street. It should be brought back into the Local Plan, classified as a suburban or urban site and using national housing density guidelines the 2.67 acre site could accommodate 250 to 500 dwellings which would help to remove the need for developing on other much less sustainable and environmentally damaging sites such as Tower Farm. 1.6 At least 2 existing brownfield sites in Portishead have not been included in the Plan. Planning permission was granted in 2017 for 33 homes at a site in Portishead between Wyndham Way and Cheviot Meadow (17/P/1229/FUL). These were not built, and permission was later granted for a care home there, but that has also not been built and the site is for sale again. Land is also for sale next to The Poacher public house, with an indicative 8 homes.How many other brownfield sites are there	for 80 homes on this 2.67 Hectare Green Belt site, mostly larger Executive style homes. That proposal was in conflict with the independent Portishead Housing Needs Assessment carried out by AECOM for the Portishead Neighbourhood Plan which highlighted the need for affordable and smaller dwelling units in Portishead. To quote the AECOM report “Our model suggests that what is most needed to be built in Portishead over the plan period is 3 bedroom properties (48%); followed by 2 bedroom (32%); plus a smaller amount of 1 bedroom properties (15%); a very small amount of very large properties with 5 bedrooms or more. There is no need for more 4 bedroom properties… Most of all, while prioritising mid-sized homes, a variety of housing should be provided to cater for incomes of different needs, incomes, sizes, and life-stages… the demand for smaller properties from those with less purchasing power is of priority concern”. This site is in a sustainable location, very close to the local Secondary school and a short flat walk to Portishead High Street. It should be brought back into the Local Plan, classified as a suburban or urban site and using national housing density guidelines the 2.67 acre site could accommodate 250 to 500 dwellings which would help to remove the need for developing on other much less sustainable and environmentally damaging sites such as Tower Farm. 1.6 At least 2 existing brownfield sites in Portishead have not been included in the Plan. Planning permission was granted in 2017 for 33 homes at	

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						every development in the town for the past 30 years so can’t be described as “necessary improvements to local or national infrastructure” in response to the proposed loss of Green Belt land; and something vague about possibly building a new school. 2,2 There is also no “provision of new, or improvements to existing, green spaces” in the NSC Plan. 2.3 The developer’s Vision Document includes plans to provide a small amount of additional land to and changes to Merlin Park (which is public land not owned by them), but shows a complete lack of understanding of the current area. Their plans would be out of keeping with the current use, and also assumes that the current/future owners of the existing land would want to make those changes. 2.4 It can therefore not be demonstrated that the Golden Rule for releasing land from the Green Belt for the provision of housing of “necessary improvements to local or national infrastructure; and the provision of new, or improvements to existing, green spaces that are accessible to the public” will be met, contrary to NPPF S156. t can therefore not be demonstrated that the Golden Rule for releasing land from the Green Belt for the provision of housing of “necessary improvements to local or national infrastructure; and the provision of new, or improvements to existing, green spaces that are accessible to the public” will be met, contrary to NPPF S156. 3 NPPF S187 1. Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of	sites in the Green Belt subject to a planning application, the following contributions (‘Golden Rules’) should be made: … b) necessary improvements to local or national infrastructure; and the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces. 2.1 There is nothing in the Draft Infrastructure Delivery Plan Schedule document in Portishead other than: a cycle lane to Clevedon; the railway line that has been used to justify every development in the town for the past 30 years so can’t be described as “necessary improvements to local or national infrastructure” in response to the proposed loss of Green Belt land; and something vague about possibly building a new school. 2,2 There is also no “provision of new, or improvements to existing, green spaces” in the NSC Plan. 2.3 The developer’s Vision Document includes plans to provide a small amount of additional land to and changes to Merlin Park (which is public land not owned by them), but shows a complete lack of understanding of the current area. Their plans would be out of keeping with the current use, and also assumes that the current/future owners of the existing land would want to make those changes. 2.4 It can therefore not be demonstrated that the Golden Rule for releasing land from the	

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Black Rock, north of Clevedon Road	No	Consistent with national policy	No	No	Before including the Tower Farm and Black Rock sites in the Local Plan, NSC has not properly considered: • Alternative brown and green field sites with much less ecological impact both in Portishead and across North Somerset. • The opportunity to increase housing density on proposed brown field sites across North Somerset which would mean these sites are not required to meet local housing targets. • The strategic ecological contribution of these specific sites in protecting the unique environment of Weston Big Wood (SSSI) and the Gordano Valley strategic green corridor • The fact that these sites were specifically added to the Green Belt in the late 1980's because of their high ecological value. For the above reasons, the Local Plan is unsound because National Planning Policy states that sites can only be removed from Green Belt for development under exceptional circumstances and these exceptional circumstances are not proven. In addition, neither site is sustainable or capable of providing safe and suitable access, and would give rise to unacceptable transport impacts, which fails the soundness tests set out in National Planning Policy. Therefore, the Tower Farm and Black Rock sites should both be removed from the Local Plan We note that developer proposals for both Black Rock and Tower Farm developments were submitted long before the funding and go-ahead for the Portishead-Bristol rail link were approved. We here describe multiple concerns about these two specific locations relating to the unique SSSI status of the adjacent Weston Big Wood woodland as well as ecological, sustainability and other concerns. Taken together, the Black Rock and Tower Farm proposed developments will encircle ~20% of Weston Big Wood's boundary. We also note that the population of Portishead has increased from circa 17000 to approximately 27000 in the last twenty-five years and currently struggles with sufficient infrastructure, so any additional development must ensure that this infrastructure deficit is fully addressed. 1 NPPF S147 Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph and whether the strategy: a) makes as much use as possible of suitable brownfield sites and underutilised land; b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport...			

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					1.1 In comparison with the previous iteration of the NSC Local Plan draft, the density of the Wyndham Way site in Portishead was increased from 485 to 785 homes. This increase in density is compatible with National Policy as it is a brownfield and is far more sustainable than the others being proposed in the town. However, only one other significant proposed site in North Somerset saw an increase in its allocation between the previous and current draft. There is no evidence that density at the other sites in the Plan has been properly considered. This should be done in order to comply with NPPF S147, and NSC's claim within its Green Belt Review Background Paper that this has been done is not credible. The Wyndham Way site contains a 1.1 hectare "green field" which is effectively wasteland and has been earmarked for commercial development for many years, but no plans have ever been brought forward because of lack of viability. The vision of the Wyndham Way area is for a mixed housing and commercial development which would bring more jobs to Portishead and prevent it becoming purely a commuter town. This particular site It is near to the new railway station which is due to open in 2028. Reclassifying it as a mixed residential and commercial site on this wasteland will increase the probability of the site being developed as the first phase of the Wyndham Way area vision/Town Centre regeneration and avoid the need for housing to be built so close to an SSSI and its inevitable detrimental impact 1.2 Many other sites across North Somerset (at least 23) are clearly, from their descriptions, brownfield. If 300 homes can be added to Wyndham Way by increasing the density, this should be done elsewhere, removing the need to build on the Green Belt in Portishead and elsewhere. 1.3 One example of a site that is not making full use of a brownfield site or optimising the density of development is Castlewood in Clevedon. The site is owned by North Somerset Council and has an allocation of just 120 homes. It is a sustainable site with an area of 3.37 hectares with a flat walk to the High Street, served by the X5, X6, X7/X7a, X10 and X11 bus services (i.e. local and Bristol services). It should be classified as either a suburban or urban site and national guidance recommends a dwelling density of 100-120 dph (dwellings per hectare) for suburban sites and 200+dph for urban sites. This brownfield site could therefore accommodate between 300 to 600 homes rather than the 120 currently planned which would mean that ecologically sensitive sites such as Tower Farm would no longer be needed. Increasing density on this site should be done "Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries", in order to comply with the NPPF. 1.4 In respect of the Castlewood site, more efficient use of it would also boost the availability of new homes in Clevedon, which currently only has an allocation of 258 compared with 6,084 in Weston, 1,347 in Portishead, 1,683 in Backwell, 1,817 in Nailsea and 1,100 in Pill. This would also help to give a fairer distribution of development across North Somerset. In addition, NSC should surely has a statutory duty to maximise their potential income from a site that they own. 1.5 Despite rapid growth in Portishead in recent years (the population has increased in size by 60% between 2001 and 2025) and a tightly drawn settlement boundary there is still some green field land in a sustainable location that would not damage the local environment if brought forward for development. An example is a plot (known as "Land South of Clevedon Road". This was included as a site reference HE20488 in the 2023 NSC Local Plan draft but has been removed from the latest version, we understand that this is because the Environment Agency has reclassified the land is being in the flood plain. This is surprising as the field is on a small ridge overlooking the Somerset Levels and is in fact on higher ground than most of the land developed in Portishead over the last 25 years. The 2023 proposal was for 80 homes on this 2.67 Hectare Green Belt site, mostly larger Executive style homes. That proposal was in conflict with the independent Portishead Housing Needs Assessment carried out by AECOM			

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					for the Portishead Neighbourhood Plan which highlighted the need for affordable and smaller dwelling units in Portishead. To quote the AECOM report “Our model suggests that what is most needed to be built in Portishead over the plan period is 3 bedroom properties (48%); followed by 2 bedroom (32%); plus a smaller amount of 1 bedroom properties (15%); a very small amount of very large properties with 5 bedrooms or more. There is no need for more 4 bedroom properties… Most of all, while prioritising mid-sized homes, a variety of housing should be provided to cater for incomes of different needs, incomes, sizes, and life-stages… the demand for smaller properties from those with less purchasing power is of priority concern”. This site is in a sustainable location, very close to the local Secondary school and a short flat walk to Portishead High Street. It should be brought back into the Local Plan, classified as a suburban or urban site and using national housing density guidelines the 2.67 acre site could accommodate 250 to 500 dwellings which would help to remove the need for developing on other much less sustainable and environmentally damaging sites such as Tower Farm. 1.6 At least 2 existing brownfield sites in Portishead have not been included in the Plan. Planning permission was granted in 2017 for 33 homes at a site in Portishead between Wyndham Way and Cheviot Meadow (17/P/1229/FUL). These were not built, and permission was later granted for a care home there, but that has also not been built and the site is for sale again. Land is also for sale next to The Poacher public house, with an indicative 8 homes. How many other brownfield sites are there in North Somerset that have not been included and that should be considered before releasing Green Belt land? 1.7 The analysis is sections 1.31 to 1.35 shows that NSC’s claim within its Green Belt Review Background Paper that the use of brownfield sites has been properly assessed is not credible. It has not fully assessed the opportunities for sustainable, brown field or greenfield development in urban and suburban sites. 1.8 The CPRE has recently emphasised the value of brownfield sites in achieving house-building targets and the fallacy that Green Belt revisions are required. Their research “shows that there are enough brownfield sites in England to build 1.4 million new homes”: https://www.cpre.org.uk/news/over-half-of-brownfield-sites-could-be-built-on-rapidly-report◈shows/ . This is something that NSC should be prioritising. 1.9 Tower Farm is situated in the Green Belt. The area was defined as Green Belt relatively recently in 1988, it was not part of the original UK wide Green Belt designation. The 1988 designation was art of the South West Avon Green Belt Local Plan and made after a Planning decision made by the Secretary of State at the time regarding the development of the Avon and Police Headquarters and a housing estate on Portishead down next to Tower Farm. The Secretary of State at the time, whilst allowing the development, emphasised the strategic ecological importance of the adjacent Gordano Valley and need to protect the integrity of the Strategic Gordano Valley Green Corridor (now defined as a North Somerset Council Strategic Green corridor). The judgement also led to the subsequent purchase in 1997 of the 38 acres of the Weston Big Wood SSSI for safekeeping by Avon Wildlife Trust. The Strategic Green corridor runs all the way from the Severn Estuary through Portbury Wharf Nature Reserve, along the Gordano valley and through to the Somerset Levels and the Mendips. This area is exceptional Green Belt in contradiction to the NSC Green Belt assessment which fails to factor in the special circumstances that led to this relatively late designation as Green Belt. NSC has therefore not demonstrated that “Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries… it has examined fully all other reasonable options for meeting its identified need for development”, contrary to NPPF S147.			

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					2 NPPF S156 Where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review, or on sites in the Green Belt subject to a planning application, the following contributions ('Golden Rules') should be made: b) necessary improvements to local or national infrastructure; and the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces. 2.1 There is nothing in the Draft Infrastructure Delivery Plan Schedule document in Portishead other than: a cycle lane to Clevedon; the railway line that has been used to justify every development in the town for the past 30 years so can't be described as "necessary improvements to local or national infrastructure" in response to the proposed loss of Green Belt land; and something vague about possibly building a new school. 2,2 There is also no "provision of new, or improvements to existing, green spaces" in the NSC Plan. 2.3 The developer's Vision Document includes plans to provide a small amount of additional land to and changes to Merlin Park (which is public land not owned by them), but shows a complete lack of understanding of the current area. Their plans would be out of keeping with the current use, and also assumes that the current/future owners of the existing land would want to make those changes. 2.4 It can therefore not be demonstrated that the Golden Rule for releasing land from the Green Belt for the provision of housing of "necessary improvements to local or national infrastructure; and the provision of new, or improvements to existing, green spaces that are accessible to the public" will be met, contrary to NPPF S156. It can therefore not be demonstrated that the Golden Rule for releasing land from the Green Belt for the provision of housing of "necessary improvements to local or national infrastructure; and the provision of new, or improvements to existing, green spaces that are accessible to the public" will be met, contrary to NPPF S156. 3 NPPF S187 1. Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; c)minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs; … 3.1 Tower Farm adjoins Weston Big Wood, an SSSI and one of the most valued landscapes and most important biodiversity sites in North Somerset. It is also close to Nightingale Valley SSSI. This planning decision should do everything possible to protect these special places.			

Name: Mr James Joseph Sullivan **I.D:** 62857665

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SP10: Transport	No	• Effective		Yes	It is not sound in respect of the Transport considerations around Nailsea and Backwell. This view is consistent with the reports own statement that the scale of development has previously been considered and rejected on this basis (para 4.33). The proposed East of Backwell Cross Rail Link (para 4.38) serves to move traffic around the local proposed developments but does not not address the wider issue of the additional traffic volume generated buy the developments and how this traffic would link up with the exiting infrastructure towards Bristol or indeed towards the M5 motorway. It is also widely known that the area around the proposed East of Backwell Cross Rail Link is a flood risk, as evidenced by regular flooding athe the cross rail bridge at Chapel Hill in Backwell.	Significant improvements to capacity and facilities at Nailsea and Backwell railway station would be a start. However, the road infrastructure will still struggle to cope.		

Name: Mr Kevin Hurlow **I.D:** 51456097

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell cannot cope with yet more houses, due to the lack of infrastructure and services. The existing schools and doctors' services would be overwhelmed. Backwell has been allocated a disproportionate percentage increase in houses compared to other housing areas in North Somerset. There are no employment opportunities in the area for the householders in the proposed new homes. The railway station is unfit for the purpose of taking thousands more commuters and is inaccessible for disabled people travelling to the south west. The roads are crammed and the proposed new road lacks any real planning. The proposed land should be used for agriculture and not for development. The country needs food security and this would further diminish the available land to supply crops or grazing.			

Name: Mr Kevin J Maitland **I.D:** 39255233

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Land east of Backwell	No		Unsure	Unsure	"HE202012 Objective 1.3: Promote the optimal use of land which supports regeneration, maximises re-use of previously developed (brownfield) land and protects the rural economy Significant negative/Uncertain (--?) The site is on greenfield land and mostly contains land classified as agricultural grade 3." This appears to be incorrect - greater than 50% of the land area in this parcel is classified as agricultural grade 1. This information has also been omitted from the analysis in Stage 2 Green Belt Assessment (Backwell – Parcel 1: Land East of Backwell School to Backwell Green) Purpose E (assist in urban regeneration by encouraging the recycling of derelict and other urban land) has been misapplied. By its own definition, this should be considered Strong, in keeping with paragraph 153 in in the National Planning Policy Framework. Planned development on these parcels will not meet criteria 154 e) (December 2024).			

Name: Mr Neil A Marshall **I.D:** 51073697

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	With all the 800 houses already alocated to Backwell more developement would even further destroy a once vibrant village. Compred to other towns Backwell seems to be over burdened with developement by increasing its share by 7%. There appears to be no need or analysis for shuch developement. Backwell is not an employment hub as the vast majority of residents already commute to Bristol for employment. The additional traffic would swamp the local transport system which is already at its limits. Backwell would simply become a suberb of Bristol. This proposal would distroy valuable farm land which is currently used to provide food for us to eat and survive. It would destroy valuable wildlife habitat including bats. The proposal dose not mention increse in facilities within Backwell such as Doctors, dentists, pharmasists, schools and leasure facilities. The proposed new road is totally unrealistic. Who will paye for this? The construction of a bridge or tunnel under the railway line would cost many, many millions of pounds. Iam guessing it wont be the developer. This means it will have to be the local tax payer. Where is the feasability study and costing analaysis. Even if were to go ahead it would not reduce the amount of traffic in Backwell or on the route to Bristol. It would not help the much heralded Bus improvement scheme. I could go on but I think my comments so far must indicate to you that this proposal is totally inapropriate and should be dismissed.			

Name: Mr Paul Griffin **I.D:** 63114785

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Policy LP7: Settlement boundaries	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	No	Land at Tickenham – as identified in the attached information should be included within a revised settlement boundary to Tickenham. The land identified is sufficient to accommodate housing sensitively. The Green Belt should be revised (given that Tickenham is proposed to be inset) to include this land – which is located in a sustainable location	Land at Tickenham (south of the Pippins) should be included within a revised settlement boundary so to allow for sensitive infill development to be delivered. Such development would contribute to the sustainability of the village. It would also helpfully bolster the Council's 5 year housing land supply.		Hill Lane Context Plan 1 and 2.pdf Hill Lane, Tickenham Location Plan.pdf Hill Lane Illustrative Layout Elevations.pdf Site Plan 1-10000.pdf

Name: Mr Stephen Charles Stephens **I.D:** 50668353

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Land east of Backwell	No	• Positively prepared • Justified • Consistent with national policy	Unsure	Unsure	With the planned developments already going ahead there is already NO sustainable infrastructure in the village. The village is being ruined by overdevelopment with no infrastructure in an area where there is little or no employment. This further proposed development on prime agricultural land is a step to far. Until the current developments are complete, appropriate assessment made of the deemed demand for houses, and the effect on the current inadequate infrastructure considered NO further development should even be considered. Why is it developers get to build without appropriate facilities/roads put in place FIRST, and current residents suffer for years waiting for everything to catch up (IF IT EVER DOES). Developing is the wrong way around. This should NOT EVEN BE CONSIDERED until the planned link road from the lake, avoiding Station Road is built. Station Road is not fit for purpose now, even before the Grove Farm development starts and certainly this planned development should never happen on Greenbelt land and so close to the school especially with no land allocated to the school for expansion to cater for the already approved developments!!! STOP, THINK and REASSESS- the roads are inadequate, to call the railway station a transport hub beggars belief and the			

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					infrastructure is inadequate. Also where is the need for all this so say extra housing coming from since as far as I can see developers are dragging their feet on current developments through lack of demand.			
Land east of Backwell	No	• Positively prepared • Justified • Consistent with national policy	Unsure	Unsure	With the planned developments already going ahead there is already NO sustainable infrastructure in the village. The village is being ruined by overdevelopment with no infrastructure in an area where there is little or no employment. This further proposed development on prime agricultural land is a step to far. Until the current developments are complete, appropriate assessment made of the deemed demand for houses, and the effect on the current inadequate infrastructure considered NO further development should even be considered. Why is it developers get to build without appropriate facilities/roads put in place FIRST, and current residents suffer for years waiting for everything to catch up (IF IT EVER DOES). Developing is the wrong way around. This should NOT EVEN BE CONSIDERED until the planned link road from the lake, avoiding Station Road is built. Station Road is not fit for purpose now, even before the Grove Farm development starts and certainly this planned development should never happen on Greenbelt land and so close to the school especially with no land allocated to the school for expansion to cater for the already approved developments!!! STOP, THINK and REASSESS- the roads are inadequate, to call the railway station a transport hub beggars belief and the infrastructure is inadequate. Also where is the need for all this so say extra housing coming from since as far as I can see developers are dragging their feet on current developments through lack of demand.			

Name: Mr Thomas Catling (Woodstock Homes, Knightcott Road, Banwell) **I.D:** 58516481

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SP1: Sustainable Development	Unsure	• Justified • Effective • Consistent with national policy	Unsure	Unsure	Woodstock Homes control the 22 acre site, Land to the South of Knightcott Road, Banwell, a site which has been promoted through the earlier stages of the Local Plan process and recently achieved a resolution to grant at the October Planning and Regulatory Committee for outline planning on 4.6 acres of the site for up to 27 dwellings (24/P/0967/OUT). Woodstock are in control of the remaining 17 acres, of which was part of a previous application for 95 dwellings (23/P/2303/OUT) was made but was later withdrawn. This representation submissions aims to provide commentary on the emerging Local Plan, with focus on the rural settlements, specifically Banwell. Banwell is identified in the adopted Core Strategy as a service village (Policy CS32), containing a number of local services along with public transport links. By way of the inclusion of Banwell within Schedule 5 of the Pre-Submission Plan, as a settlement with a defined boundary, it is clear that the council acknowledges the village within the settlement hierarchy. The Vision for the North Somerset Local Plan 2041 makes clear that there is an aspiration to encourage development in highly sustainable, accessible and attractive places. SP6: Villages and rural areas, reinforces this aspiration with the importance of accessible locations with good walking, cycling and public transport connections. SP1: Sustainable development illustrates a clear focus for development to come from the most sustainable areas however, this is contradicted by LP7 which prevents growth directly in Banwell.			CP-01 PH2 Knightcott Rd, Banwell - Concept Plan @ A2 Notes.pdf Knightcott Road Banwell - Representations Reg 19.pdf
SP3: Spatial strategy	Unsure	• Justified • Effective • Consistent with national policy	Unsure	Unsure	Woodstock Homes control the 22 acre site, Land to the South of Knightcott Road, Banwell, a site which has been promoted through the earlier stages of the Local Plan process and recently achieved a resolution to grant at the October Planning and Regulatory Committee for outline planning on 4.6 acres of the site for up to 27 dwellings (24/P/0967/OUT). Woodstock are in control of the remaining 17 acres, of which was part of a previous application for 95 dwellings (23/P/2303/OUT) was made but was later withdrawn. This representation submissions aims to provide commentary on the emerging Local Plan, with focus on the rural settlements, specifically Banwell. Banwell is identified in the adopted Core Strategy as a service village (Policy CS32), containing a number of local services along with public transport links. By way of the inclusion of Banwell within Schedule 5 of the Pre-Submission Plan, as a settlement with a defined boundary, it is clear that the council acknowledges the village within the settlement hierarchy. The Vision for the North Somerset Local Plan 2041 makes clear that there is an aspiration to encourage development in highly sustainable, accessible and attractive places. SP6: Villages and rural areas, reinforces this aspiration with the importance of accessible locations with good walking, cycling and public transport connections. However, Policy SP3 (Spatial Strategy) acknowledges that “most of the development which takes place in these areas			CP-01 PH2 Knightcott Rd, Banwell - Concept Plan @ A2 Notes.pdf Knightcott Road Banwell - Representations Reg 19.pdf

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					will be at the relatively more sustainable villages". Banwell is identified within the current Core Strategy as a Service Village (Policy CS32), offering a number of a local services along with public transport links throughout the wider district. However, Schedule 5 (Settlements with settlement boundaries), has Banwell listed as "Retained and reviewed existing boundary", meaning no further allowance for sustainable growth at the edge of the settlement boundary has been considered. By assessing the settlement boundaries further, this would therefore help to reduce the need for Green Belt release throughout the district.			
Policy LP5: Housing, employment and mixed use allocations	Unsure	• Justified • Effective • Consistent with national policy	Unsure	Unsure	Woodstock Homes control the 22 acre site, Land to the South of Knightcott Road, Banwell, a site which has been promoted through the earlier stages of the Local Plan process and recently achieved a resolution to grant at the October Planning and Regulatory Committee for outline planning on 4.6 acres of the site for up to 27 dwellings (24/P/0967/OUT). Woodstock are in control of the remaining 17 acres, of which was part of a previous application for 95 dwellings (23/P/2303/OUT) was made but was later withdrawn. This representation submissions aims to provide commentary on the emerging Local Plan, with focus on the rural settlements, specifically Banwell. Banwell is identified in the adopted Core Strategy as a service village (Policy CS32), containing a number of local services along with public transport links. By way of the inclusion of Banwell within Schedule 5 of the Pre-Submission Plan, as a settlement with a defined boundary, it is clear that the council acknowledges the village within the settlement hierarchy. The Vision for the North Somerset Local Plan 2041 makes clear that there is an aspiration to encourage development in highly sustainable, accessible and attractive places. SP6: Villages and rural areas, reinforces this aspiration with the importance of accessible locations with good walking, cycling and public transport connections. However, Policy SP3 (Spatial Strategy) acknowledges that "most of the development which takes place in these areas will be at the relatively more sustainable villages". Banwell is identified within the current Core Strategy as a Service Village (Policy CS32), offering a number of a local services along with public transport links throughout the wider district. However, Schedule 5 (Settlements with settlement boundaries), has Banwell listed as "Retained and reviewed existing boundary", meaning no further allowance for sustainable growth at the edge of the settlement boundary has been considered. By assessing the settlement boundaries further, this would therefore help to reduce the need for Green Belt release throughout the district. SP1: Sustainable development illustrates a clear focus for development to come from the most sustainable areas however, this is contradicted by LP7 which prevents growth directly in Banwell. The Wolvershill and Woodspring proposed allocations helps to ensure larger allocations with longer term development forecast. However, the council will need to accept that the delivery of these sites will take many years before completion. More specifically, the Woodspring allocation for 3,500 homes, although requires the 'Golden Rules' set out in the NPPF to be met (50% affordable housing, improvements to local infrastructure and provision of new green spaces), there could be more opportunity for developments in sustainable settlements to come forward result in less Green Belt land being released to meet the housing targets. LAND TO THE SOUTH OF KNIGHTCOTT ROAD, BANWELL The site is situated immediately adjacent to the existing built development to the west of the village and to the south of the A371 Knightcott Road. A mix of existing residential development to the east at Knightcott Gardens as well as a handful of existing properties to the north of the site. The site is sustainable in transport terms and is within walking/cycling distance of a range of facilities, with access to a network of footpaths and Public Rights of Way (PRoW), while Knightcott Road is a bus route with connections to the national rail network in Weston-Super-Mare. Schedule 7 also includes reference to the Banwell Bypass which will assist with all movements to the east directly into Banwell. The recently approved scheme for 27 dwellings has now set the principle of development in the norther section of the site. Woodstock Homes believe there is still further opportunity to design a scheme that continues the principles of the gap between Banwell and Knightcott, encourages views up towards Banwell Hill, and sets parameters for storey heights of future dwellings. This could look to offer 62 additional units (total 89 units). Further community benefits can be provided allowing for a provision of tree planting (orchard), wildflower meadows, community allotments and play provision.			CP-01 PH2 Knightcott Rd, Banwell - Concept Plan @ A2 Notes.pdf Knightcott Road Banwell - Representations Reg 19.pdf

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					Under Policy LP10: Strategic gaps, north of Knightcott Road and to the east of the Wolvershill allocation, a strategic gap proposal has been put in place to protect the identify and character of the settlements. The land south of Knightcott Road has allowed for a landscape gap to the eastern area to help protect the identity of Banwell and the Knightcott Hamlett. Future development could be proposed to the western area of the site allowing for this gap to continue along the eastern corridor to Banwell Hill. Policy DP53: Best and more versatile land looks to safeguard Grades 1, 2 and 3a agricultural land by proposing strict criteria significantly restricting potential development on BMV land. This will be problematic for many settlements within North Somerset where the spatial strategy already severely constraints opportunities for sustainable growth. This will rule out potential opportunities for small scale developments on BMV land going against the approach which does envisage the use of BMV land where necessary to ensure the delivery of sustainable development. CONCLUSION A number of areas have been highlighted above where the North Somerset Pre-Submission Local Plan could benefit from further review. Specifically, provision for sustainable growth in rural settlements such as Banwell has not been allowed despite the area being identified as a Service Village. The promotion of Land to the South of Knightcott Road allows for opportunities to meet local housing needs in a sustainable way. We encourage the Council to consider incorporating smaller and medium sized allocations in sustainable villages such as Banwell. This would help to strengthen the supply strategy allowing for the plan's objectives to be achieved over the plan period.			
Policy LP7: Settlement boundaries	Unsure	• Justified • Effective • Consistent with national policy	Unsure	Unsure	Woodstock Homes control the 22 acre site, Land to the South of Knightcott Road, Banwell, a site which has been promoted through the earlier stages of the Local Plan process and recently achieved a resolution to grant at the October Planning and Regulatory Committee for outline planning on 4.6 acres of the site for up to 27 dwellings (24/P/0967/OUT). Woodstock are in control of the remaining 17 acres, of which was part of a previous application for 95 dwellings (23/P/2303/OUT) was made but was later withdrawn. This representation submissions aims to provide commentary on the emerging Local Plan, with focus on the rural settlements, specifically Banwell. Banwell is identified in the adopted Core Strategy as a service village (Policy CS32), containing a number of local services along with public transport links. By way of the inclusion of Banwell within Schedule 5 of the Pre-Submission Plan, as a settlement with a defined boundary, it is clear that the council acknowledges the village within the settlement hierarchy. The Vision for the North Somerset Local Plan 2041 makes clear that there is an aspiration to encourage development in highly sustainable, accessible and attractive places. SP6: Villages and rural areas, reinforces this aspiration with the importance of accessible locations with good walking, cycling and public transport connections. SP1: Sustainable development illustrates a clear focus for development to come from the most sustainable areas however, this is contradicted by LP7 which prevents growth directly in Banwell.			CP-01 PH2 Knightcott Rd, Banwell - Concept Plan @ A2 Notes.pdf Knightcott Road Banwell - Representations Reg 19.pdf
Policy LP10: Strategic gaps	Unsure	• Justified • Effective • Consistent with national policy	Unsure	Unsure	Woodstock Homes control the 22 acre site, Land to the South of Knightcott Road, Banwell, a site which has been promoted through the earlier stages of the Local Plan process and recently achieved a resolution to grant at the October Planning and Regulatory Committee for outline planning on 4.6 acres of the site for up to 27 dwellings (24/P/0967/OUT). Woodstock are in control of the remaining 17 acres, of which was part of a previous application for 95 dwellings (23/P/2303/OUT) was made but was later withdrawn. This representation submissions aims to provide commentary on the emerging Local Plan, with focus on the rural settlements, specifically Banwell. Banwell is identified in the adopted Core Strategy as a service village (Policy CS32), containing a number of local services along with public transport links. By way of the inclusion of Banwell within Schedule 5 of the Pre-Submission Plan, as a settlement with a defined boundary, it is clear that the council acknowledges the village within the settlement hierarchy. The Vision for the North Somerset Local Plan 2041 makes clear that there is an aspiration to encourage development in highly sustainable, accessible and attractive places. SP6: Villages and rural areas, reinforces this aspiration with the importance of accessible locations with good walking, cycling and public transport connections. The recently approved scheme for 27 dwellings has now set the principle of development in the norther section of the site. Woodstock Homes believe there is still further opportunity to design a scheme that continues the principles of the gap between Banwell and Knightcott, encourages views up towards Banwell Hill, and sets parameters for			CP-01 PH2 Knightcott Rd, Banwell - Concept Plan @ A2 Notes.pdf Knightcott Road Banwell - Representations Reg 19.pdf

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					storey heights of future dwellings. This could look to offer 62 additional units (total 89 units). Further community benefits can be provided allowing for a provision of tree planting (orchard), wildflower meadows, community allotments and play provision. Under Policy LP10: Strategic gaps, north of Knightcott Road and to the east of the Wolvershill allocation, a strategic gap proposal has been put in place to protect the identify and character of the settlements. The land south of Knightcott Road has allowed for a landscape gap to the eastern area to help protect the identity of Banwell and the Knightcott Hamlett. Future development could be proposed to the western area of the site allowing for this gap to continue along the eastern corridor to Banwell Hill.			
Policy DP53: Best and most versatile land	Unsure	• Justified • Effective • Consistent with national policy	Unsure	Unsure	Policy DP53: Best and more versatile land looks to safeguard Grades 1, 2 and 3a agricultural land by proposing strict criteria significantly restricting potential development on BMV land. This will be problematic for many settlements within North Somerset where the spatial strategy already severely constraints opportunities for sustainable growth. This will rule out potential opportunities for small scale developments on BMV land going against the approach which does envisage the use of BMV land where necessary to ensure the delivery of sustainable development.			CP-01 PH2 Knightcott Rd, Banwell - Concept Plan @ A2 Notes.pdf Knightcott Road Banwell - Representations Reg 19.pdf

Name: Mr and Mrs Britton **I.D:** 62798337

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No		No		The proposals for the Tower Farm site are neither legally compliant nor sound. North Somerset local plan is in breach of 7 sections of the NPPF, namely S110, S115, S14, S156, S187, S192 and S193. In the 1980's, with the agreement of all parties, this land was designated as "Green Belt", in part to protect the ecology of Weston Big Wood, its fauna and flora. A significant centre of the wood is a designated SSSI. The proposed "buffer zone" would be ineffectual in protecting this area. Indeed, even in the construction period, as in any development, irreparable damage is wrought. It is vital to protect the unique environment of Weston Big Wood and the Gordano Valley Strategic Green Corridor. We feel that North Somerset have not given sufficient consideration to the above points, which makes their proposals unsound and not legally compliant. In addition, we feel that the proposed single access to The Downs and The Deans where there are approximately 200 dwellings, plus the new estate of approximately 400+ houses, is totally inadequate. The proposal would result in severe traffic problems at peak periods and could be inaccessible to emergency vehicles. This fails soundness tests set out in National Planning Policy. Consequently we believe the proposals are unsound and not legally compliant and should therefore be removed from the local plan.			

Name: Mrs A Harwood **I.D:** 39398401

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared	Unsure	Unsure	Backwell already has 800 new houses approved, a 40% increase for the village. These further additional numbers would lead to complete overdevelopment. The proposed road would not effectively serve Nailsea's traffic or relieve congestion on an already too busy Station Road. Station Road is already unsafe for pedestrians and children walking to and from school.			

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		• Justified • Effective • Consistent with national policy			Despite this increase, there is a deficit in school places and no investment in health services or leisure facilities. The lack of infrastructure and services cannot support another 1,000 houses. Backwell is allocated a higher number of houses than any other village in North Somerset, and even a higher growth percentage than towns. Backwell is expected to take 7% of the district's housing allocation, compared to Clevedon's 2%. Backwell is not an employment hub, most residents commute. This will only serve to make the roads even busier. This development proposes to use Grade 1 Agricultural Land currently used for food crops and grazing. There is only 7% of this high quality land left in the whole of North Somerset. Government policy states that "we must protect our best and most versatile land" to safeguard food security. The proposals contradict this policy and undermine food security. Development would destroy valuable wildlife habitats and further harm biodiversity in one of the world's most nature-depleted countries. The proposals threaten the Brockley Maternity Roost and SSSI, with rare Lesser and Greater Horseshoe Bats relying on the land for food. The Infrastructure Delivery Plan lacks analysis and costings, and there are no funding guarantees for the new road or services. Backwell Common and surrounding areas are prone to flooding, often causing roads to close, which would be aggravated by more housing. Backwell Lake (Reservoir) and adjacent fields, where the new roads and housing is planned and are on a floodplain, which floods regularly. The railway station is not fit for purpose as a transport hub; it remains inaccessible for people with mobility issues and presents serious challenges when travelling with young children. Only recently there was a fatal accident in the vicinity.			

Name: Mrs Ann Heymans **I.D:** 39056033

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Your Local Plan states that there should not be development where it may "cause significant adverse impacts on local services and infrastructure, including cumulative impacts." Backwell is allocated a higher number of houses than any other village in North Somerset. The increase in population with East of Backwell, on top of the other sites already given planning permission, would be 80%. A 40% increase in housing would lead to an overdevelopment of the town. The two sites that are already being developed, Rodney Road and Farleigh Flields East have caused disruption and distress resulting in much local anger. The "cumulative Impact" of three more huge developments will test the social cohesion of the village. No impact assessment has been provided. Although a primary school is proposed for Backwell, it will be funded through developer contributions and will be phased. There will continue to be a deficit in school places until adequate provision is made. Additional development will place immense pressure on the town's existing health and leisure provision. There is no planned direct investment to combat this pressure. The lack of infrastructure and services cannot support another 1,000 houses. The Infrastructure Delivery Plan lacks analysis and costings, and there are no funding guarantees for the new road or services. The proposed road would not effectively serve Nailsea's traffic or relieve congestion on Station Road, Backwell Common, or Chapel Hill. Flooding is another issue. Backwell Lake and adjacent fields, where the new road and housing is planned, are on a floodplain, which floods regularly. The new railway bridges needed for the new road, and structures at the station would be hugely expensive and possibly unfeasible. The railway station is not presently fit for purpose as a transport hub. It remains inaccessible for people with mobility issues and presents serious challenges when travelling with young children. The plan does recommend new employment sites but with Bristol being so close most residents will continue to commute. The land east of Backwell is classed as Grade 1 agricultural land and is consistently used for growing food-crops and			

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					grazing. Government policy states that “we must protect our best and most versatile land” to safeguard food security. The proposals fundamentally contradict this policy. Backwell is a village surrounded by beautiful wildlife areas and a rich biodiversity. Residents wish this to remain and providing "Green Spaces" which have to be funded locally does not mitigate for the loss of these natural habitats. The loss of greenbelt land is equally harmful. As a sop, Government policy may require 50% affordable housing on greenbelt land, but this reduces the funds developers contribute towards infrastructure and biodiverse projects. There are the bats in Brockley, badgers, deer, birds, bees – all are threatened by our increasing “development” of their habitats. The sheer volume of growth with the required investment infrastructure and services over such a short period is destabilizing, unsustainable and undeliverable. There is no “Needs or Viability Analysis” for an extra 1,000 houses. The residents of Backwell are angry about this lack of concern for our village community. Development on the Land East of Backwell should not be part of North Somerset's Local Plan. Planning Permission should not be given. Development on the Land East of Backwell should not be part of North Somerset's Local Plan. Planning Permission should not be given.			

Name: Mrs Elaine Croker **I.D:** 62768705

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	We object to the proposal on the following grounds. It is good agricultural land which should not be used for housing. Our food security must be safeguarded. The housing development is far in excess of what the village can cope with leading to problems with schools, doctors and dentists. there appears to be no guarantees of any improvements to the infrastructure or services within the village. The expensive proposed road would not necessarily ease traffic conditions and with regard to the railway station being a transport hub it is not very accessible for those with mobility issues or those with young children. Backwell appears to have been targeted unfairly regarding the number of increased houses which itself incurs more commuting to places of work leading to more congestion on existing roads. Wildlife habitats would be severely impacted as a result of this proposal. The proposed area is prone to flooding and any housing would aggravate this issue. To confirm Backwell would not be able to sustain such a proposed development and all it's issues without greatly impacting on it's character.			

Name: Mrs Flanagan **I.D:** 62791425

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Justified	Unsure	No	Comments regarding HE2015, HE206, HE20491, HE201065 and HE201097 I do not believe the village of Pill and surrounding areas have the infrastructure to sustain more people to the proposed plan ie medical (doctors, chemist and nurse) roads too busy in and out of village parking a problem at present everywhere commercial, shops and facilities being overwhelmed education not enough places in nurseries or schools.	Building of housing is maybe essential. But not to the colossal current plan. I would propose HE206 and HE201065 to proceed and scrap the rest.		

Name: Mrs G Hills **I.D:** 62800577

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	There has been a sudden jump from these sites being "other potential" to being implemented without further consultation. I do not feel the council has considered the traffic congestion at Junction 19.	A marked reduction in the number of houses. Perhaps only using 1 of the proposed sites.		

Name: Mrs H Taylor **I.D:** 62744353

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Vision, Strategic Priorities and Sustainability Objectives	No	• Positively prepared	No	No				

Name: Mrs Judith M Brown **I.D:** 21472129

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No		No		I wish to object in the strongest possible terms to the proposed further developments proposed for Backwell. The land to the east of Backwell is grade 1 agricultural land, of which there is only 7% in the whole of North Somerset. This should be protected at all costs. In early November 2025, the cross-party Science & Technology Group on Agriculture produced a report stating that we should be producing 30% more of our own food, production has decreased by 1/3 in recent years. Furthermore imports are becoming increasingly vulnerable to climate change and cyber attacks. Farmers should be supported and farm land protected as a matter of priority. The proposed area is extremely prone to flooding. The water table is high as the area is low lying, not being above 50’ above sea level at the very highest, and even lower around Backwell Lake. It is a fact that these areas are already waterlogged throughout the winter. The roads are not able to sustain traffic at present, nor is Nailsea and Backwell station, which is inaccessible to anyone with mobility issues or those with young children. The proposed new road, will not ease any problems, as the cost of a bridge over, or a tunnel through the railway embankment is prohibitive. The existing tunnel on the proposed route could only be used as a pedestrian or cycle route, it is too small for vehicular access. The area has no large employers, and therefore is a ‘commuter area, so roads and travel hubs are important. The current school places, health and leisure facilities are at capacity, and some in great need of upgrading. The birth rate is dropping – why is all this housing needed, where are the proposed purchasers of these properties coming from? The current developments around the area have empty properties and are not selling at the anticipated rate, why build more to remain empty.			

Name: Mrs Julie Goldbert **I.D:** 62818017

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Grove Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	No	With 800 houses already approved in Backwell (40% increase for the village). The extra houses planned would lead to over development. The proposed road would do little, if any, to effectively serve Nailsea's traffic or congestion on Backwell Common, or Chapel Hill and building the road under or over the railway would be unfeasible and too expensive. There will be a deficit in school places and, with no additional investment in vital health care and leisure facilities, this lack of infrastructure cannot support an additional 1000 homes (2,000-4,000 people). Most residents commute from Backwell. The development would destroy valuable wildlife habitats and harm biodiversity. The bats at Brockley Maternity Roost are a Protected Species and their natural habitats should not be disturbed or altered. Backwell Common and surrounding areas are prone to flooding and this will increase wtih global warming. Also the Backwell Reservoir and surrounding areas as prone to flooding. Owners of homes could potentially find themselves not able to insure against flooding. The railway station is not classed as a transport hub, it is inaccessible for people with mobility issues and serious challenges for people travelling with young children. The Grade 1 agricultural land is used for crops and grazing and there is only 7% of this high quality land left in the whole of north Somerset.			

Name: Mrs Julie Wild **I.D:** 62853953

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell is a semi-rural village with substantial new development having already been granted for an additional 794 houses - a 40% increase in a village environment.. Residents had strong and valid reasons for considering this to be an excessive number. This new proposal will add to the destruction of the remaining greenbelt and potential regenerative farming land Only 7% of Grade 1 Agricultural land now exists in the whole of North Somerset for growing food and grazing animals The UK is one of the most nature-depleted countries in the world. Government policy states that “we must protect our best and most versatile land” to safeguard food security but these proposals contradict this policy and will further harm our dwindling countryside. There is no realistic or viable infrastructure in place (current or proposed) to support a development of this magnitude. The suggested road schemes are untenable and would further destroy greenbelt land, wildlife habitats and vital foraging grounds. In addition, some of the designated land is prone to frequent flooding. The real costs to successfully implement this would be prohibitive The Delivery Plan does not guarantee additional funding for schools, leisure facilities and health services which are already at capacity and in need of further investment. Who will be paying for this? Why is the allocation of housing so disproportionate in comparison to other areas? Where is the evidence and analysis that Backwell needs an additional 1000 houses? Backwell is not an area that can offer substantial employment opportunities and since COVID people are returning to the			

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					work place for social and mental well being. Most residents of working age commute into Bristol The existing train station is without doubt a great asset for a satellite village but it is not fit to serve as a transport hub. Current residents are commuting on an already over-subscribed rail and road network where trains and buses are not reliable on a daily basis. Additional development will mean more cars on the road and increased congestion. The A370 cannot sustain this The existing construction work in the village may only be temporary but it is causing significant disruption to many residents. Permitting the construction of another 800+ houses would cause months if not years of further chaos. The sheer volume of growth is undeliverable Where is the impact assessment on the social ramifications of this development? Backwell has a strong united community spirit. Overdevelopment will erode the heart of the village with a very real danger of turning Backwell into another faceless town. Growth is inevitable and can be positive but this proposal is without question unsustainable and undeliverable. The plan lacks cohesion and relies on too many questionable logistics which cannot be fulfilled. It undermines the local community Once those fields have been destroyed, that valuable green space is lost permanently			

Name: Mrs K Warrington **I.D:** 62849153

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	‣ Justified ‣ Consistent with national policy	No	Unsure	Tower Farm, portishead site allocation- My objection is the proposal to include this site for residential housing. The site is located next to Weston Big Woods SSSI and should be protected as such. The proposal for residential development morning the woods would affect the setting of the woods. The existing access to the site is unsuitable. Down road and The Downs are already busy roads due to the volume of traffic around the top of portishead and High Down Schools. The addition of 400 homes and potentially car movements from 400+ vehicles would put excessive strain on the existing infrastructure. There doesn’t seem to be a sensible access option off Valley Road either. I have serious concerns about the density of housing proposed at this site and its suitability. Portishead has one main access road in and out. Other services like doctors surgeries and dentists are at capacity and have no NHS spaces. The proposed housing allocation would exacerbate these issues which only seem to be getting worse. I consider smaller pockets of residential development in and on the edge of portishead would be more suitable, and would not have such a significant impact on the SSSIs and Green Belt. I am not against further residential development in portishead, but this particular site is concerning and would to the detriment of existing residents who live at the top of Portishead. As well as finishing the significance of the protected SSSIs.	As above comments. The Tower Farm site allocation is unsuitable and would have a negative impact on the existing local infrastructure.	N/A	

Name: Mrs Mary Theresa Kingston **I.D:** 58528577

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP11: Historic and natural environment	Unsure	Effective	Unsure	Yes		Housing development at Woodhill Nursery in Congresbury will detract from the landscape and scenic beauty of Cadbury Hill Fort Scheduled Ancient monument. Not just from the perspective from the ground looking up, but also from the top of the ancient Hill Fort looking down. No matter how carefully planned the lighting requirements are for potential new houses - there will be disruption to the horseshoe bats which cannot be monitored, controlled or enforced. Headlights from cars>, Summer Barbeques? will anybody enforce a ban on lighting up houses at Christmas? The allotments at the end of Woodhill should be ringfenced from future development and identified as a local green space to ensure access to the countryside and benefits of working with nature are preserved for those who do not enjoy the luxury of their own gardens. Locating a school on Smallway/the end of Woodhill, would destroy the strategic gap between Yatton and Congresbury, disturb bat commuting routes, add light pollution to an important area for greater and lesser Horseshoe bats.		
Policy LP6: Educational, sporting, leisure and community use allocations	No		Unsure	Yes	Locating a large secondary school within the strategic gap between Yatton and Congresbury would have an adverse impact on the character and setting of the area. It would also be detrimental to our horseshoe bat populations. Whilst a new school is required, this is not the right location. It would be better placed at the North End of Yatton.			
Policy LP15: Local Green Space	No	Effective	Unsure			The allotments on Woodhill should be included as a Local Green Space. Although the settlement boundary to the north of Congresbury has been significantly extended, there are no allocated Local Green Spaces. Given the current mental health crisis and the disconnect between children and understanding of food and diet, it is vital that this area is preserved for local people to continue their ability to be connected with nature and food production		
Woodhill Nurseries	No	Effective	Unsure	Yes	Building 100 houses at Woodhill Nurseries would not conserve priority habitats and the recovery of protected species., nor enhance bat habitats and foraging opportunities for our horseshoe bats. Woodhill is an important, dark commuting corridor for bats and placing so many houses here - despite efforts to minimise lightspill will disturb them. It will be impossible to replicate the current level of darkness with so many houses . Bats are out on warm evenings at the moment and will the council ensure that all these new houses are not swamped with Christmas Lights, for example? This development would also have a detrimental impact on Cadbury Hill Fort and its setting. Not just from the ground, but historic views from this ancient monument across the landscape will be replaced with rooftops and sprawl. This development at the foot of Cadbury Hill would detract from the historic environment and distinctive character of this part of Congresbury			

Name: Mrs P **I.D:** 39369441

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Backwell is a beautiful village, surrounded by fields, woodland and lakes. A disproportionate housing development of this size will totally ruin the village by spoiling the character and charm of Backwell. Backwell already has 800 new houses approved, which is an increase of 40% for the village. A further 1000 houses would mean a total increase of 80%, turning the village into a small town, which would be disastrous for our village and it is totally unjustifiable. There is no needs or viability analysis for an extra 1000 houses. Backwell is being allocated a higher number of houses than any other village in North Somerset, despite being prone to flooding and lacking the infrastructure and facilities to deal with such a massive development. Furthermore, the proposed development would use Grade 1 Greenbelt land, which is currently prime Agricultural Land, used for crops and grazing. These proposals contradict the Government's policy, which states that "we must protect our best and most versatile land" to safeguard food security. The increased population will put a huge extra strain on the local amenities (doctors, dentists, schools, etc) and the extra cars will add to the existing traffic congestion on the A370 and other roads around Backwell and Nailsea. As well as causing traffic chaos for local residents, this will significantly increase travel problems to Bristol for people living further West along the A370. Building more roads through Backwell or Nailsea is not a solution. That would only spoil the area even further and involve huge financial costs. The proposed road would not effectively serve Nailsea or relieve congestion in Backwell, anyway. These fields on Backwell Common are a very important environment for wildlife. As well as bats and hedgehogs, which are endangered, we have seen deer, foxes, badgers, grass snakes and many other animals and birds in Backwell, many of whom feed and live in those fields which are in the proposed development area. Building houses on these fields will have a serious negative impact on the already dwindling wildlife population of North Somerset.			

Name: Mrs P Hayes **I.D:** 62663617

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	It is crazy to build even more homes in Backwell after the last lot of 800 home approvals that are not even completed yet. We have limited school places and already have growing traffic problems. The Backwell Common area is really unsuitable for lots of extra traffic. The narrow road is already dangerous at times with many cyclists and blind corners. The fields in this area are core to the character of the village and used by hundreds of people every week and important to wildlife, well-being and mental health. We have loads of flooding problems here too. Surely there are better places. Look at some of the other villages in North Somerset that are having a *much* smaller increase relative to their population.			

Name: Mrs R Watts **I.D:** 21123425

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Loss of Green Belt - The site lies in a portion of the Green Belt which fulfils the purpose of preventing sprawl from Nailsea, and preserving the rural setting of the settlement and openness of the countryside. Green Belt release must be justified within a strict framework that prioritizes minimizing harm and using other land first. The Council has not demonstrated that all other reasonable options have been exhausted			

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					(brownfield, urban infill, higher densities in the existing settlement). No sustainable transport links have been shown which would compensate for the loss of green belt. This site should not be considered as suitable for release of green belt. In addition, the allocation for north Nailsea conflicts with the Wraxall & Failand Neighbourhood Plan (2022–2038), which has already been adopted by the Council and forms part of the legal Development Plan. That plan strongly protects the Green Belt, rural character and road safety.			

Name: Mrs S E Clarke **I.D:** 62645601

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Positively prepared • Justified	No	No	44% population Bomb on Pill& Easton in Gordano disproportionate & unjustified. No deliverable plan for A369,M5 J19, schools,GP access or drainage by2041 Sustainability Appraisal fails SEA directive-No Assessment of Brownfield alternatives to Pill Green Traffic on the A369 is already overwheming. Pill Green is high performing agricultural land,with important wild life,the Green Belt must be respected in this case.	Delete the Pill Green Site(600 homes) from the North Somerset Plan Schedule of Sites		

Name: Mrs S Sully **I.D:** 39287777

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I wish to appeal against the proposal in the local plan to build 1,000 more houses in Backwell. This proposal, in addition to the 800 houses already approved or now under construction, constitutes a huge over-development, considering that Backwell is largely a commuter village, where there is little local employment and with an infrastructure of roads and services that are already oversubscribed. The suggestion of a new road would merely direct traffic to Backwell Lake, to join any congestion from yet another near 600 houses proposed for that area, and all on green-field sites, which the Government claims should be protected.			

Name: Mrs Sommers **I.D:** 62852129

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Banwell Road, Locking /Elborough	No	• Justified • Effective	No	No	The consultation process has not adequately engaged affected residents at Elborough Village. The Statement of Community Involvement requires meaningful opportunities for participation, but the evidence shows limited outreach and insufficient accessible formats. • The Duty to Cooperate has not been met. There is inadequate evidence of effective collaboration with neighbouring authorities on housing distribution and infrastructure	The council re-runs consultation with improved accessibility and wider community engagement. • Housing allocations in flood-risk zones are removed and redistributed to sustainable sites closer to transport		

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					planning. • Not justified: The housing numbers are based on outdated projections and do not reflect current demographic trends or infrastructure capacity. • Not effective: Allocating significant housing in flood-risk areas undermines deliverability and resilience. • Not consistent with national policy: The plan fails to prioritise sustainable development by placing growth in locations poorly served by public transport. The evidence base does not adequately assess the impact of such a large-scale expansion on transport, infrastructure, and biodiversity. • The Duty to Cooperate has not been met, as there is no clear evidence of engagement with transport authorities or environmental bodies regarding the scale of development proposed. • The Sustainability Appraisal fails to properly consider alternatives that would avoid disproportionate growth in small settlements. • Transport: The village at Elborough has limited public transport links. Doubling its size without significant investment in bus and rail services will increase car dependency, contrary to national policy on sustainable transport. • Wildlife: The proposed sites are adjacent to sensitive habitats and wildlife corridors. Development here risks irreversible harm to biodiversity, conflicting with the NPPF requirement to protect and enhance the natural environment. • Access: The existing road network around Elborough is narrow and unsuitable for the traffic volumes that such expansion would generate. Emergency access and pedestrian safety are not adequately addressed. • Infrastructure: Local services (schools, healthcare, utilities) are already under strain. The plan does not provide credible evidence of how infrastructure will be expanded to meet the needs of a doubled population. • Scale of growth: Doubling the size of the village is disproportionate and unjustified. It undermines the settlement hierarchy and fails the test of being “positively prepared” and “justified.” For these reasons, I object to the North Somerset Local Plan 2041: Pre-submission Plan. I ask the Inspector to find the plan unsound unless the above changes are made.	hubs. • Updated evidence on housing need and infrastructure capacity is published before submission. • A clear statement of cooperation with neighbouring authorities is provided. • Alternative sites closer to existing transport hubs and larger settlements be considered. • A full ecological assessment be undertaken to safeguard wildlife habitats. • A detailed infrastructure delivery plan be published before submission		

Name: Mrs Wendy Derrick **I.D:** 18204961

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	• Justified • Effective	Unsure	No	Backwell already has 800 new houses approved, a 40% increase for the village. These additional numbers would lead to complete overdevelopment. and dangerous for our roads and our children who use the path ways with a junior school and comprehensive in these roads, I have seen many a near miss already The proposed road would not effectively serve Nailsea's traffic or relieve congestion on Station Road, Backwell Common, or Chapel Hill. The massive increase in housing will outway this. It is already dangerous, I know because I live on Station road, and have seen lorries thunder down it with no regard to the 100’s of kids coming out of school	Just stick with the housing you have already given permission for and leave it at that, which is more than enough for a little village to take	I don’t	

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					Engineering the road under or over the railway would be highly expensive and possibly unfeasible. Too much traffic as it is. Despite this increase, there is a deficit in school places and no investment in health services or leisure facilities. The lack of infrastructure and services cannot support another 1,000 houses. Backwell is allocated a higher number of houses than any other village in North Somerset, and even a higher growth percentage than towns. Backwell is expected to take 7% of the district's housing allocation, compared to Clevedon's 2%. There is no needs or viability analysis for an extra 1,000 houses. Backwell is not an employment hub, most residents commute, leading to more traffic on the roads No social cohesion impact assessment has been provided. Grade 1 Agricultural Land currently used for food crops and grazing. There is only 7% of this high quality land left in the whole of North Somerset. Government policy states that "we must protect our best and most versatile land" This is not happening. You have not co operated with the residents of Backwell on any of the housing you are forcing this little village to have, with no facilities, no infrastructure, getting rid of the green belt. Making the whole place on safe on the roads.			
Policy LP3: Strategic location: Nailsea and Backwell	No	‣ Justified ‣ Effective	No	No	1. Government policy states that "we must protect our best and most versatile land" to safeguard food security. The proposals contradict this policy and undermine food security. 2. Development would destroy valuable wildlife habitats and further harm biodiversity in one of the world's most nature-depleted countries. 3. The proposals threaten the Brockley 4. Maternity Roost and SSSI, with rare Lesser and Greater Horseshoe Bats relying on the land for food. 5. The Infrastructure Delivery Plan lacks analysis and costings, and there are no funding guarantees for the new road or services. 6. Backwell Common and surrounding areas are prone to flooding, which would be aggravated by more housing. 7. Concerns regarding the strategic growth location designation include the impact on the area's character, the loss of Greenbelt and high-quality agricultural land, the risk of flooding, and uncertainty over whether the road can be funded and delivered on time to support the proposed housing. 8. Backwell Lake (Reservoir) and adjacent fields, where the new roads and housing is planned and are on a floodplain, which floods regularly. 9. Government policy requires 50% affordable housing on Greenbelt Land, but this reduces the funds developers contribute towards infrastructure.	There is none		
Grove Farm	No	‣ Justified ‣ Effective	No	No	Backwell already has 800 new houses approved, a 40% increase for the village. These additional numbers would lead to complete overdevelopment. The proposed road would not effectively serve Nailsea's traffic or relieve congestion on Station Road, Backwell Common, or Chapel Hill. The massive increase in housing would outway a new road even then. The small b road Station road can’t cope with the traffic it has now, but have seen many a near miss, it is so dangerous and no one is thinking about the safety on these small roads, specially with 2 major school. Directly on them Engineering the road under or over the railway would be highly expensive and possibly unfeasible. Too	Stick with the current permission and build no more		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					much traffic as it is. Despite this increase, there is a deficit in school places and no investment in health services or leisure facilities. The lack of infrastructure and services cannot support another 1,000 houses. Backwell is allocated a higher number of houses than any other village in North Somerset, and even a higher growth percentage than towns. Backwell is expected to take 7% of the district's housing allocation, compared to Clevedon's 2%. There is no needs or viability analysis for an extra 1,000 houses. Backwell is not an employment hub, most residents commute No social cohesion impact assessment has been provided. Grade 1 Agricultural Land currently used for food crops and grazing. There is only 7% of this high quality land left in the whole of North Somerset. Government policy states that "we must protect our best and most versatile land"			
Land east of Backwell	No	• Justified • Effective	No	No	Backwell already has 800 new houses approved, a 40% increase for the village. These additional numbers would lead to complete overdevelopment. The proposed road would not effectively serve Nailsea's traffic or relieve congestion on Station Road, Backwell Common, or Chapel Hill. The massive increase in housing would outway a new road even then. The small b road Station road can't cope with the traffic it has now, but have seen many a near miss, it is so dangerous and no one is thinking about the safety on these small roads, specially with 2 major school. Directly on them Engineering the road under or over the railway would be highly expensive and possibly unfeasible. Too much traffic as it is. Despite this increase, there is a deficit in school places and no investment in health services or leisure facilities. The lack of infrastructure and services cannot support another 1,000 houses. Backwell is allocated a higher number of houses than any other village in North Somerset, and even a higher growth percentage than towns. Backwell is expected to take 7% of the district's housing allocation, compared to Clevedon's 2%. There is no needs or viability analysis for an extra 1,000 houses. Backwell is not an employment hub, most residents commute No social cohesion impact assessment has been provided. Grade 1 Agricultural Land currently used for food crops and grazing. There is only 7% of this high quality land left in the whole of North Somerset. Government policy states that "we must protect our best and most versatile land"	Just stick with the developments you have already given permission for, that's more than enough of what Backwell can cope with	I dont	

Name: Ms Jones **I.D:** 62805089

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Churchill Avenue	No	• Justified	Unsure	Unsure	Penny Field must be protected and made a Local Green Space. Under local planning policy, Penny Field is the perfect candidate for Local Green Space designation because it would be in the top 24% of sites based on policy alignment. Clevedon Town Council, two petitions (2022 and 2025) of 600+ signatures and the consultation for Clevedon Placemaking Strategy all call to protect Penny Field.			

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					Penny Field is a prime candidate for Local Nature Recovery, as identified by WEC, due to the presence of three priority species. Penny Field is also located on a Green Infrastructure Corridor under NSC'S own policy. Under any Equalities Impact Assessment the reduction of green space would adversely affect lower income households.			

Name: Ms Karen E Clark **I.D:** 62858497

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The proposal to build 1000 more houses in Backwell, on precious Grade 1 Agricultural Greenbelt land, is one which in my opinion is poorly thought out, particularly in respect of the negative impact on a village already having to cope with building developments which have already been agreed, and without any new infrastructure or services planned to meet such an increase in population. An additional 1000 houses would mean increased traffic flow and potential for congestion and accidents, with most people already commuting from Bristol or Weston-super-Mare for employment, which already leads to traffic build up in and around the area, particularly at peak times. The Grade 1 Agricultural Greenbelt land subject of this proposal represents precious high quality land ideal for food crops and grazing and should be protected as such, with only 7% of such land remaining in the whole of North Somerset. The proposed development would destroy existing wildlife habitats which would take many, many years to re-establish and cause suffering and disruption to many species, birds and mammals alike in the process, at a time when it is of the utmost urgency to protect valuable wildlife habitats and biodiversity. Nature cannot afford such disruptions, particularly when weather and climate seem to have greater impact on survival rates already. The area proposed for this development is already high risk for flooding and this risk would only be exacerbated by additional housing, potentially impacting other housing in the area as a by-product. Backwell is not set up for such a high increase in population and traffic and existing services, schools, roads and public transport links would be overwhelmed. The proposal seems completely without merit, providing housing which would be unaffordable for many people, would deplete existing services and infrastructure and completely disrupt the current environment which is already likely to be under strain from existing development planned.			

Name: Ms Poole **I.D:** 62808673

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy DP35: Nature conservation		• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The UK Government is currently failing spectacularly on its manifesto commitments to protect nature, and the housing quota for North Somerset is yet another setback and an undoubted challenge for the Council. However, the current proposals ignore the cumulative effects of development in key areas, and the significant net loss of Green Belt, and are in direct contravention of the National Planning Policy Framework For nature to recover and flourish in North Somerset, it is critically important that the connectivity of ecological networks is at least maintained but steps are also taken to improve it. Section 40 of Natural Environment and Rural Communities Act 2006 places a duty on public bodies to contribute to the coherence and resilience of ecological networks. I am concerned that the allocations currently set out in the draft plan will adversely affect this coherence and resilience of valuable ecological networks in North Somerset. I also believe some of the proposals undermine the principles of the North Somerset Local Nature Recovery Strategy (LNRS), which establishes priorities and specific actions to drive nature's recovery and provide wider environmental benefits within the region - requirements set out by Government in the Environment Act 2021. As it stands, the Plan presents a significant threat to the essential connections between international, national, and locally designated sites, and will bring about the irreversible loss of wildlife corridors and stepping stones that connect these sites.			

Name: Myna Legg **I.D:** 62658497

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I totally disagree with the plan to build some 800 to 1000 houses. These additional numbers would lead to a complete overdevelopment, increasing the size Backwell by @40%. There has been no consideration given to providing additional facilities such as schools, doctors, shops and public buildings. The current facilities will be inadequate to support this expansion. The road and houses are planned on an area which already floods and these additional houses would further aggravate this problem. Further, the cost of building a road over or under the railway line would be expensive, and there are no funding guaranteed in the plan for these infrastructure. Current road infrastructures are not sufficient to support this over expansion. It seems inappropriate to develop house where there is no employment. This will increase traffic, commuting and pollution.			

Name: N Boswell Brown **I.D:** 39279329

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP2: Strategic location: Woodspring (south west of Bristol)	Unsure		Unsure	Unsure	I do not know the legalities of this plan although the legalities of building on green belt land should be brought into question of course. What is the point of having land designated to green belt if it is then to be developed?	There needs to be absolute agreement and accountability of the developers to an acceptable and sustainable way in which this land is developed. Too often developers agree to certain requirements only to not meet their obligations on project completion. It is essential that this development has very high standards in terms of future-proofing against the challenges of climate change. Biodiversity has decreased enormously and we need to mitigate against this as much as possible with any development. Therefore it is imperative that plans must include a significant proportion of land that is allocated to green spaces - woodland, orchards, allotments, parks and walkways. Ensuring pedestrianisation is prioritised and car use is discouraged as much as possible by having access to walkways, cycle routes and public transport - but also ensuring key services are in close proximity such as shops, doctors surgery, schools and employment opportunities. There must be a great deal of thought put into access to the development and traffic congestion - which is already a problem in this area. Yanley Lane will need to be made access only for residents and I am very concerned of the build up of traffic on the A38. Flooding is also already as issue which will be made worse by development on this green land. There will need to be wide nature corridors in and around the development including at the ridge of Yanley Lane to ensure more tree planting to mitigate against the extra pollution and to preserve the view from housing. There must be strong agreement to the variety of housing built to ensure there is a mix of housing to serve the community, affordable housing and accessible housing, including bungalows for those with mobility limitations, often neglected by developers - having a flat entrance to a two storey home is not sufficient to tick the accessible housing box.		

Name: N Cambourne **I.D:** 62812353

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell already has far too many new houses being built. There is no work here everyone has to commute and the roads are already overloaded. Building on a flood plain is a very bad idea. This application should be rejected.			

Name: N Chalk **I.D:** 62812001

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No		No	No	Not positively prepared: The proposed location and volume of development will adversely impact on services in Portishead that are already under pressure - schools, pharmacies, GP surgeries and particularly transport infrastructure (for example the A369 and Down Road). This site would significantly increase private vehicle use (accessing main roads via the side roads of the Deans and Downs that are already difficult to access), increasing pollution, rather than support sustainable travel options (contrary to National Planning Policy framework [NPPF] Dec 24 publication paragraphs 109-110). Not justified: There is no robustly presented alternatives assessment that demonstrates the Tower Hill Farm site is the only or most appropriate option for growth in Portishead. The loss of best and most versatile (BMV) farmland (grade 2/3a by reference to the Agricultural Land Classification dataset) and risk of irreversible damage to the ancient Weston Big Woods make this proposed site untenable. Not effective: Delivery of development at this site relies on multiple other factors that have not been fully planned - new school provision, increased bus services, off-site bio-diversity management and creation of buffer zones. There is no published phasing plan, funding stream or legal agreements to deliver these dependencies. Without these, the proposal cannot be considered viable within the plan period (NPPF paragraph 35). Not consistent with national policy: The proposal is in conflict with the NPPF paragraphs 193 b&c. These include the detail that "developments resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists". There are no demonstrated "wholly exceptional reasons" to develop this land and the compensation suggested by the Council of an 'ecological buffer' is not clear and is insufficient to address indirect impacts such as root-zone damage and wildlife disturbance. The Woodland Trust and Avon Wildlife Trust state that ancient woodland (such as Weston Big Wood) is irrecoverable once damaged. The NPPF requires delivery of net-gain in biodiversity. There is no clear demonstration to that effect within this proposal. The farmland / woodland edge surrounding the Weston Big Wood serves as a critical ecological and landscape transition corridor. Development of these areas (including Tower Hill Farm) would fragment habitats and negatively impact on the Gordano Valley wildlife corridor. The proposed 'buffer' would not fully mitigate this impact. This development would also alter surface-water run-off and soil composition of what is currently farmland. This has the potential to negatively impact the hydrological system that sustains the adjacent ancient woodland. No modification could be made to the proposal that would make this site suitable. The fact that the site is adjacent to Weston Big Wood, a SSSI / ancient woodland would mean that any development would result in irreversible damage to this important area. The land should be retained as green space to benefit the community and wildlife and should be managed to enhance biodiversity.			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					I do not support the North Somerset Local Plan 2041 for the Tower Hill Farm location			
Black Rock, north of Clevedon Road	No		No	No	Not positively prepared: The Black Rock field site lies on the Clevedon Road access to Portishead. This area is poorly served by public transport and does not have easy / close access to amenities. Residents in the proposed development would, therefore, rely heavily on private vehicles to access services such as primary schools and healthcare. The proposal identifies that additional footways and bus provision is required which highlights the insufficiency of current provision. The NPPF (Dec 24 publication, paragraphs 109-110) details that patterns of development should be where there are genuine options for a variety of sustainable transport. The Black Rock site will not meet this requirement even with the proposed (but not clearly planned) transport infrastructure changes. Not justified: The Black Rock field is an unsuitable location as environmental and ecological requirements cannot be met on-site (as acknowledged by the Council in the proposal) but will need to met "off site on land to the southwest". This is in conflict with NPPF paragraph 193(a) which states that alternative sites with "less harmful impacts" should be sought and that compensation for environmental impact should be a last resort. Not effective: The viability of the site relies on multiple dependencies including ecological off-set land, new footways and bus services and delivery of a section of the 'Gordano Greenway'. There is no clear, published plan of responsibility or funding for these elements. Therefore, the proposal for Black Rock does not meet the 'effective' requirement outlined in paragraph 36(c) of the NPPF. Not consistent with national policy: The site requires off-site mitigation for environmental and ecological elements and relies on the provision of a "suitable ecological buffer". These features are not clearly planned and not detail sustainability. This means that the site does not clearly meet environmental requirements laid out in the NPPF. The proposal is in conflict with the NPPF paragraphs 193 b&c. These include the detail that "developments resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists". There are no demonstrated "wholly exceptional reasons" to develop this land and, as outlined above, the compensations suggested by the Council are insufficient to address indirect impacts such as root-zone damage and wildlife disturbance. The Woodland Trust and Avon Wildlife Trust state that ancient woodland (such as Weston Big Wood) is irrecoverable once damaged. The NPPF requires delivery of net-gain in biodiversity. There is no clear demonstration to that effect within this proposal. The farmland / woodland edge surrounding the Weston Big Wood serves as a critical ecological and landscape transition corridor. Development of these areas (including Black Rock) would fragment habitats and negatively impact on the Gordano Valley wildlife corridor. The proposed environmental / ecological mitigations would not fully alleviate this impact. No modification could be made to the proposal that would make this site suitable. The fact that the site is adjacent to Weston Big Wood, a SSSI / ancient woodland would mean that any development would result in irreversible damage to this important area. The land should be retained as open countryside to benefit the community and wildlife and should be managed to enhance biodiversity. I do not support the North Somerset Local Plan 2041 for the Black Rock location			

Name: N Everitt **I.D:** 18209249

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Of my many concerns I will list the key objections to this plan to overdevelop Backwell further. Local facilities and roads (and police services) cannot cope with more residents and cars. The local dentists, doctors and schools are near capacity and already housed in buildings with limited or no parking. The local shops again have no parking and are frequently congested with an increasing number of prangs and dangerous driving in the area especially on Fridays. This volume of growth is destabilising for the area. The proposed new road and other services have no funding accompanying them in these plans. I know that government policy demands 50% affordable housing on Greenbelt Land but this further reduces funds the developers can contribute toward the required infrastructure. The proposed area is already prone to flooding and has been for as long as I have lived in Backwell – since the 1960s. Flooding is a major issue and would be aggravated by more housing. Furthermore the loss of our greenbelt and agricultural land is a major concern and seems contrary to policies to safeguard our most versatile land and undermines food security. There is only 7% high quality agricultural land left in the whole of North Somerset – how can the destruction of this land be justified given those numbers? The community in Backwell commutes to other towns – mostly Bristol – for work. The train station is not a transport hub, being inaccessible for anyone with mobility issues and providing few trains and even those are usually overcrowded. The main road into Bristol is heavily congested at rush-hour, especially on the Long Ashton Bypass. More congestion in a village that is divided by the main commuting road is only going to cause more issues for the children crossing this road to school each day. Backwell already has accepted a 40% increase in housing – including behind my family home on a field we all used to enjoy for walking and countryside views. The additional 1000 houses would take us to a 80% growth in population which changes the entire character of the area and requires a major social cohesion study.			

Name: N Manville **I.D:** 63069473

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land to the west of Elborough					I am writing in response to the Pre-Submission Plan 2041 (Reg19) Autumn 2025 consultation to express my strong objection to the proposed development in the Elborough area. My concerns reflect those raised by Hutton Parish Council and local residents, which I fully support. The key issues are outlined below: 1. Loss of Green Space The development would result in the permanent loss of valuable green space and remove the strategic gap between settlements. 2. Infrastructure Deficiencies There are already major concerns regarding the lack of existing facilities—including shops, schools, and core services—which are not adequate to support the increased traffic and population. 3. Public Opinion A 2021 survey showed that 83% of residents did not support new housing in the vicinity, indicating strong local opposition. 4. Sustainability While the proposed site may score favourably in some sustainability assessments, residents remain concerned about its isolated nature. This undermines claims that it is genuinely a sustainable development option. Flooding Risk I would also like to emphasise the significant risk of flooding in this area. Increasing impermeable surfaces through new development would worsen water runoff, particularly in the context of climate			

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					change. Runoff from farmland on the hill above Elborough already results in heavy flows, and flash flooding is a known issue across the region, potentially affecting local properties. Given these strong and well-evidenced concerns, I trust that they will be fully considered as part of the consultation process.			
Land north of Banwell Road, Locking /Elborough						I am writing in response to the Pre-Submission Plan 2041 (Reg19) Autumn 2025 consultation to express my strong objection to the proposed development in the Elborough area. My concerns reflect those raised by Hutton Parish Council and local residents, which I fully support. The key issues are outlined below: 1. Loss of Green Space The development would result in the permanent loss of valuable green space and remove the strategic gap between settlements. 2. Infrastructure Deficiencies There are already major concerns regarding the lack of existing facilities—including shops, schools, and core services—which are not adequate to support the increased traffic and population. 3. Public Opinion A 2021 survey showed that 83% of residents did not support new housing in the vicinity, indicating strong local opposition. 4. Sustainability While the proposed site may score favourably in some sustainability assessments, residents remain concerned about its isolated nature. This undermines claims that it is genuinely a sustainable development option. Flooding Risk I would also like to emphasise the significant risk of flooding in this area. Increasing impermeable surfaces through new development would worsen water runoff, particularly in the context of climate change. Runoff from farmland on the hill above Elborough already results in heavy flows, and flash flooding is a known issue across the region, potentially affecting local properties. Given these strong and well-evidenced concerns, I trust that they will be fully considered as part of the consultation process.			

Name: N Miguel **I.D:** 62851169

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared	Unsure	Unsure	I am writing to express my strong opposition to the proposed planning development on Backwell Common. I have been a resident on Backwell Common for more than 41 years. Having grown up here and now living next to my mother with my husband and two young children, I am deeply connected to this area. Backwell Common and the surrounding areas are a gift to our community and are utilised by countless people. This area provides an essential space for nature, exercise, and mental well-being, which was particularly evident during			

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					the pandemic. We saw individuals, couples, and families walking this beautiful area every few minutes. As a play therapist, I have personally used this natural environment to help children experiencing loss find their grounding. While I understand the need for housing and development, I strongly believe that we must preserve this area to continue offering a space where people can clear their minds and appreciate nature. The volume of people who use this area daily demonstrates its necessity to the community. I urge you to reconsider the scale of this project and preserve Backwell Common for current and future generations. Thank you for considering my views.			

Name: N Moorcroft **I.D:** 30658209

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Policy LP2: Strategic location: Woodspring (south west of Bristol)	No	Justified	Yes	Yes	Firstly I feel this abhorrent breach of the Green Belt by the acceptance of the building of the EPIC site was a complete dereliction of responsibility by both the Planning Officers and North Somerset Council with absolutely zero gain for the community as a whole indeed to the detriment of the community. It has heralded a wholesale sacking of the greenbelt and its protections and this document is proof of its destruction. I have specific comments in relation to the employment development in the green belt:We think that the two sites allocated for employment opportunies are completely inappropriate because of both landscape value, historic views of Ashton Court Estate, Brunel's Suspension Bridge and Royal York Crescent and other listed buildings in Clifton (see Historic England comments) and Hanging Hill woodland. We suggest these be retained as green belt and then they would act as a clear green edge between Bristol and the new development areas. The employment opportunities could be allocated on other sites closer to the A38 and e.g. linked to Castle Farm.or better located near the conurbation of Weston Super Mare The WECA Spacial Development Strategy we understand will not be completed until later in 2027.due to is failure of previous leadership This strategy will affect in a major way the transportation corridor reservations that will be needed for a masterplan. This period could be used to complete an NSC led master planning approach particularly if it was included within the amended Local Plan.We think that there has been a totally inadequate appreciation and understanding of both the visual quality, nature significance animal migration and water movements in the Woodspring golf course area and adjoining topography and the sloping fields leading up to the village and church at Dundry. These are locally known to include many very waterlogged sites - land which currently reduces the poten/al extent of flooding in southern Bristol. We think that this understanding and appreciation of the value of the outstanding landscape which is to be taken out of the green belt requires some form of compensation to the existing and new residents of the developed area in the form of how the development is designed, what additional spaces are available for community recreation specifically walks into the future. In addition, the identification of a new area of green belt is necessary to compensate for the loss of open land to built development. There are a number of smaller but significant issues that are of concern for the residents of Yanley hamlet and Dundry village. These include: a) b) c) d) e) That the development on the Woodspring golf course site should allow for a wildlife corridor in the form of a saddle over the ridge restricting development including gardens in a band 75m below the site boundary. That this area remains in the green belt and is enhanced appropriately through tree planting etc. Due to the pressures from the consented EPIC development site and the proposed new housing development, before any housing development can be commenced that Yanley Lane is gated to through external traffic but remains accessible for walkers, cyclists, horse riders, farmers, immediately adjacent neighbours and emergency vehicles in a design that is agreed with the local community. That footpaths are retained in existing locations most importantly including the Historic Monarch's Way through the lower flank of Dundry Hill and across the Woodspring area That spring lines and water issues are identified early in the process, and all water is retained on the surface and integrated into commensurately sized damp habitat That veteran and legacy oaks in particular are adequately , safeguarded and retained as part of the landscape structure of any development Suggested alternative approach to Policy LP2 We conclude our response with a suggested alterna3ve approach to Policy LP2 which we think provides a process that would meet the strategic objec)ves of North Somerset Council.This approach would involve engagement with the existing and new communities and the opportunity to design a special place to live that is resilient in rela/on to both climate and nature. The planning approach would be predicated on deep analysis and evidence base, leading to a design approach that			

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					delivers an advanced and future-proof model for this locality to be enjoyed equally by the new community and the existing residents. 1. 2. 3. 4. A new strategic growth location is proposed for a new settlement of about 3500 houses at Woodspring based on Garden Village principles. The delivery will be phased through the plan period following a process of detailed examination, strategic policy formulation and master planning. North Somerset Council should establish a leadership group and Project Delivery Board involving WECA, relevant parties such as Homes England and most importantly include independent local community representatives. The project delivery board apparently intend to commission work that will form the basis of a site- specific SPD that will include: - A detailed hydrology of the area throughout the valley along with flooding constraints, both fluvial and related to the nearby overground reservoirs some of these watercourses are the most volatile in North Somerset and seem to be ignored by those who report to North Somerset. Most importantly this plan has little or no regard for those in the lower levels of the Valley where despite SUDS little will be done to ameliorate the vastly increased runoff created inevitably by urbanisation , The hydrological report commissioned by NSC for the SBLR has turned out to be very inaccurate to the point of being farcical and local opinion proved to be accurate I trust that this time more local opinion will be included rather than an academic who knows little of the minutiae that has contributed and manifested itself in the flood plain regularly flooding. Assessing in detail the topography, ecology and landscape quality of the area - Preparing a definitive corridor for a future Bristol –airport mass transit route that will inform the master planning process. - Defining a community engagement strategy - Establishing a bespoke independent design review group for the project - Considering the stewardship legacy for the necessary community and public infrastructure, including managing assets for the benefit of the community - Formulating a strategic masterplan and design brief for the new community Developers prepare detailed masterplans and design codes in accordance with the SPD The Plan must include infrastructure for the newly created communities prior to their completion and this new community should have zero impact on the existing community in `Long Ashton These facilities should consist of Schools,Community Hub,Large green spaces ,Bus Services ,Health Centre all created at the time of the rest of the development with all road exits directed towards the Bristol City Conurbation via the A38 In regards to any traveller site being considered ,I would consider this site to be totally unsuitable			

Name: N Shelton **I.D:** 62691937

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Strategic Policies	No	' Justified	Unsure	No	Section 40 of Natural Environment and Rural Communities Act 2006 places a duty on public bodies to contribute to the coherence and resilience of ecological networks. These plans dangerously encroach on SSIs (managed by Avon Wildlife Trust, eg the ancient woodlands at Weston Big Wood) and disregard the buffer zones and wildlife corridors put in place to protect these most fragile eco-systems in North Somerset (some of the most unique in the UK, in fact). The council must re-consider the scale of these developments and the land it impacts. Making some concessions on numbers of dwellings and boundaries would surely be reasonable?			

Name: N Taylor **I.D:** 62848673

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Lack of infrastructure such as schools, doctors, nhs dentist. It will increase traffic increasing congestion and as my children are regularly walking in Back well I worry for their safety. There is an economic risk to the agricultural land and appeal of living in a village as it would lose the character with even more hpuses.	Lack of infrastructure such as schools, doctors, nhs dentist. It will increase traffic increasing congestion and as my children are regularly walking in Back well I worry for their safety. There is an economic risk to the agricultural land and appeal of living in a village as it would lose the character with even more houses.		

Name: N Whiteley **I.D:** 31063873

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Strategic Priorities	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	The Strategy is not the most appropriate one based on evidence Failure to Exhaust Brownfield/Urban Capacity First: The Strategic Priority to release Green Belt land (e.g., at Woodspring, Nailsea, and Backwell) is not justified because the Council has not fully demonstrated that all "grey belt," brownfield, and urban intensification options (particularly in Weston-super-Mare and Portishead) have been exhausted. Evidence: Local groups argue that density on brownfield sites could be increased (as seen in the Portishead Wyndham Way rebuttals) to reduce the need for Green Belt release. The strategy relies too heavily on easy-to-deliver greenfield sites rather than complex urban regeneration. Loss of Best and Most Versatile (BMV) Agricultural Land: The allocation of strategic sites (like those around Backwell) involves the permanent loss of Grade 1 and Grade 2 agricultural land. Policy Conflict: This contradicts the National Planning Policy Framework (NPPF) requirement to recognise the economic and other benefits of the best and most versatile agricultural land. The plan prioritises housing numbers over food security and natural capital without sufficient justification. Not "Consistent with National Policy" (Conflicts with the NPPF) Green Belt "Exceptional Circumstances" Not Met: The NPPF (Para 145 approx) states that Green Belt boundaries should only be altered in "exceptional circumstances." The Council relies on the "Standard Method" housing target as the primary justification. "Housing need" alone is often not considered an "exceptional circumstance" by Inspectors if it leads to severe harm to the Green Belt's purposes (preventing urban sprawl, preventing settlement merger). The proposed expansion at Long Ashton / Woodspring risks merging North Somerset settlements with Bristol, violating a core purpose of the Green Belt. Sustainable Transport & Climate Change (NPPF Para 110/115): The Strategic Priority for Climate Action is undermined by the Spatial Strategy. Allocating large growth in villages like Backwell or edge-of-Bristol sites (Woodspring) without guaranteed mass transit infrastructure creates car-dependent dormitories. If the "Wolvershill" or "Woodspring" sites proceed without the delivery of the Banwell Bypass or mass transit links first, the plan fails the NPPF requirement to ensure "significant impacts from the development on the transport network... can be cost effectively mitigated." Not "Effective" (The Plan is not deliverable) Infrastructure Funding & Timing:			

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					The plan promises "infrastructure-led growth," but the funding for critical infrastructure (new schools, medical centres, and strategic road improvements) is often identified as coming from developer contributions (CIL/Section 106) which are not guaranteed. If the viability of the strategic sites (especially with the new requirement for 50% affordable housing on Green Belt release) is squeezed, infrastructure is usually the first thing to be cut. The plan lacks a robust "Plan B" if these strategic sites stall due to viability, making it ineffective. Viability of "Golden Rules" (Affordable Housing): The plan introduces high demands for affordable housing (50%) on Green Belt sites. While socially desirable, developers may argue this renders sites unviable, leading to future applications to reduce this number. If the plan relies on this 50% to meet its affordable housing priority, and it is not economically viable, the plan is not effective. Not "Positively Prepared" (Unmet Needs & Constraints) Disproportionate Growth: The strategy assigns "Strategic Growth Area" status to villages like Backwell and Nailsea, effectively doubling the size of some communities. This ignores the physical and environmental constraints (flood risk zones, narrow rural road networks) that prevent these locations from absorbing such growth sustainably. Standard Method Rigidity: The Council has accepted the government's standard housing methodology figure (~24,000 homes) without sufficiently arguing the case for "exceptional circumstances" to deliver less due to the district's severe constraints (Mendip Hills AONB, Flood Zone 3, and Green Belt). A "Positively Prepared" plan should objectively assess what can realistically be delivered, not just accept a top-down algorithm. Arguments on Legal Compliance Duty to Cooperate: Has North Somerset Council engaged constructively and actively with Bristol City Council to explore if Bristol's unmet housing need must be met in North Somerset's Green Belt? If Bristol can accommodate more density (building upwards), North Somerset's "duty" to accept this overflow is reduced. If this engagement trail is weak, the plan fails the legal duty. Sustainability Appraisal (SA) & Habitats Regulations Assessment (HRA): The Strategic Priorities must be supported by a robust SA. Opponents (e.g., in Long Ashton) argue that the SA fails to properly value the ecological impact on protected species (like Greater Horseshoe Bats associated with the nearby SACs). If the SA has not properly scored "reasonable alternatives" (i.e., not building on that specific Green Belt site), the plan is legally vulnerable.			
Land south of Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	The site constitutes an unjustified expansion of Nailsea, since brownfield sites elsewhere in North Somerset have no been fully considered.			
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective	No	No	1. Soundness: Not Justified (Unwarranted Green Belt Release and Disproportionate Scale) The exceptional circumstances for Green Belt release are not demonstrated, as alternatives (e.g., brownfield intensification in Weston-super-Mare or Portishead) remain unexplored, breaching NPPF para 147's "very special circumstances" test. Excessive Burden on Backwell: The 889 homes would more than double Backwell's housing stock (adding to ~800 already consented nearby, e.g., Grove Farm's 515 homes and Farleigh Fields' 221), transforming a rural village into an urban	The East of Backwell site should be removed form the plan.		

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		' Consistent with national policy			extension without proportional needs assessment. This contradicts the plan's rural limits (SP6) by treating Backwell inconsistently as both rural and urban (lumped with Nailsea), overriding the adopted Neighbourhood Plan that prioritizes village scale. Agricultural and Landscape Harm: The site comprises Grade 2 agricultural land, with the Sustainability Appraisal noting significant negative effects from loss of fertile soil and countryside openness. It risks urban sprawl toward Flax Bourton, eroding separation from the Mendip Hills National Landscape and historic boundaries (e.g., around Woolleys Farmhouse and Backwell Farleigh Conservation Area). 2. Soundness: Not Effective (Uncertain Infrastructure Delivery and Phasing Risks) Promises of infrastructure-led growth (e.g., Cross Rail Link road, rail crossing, bus interchange) lack firm funding, timelines, or viability evidence, rendering delivery speculative per NPPF para 23. Transport Deficiencies: The site's valley location exacerbates A370/Station Road congestion, with no detailed budget for the new distributor road (Station Road to A370) or railway bridge/tunnel. There is no accounting for unsafe school routes and pedestrian risks (e.g., near Backwell Lake), with existing crossroads at capacity; proposed mitigations like Festival Way extension and cycle parking are aspirational but undeliverable without developer guarantees. Education and Services Overstretch: Three primary schools (one at Grove Farm, two east of Backwell) require unspecified investments, ignoring existing pressures (e.g., Backwell School oversubscribed). Flooding risks from heavy rain (e.g., at Grove Farm) threaten drainage, with vague SuDS integration and no coordinated Flood Risk Assessment for cumulative 1,000+ homes. These gaps could delay phasing (linked to Infrastructure Delivery Plan), leading to car-dependent sprawl despite SP10's active travel focus. 3. Soundness: Not Consistent with National Policy (Environmental and Heritage Conflicts) The allocation violates NPPF protections for biodiversity (paras 174–192), Green Belt (paras 136–151), and heritage (paras 194–208). Biodiversity Threats: The site is a key foraging area for horseshoe bats (linked to Brockley maternity colony, Gordano Valley SAC, and SSSIs), with development fragmenting flight corridors despite proposed "North Somerset Nature Park" mitigations (habitat offsets, dark corridors). BPC deems this "woefully inadequate" for international significance, risking non-compliance with Wildlife & Countryside Act 1981. Health and Landscape Inconsistencies: Air pollution in the valley could harm residents, conflicting with healthy communities (SP1/DP49). Buffers (e.g., west of Park Farm) aim to preserve views to Tyntesfield and Church Town but fail to mitigate broader openness loss, undermining landscape sensitivity (DP39). 4. Soundness: Not Positively Prepared (Ignores Community and Sustainability Limits) The site fails to balance growth with environmental capacity, imposing "unfair share" on Backwell (e.g., 8 ha extra employment risking further Green Belt loss) without consulting on ambiguities. Near-universal opposition (e.g., 98% against related bus schemes, 800–1,300 objections per site) reflects eroded trust, with calls for redistribution to sustainable urban edges like SW Bristol. 5. Legal Compliance Issues Habitats Regulations Assessment (HRA): Inadequate evaluation of adverse effects on Gordano Valley SAC from bat habitat loss/pollution, breaching EU Habitats Directive (92/43/EEC) and Conservation of Habitats and Species Regulations 2017; requires full Appropriate Assessment, absent here. Sustainability Appraisal (SA) Shortcomings: SA underplays negatives (e.g., agricultural loss, sprawl) without rigorous alternatives testing, violating SEA Directive 2001/42/EC. Duty to Cooperate (DTC): Fails s33A by not jointly planning transport mitigations with Bristol/North Somerset neighbors, straining shared M5/A370 links.			

Name: N.D.R. Eade **I.D:** 63106881

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Land at Tower Farm					In response to the proposed new housing development at two of Portishead's green belt areas namely Tower Farm and Black Rock. I am very much against this proposal because firstly Portishead does not have the necessary infrastructure to accommodate hundreds of new residents and their families. Portishead health centres, dentist, school and nurseries are over subscribed at the moment and with only one pharmacy in operation more people added to the Portishead community would create endless waiting time, far worse than it is at the present time. Secondly and very important is the road system in and out of Portishead. At present there is only three exit and incoming roads to Portishead, two of which, Clapton Lane and Clevedon Road are totally inadequate for high volume traffic. On numerous occasions in the past when traffic is disrupted on the M-5 motorway some of the traffic is diverted through Portishead to Clevedon Road for the traffic to rejoin the motorway in Clevedon when this has happened it caused serious disruption to the Portishead community. Having more and more people settling in the area would only make things worse especially those who live in North Weston and Weston-in-Gordano where the road is a very narrow. Also the proposed new housing estate on green belt land will surely disrupt the natural biodiversity of the area which is rich in wild life and woodlands and is regularly used as part of the-leisure-and-educational activities by the Portishead community: I realise the need for more housing is important throughout the country but in some areas such as Portishead one has to be realistic. Adding more people to a community that is already over populated and with the current infrastructure in the town I foresee many problems on the horizon.			
Black Rock, north of Clevedon Road					In response to the proposed new housing development at two of Portishead's green belt areas namely Tower Farm and Black Rock. I am very much against this proposal because firstly Portishead does not have the necessary infrastructure to accommodate hundreds of new residents and their families. Portishead health centres, dentist, school and nurseries are over subscribed at the moment and with only one pharmacy in operation more people added to the Portishead community would create endless waiting time, far worse than it is at the present time. Secondly and very important is the road system in and out of Portishead. At present there is only three exit and incoming roads to Portishead, two of which, Clapton Lane and Clevedon Road are totally inadequate for high volume traffic. On numerous occasions in the past when traffic is disrupted on the M-5 motorway some of the traffic is diverted through Portishead to Clevedon Road for the traffic to rejoin the motorway in Clevedon when this has happened it caused serious disruption to the Portishead community. Having more and more people settling in the area would only make things worse especially those who live in North Weston and Weston-in-Gordano where the road is a very narrow. Also the proposed new housing estate on green belt land will surely disrupt the natural biodiversity of the area which is rich in wild life and woodlands and is regularly used as part of the-leisure-and-educational activities by the Portishead community: I realise the need for more housing is important throughout the country but in some areas such as Portishead one has to be realistic. Adding more people to a community that is already over populated and with the current infrastructure in the town I foresee many problems on the horizon.			

Name: Nailsea Action Group **I.D:** 58582945

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Sustainable development objectives					Nailsea Action Group's view is that the choice of Nailsea (and Backwell) as a strategic location is wrong. It is not sustainable in that most new residents will have to commute to other cities and towns to work, and the infrastructure provision will be completely inadequate. Locations closer to Bristol would be better able to provide the occupational, transport, educational, health infrastructure and leisure facilities needed by the new residents.			
Sustainable development objectives	No	‣ Effective	Unsure	Unsure	Nailsea Action Group’s view is that the choice of Nailsea (and Backwell) as a strategic location is wrong. It is not sustainable in that most new residents will have to commute to other cities and town to work, and the infrastructure provision will be			

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					completely inadequate. Locations closer to Bristol would be better able to provide the occupational, transport, educational, health infrastructure and leisure facilities needed by the new residents.			
SP1: Sustainable Development	No	• Justified • Effective	Unsure	Unsure	Nailsea Action Group is concerned that not enough emphasis has been placed on matters that are of importance to the daily lives of residents of North Somerset. We note that issues like health provision, education, town structure and others are mentioned only very minimally, yet are presented as essential for sustainable development. Funding mechanisms for such infrastructure are mentioned in vague terms, or in some cases, not at all. No mention is made of specific plans, with achievable timescales. This is definitely not sound practice. Nailsea Action Group considers the Local Plan is not effective because it depends on major infrastructure projects that are uncertain, unfunded, and untested. For Nailsea and Backwell, the proposed “strategic rail crossing” and three new primary schools are presented as essential to make development acceptable, yet there is no binding commitment, timetable, or funding mechanism to ensure they are delivered. Inspectors have previously found plans unsound where critical infrastructure was not secured, as in the Tandridge Local Plan (Inspector’s letter, 2023), where refusal of Housing Infrastructure Fund support rendered the plan undeliverable. Without secured infrastructure, the plan cannot be delivered as intended and therefore fails the effectiveness test.	If the plans for Nailsea are to succeed, they need to be more exact, properly costed including realistic and achievable infrastructure proposals. It is all too vague and therefore likely not to come to fruition.		
SP2: Climate Change								
SP3: Spatial strategy	No	• Justified • Effective • Consistent with national policy	Unsure	Unsure	In this iteration, Nailsea becomes a large sprawling conurbation, with an ineffective ‘centre’, offset at one end, and only easily accessible by a small proportion of the town. This aspect of the Local Plan is not sound because it is unlikely to be effective on account of the following:- • There is next to nothing in the Local Plan that promises necessary infrastructure in Nailsea. The current developments have brought none significant so far despite undertakings given in the plans. • Each development is treated singly, not cumulatively with those nearby. • Access to and from these recent substantial building developments is still via the narrow lanes that are consistent with Nailsea as a village. • As for access further afield, all routes into and out of the town have significant pinch points long recognised as unmitigatable and troublesome. Overall there is:- Failure of Consistency with National Policy • Flood risk conflict: NPPF requires directing development away from areas of highest flood risk. SP3 claims to minimise flood risk allocations, yet strategic sites are adjacent to Flood Zone 3. • Climate change pledge: NSC has pledged carbon neutrality by 2030, but the spatial strategy disperses growth in car dependent locations, undermining national and local climate objectives. Failure of the Justified Test • Evidence base is vague: The Infrastructure Delivery Plan and supporting transport papers list “possible” actions rather than definitive, funded schemes. This means the strategy is not based on proportionate evidence. Failure of the Effective Test • Deliverability uncertain: There is no clear mechanism or funding identified to deliver the promised bus, rail, and rapid transit improvements. Without this, the policy cannot be implemented effectively. • Reliance on external agencies: Many transport improvements depend on	Radical re-consideration of this part of the Local Plan that clearly fail the soundness tests, which also thread through much of the following sections.		

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					regional or national bodies (e.g. WECA, Network Rail), but there is no binding agreement in place. • Infrastructure lag: Housing allocations are front loaded, but transport improvements are aspirational, meaning development would outpace infrastructure delivery. Failure of Consistency with National Policy • NPPF requirement: National policy requires plans to promote sustainable transport and reduce reliance on private cars. SP10's wording is consistent in principle, but allocations undermine this by directing growth to locations with poor sustainable transport options. • Climate change conflict: The NPPF (para. 152–154) requires plans to support climate resilience. SP10's support for airport and port expansion increases carbon emissions, conflicting with national climate policy			
SP5: Towns	No	◦ Justified ◦ Effective	Unsure	Unsure	The consultation document states: "Proposals for new development will be supported provided that they:…Can be successfully served by infrastructure such as transport, education and health facilities." For Nailsea, the bolded text above contains a significant proviso. It is doubtful, not least for reasons given in response to SP 3, that this proviso can be met. This aspect of the plan therefore has also to be unsound. As the Policies map for Nailsea illustrates, the town is expected cumulatively to grow significantly, and especially some way to the west and south of its centre, making the town in effect very heavily lop-sided. The proposals (see the italicised text below) for the future refreshment and re-vitalisation of the centre of the town are vague, uncosted, and, in any event, constrained by the lack of significant adjacent land on which to expand in order to accommodate the hoped-for increased footfall. If the suggested developments cannot "be successfully supported by infrastructure such as transport", they may not even come to fruition at all. This is unlikely to attract future traders, retailers and businesses to Nailsea. It is likely that the lack of easy routes to the town centre shops from the outlying areas, coupled with the recently introduced parking fees (the absence of which hitherto have made Nailsea attractive to shoppers local and not so local), which everyone knows will increase, will encourage new residents – and old – to take their business elsewhere. Furthermore, they will use the car to do so. Few residents, especially in the new further-flung residential developments, are likely to do their (probably heavy) weekly – or any – shopping on foot to a bus stop (if there is one) to get to town and back again, especially if they also have young children in their care. The facts of the matter set against the aspirations of Policy SP5 for Nailsea demonstrate the unsuitability of Nailsea (and Backwell) as a location for such major expansion. This is emphasised by the challenges for transport, not only within the town, but to and from outside it, characterised, as every route is, by significant constraining pinch points. An added factor to Nailsea's unsuitability as a location for major population growth is the very small allocation of land for more employment, a barely meaningful 1.1 hectares, which makes it more than likely that new residents will look towards Bristol for their work, and commute daily to and from it (see comments made relating to Policy SP9, Employment). A much more suitable location lies nearby where there would be good public transport connections with Bristol and job opportunities: the land west of Bristol close to the east boundary of Long Ashton. (Policy SP2 refers) This part of the plan is unsound because the evidence to suggest that the town "can be successfully served by infrastructure such as transport" is extremely weak. Many proposals are made for Nailsea in particular, some of which are copied below	Ensure that plans for infrastructure development are genuinely realistic and achievable.		

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					(in Italics): ‘The Nailsea Placemaking Strategy recognises as a priority regenerating the Town Centre through renewal, retrofitting, improving townscape and generating mixed use and outward facing active frontages and by bringing new homes into the town centre. The potential for concentrated activity around the west end of the Town Centre and Somerset Square in particular for leisure, retail, recreational and play spaces should be reflected in development proposals.’ All the above (and the proposals not listed) is unsound because it is not a plan, therefore not effective. It is a collection of aspirations. So-say intentions are hedged about with ‘should’, ‘where appropriate’, ‘recognises’, ‘potential’. A plan is a definite decision about what clearly is going to happen, the actual actions that will take place: not this.			
SP7: Green Belt	Unsure	• Justified • Effective • Consistent with national policy	Unsure	Unsure	Nailsea Action Group considers that the release of Green Belt land north of Nailsea and east of Backwell is not justified. The NPPF requires “exceptional circumstances” for Green Belt release. Case law confirms that this is a high bar. In Gallagher Homes Ltd v Solihull MBC [2014] EWCA Civ 1610, the Court of Appeal held that the mere unsuitability of land for housing cannot amount to exceptional circumstances. More recently, in Save Greater Manchester Green Belt Ltd v Secretary of State [2025] EWHC 2742 (Admin), Lang J clarified that while authorities have discretion, they must demonstrate a clear evidential basis for exceptional circumstances, not simply rely on housing need. The evidence base here does not demonstrate why Nailsea and Backwell must bear this burden compared to reasonable alternatives such as brownfield redevelopment or urban intensification. Without a transparent comparison of alternatives, the allocations are not justified. Nailsea Action Group appreciates the positive approach to the extension to the Green Belt proposed to the south of Nailsea as defined on the Policies Map to maintain the separation to prevent the merger of Nailsea and Backwell and prevent further encroachment into the countryside. However, even if ratified, the ease with which it might be later overruled to allow developers to build, is not reassuring.	In the light of the legal implication that exceptional circumstances do not apply to the Nailsea scenario, leave the green belt unbuilt on.	The suggestion to extend the green belt to the sough of Nailsea is sound.	
SP7: Green Belt	No	• Justified • Consistent with national policy	Unsure	Unsure	The plan is inconsistent with national policy. The Green Belt release undermines the purposes of the Green Belt, including preventing urban sprawl and safeguarding the countryside. The ecological mitigation measures, such as the proposed Nature Park and wetland creation, are vague, unfunded, and risk failing to meet statutory duties under the Habitats Regulations and biodiversity net gain requirements. In Compton Parish Council v Guildford BC [2019] EWHC 3242 (Admin), the High Court emphasised that Green Belt changes must be supported by clear evidence and lawful reasoning. Similarly, the principle in Tesco Stores Ltd v Dundee City Council [2012] UKSC 13 confirms that policy interpretation is a matter of law, requiring clarity and enforceability. National policy requires clear, enforceable measures to protect biodiversity and deliver net gain, which this plan does not provide. Nailsea Action Group judges the inclusion of the north Nailsea site in SP7 as unsound because it contravenes much of what is expressed in that policy and in DP12: “Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances,” and “Proposals for major development involving the provision of housing in the Green Belt should meet the ‘Golden Rules’ as set out in the NPPF, relating to affordable housing, necessary improvements to local or national infrastructure, and publicly accessible green spaces.” “The NPPF indicates that development in the Green Belt is inappropriate unless specified exceptions apply.” With respect to the North Nailsea site, it is not clear that such exceptions are sufficiently strong to merit the appropriateness of the site.	NSC should select a site closer to Bristol, where public transport is usable and practicable.		

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SP8: Housing	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The Local Plan's proposals for Nailsea and Backwell are not positively prepared. The allocation of 3,500 homes and 6.1 hectares of employment land is not supported by robust evidence that the required transport, school, health, and ecological infrastructure can be delivered in step with housing growth. The phasing strategy is vague and unenforceable, leaving a real risk that housing will be built without the promised infrastructure. This mirrors concerns raised by Inspectors in the Tandridge Local Plan examination (2023), where unresolved highway capacity issues and lack of secured funding for junction improvements led to findings of unsoundness. A plan that relies on aspirational measures without secured delivery mechanisms cannot be considered positively prepared under paragraph 35 of the NPPF.	As a plan that relies on aspirational measures without secured delivery mechanisms cannot be considered positively prepared under paragraph 35 of the NPPF, ensure the delivery mechanisms are securely deliverable.		
SP9: Employment	No	• Justified • Effective	Unsure	Unsure	Nailsea Action Group notes that 1.1 hectares of employment land has been allocated to Nailsea. Also noted is that the Nailsea and Backwell area does not feature in Schedule 2, employment sites. This Policy (SP9) states that there is 72.8 hectares allocated for employment in North Somerset, whereas Schedule 2: Employment sites only lists 53.7 hectares. The 1.1 hectares is a tiny allocation of employment land to a town that is expecting such a large number of new dwellings. The residents of most will inevitably seek employment further afield and use their cars to get there and back, thereby increasing road congestion, pollution, and unavoidably contradicting the local authority's espoused policies on climate change. This insufficient allocation cannot realise the overall aims of the Local Plan and is therefore unsound. In the current economic climate, a significant proportion of new employment is created by light industry such as basic manufacture and assembly, warehousing etc. Nailsea is inherently unsuitable for such light industry, mainly due to transport access difficulties detailed above. Anecdotally, it has been suggested that organisations have investigated Nailsea as a site for light industry but have been put off by the difficulty of getting large trucks and goods into and out of the town. Until this situation is remedied, the prospects of light industry coming to Nailsea is remote. There are currently very few service sector, public services, and administrative organisations operating in Nailsea, and there have been no significant employers added over the last few years. Apart from Pelican Services which has a staff of over 300 people, there are no major stand-out employers, despite there being three trading estates: Blackfriars Road, Southfield Road and the old Coates site. Two large supermarkets – Tesco and Waitrose – and several medium sized stores, such as Iceland, employ almost exclusively from the immediate locality. The units on the trading estates all employ relatively small numbers of people with the possible exception of Brabantia and Proper Job. Most other employment is with retail in single figures. As at March 2025 some 30 jobs are advertised on the internet in Nailsea, mostly low paid and with small employers or for individual working. There is not a tradition of administration, services and public sector opportunities in Nailsea. For example, the Nailsea Business Directory identifies about a dozen small accountancy firms, about half a dozen IT establishments, and there are at least half a dozen solicitors, estate agents and refreshment outlets all in close proximity to each other. Without significantly better infrastructure – and there is none planned at present - it seems unlikely that Nailsea will attract major stakeholders in administration, services and the public sector.	Either securely identify and allocate far more land for employment, or reduce the housing plans for Nailsea so that what is provided will meet the needs of the present and future population and prevent a great deal of commuting.		
SP10: Transport	No	• Effective	Unsure	Unsure	Every entrance / exit from Nailsea has restrictions and pinch points. In addition, links to Bristol and other large towns are completely inadequate. A cross rail link from Nailsea to the A370 has been discussed many times, and indeed in the last Local Plan, was discounted as too expensive. The public transport facilities in the area may be excellent by some measures, but they are not fit for purpose because there are far too few jobs in the area. The first table below shows that, like most of the other locations in North Somerset, most of the area's working population drive to work. That is because public transport lacks			Travel census tables.docx

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					sufficient capacity. Also, the need to change the public transport service during the commute prevents public transport from providing reasonable commuting times to the diversity of mid-distance workplace locations. The second table below shows that a third of Nailsea and Backwell's (N & B's) working population commute that sort of distance, between 10 and 20 km. Census table QS701EW - Method of travel to work (see the attachment below for the table) Census table QS702EW - Distance travelled to work (see the attachment below for the table) Nailsea Action Group also notes that some operational changes by public transport authorities affect NSC objectives. For instance, the reduced capacity of the High Speed Trains results in severe difficulties boarding an already full train at peak times in Nailsea Backwell train station. North Somerset Council has endeavoured, in the past, to facilitate the delivery of net-zero, and to remove the detrimental effects of transport. In the transition period between 2025 and 2040, it is important that the effects on residents' lives and livelihoods are not unnecessarily adversely affected. For instance, creating a bus lane on the A370 is beneficial for public transport, but unnecessarily mandating it 24 /7 is not.			
SP11: Historic and natural environment	No	• Justified • Effective	Unsure	Unsure	Nailsea Action Group's focus in this section is the preservation of our natural environment. In the spirit of SP11's clauses "Conserve, restore and enhance priority habitats, ecological networks and the protection and recovery of priority species;" and "Preserve and enhance conservation areas," Nailsea Action Group, for example, strongly supports the restoration of Netcott's Meadow located at the end of Bucklands End, now neglected by its current owner. Under the previous owners the site was well managed by the Avon Wildlife Trust, but this organisation is no longer permitted access. This meadow was, until 2017, the only remnant of species-rich, damp, unimproved grassland in the area, and was well known for its orchids, damp-loving plants, insects and birds, lying on the southern edge of the parish of Nailsea and adjoining Backwell Lake, which is a Nature Reserve. Because of its importance, and the threats to it, the meadow was made the subject of an EIA (Agriculture) Regulations in 2017 by Natural England. Netcott's Meadow had been designated as a County Wildlife Site for many years, and identified as the only Coronation Meadow in what was the county of Avon under a scheme devised by the now King https://coronationmeadows.org.uk/meadow/netcotts-meadow-nailsea. It has been listed in the current North Somerset Local Plan as a Local Green Space for planning purposes, and is also included in a proposed extension of the Green Belt around the southern edge of Nailsea. The current owner is ignoring all these identifications, allowing the meadow to return to scrubland with the intention of building dwellings on the site.	Enforce Policy DP35		
Policy LP2: Strategic location: Woodspring (south west of Bristol)								
Policy LP2: Strategic location: Woodspring (south west of Bristol)	Yes		Unsure	Unsure			Nailsea Action Group agrees with this allocation as it satisfies the criteria stated in SP3 for a new build	

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							area. It is close to employment locations, has adequate transport to all the facilities of a large city and will result in a consequent reduction in car travel.	
Policy LP3: Strategic location: Nailsea and Backwell		• Justified • Effective	Unsure	Unsure	One of the many strategic proposals is the Cross rail link between Nailsea Station Road and A370. This proposal is so recent, undetailed and tentative, it can hardly qualify for a place in a plan and is therefore unsound as it is not effective in its current iteration. It is only vaguely costed and it is not clear who the payers will be for some significant parts of the proposal. It has been made in isolation from the problems of congestion and overuse of the B3130 through Tickenham to the M5 motorway. This will not happen in the next 15 years, with vague development costs between £16m and £70m mentioned. Distances between town centre, station and the new proposed sites are difficult for active travel (walking and cycling), particularly with Nailsea's (old) age demographics. Schools and other educational requirements In the current iteration of the draft Local Plan, Schedule 4 shows no new educational provision for Nailsea despite extensive areas of land identified as most suitable or with other potential, let alone those sites already built on and inhabited or under construction. If, as is widely reported, Nailsea's population is likely to rise by some 5,000 souls in the foreseeable future, to avoid overcrowding in the already existing schools or pupils having to travel unwarrantably long distances for their education and the delaying complications that capital funding such schools tends to generate, it is very important that at least indicative intentions for school development in Nailsea are provided. In the 364 pages of the Local Plan, only three seem to be devoted exclusively to education. Health, GP services, hospitals and support services such as pharmacies Nailsea currently has two GP practices. There are 17 doctors in the two practices. This may seem adequate in the overall scheme. However, a significant number of doctors work a reduced number of days in the Nailsea practices. Further analysis determines that there is the equivalent to 8-9 full time doctors supporting a current population of approximately 16,000 residents. Whilst Nailsea Action Group has not compared these figures with national 'ideal' statistics, anecdotal evidence is that GP services work under considerable strain in attempting to support the current town population. Any increase in population will put additional pressure on these medical services. It is essential that a commensurate increase in doctors will be required IN ADVANCE of Nailsea's potential increase in size and population. There are currently two Pharmacy groups in three locations in Nailsea. There is uncertainty about one pharmacy situation, and this could result in potential closure of their Nailsea site. This could have a detrimental impact on a growing Nailsea population. As it stands, there regularly are long queues in all locations. As with the other services, there will have to be a planned expansion of pharmacy provision.	To make the cross rail plan usable and therefore effective, provide much more detailed costings. take into account the knock-on effects to Tickenham, the B3130 and the traffic into Bristol on the A370. Be more precise about all aspects of LP3.		
Policy LP6: Educational, sporting,	No	• Effective	Unsure	Unsure	Whilst Nailsea Action Group has views on all aspects of this policy, our focus here is mainly on the Educational aspect. There exists a functional descrepancy in regards to primary schools in Nailsea. In Schedule 4 (page 343+), no primary school is	If the numbers of houses to be built is a genuine intention, then match that likely population increase with the appropriate		

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leisure and community use allocations					identified for Nailsea. However, in Schedule 1 (p262+), on pages 268-9 Land south of Nailsea the following paragraph is documented: "…Provision of land for, and delivery of, a new primary school (including early years provision in accordance with government requirements) is required, along with financial contributions towards special educational needs provision and family centre services." In any event it could be that such a location for a new school, is in the wrong place, or there needs to be an additional school in the north of Nailsea where the Policies map indicates that up to 836 dwellings may be built. The school 'local' to those sites, Kingshill Primary, is now small, many of the buildings that were occupied when it was very large as Nailsea Church of England Junior School and Greenslade County Infants' School are now used for other purposes or demolished. Much of the population that generated the school numbers then in the 1970s, 80s and 90s stayed, but is now dying off and the houses that they currently occupy will once again become available for occupation by families with school-age children. Even without the proposed 836 dwellings, the school will fill again quickly. This part of the 2026-2041 plan does not look far enough ahead is therefore inadequate which makes it unsound.	increase in school places and new schools.		
Policy LP7: Settlement boundaries	No	• Justified • Effective • Consistent with national policy	Unsure	Unsure	LP7 is not justified, not effective, and not consistent with national policy. The evidence base does not demonstrate that Schedule 5 has prioritised brownfield regeneration, urban intensification, mixed-use redevelopment, or higher-density development in sustainable locations, as required by NPPF paragraphs 119–125 on making effective use of land. Instead, the plan relies heavily on large, car-dependent greenfield SHLAA sites around Nailsea, without showing that brownfield or urban capacity within the town has been fully assessed or exhausted. This approach fails to reflect Nailsea's significant environmental constraints, limited public transport, and already overstretched infrastructure, meaning the plan is not effective or deliverable. As a result, the strategy for Nailsea is not positively prepared, lacks a transparent and proportionate evidence base, and does not align with national policy on sustainable development or efficient land use.			
Policy LP8: Town centre hierarchy	No	• Justified • Effective	Unsure	Unsure	Nailsea's Town Centre is identified on the Policies map as largely comprising High Street, Somerset Square, Colliers Walk and surrounding car parks. We support this continued usage, with retail being joined by a varied mix of other associated uses including cafes, eateries, drinking establishments, commercial and entertainment outlets, as well as some residential use. The Centre boundary, as currently drawn, has, debatably, sufficient spare land and under-used accommodation to provide the likely additional space required to serve an increased residential population. The current town centre has a plentiful supply of car parking which, ideally, should be free to all users as a crucial part of the Centre's vitality. As indicated by a recent survey by some Nailsea Town Councillors the recent introduction of pay parking has had a highly detrimental effect on trade for many existing shops and associated facilities, as well as causing disruption on surrounding residential roads with excess parking obstructing easy, and, some cases, any passage especially of larger vehicles. The Town Centre should ideally be readily accessible by all residents. Many of the proposed new residential allocation sites are distant, and would create a lop-sided overall settlement layout. It will counter the Local Plan aspiration for Town Centres to be "accessible" and are therefore not supported. The proposed increase in public transport routes and numbers is too small to achieve the relevant Accessibility standards. Section LP8 states any additional retail locations must be accessible by walking, cycling and public transport. The current Town Centre clearly does not meet this standard for several of the proposed new residential sites, particularly to the west and south. However, the development of any such additional retail in a new location would have a serious detrimental effect on the viability and vitality of the existing centre - and should not be allocated. The overall effect therefore is that proposals for so much additional residential site allocation – in remote parts of the town, is	Restore free parking to Nailsea's car parks if the centre is to thrive and to attract residents (existing and yet to come) to patronise it rather than going elsewhere.		

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					unsound.			
Policy LP9: Extent of the Green Belt					(Relates also to SP9 pp29-31) If the Inspection does not agree to the extension of the green belt, the designation of ‘strategic gap’ (see also LP10 pp78-79) between Nailsea and Backwell should be restored. This area should not be without any designation, thereby attracting unwanted speculative applications from developers.	Clearly specify NSC's support for the place and protection of the strategic gap in the Local pLan.		
Policy LP10: Strategic gaps	No	• Effective	Unsure	Unsure	Nailsea Action Group notes the removal of the strategic gap between Nailsea and Backwell (it is proposed to extend the Green Belt between these settlements). Nailsea and Backwell are treated as a single broad location for the purposes of this consultation. Nailsea Action Group (NAG) is concerned that NSC will treat both locations as a single combined unit. NAG wish to emphasise that each community has a distinct character and this status is valued by local residents in both Nailsea and Backwell. The long-standing strategic gap between Nailsea and Backwell is treasured by each community and any effort to merge the two towns by removal of this gap will be strongly resisted.	Maintain the strategic gap between Nailsea and Backwell.		
Policy LP10: Strategic gaps	No	• Effective	Unsure	Unsure	Nailsea Action Group (NAG) notes the removal of the strategic gap between Nailsea and Backwell (it is proposed to extend the Green Belt between these settlements). Nailsea and Backwell are treated as a single broad location for the purposes of this consultation. Nailsea Action Group is concerned that NSC will treat both locations as a single combined unit. NAG wish to emphasise that each community has a distinct character and this status is valued by local residents in both Nailsea and Backwell. The long-standing strategic gap between Nailsea and Backwell is treasured by each community and any effort to merge the two towns by removal of this gap will be strongly resisted.	Nailsea Action Group recommends that if the extension of Green Belt is not approved, then the area between Nailsea and Backwell should automatically revert to the designation of 'Strategic Gap'.		
Policy LP11: Transport infrastructure, allocations and safeguarding	No	• Justified • Effective	Unsure	Unsure	Nailsea Action Group considers lack of adequate transport and commuting facilities as one of the major drawbacks of this Local Plan for Nailsea residents. Our comments on this aspect of the plan are documented in section SP10 and Schedule 7. We repeat some of the major issues which are specific to Nailsea Residents here. The existing, already congested out-commuting by car from the Nailsea and Backwell strategic location will increase substantially because the large amount of proposed local house building is not matched by any significant employment provision. Because most employment opportunities will continue to be to the east in Bristol and beyond, most of the new commuting will try to use the same already congested roads to the east. However, there is nothing in the Local Plan that is likely to alleviate that increased congestion. 1. The Local Plan's infrastructure proposals are listed in other parts of the document. The items that will have an impact on Nailsea are listed below with response comments: • “Reserved transport corridor within consented Youngwood Lane development” Comment: This proposal is confined withing the proposed settlement boundary and consequently has no effect on commuting congestion beyond the town's settlement boundary •“Station Road to A370, Cross Rail Link, Nailsea and Backwell” Comment: 1) Funding for the cross rail link is uncertain 2) This proposal is confined within the strategic location and consequently has no effect on the wider commuting congestion. • “Platform extension at Nailsea & Backwell railway station” Comment - The abysmal history of railway improvements at the station gives no confidence that anything will happen. Even if platform improvements were made, they would not improve the passenger carrying capacity of the railway. • “Transport hub at Nailsea & Backwell railway station” Comment - Who would fund	Ensure transport and infrastructure plans meet the assessed need of the substantial new populations of Nailsea and Backwell. NSC should ensure the funding is available to build this infrastructure.		

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					this? Presumably not rail. • “Strategic cycle link between Nailsea and Clevedon via the Moors” Comment – This would do nothing to relieve commuting congestion to Bristol, which is the main work destination In Summary, there's nothing with any certainty that could relieve the increased traffic congestion that would result from the proposed house building. 2. Nailsea’s proximity to Nailsea & Backwell station will not contribute to sustainable development because the railway is so near capacity that, during rush hours, trains to Bristol often arrive at the station already full and there is no provision in this list to substantially improve the railway's capacity. In the face of the proposed house building in Nailsea an Backwell, a substantial increase to the railway's passenger carrying capacity is the only improvement that would enable the railway to contribute to sustainable local transport.			
Policy LP11: Transport infrastructure, allocations and safeguarding	No	• Positively prepared • Effective	Unsure	Unsure	Nailsea Action Group considers lack of adequate transport and commuting facilities as one of the major drawbacks of this Local Plan for Nailsea residents. Our comments on this aspect of the plan are documented in section SP10 and Schedule 7. We repeat some of the major issues which are specific to Nailsea Residents here. The existing, already congested out-commuting by car from the Nailsea and Backwell strategic location will increase substantially because the large amount of proposed local house building is not matched by any significant employment provision. Because most employment opportunities will continue to be to the east in Bristol and beyond, most of the new commuting will try to use the same already congested roads to the east. However, there is nothing in the Local Plan that is likely to alleviate that increased congestion. 1. The Local Plan's infrastructure proposals are listed in other parts of the document. The items that will have an impact on Nailsea are listed below with response comments: • “Reserved transport corridor within consented Youngwood Lane development” Comment: This proposal is confined withing the proposed settlement boundary and consequently has no effect on commuting congestion beyond the town's settlement boundary • “Station Road to A370, Cross Rail Link, Nailsea and Backwell” Comment: 1) Funding for the cross rail link is uncertain 2) This proposal is confined within the strategic location and consequently has no effect on the wider commuting congestion. • “Platform extension at Nailsea & Backwell railway station” Comment - The abysmal history of railway improvements at the station gives no confidence that anything will happen. Even if platform improvements were made, they would not improve the passenger carrying capacity of the railway. • “Transport hub at Nailsea & Backwell railway station” Comment - Who would fund this? Presumably not rail. • “Strategic cycle link between Nailsea and Clevedon via the Moors” Comment – This would do nothing to relieve commuting congestion to Bristol, which is the main work destination In Summary, there's nothing with any certainty that could relieve the increased traffic congestion that would result from the proposed house building 2. Nailsea’s proximity to Nailsea & Backwell station will not contribute to sustainable development because the railway is so near capacity that, during rush hours, trains to Bristol often arrive at the station already full and there is no provision in this list to substantially improve the railway's capacity. In the face of the proposed house building in Nailsea an Backwell, a substantial increase to the railway's passenger carrying capacity is the only improvement that would enable the railway to contribute to sustainable local transport.	NSC should focus on transport infrastructure which enables residents of Nailsea to commute effectively to employment locations. Nailsea (and Backwell) are commuter towns, as there is very little employment opportunities locally. Transport facilities which would help Nailsea residents are listed in our comment above.		

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Policy LP15: Local Green Space	No	• Positively prepared • Effective	Unsure	Unsure	A major focus for Nailsea Action Group is the retention of local green space for the use of residents of all ages. It is reassuring that some spaces have been recognized as green space (as listed under Schedule 3: Local Green Space). However, it would be beneficial to Nailsea if some sites were designated as 'Local Green Space' or 'Village Green' to provide more protection from predatory investors (most not local North Somerset residents) who buy up green space, long used by local residents as a recreational facility, and apply for building planning application. Nailsea Action Group is pleased that NSC recognises many areas as green space, but are particularly concerned that the areas below are as well protected as possible: • The Perrings open space • Netcott's Meadow, • The space north of Blakeney Close • All of Trendlewood Park including the land south of Bibery Close. It is noted that Morgans Hill is included as green space. However it does not seem to be correctly drawn on the policies map in that the area south of Nailsea Football ground (in the Grove) is designated both as building land and green space.	NSC has a bad reputation concerning local green space within the settlement boundaries of Nailsea. Nailsea Action Group notes that, historically, spaces such as the site south of the Uplands, long used as open green space, was willingly released for development. NSC should stick to their criteria for local green space and refuse planning permission for any inappropriate application.		
Policy LP15: Local Green Space		• Positively prepared	Unsure	Unsure	A major focus for Nailsea Action Group is the retention of local green space for the use of residents of all ages. It is reassuring that some spaces have been recognised as green space (as listed under Schedule 3: Local Green Space). However, it would be beneficial to Nailsea if some sites were designated as 'Local Green Space' or 'Village Green' to provide more protection from predatory investors (most not local North Somerset residents) who buy up green space, long used by local residents as a recreational facility, and apply for building planning application. Nailsea Action Group is pleased that NSC recognises many areas as green space, but are particularly concerned by the areas below are as well protected as possible: • The Perrings open space • Netcott's Meadow, • The space north of Blakeney Close • All of Trendlewood Park including the land south of Bibery Close. It is noted that Morgans Hill is included as green space. However it does not seem to be correctly drawn on the policies map in that the area south of Nailsea Football ground (in the Grove) is designated both as building land and green space.	Increase and ease the ability with which areas of local green open space may be identified and secured as such.		
Policy DP12: Development in the Green Belt		• Effective • Consistent with national policy	Unsure	Unsure	The plan is inconsistent with national policy. The Green Belt release undermines the purposes of the Green Belt, including preventing urban sprawl and safeguarding the countryside. The ecological mitigation measures, such as the proposed Nature Park and wetland creation, are vague, unfunded, and risk failing to meet statutory duties under the Habitats Regulations and biodiversity net gain requirements. In Compton Parish Council v Guildford BC [2019] EWHC 3242 (Admin), the High Court emphasised that Green Belt changes must be supported by clear evidence and lawful reasoning. Similarly, the principle in Tesco Stores Ltd v Dundee City Council [2012] UKSC 13 confirms that policy interpretation is a matter of law, requiring clarity and enforceability. National policy requires clear, enforceable measures to protect biodiversity and deliver net gain, which this plan does not provide. Nailsea Action Group judges the inclusion of the north Nailsea site in SP7 as unsound because it contravenes much of what is expressed in that policy and in DP12: "Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances," and "Proposals for major development involving the provision of housing in the Green Belt should meet the 'Golden Rules' as set out in the NPPF, relating to affordable housing, necessary improvements to local or national infrastructure, and publicly accessible green spaces." "The NPPF indicates that development in the Green Belt is inappropriate unless specified exceptions apply." With respect to the North Nailsea site, it is not clear that such exceptions are sufficiently strong to merit the appropriateness of the site.	No development in the Green Belt		
Policy DP24: Town Centres	Unsure		Unsure	Unsure	Nailsea Action Group agrees with NSC's sentiment and proposals for the development of Nailsea Town Centre. Its views are stated in SP5: Towns, and in LP8:		NAG Agrees with the	

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					Town Centre Hierarchy		sentiments expressed for Nailsea Town Centre. However, an indication of an achievable plan and indication of funding strategy would be useful.	
Policy DP24: Town Centres							Nailsea Action Group broadly agrees with NSC's sentiment and proposals for the development of Nailsea Town Centre with some reservations related to access and parking. Its views are stated in SP5: Towns, and in LP8: Town Centre Hierarchy	
Land at North West Nailsea			Unsure	Unsure		Request extension of the site requirements to reflect items not carried forward from the adopted Sites and Policies Plan: "New Primary School to be included as part of development" – Reason: A new primary school for Nailsea is only included in the consultation draft plan in the Site Requirements for the South Nailsea site. The requirement for a new primary school at the North West Nailsea site has not been carried forward from the adopted Sites and Policies Plan. The scale of local residential development since adoption of the Sites and Policies plan together with that proposed in the consultation draft plan is such that there is likely to be a need for increased primary school provision for the additional children north of the centre of town. Consequently the Site Requirements for one of the northern Nailsea sites should include additional primary school. "Consideration of fact that site is within	NAG is broadly supportive of this development, as some requested changes were made in the Site Requirement relative to the requirements in the adopted Sites and Policies document. Support • Changes related to completion National	

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						5km consultation zone for Bats SAC.”	Grid’s power supply • Reduction of site capacity to 225 • Retention of: - “Where possible, retention of Tree Preservation Order trees” - “Retention of strong hedge boundaries especially to the north” - “PROW links to Causeway View” - “Relocation or replacement of Fryth Way sports pitch” - “Coal Mining Risk Assessment required” - “Protection of adjacent Tickenham, Nailsea and Kenn Moor Site of Special Scientific Interest”	
Land at North West Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	No green belt sites, including this one, should be carried forward into the emerging plan. The proximity of this area to SSIs, ancient hedgerows and an abundance of wildlife will gravely endanger the local environment and its ecology. Developers, as in this case, constantly – and planning officers sometimes - misunderstand or ignore the need for a substantial buffer zone beyond the technical boundary of the land on which they apply for permission to build, and the impact on the quality of the water flowing through the site on the environment downstream of the site. Nailsea Action Group objects to this application as outlined below. It will be said that new housing has always taken over open green space, but those were times when the interdependency of the environment with the well-being, if not the survival, of the human race, was very little understood. What may have been the accepted case in former times – even relatively recently – cannot be said to be so now, and should not, for the good of all people and creatures, be applied to every, or possibly any, case made for building. The houses that the country’s population is deemed to need should only be built where there is the least possible detrimental impact on the immediate environment. The north Nailsea site carries far from such a description.	Remove this site from the plan.		

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					In the last fifty years 73% of the world's natural habitat has been lost to urban and agricultural development. The north Nailsea site is tiny by comparison, and may be considered and argued to be insignificant globally, but it is the relentless chipping away at the natural habitat that eventually aggregates to a quantity that means that life as we, or our children and grandchildren, know it will become unsustainable. Even if the green belt in which the site currently sits is re-classified as grey belt under current government proposals, almost no amount of justification and advertised affordable mitigation and remediation will change the following:- 1. The impact of the site's boundary, however much softened by parkland and attenuation ponds, on the surrounding countryside and the habitat it provides for many creatures, some relatively rare including otters and owls, and the creatures they feed on. This development needs to be seen in the round, the consequential destruction of the area in the context of being yet another albeit tiny contributor to the destruction of the planet and its human inhabitants. Ultimately the overall food chain ends in us. When the chain is broken or destroyed, so will we be in the end. And it will be the end. 2. The impact of the site within its boundaries on the ecology of the area particularly on its invasion by a significant road cutting the site in two, including an ancient and life-sustaining hedgerow, and destroying the habitats and foraging routes of many small creatures. Evidence from other recently developed areas of Nailsea suggest that the alternative pathways and locations for these provided by the developers are not adopted, and the creatures either desert or die. More explicitly, the loss of good quality farmland directly affects the human food supply. 3. The impact on the quality of the water in the river (Land Yeo), especially as it subsequently passes through the nearby SSSI. 4. The impact of the increased traffic particularly on the B3130 past the notorious pinch point at Stone Edge Batch (via which traffic heads for both junctions 19 and 20 of the M5 motorway), and the already very busy road through Tickenham. On every road into Nailsea from outside it there are significant pinch points making the town a very unsuitable location for a significant increase in population, which is what is happening cumulatively, without any appropriate, foreseeable or planned meaningful mitigation or remediation. It is said that infrastructure development will follow house building, but, contrary to what happens in many other European countries where it precedes house building, this rarely happens here and certainly not in North Somerset or Nailsea, and is not planned to precede or follow at any significant level. 5. Despite attenuation ponds and SuDS (Sustainable Drainage Systems) which will be clearly insufficient as currently planned, the impact of potential flooding in the area to the new houses and, more likely, to the older ones immediately to the south of the site, with the resulting damage, distress and cost this generates not least increased by the local sewerage system overflowing into homes, and the common overall consequential inability of the homeowners to acquire affordable insurance, or any insurance at all. 6. Green belt or grey belt, the impact of effectively joining two separate communities – Wraxall and Nailsea – together, with the threat echoed to the south of Nailsea by the Gleesons development between it and Backwell. 7. The impact on local historic houses such as Birdcombe Court (The Tower House).			
Land north of Nailsea	No	• Positively prepared • Justified • Effective	Unsure	Unsure	No green belt sites, including this one, should be carried forward into the emerging plan. The proximity of this area to SSIs, ancient hedgerows and an abundance of wildlife will gravely endanger the local environment and its ecology. Developers, as in this case, constantly – and planning officers sometimes - misunderstand or ignore the need for a substantial buffer zone beyond the technical boundary of the land on which they apply for permission to build, and the impact on the quality of the water flowing through the site on the environment downstream of the site. Nailsea Action Group objects to this application as outlined below.	It is not positively prepared, Justified or effective to convert this Green Belt area to 'Grey" belt. The rationale is adequately covered in the comment above		

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					It will be said that new housing has always taken over open green space, but those were times when the interdependency of the environment with the well-being, if not the survival, of the human race, was very little understood. What may have been the accepted case in former times – even relatively recently – cannot be said to be so now, and should not, for the good of all people and creatures, be applied to every, or possibly any, case made for building. The houses that the country's population is deemed to need should only be built where there is the least possible detrimental impact on the immediate environment. The north Nailsea site carries far from such a description. In the last fifty years 73% of the world's natural habitat has been lost to urban and agricultural development. The north Nailsea site is tiny by comparison, and may be considered and argued to be insignificant globally, but it is the relentless chipping away at the natural habitat that eventually aggregates to a quantity that means that life as we, or our children and grandchildren, know it will become unsustainable. Even if the green belt in which the site currently sits is re-classified as grey belt under current government proposals, almost no amount of justification and advertised affordable mitigation and remediation will change the following:- 1. The impact of the site's boundary, however much softened by parkland and attenuation ponds, on the surrounding countryside and the habitat it provides for many creatures, some relatively rare including otters and owls, and the creatures they feed on. This development needs to be seen in the round, the consequential destruction of the area in the context of being yet another albeit tiny contributor to the destruction of the planet and its human inhabitants. Ultimately the overall food chain ends in us. When the chain is broken or destroyed, so will we be in the end. And it will be the end. 2. The impact of the site within its boundaries on the ecology of the area particularly on its invasion by a significant road cutting the site in two, including an ancient and life-sustaining hedgerow, and destroying the habitats and foraging routes of many small creatures. Evidence from other recently developed areas of Nailsea suggest that the alternative pathways and locations for these provided by the developers are not adopted, and the creatures either desert or die. More explicitly, the loss of good quality farmland directly affects the human food supply. 3. The impact on the quality of the water in the river (Land Yeo), especially as it subsequently passes through the nearby SSSI. 4. The impact of the increased traffic particularly on the B3130 past the notorious pinch point at Stone Edge Batch (via which traffic heads for both junctions 19 and 20 of the M5 motorway), and the already very busy road through Tickenham. On every road into Nailsea from outside it there are significant pinch points making the town a very unsuitable location for a significant increase in population, which is what is happening cumulatively, without any appropriate, foreseeable or planned meaningful mitigation or remediation. It is said that infrastructure development will follow house building, but, contrary to what happens in many other European countries where it precedes house building, this rarely happens here and certainly not in North Somerset or Nailsea, and is not planned to precede or follow at any significant level. 5. Despite attenuation ponds and SuDS (Sustainable Drainage Systems) which will be clearly insufficient as currently planned, the impact of potential flooding in the area to the new houses and, more likely, to the older ones immediately to the south of the site, with the resulting damage, distress and cost this generates not least increased by the local sewerage system overflowing into homes, and the common overall consequential inability of the homeowners to acquire affordable insurance, or any insurance at all.			

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					6. Green belt or grey belt, the impact of effectively joining two separate communities – Wraxall and Nailsea – together, with the threat echoed to the south of Nailsea by the Gleesons development between it and Backwell. 7. The impact on local historic houses such as Birdcombe Court (The Tower House).			
Land off Pound Lane, Nailsea	No	• Positively prepared	Unsure	Unsure	No green belt sites including this one should be carried forward into the emerging plan This could not be closer to the flood zones if it tried: an extremely unwise location on which to build and in which to purchase a property. Caveat Emptor applies of course, but it would be from an ethicless builder.	Any land around Nailsea and Backwell should not be converted from Green belt to Grey belt. The reasons for this have been covered on many of the subsets of this consultation, but some are listed below: - Most residents will commute to Bristol and other towns. Greatly improve commuting facilities - Grey belt should be commissioned closer to the facilities and employment facilities of bristol - This area is good farming land, and food production farms should not be removed from green belt. Identify other areas which are not prime farming land, or convert brown field sites.		
Land off Pound Lane, Nailsea	No	• Effective	Unsure	Unsure	No green belt sites including this one should be carried forward into the emerging plan This could not be closer to the flood zones if it tried: an extremely unwise location on which to build and in which to purchase a property. Caveat Emptor applies of course, but it would be from an ethicless builder.	Remove this site form the plan		
Poplar Farm, Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	Unsure	Failure of Legal Compliance 'North Somerset Council's (NSC) own Sustainability Appraisal shows Poplar Farm scores negatively on flood risk, biodiversity, and climate change. The site lies next to Flood Zone 3 and a nationally important SSSI. The Council has not demonstrated which safer, reasonable alternatives (i.e. suitable, available and achievable) in Flood Zone 1 were properly considered. Allocating Poplar Farm therefore fails the legal duty under Section 19(5) of the Planning and Compulsory Purchase Act 2004 and the SEA Regulations 2004, and makes the Local Plan unsound. Furthermore, the Habitats Regulations Assessment is inadequate: Regulation 63 of the Conservation of Habitats and Species Regulations 2017 requires a full Appropriate Assessment (AA) where significant effects cannot be excluded, yet NSC relied only on strategic screening and deferred mitigation to later stages. This breaches the precautionary principle and statutory duties under Section 28G of the Wildlife and Countryside Act 1981 to protect SSSIs, exposing the plan to judicial review. Failure of Soundness The allocation at Poplar Farm fails all four NPPF soundness tests. • It is not positively prepared; NSC Habitat Regulations Assessment produced by AECOM notes that Poplar Farm is functionally linked to North Somerset and Mendip Bats SAC and development has a potential for adverse impact on the site. The report suggests that mitigation 'may' be required and suggests deferring this to after the Local Plan has been finalised. The plan therefore does not adequately address all the necessary environmental needs from the outset. The site is also adjacent to an SSSI, Paragraph 179, Chapter 15 of the NPPF states LPA's would 'not normally permit development on land within or outside an SSI which is likely to have an adverse affect on it. The SSSI supports the corridors for the Lesser and Greater Horse Shoe Bat, development on Poplar Farm would be in breach of this. The cumulative impact on bat habitats and corridors of surrounding development will only exacerbate the issues at Poplar Farm.	Remove Poplar Farm, Nailsea, from the sites available for development in LP41		

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					• It is not justified: The Poplar Farm site has not been adequately assessed against smaller, distributed allocations and/or this assessment has not been transparently evaluated • It is not effective; Delivery depends on unfunded and uncertain infrastructure including a strategic rail crossing and new schools, with no binding funding commitments or plans aligned to housing development phases. The site is not well served by public transport and lacks proximity to key services, undermining its ability to create an inclusive and accessible neighbourhood. Poplar Farm's location makes complying with NSC Active travel policy unfeasible and car dependency will increase. Insufficient pavements and unsuitable footpaths make walking or wheelchair use dangerous given the additional traffic from this site and existing additional sites in the surrounding area. Access from outside of Nailsea to the site will increase pressure on rural roads insufficient to cope with additional traffic and the Causeway, already under pressure and close to capacity with daily use. • It is not consistent with national policy: the site would harm biodiversity, conflict with statutory duties under the Natural Environment and Rural Communities Act 2006, and lacks a credible transport strategy to reduce car dependency. Furthermore, the NPPF (2024) requires Local Plans to promote mixed communities and sustainable development (paras 62–65). Without clear evidence of housing diversity, service access, and integration, the allocation is not the most appropriate strategy and fails to deliver sustainable development.			
Poplar Farm, Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	Failure of Legal Compliance North Somerset Council's (NSC's) own Sustainability Appraisal shows Poplar Farm scores negatively on flood risk, biodiversity, and climate change. The site lies next to Flood Zone 3 and a nationally important SSSI. The Council has not demonstrated which safer, reasonable alternatives (i.e. suitable, available and achievable) in Flood Zone 1 were properly considered. Allocating Poplar Farm therefore fails the legal duty under Section 19(5) of the Planning and Compulsory Purchase Act 2004 and the SEA Regulations 2004, and makes the Local Plan unsound. Furthermore, the Habitats Regulations Assessment is inadequate: Regulation 63 of the Conservation of Habitats and Species Regulations 2017 requires a full Appropriate Assessment (AA) where significant effects cannot be excluded, yet NSC relied only on strategic screening and deferred mitigation to later stages. This breaches the precautionary principle and statutory duties under Section 28G of the Wildlife and Countryside Act 1981 to protect SSSIs, exposing the plan to judicial review. Failure of Soundness The allocation at Poplar Farm fails all four NPPF soundness tests. • It is not positively prepared; NSC Habitat Regulations Assessment produced by AECOM notes that Poplar Farm is functionally linked to North Somerset and Mendip Bats SAC and development has a potential for adverse impact on the site. The report suggests that mitigation 'may' be required and suggests deferring this to after the Local Plan has been finalised. The plan therefore does not adequately address all the necessary environmental needs from the outset. The site is also adjacent to an SSSI, Paragraph 179, Chapter 15 of the NPPF states LPA's (local planning authorities) would 'not normally permit development on land within or outside an SSI which is likely to have an adverse affect on it.' The SSSI supports the corridors for the Lesser and Greater Horse Shoe Bat, and development on Poplar Farm would be in breach of this. The cumulative impact on bat habitats and corridors of surrounding development will only exacerbate the issues at Poplar Farm. • It is not justified: The Poplar Farm site has not been adequately assessed against smaller, distributed allocations and/or this assessment has not been transparently evaluated • It is not effective; Delivery depends on unfunded and uncertain infrastructure including a strategic rail crossing and new schools, with no binding funding commitments or plans aligned to housing development phases. The site is not well served by public transport and lacks proximity to key services, undermining its ability	Remove this site from the plan		

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					to create an inclusive and accessible neighbourhood. Poplar Farm's location makes complying with NSC Active travel policy unfeasible, and car dependency will increase. Insufficient pavements and unsuitable footpaths make walking or wheelchair use dangerous given the additional traffic from this site and existing additional sites in the surrounding area. Access from outside of Nailsea to the site will increase pressure on rural roads insufficient to cope with additional traffic and the Causeway, already under pressure and close to capacity with daily use. • It is not consistent with national policy: the site would harm biodiversity, conflict with statutory duties under the Natural Environment and Rural Communities Act 2006, and it lacks a credible transport strategy to reduce car dependency. Furthermore, the NPPF (2024) requires Local Plans to promote mixed communities and sustainable development (paras 62–65). Without clear evidence of housing diversity, service access, and integration, the allocation is not the most appropriate strategy and fails to deliver sustainable development. Collectively, these deficiencies mean the allocation is unsound and should be removed in favour of more sustainable alternatives.			
Land south of Nailsea	No	• Justified • Effective	Unsure	Unsure	This is a consolidation of 4 areas on the 'sites' consultation. Nailsea Action Group is pleased that the wholly inappropriate application proposed by Gleesons in 2023 does not seem to feature in this Local Plan. However, it seems this this area has replaced the original Gleesons application, in spirit. This area has been the strategic gap between Nailsea and Backwell over many decades and our objection to building in this area still stands. There are many other reasons why this good agricultural land is not suitable for housing, and Nailsea Action Group has many reservations, some of which are listed below: 1) Access. The proximity of the end of Sedgemoor Close to the northern extremity of the site suggests that this might be applied for as an additional access point. This would turn a very quiet residential cul de sac into a busy road, and would necessarily also take up some land from one of the few green spaces in Nailsea. Needless to say, access to the town centre, and other town facilities will require the use of cars, due to the distances involved. 2) Commuting. The 500 dwellings in South Nailsea would have significant impacts on the issues detailed on the transport matters discussed above. 3) Flooding. This area is prone to flooding, particularly at the southern end.			
Land south of Nailsea	No	• Effective	Unsure	Unsure	This is a consolidation of four areas on the 'sites' consultation. Nailsea Action Group is pleased to note that the wholly inappropriate application proposed by Gleesons in 2023 does not seem to feature in this Local Plan. However, it seems this this area has replaced the original Gleesons application, in spirit. This area has been the strategic gap between Nailsea and Backwell over many decades and the objection to building in this area still stands. There are many other reasons why this good agricultural land is not suitable for housing, and Nailsea Action Group has many reservations, some of which are listed below: 1) Access. The proximity of the end of Sedgemoor Close to the northern extremity of the site suggests that this might be applied for as an additional access point. This would turn a very quiet residential cul de sac into a busy road, and would necessarily also take up some land from one of the few green spaces in Nailsea. Needless to say, access to the town centre, and other town facilities will require the use of cars, due to the distances involved. 2) Commuting. The nearly 600 dwellings in South Nailsea would have significant impacts on the issues detailed on the transport matters discussed above. 3) Flooding. This area is prone to flooding, particularly at the southern end.	Remove this potential site from the plan		
Schedule 7: Transport Infrastructure, allocations and safeguarded routes	No	• Positively prepared • Effective	Unsure	Unsure	Nailsea Action Group's response is as follows: The existing, already congested out-commuting by car from the Nailsea and Backwell strategic location will increase substantially because the large amount of proposed local house building is not matched by any significant employment provision. Because most employment opportunities will continue to be to the east in Bristol and beyond, most of the new commuting will try to use the same already congested roads to the east. However, there is nothing in the schedule that is likely to alleviate that	- Ensure funding is available and budgeted for the Cross Rail Link - Increase the number of carriages at peak times for travel between Nailsea and Bristol. - Get funding for the extension of the Railway platforms at Naisea		

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					increased congestion. 1. Schedule 7 lists the Local Plan's infrastructure proposals. The items in the schedule that will have an impact on Nailsea are listed below with response comments: • “Reserved transport corridor within consented Youngwood Lane development” Comment: This proposal is confined within the proposed settlement boundary and consequently has no effect on commuting congestion beyond the town's settlement boundary • “Station Road to A370, Cross Rail Link, Nailsea and Backwell” Comment: 1) Funding for the cross rail link is uncertain 2) This proposal is confined within the strategic location and consequently has no effect on the wider commuting congestion. • “Platform extension at Nailsea & Backwell railway station” Comment - The abysmal history of railway improvements at the station gives no confidence that that anything will happen. Even if platform improvements were made, they would not improve the passenger carrying capacity of the railway. • “Transport hub at Nailsea & Backwell railway station” Comment - Who would fund this? Presumably not rail • “Strategic cycle link between Nailsea and Clevedon via the Moors” Comment – This would do nothing to relieve commuting congestion to Bristol, which is the main work destination In Summary, there's nothing with any certainty in the schedule that could relieve the increased traffic congestion that would result from the proposed house building 2. Proximity to N&B station will not contribute to sustainable development because the railway is so near capacity that, during rush hours, trains to Bristol often arrive at the station already full and there is no provision in this list to substantially improve the railway's capacity. In the face of the proposed house building in Nailsea an Backwell, a substantial increase to the railway's passenger carrying capacity is the only improvement that would enable the railway to contribute to sustainable travel locally. 3. The schedule includes the following with no text elsewhere in the plan to indicate what a motorway junction buffer is. 'Motorway junction buffers • M5 Junction 19 buffer • M5 Junction 20 buffer • M5 Junction 21 buffer' Is the buffer a) an additional narrow lane to give improved access to motor cycles, b) an additional lane dedicated to providing priority access to emergency services or c) something else?			
Schedule 7: Transport Infrastructure, allocations and safeguarded routes	No	• Justified • Effective	Unsure	Unsure	The existing, already congested out-commuting by car from the Nailsea and Backwell strategic location will increase substantially because the large amount of proposed local house building is not matched by any significant employment provision. Because most employment opportunities will continue to be to the east in Bristol and beyond, most of the new commuting will try to use the same already congested roads to the east. However, there is nothing in the schedule that is likely to alleviate that increased congestion. 1.Schedule 7 lists the Local Plan's infrastructure proposals. The items in the schedule that will have an impact on Nailsea are listed below with response comments: • “Reserved transport corridor within consented Youngwood Lane development” Comment: This proposal is confined within the proposed settlement boundary and consequently has no effect on commuting congestion beyond the town's settlement boundary • “Station Road to A370, Cross Rail Link, Nailsea and Backwell” Comment: 1) Funding for the cross rail link is uncertain 2) This proposal is confined within the strategic location and consequently has no effect on the wider commuting congestion. • “Platform extension at Nailsea & Backwell railway station” Comment - The abysmal history of railway improvements at the station gives no confidence that that anything	Review and publish how NSC will alleviate likely congestion on the roads convincingly with costed and achievable plans.		

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Name: Nailsea Holdings LVA LLP **I.D:** 63359201

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SP3: Spatial strategy	Unsure	• Justified • Effective • Consistent with national policy	Unsure	Unsure		Currently we consider that the wording of this policy is quite vague and does not clearly set out what the spatial strategy for NSC is to be. Whilst further detail is given in the supporting text insomuch as clarifying that the main focus for development is Weston-super-Mare, with four additional strategic development location that includes Nailsea and Backwell we consider that this needs to be made clear in the text of policy SP3. This change would also dovetail with policy SP5 which specifically mentions the four main towns.		739 A3 MJK 101225 Reps to Pre-sub Draft LP V1-merged-compressed.pdf
SP7: Green Belt	No	• Justified • Effective • Consistent with national policy	Unsure	Unsure		On behalf of our client, Nailsea Holdings LVA LPP (LVA) Grass Roots Planning enclose representations to North Somerset Council’s (NSC) pre-submission Local Plan (LP) Consultation. Our representations focus on a 27.9 hectare site known as Land North of Southfield Road Trading Estate, Clevedon Road, Nailsea (see submitted site location plan ref: 1033-LNN-APG-XX-ZZ-DR-A-001-P04), which is subject to a current planning application (Ref: 24/P/1586/OU2) and is also identified as a proposed allocation in LP under Policy SP7 We previously set out significant concerns in our previous representations made in 2023 regarding the housing requirement that was being planned for in the Regulation 19 Plan and the fact that it made no allowance for new housing allocations in Nailsea at all.	Previously we made representations to the Reg 19 Local Plan stage in January 2023. This focused on the past history of housing delivery in North Somerset, growing affordability issues, regional planning matters and of the failure to deliver a housing land supply over a prolonged period. We have been pleased to see that since this point the council has significantly changed its approach to the new Local Plan and now seems to be planning for the minimum housing requirement that is determined by the Standard Method (SM), and while some residual concerns remain in respect of the plan strategy, and cross boundary issues in particular, we welcome the council’s change in direction that led to them consulting on additional site’s in the Spring of this year.	739 A3 MJK 101225 Reps to Pre-sub Draft LP V1-merged-compressed.pdf

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						We are pleased that the Council have now produced a more positive plan that seeks to meet the minimum housing requirement that the SM identifies and that the distribution of new proposed development now recognises the importance of the settlement of Nailsea and its ability to accommodate development in a sustainable manner.While positive changes have been made, and we applaud the council for changing course to adopt a plan that is far more ambitious than the previous Regulation 19 version, some further changes should be considered to ensure that the examining Inspector(s) can find the plan should in due course.	We then made further representations to the additional site's consultation stage in summer of this year, setting out why LVAs land north of Nailsea represented an appropriate location for development and should be include in the new Local Plan. While both of our previous representations should be read alongside this submission by the Examining Inspectors in due course for context, we are pleased to see that the site was then included in the emerging LP that is now subject to this consultation, and the Plan Strategy now allows for the sustainable growth of Nailsea. Policy SP7: Green Belt We welcome the release of land from the Green Belt to meet housing needs that this policy sets out. Our only comments on the policy text put forward is that refence to certain site's being considered to be Grey Belt would be appropriate, and the potential yield from the North Nailsea should be revisited. We have already set out in a detailed note how the site at North Nailsea meets the new definition of Grey Belt and we enclose this for ease of reference (Appendix E). This classification supports the decision to release it from the Green Belt and therefore we propose that the policy itself, or the supporting text at least, refers to this. In terms of the potential housing yields from the site we set out later how the current proposals have been amended to address consultee responses, which included a request that densities on the site be revised to make the most efficient use of the land. This has resulted in the overall numbers proposed being increased to 429 and we suggest that the policy is amended to reflect this. This will also have the advantage of increasing the housing supply the LP puts forward which will make it more flexible, and more likely to be found sound.	
SP7: Green Belt	Unsure	• Justified • Effective • Consistent with national policy	Unsure	Unsure		We welcome the release of land from the Green Belt to meet housing needs that this policy sets out. Our only comments on the policy text put forward is that refence to certain site's being considered to be Grey Belt would be appropriate, and the potential yield from the North Nailsea should be revisited. We have already set out in a detailed note how the site at North Nailsea meets the new definition of Grey Belt and we enclose this for ease of reference (Appendix E). This classification supports the decision to release it from the Green Belt and therefore we propose that the policy itself, or the supporting text at least, refers to this. In terms of the potential housing yields from the site we set out later how the current proposals have been amended to address consultee responses, which included a request that densities on the site be revised to make the most efficient use of the land. This has resulted in the overall numbers proposed being increased to 429 and we suggest that the policy is amended to reflect this. This will also have the advantage of increasing the housing supply the LP puts forward which will make it more flexible, and more likely to be found sound.		

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SP7: Green Belt	Unsure	• Justified • Effective • Consistent with national policy	Unsure	Unsure			We strongly support the release of land to the north of the existing settlement edge of Nailsea, specifically the extent of land covered by our planning application 24/P/1586/OU2. This land constitutes Grey Belt land, as our note on the subject appended as Appendix E explains, and as such it is an obvious candidate for Green Belt release to provide much needed housing and employment land in a highly accessible location.	
SP8: Housing	Unsure	• Justified • Effective • Consistent with national policy	Unsure	Unsure		In respect of the housing requirement that this policy sets out, while we welcome the change in approach that now utilises the SM to determine the minimum requirement, we still have some residual concerns that no allowance is made to address unmet needs arsing in Bristol City's administrative boundaries, the scale of windfall provision and the reliance on large strategic sites at Banwell and Woodspring. In respect of unmet needs we will not be presenting evidence on this point but we are aware of the representations of others and share similar concerns this has not been accounted for. Windfalls seem to account for 2,928 of the total housing supply proposed by the council, which equates to 12.4% of the total. Given that windfalls are an unplanned and not necessarily reliable source of supply we suggest that they should not be relied on to such a significant degree and instead should be seen to be a 'top-up' that provide further flexibility if they come forward. In our experience maximum allowances of 10% for windfalls are normally more typical, with many authorities plans even allowing for a lower proportion than that. In addition to the above, this approach fails to acknowledge that historic windfall delivery occurred within a markedly different policy context. Under the adopted Core Strategy, policies such as CS32 (Service Villages), amongst others, expressly support "development within or adjoining the settlement boundary" where it enhances sustainability and respects local character. This policy approach enabled a consistent pipeline of small and medium-scale edge-of-settlement schemes across the district over the last 7+ years. By contrast, the PSP introduces a materially different framework. The emerging policies collectively remove this positive presumption for development adjoining settlement boundaries, and instead restricts windfall almost exclusively to sites within tightly drawn boundaries. This represents a logical inconsistency: windfall rates achieved under current policy cannot be assumed to continue when that policy basis has been withdrawn. The result is an artificially inflated windfall allowance which risks undermining the soundness of the plan. A more cautious windfall allowance, or preferably, the identification of additional small and medium allocations in sustainable settlements, is required to ensure the plan is positively prepared and deliverable. Accordingly, we suggest that the council reconsider this allowance and allocate further specific sites to replace what is an unplanned and unreliable source of supply that might render achieving the minimum development requirements of NSC difficult to achieve. Boosting delivery on sites such as North Nailsea in the early part of the plan period will also assist. Finally, while we support the provision of large strategic sites to ensure a broad portfolio of allocation types and also to provide a reliable long term supply the council needs to accept that		

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						delivery on such sites takes time, with required infrastructure usually meaning that first completions will be many years in the future. Both the Banwell and Woodspring strategic sites are yet to obtain planning permisson, and Lichfield's 'Start to Finish' assessment (3rd Addition – March 2024) makes it clear that statistically site's in such a position are not expected to start delivering for 6.7 years after the validation of the first planning application. The Banwell site has been subject to a planning application for nearly one year, but Woodspring is yet to be subject to an application. Therefore, even assuming a quicker than average delivery of first completions on these sites (say 5 years) over the remaining 10 years of the plan these site's would average 330 dwellings and 350 dwellings per year respectively. This rate of average completions would significantly exceed the national average on site's of 2,000+ dwellings which equate to 100-188 dpa according to Lichfield's analysis. On the basis of this evidence the current supply is overestimated by at least 3,040 homes. This underlines that overreliance on these sites to deliver a five-year housing land supply in particular would be foolhardy. While we do not suggest that either site be deleted from the LP, we do recommend that the potential for additional site's should be considered to boost supply, and greater emphasis on the early delivery of other sites contained in the plan, that can deliver housing supply quickly, should be made. For example the proposed allocation at North Nailsea offers one such site that does not require extensive new infrastructure to deliver, and compliments and strengthens the existing infrastructure of the Townwhich means it can deliver early in the plan period – the LP should make that expectation clear and also the current live planning application should be approved as soon as possible to ensure that this happens.		
Policy LP3: Strategic location: Nailsea and Backwell	Unsure	• Justified • Effective • Consistent with national policy	Unsure	Unsure		The policy refers to meeting the 'Golden Rules' that NPPF sets out, specifically it sets out that the proposed allocations that lie within the Green Belt, including LVAs site at North Nailsea, must deliver 50% affordable housing to meet this. This is a slightly incorrect interpretation of the Golden Rules policy in respect of current planning applications, specifically we refer you to paragraph 157 of the NPPF which states: '.....the affordable housing contribution required to satisfy the Golden Rules is 15 percentage points above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of 50%.' Currently policy CS16 requires sites in NSC to provide 30% affordable housing. In accordance with the NPPF's policy referenced above our planning application for the North Nailsea site, 24/P/1586/OU2, proposes to provide 45% affordable housing. This level of affordable housing has been considered in viability terms, alongside the other likely contributions that will be required in respect of this site, and accepted as being a level that the applicants can bear without rendering the development unviable. The wider contributions also include unilaterally offered improvements to the sports pitches that lie within the site and the provision of a new community building to allow for their efficient use, which has been formulated in consultation with Nailsea Juniors FC. If the affordable housing contribution were to be pushed to 50% this separate contribution may not be possible		

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						due to viability concerns. Accordingly, given the benefits associated with the delivery of the pitch improvements and associate changing facilities we ask that the policy be amended to reflect NPPF policy and the correct affordable housing requirement of 45% be applied. We also note the extensive range of infrastructure measures that policy LP3 sets out. While in principle we consider that land at North Nailsea should be making contributions towards appropriate infrastructure the list is extensive and little information has been provided to suggest it would not render development in the area unviable. While the Infrastructure Delivery Plan (IDP) that is contained in the LP evidence base lacks detail we have used it, also informed by our experience of other strategic projects and the cost of similar infrastructure, to estimate the total cost of the infrastructure that LP3 refers to as follows: (please see attached document) While the above makes no allowance for bus improvements along the A370 or other site specific S106 requests that are likely to be made (contributions towards off-site recreational facilities, specific highway junction works, BNG where off site mitigation is required etc.) it already illustrates the scale of S106 burdens that are being expected to be borne by developers which are higher than nearly all the other parts of the UK that we work in. Given this we strongly recommend that the Council needs to consider these contributions in more detail and assess them in a viability appraisal that is specific to Nailsea/Backwell to ensure that development is not rendered impossible due to sites becoming unviable. CIL will also be applicable to development in the area and an analysis of what that will fund, and how it correlates to S106 to avoid double counting also needs further explanation and clarity in either the Policy or supporting text. These requirements are even more relevant given that our clients land at North Nailsea, proposed as an allocation, is expected to deliver elevated levels of affordable housing. In addition, not all developments in this area will have the same impact. For example the transport assessment, associated modelling and analysis that supports the application for North Nailsea (Ref: 24/P/1586/OU2) has not identified any significant impacts arising from this development on the junctions in the south of Nailsea and in Backwell due to the trip distribution related to it. This is logical given this site's location on the northern edge of the urban area, where most trips beyond the town would travel north east of north west. Therefore, requiring this site to contribute towards improvements to the Backwell Crossroads and Station Road Traffic Light Junction is not justified as the transport evidence does not point to any material impacts arising on these junctions. In light of these considerations regarding the potential burden of financial contributions we request that the plan and evidence base be amended in the following ways: • The text of LP3 needs to have more flexibility and make		

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						reference to the fact that not all of the developments will have the same impacts, and therefore certain mitigation measures listed in the policy may not be relevant to all – we would suggest the following text change: 'Where the assessed impacts of specific development indicate a need for mitigation, proposals will make a proportionate contributions towards the delivery of a package of measures including:.....'; • The reference to 50% affordable housing should be amended to 45%; • Further costings analysis needs to be supplied to determine if the package of measures is deliverable without rendering development in the area unviable, and if this is identified as an issue, sources of external funding separate to developer contributions will need to be sought; and • Connected to the above a specific viability appraisal of development in Nailsea/Backwell should be undertaken. Separate to these comments we are broadly supportive of the policy. Nailsea should clearly be a focus for development for the reasons we set out in our previous representations due to the range of facilities it provides, available jobs (with national statistics showing it is well contained relative to other settlements in NSC) and the public transport available, which includes both bus and rail. For the avoidance of doubt our current application is considered to be in accordance with the emerging policy LP3, subject to the correction to the affordable housing requirement to bring that into line with NPPF policy. This is because it will locate much needed housing in close proximity to the town centre and other facilities that already exist there, which means it is a sustainable and accessible location for such use, and through the provision of publicly accessible open space, which opens up the River Yeo corridor for wider use and provides a much improved football facility as mentioned above, which exceeds policy standards in this regard		
Policy DP6: Net zero construction	Unsure	• Justified • Effective • Consistent with national policy	Unsure	Unsure		Policy DP6 introduces a wide range of locally specific energy and carbon requirements that go significantly beyond national Building Regulations. While the principle of supporting sustainable construction is recognised, the policy is not justified by proportionate evidence. It requires developments to achieve "net zero operational energy", impose ultra-low energy use thresholds, and minimise embodied carbon, but provides no clear viability evidence demonstrating that these expectations can realistically be delivered across all development typologies in North Somerset. The Council's own viability assessment confirms that achieving the performance standards implied by DP6 will add 4–9% to base build costs for residential development. This uplift sits on top of the recently introduced national Part L 2021 requirements, which themselves represent a 31% reduction in energy use ahead of the Future Homes Standard. Importantly, the assessment notes that BCIS data has not yet adjusted to reflect these new national standards, meaning that the additional DP6 cost impacts are likely underestimated at this stage. The assessment also records that the embodied carbon requirement, added late to the policy, was treated as having only		

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						a “nominal” viability cost rather than being independently tested or sensitivity modelled. This is material: DP6 now requires embodied carbon assessments for schemes of 50 dwellings or more, setting specific $kgCO_2e/m^2$ thresholds without any robust evidence that such requirements are viable on non-strategic, medium-sized sites. The assessment further acknowledges that the short-term economic context, including high construction inflation, is likely to make viability “challenging in some cases”, particularly outside the strongest value areas. Given these concerns, we consider DP6 is not appropriately justified, effective, or consistent with national policy, particularly as the Government intends the Future Homes Standard to regulate energy performance at a national level. To be sound, the policy requires refinement, and further viability testing, particularly in relation to the deliverability of small and medium-sized sites in sustainable locations.		
Policy DP43: Affordable housing (including rural exception schemes)	Unsure	‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Our only comment on this policy relates to the issue about the reference to 50% affordable housing be required on site’s that are to be released from the Green Belt and the prescriptive nature of the tenure split that is defined as needing to be 75% social rent and 25% shared ownership. As set out earlier the plan should be amended to refer to 45% affordable housing on sites released from the Green Belt. In terms of the tenure split while we currently have no issue with the split proposed we must be mindful that needs may change over the plan period, or a specific housing needs survey may indicate a different mix is required. Therefore, we suggest the text be amend to add this flexibility to add a ‘unless evidence is available to suggest an	Our only comment on this policy relates to the issue about the reference to 50% affordable housing be required on site’s that are to be released from the Green Belt and the prescriptive nature of the tenure split that is defined as needing to be 75% social rent and 25% shared ownership. As set out earlier the plan should be amended to refer to 45% affordable housing on sites released from the Green Belt. In terms of the tenure split while we currently have no issue with the split proposed we must be mindful that needs may change over the plan period, or a specific housing needs survey may indicate a different mix is required. Therefore, we suggest the text be amend to add this flexibility to add a ‘unless evidence is available to suggest an alternative tenure split would be appropriate in a specific location’.		

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					alternative tenure split would be appropriate in a specific location'.			
Policy DP53: Best and most versatile land	Unsure	• Justified • Effective • Consistent with national policy	Unsure	Unsure	Policy DP53 seeks to safeguard Grades 1, 2 and 3a agricultural land and introduces a strict set of criteria which significantly restrict the potential for development on BMV land. While the protection of BMV land is supported in principle, the approach taken in DP53 goes beyond national policy and risks unnecessarily constraining otherwise sustainable development opportunities. The NPPF requires decision makers to consider the economic and other benefits of BMV land, but also explicitly states at footnote 65 that where significant development of agricultural land is necessary, areas of poorer quality land should be preferred. The NPPF does not impose an absolute bar on development of BMV land, nor require the stringent protection mechanisms set out in DP53. The inflexibility of DP53 is problematic in a district such as North Somerset where the spatial strategy already severely constrains opportunities for growth. Many sustainable settlements are surrounded by a mix of	DP53 should therefore be amended to provide greater flexibility, consistent with the NPPF. The policy should distinguish between significant areas of BMV land and small inclusions, and should recognise that sustainable development proposals may justify the loss of limited areas of 3a land where wider benefits clearly outweigh the harm, as set out in footnote 58 of the Framework. Without such modifications, DP53 is not justified, not effective, and not consistent with national policy		

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					Grades 2, 3a and 3b land. If DP53 is applied rigidly, it will effectively rule out proposals on even small pockets of BMV land, regardless of whether the majority of a site is lower grade, or whether the scheme delivers significant sustainability benefits such as affordable housing, accessible village growth or early delivery of new homes. This contradicts the more balanced approach envisaged by the Framework, which clearly anticipates that some BMV land may be required where necessary to deliver sustainable development. DP53 also fails to acknowledge the practical reality that ALC mapping at a site level often reveals a mosaic of grades, with small and irregular pockets of Grade 3a occurring within wider areas of Grade 3b or lower. The approach taken in DP53 would treat such sites as if they were entirely BMV, meaning that minor inclusions of 3a land could preclude development entirely or severely constrain masterplanning. This is directly at odds with national policy and risks undermining good place-making by forcing layouts to “work around” small fragments of higher-grade soil, regardless of whether these areas are functionally or		

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					visually significant. DP53 should therefore be amended to provide greater flexibility, consistent with the NPPF. The policy should distinguish between significant areas of BMV land and small inclusions, and should recognise that sustainable development proposals may justify the loss of limited areas of 3a land where wider benefits clearly outweigh the harm, as set out in footnote 58 of the Framework. Without such modifications, DP53 is not justified, not effective, and not consistent with national policy			
Land north of Nailsea	Unsure	• Justified • Effective • Consistent with national policy	Unsure	Unsure			We strongly support the allocation of the North Nailsea site under policies LP3 and LP7 and note the site requirements that are set out at page 266 of the LP document. It is noted that the allocation is based on the initial submission for the site that put forward 381 dwellings, a care home and employment land. The proposals for the site have now changed as explained below and the planning application that relates to the land now proposes the site accommodate up to 429 dwellings. As a minor point and suggestion, we recommend that each allocation be given a specific reference for clarity. A suffix based on each site's location would be useful – for example the land at North Nailsea could be referenced NS1, and others sites such as the adjacent Pound Lane allocation be NS2, NS3 etc. In terms of the site requirements we have the following observations, some of which require amendments to the plan to be made to ensure that the site is deliverable and the plan sound. Drainage Matters The LP currently sets out a range of site-specific requirements relating to drainage. The current planning application has robustly considered this matter, cumulating in the Environment Agency (EA) and LLFA raising no objection to the proposals. In terms of the site-specific requirements that relate to drainage there are no issues relating to the development maintaining overland flows across the site and taking a sequential approach to the areas subject	

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							to flood risk. However, the policy requirements relating to restrictions on flow rates from the site, and easements, have not been properly considered in our view. Firstly, the requirement to restrict discharge rates for surface water to 2 litres a second is very onerous and would require large swathes of the site to be reserved for attenuation basins which would be an inefficient use of land and has not been requested by the EA or LLFA as part of the current application.The current drainage strategy for the site has been designed to Qbar rate which is an approach supported by national guidance and the LLFA has raised no objection to this approach as part of our current application. In light of this we consider that the current flow rate restriction set out in the emerging LP is unduly onerous and not required or reasonable – instead this should be deleted because guidance and requirements can change and it is more appropriate that this matter so considered as part of the development management process. The second requirement that is of concern is reference that: ‘6 metre corridor space will need to be provided for the maintenance of the drainage features’. This is not well defined because ‘drainage features’ could include all forms of SUDs (for example swales, rain gardens etc) and providing a 6m maintenance easement to all such features would be unduly restrictive and render achieving a well planned and designed layout impossible. We assume that the Council did not intend a 6m easement to apply in this way, and were instead seeking that it apply to the River Yeo and existing drainage ditches and would like clarity on this. Notwithstanding the need for clarity from the Council on this point, we propose that the wording of the site requirements be changed to provide further flexibility because ultimately the management regime and related easements needs to be agreed with whoever is nominated to manage these features in the future and they may consider that smaller easements are acceptable, therefore we suggest then relevant bullet point be reworded to: ‘Suitable easements, to be agreed with the adopting body, will need to be provided for the maintenance of the drainage features.’ Highways Requirements We note the requirement that the site be designed to a 20mph speed limit and we have amended the proposals to achieve this. The reference to proportionate contributions to schemes identified in the Nailsea and Backwell Transport Strategy, as well as further contributions for improving public rights of way to link the site to then nearby Town centre, is also noted. In the absence of an adopted Strategy Document, we have already set out our proposed highways improvements that the North Nailsea site will deliver as part of our application and are looking forward to discussing and agreeing these measures with your highway’s colleagues. If agreed,	

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							we would suggest that the development requirements text may need to be slightly amended to reflect any final agreement and S106 for consistency. In respect of the final bullet point requirement, we can confirm that our highways consultants have checked the proposed new roundabout junction that is proposed as part of our planning application and they have confirmed that what is proposed will not preclude the delivery of the proposed allocation for 100 Units off Pound Lane. The Current Planning Application Separate to the above specific comments on the site requirements we would also draw the Planning Policy Departments attention to recent updates to planning application 24/P/1586/OU2 which are enclosed as follows for ease of reference, these do not include the full suite of documents because we do not anticipate your department will want to review items like the ES Addendum, but please let us know if you wish to see these and they can be provided: • Appendix A - Report Summarising the Changes Made • Appendix B - Amended Site Master Plan • Appendix C - Updated set of Parameter Plans • Appendix D – Technical Note dealing with the issue of Active Travel In summary the amendments that have been made can be summarised as follows: • Removal of the proposed care home and extra care facilities and their replacement with additional dwellings in this central area of the site; • Proposed reconfiguration of the eastern access on to Clevedon Road to address flooding issues, resulting in the access being moved further south and the removal of some dwellings here; • The main through route proposed within the development has been re-orientated slightly to respond to an easement that applies to a pipeline that runs through the site, allowing for offsets and working zones as requested through consultation with the pipeline operators (Exolum); • Secondary streets have also been amended as a result of the pipeline easements with the requested offsets allowed for in the illustrative master plan design; • Traffic calming measures have also been introduced to this main route to slow traffic speeds, including the provision of raised table junctions and crossing points for key active travel linkages that give priority to pedestrian/cyclists over the private car; • The root protection zones for the retained trees have been shown on the illustrative masterplan with the development extents being amended after consultation was held with the Council’s tree officer specifically in respect of offsets to trees that could be considered to be of veteran status; • The location of the proposed MUGA and play areas, adjacent to the community hub have been reorientated; • The heights of the development have been increased	

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							within the western and central locations of the site to maximise densities in response to a council request that the site yield be maximised; and • Following a request that we look to maximise the yield from the site, we also examined the car parking provision that the illustrative master plan allows for. This involved slightly reducing parking provision based on the Council's methodology to reassess this matter in respect accessibility (with James Wigmore, Lead Transport Planner) and the layout now allow for this which has allowed housing numbers to be elevated slightly. The rationale behind these changes is set out in detail as part of Appendix A, and we hope this is clear. While re-consultation on these changes is ongoing we consider that, given that much of them respond directly and positively to previous consultee comments, that the revised plan is likely to be acceptable. Accordingly, we would suggest the emerging allocation be amended to reflect the revised scheme – primarily that should include changing the site yield to 'up to 429' from the 381 units previously identified, which reflects the deletion of the care home element and increase in densities on some part of the site. Conclusion We welcome the council's change in approach that the pre-submission draft of the LP sets out, specifically the efforts it now makes to provide an increased housing supply to better meet its objectively assessed housing needs. However, dealing with the land supply and delivery issues that affect the area is a pressing problem that requires action now – namely the realise of land via planning permissions in advance of the Local Plan adoption, and immediately after it. Therefore, both development management decisions and the plan itself need to engender a flexible approach to allow this to be achieved. This should include making site specific requirements easy to understand, infrastructure delivery that does not require extensive periods of time to be formulated and agreed – and where possible 'oven ready' sites being released as soon as possible.	

Name: Nancy Morgan **I.D:** 62864801

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Land south of Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent	Unsure	Unsure	The proposed figure of 1,817 new home in Nailsea will lead to a total over development of the town which is already suffering from too many homes with not enough facilities or infrastructure to support it. In the last few years, we have already had 350 homes built in Nailsea with more already planned for. There are no new amenities, infrastructure or services detailed with these plans, except for 3 new primary schools to be funded by developers. Where are the new leisure facilities, where are new Doctor surgery, Nailsea and Backwell does not have enough of these facilities to support our current population.			

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		with national policy			The roads around the west end of Nailsea are already congested and difficult to navigate through with some areas being single track. Nailsea has no A roads and all routes into town are restricted. The proposed new road will not reduce traffic on Station Road but add to the traffic which is already congested. A link road which appears to go under a rail crossing seems extremely expensive and problematic. How can permission be granted to put 100 houses near the Moor End Spout nature reserve which is a site hosting many protected species and on Grade 2 Agricultural land to the south of Nailsea. Nailsea and Backwell villages are already over developed and under funded adding a further 1193 houses in Nailsea and 1800 in Backwell will only increase the problem. The plans put forward are not thought out or detailed enough.			

Name: Nancy Wedin **I.D:** 58636097

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP2: Climate Change	Yes		Yes	Yes			I support these plans to they seek to fulfil the core strategy of the NSC to protect the environment as part of its Climate Emergency commitments. I agree that the risk of flooding should be minimised; unsustainable development would add to this risk as we are a village which already suffers annually from flooding. I also agree that we need better infrastructure for public transport or to ease congestion on the village roads, which are not built to accommodate more vehicles equated to development. This will also lead to a reduction in carbon emissions from single use vehicles.	
SP6: Villages and rural areas	Yes		Yes	Yes			I support this policy: Major alterations and development would not preserve the unique character and viability of the natural environment of Wrington. It would be in direct contravention of the North Somerset Council regulations regarding development and alterations within a conservation area. It is crucial that any changes respect and uphold these regulations to maintain the integrity of our village. Loss of valuable farmland and countryside encourages urban sprawl and the destruction of natural habitats, so it is essential that we preserve our countryside for future generations. Most people live here as they enjoy nature, rural landscapes and the peace of the countryside. It is true that local community	

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							needs must be met in this way.	
SP7: Green Belt	Unsure	Justified	Yes	Unsure		We must protect our Green Belt from further development. I am very concerned about the plans to build on/exploit our green belt land as part of the Airport's expansion plans. This land should be protected for wildlife and nature. Releasing green belt land for extra Bristol Airport operational capacity may cause significant adverse effects on the rural landscape and the local ecology, including soil, air, and water pollution. These sites are home to rare birds, insects, and protected bats, and their destruction would disrupt habitat and feeding grounds, affecting biodiversity. Rather than treating land solely as a commodity, it is important to balance development with conservation, recognising the value these natural spaces provide to wildlife and our community. From both an environmental and social perspective, allowing Bristol Airport to use Green Belt land represents an unsustainable and damaging course of action that runs counter to the long-term interests of the region.		
SP8: Housing	Yes		Yes	Yes				
SP10: Transport	Yes		Yes	Yes	Implementing a better public transport infrastructure would go further to enhance the work NSC has been doing to reduce greenhouse gas emissions. I would welcome the delivery of all the services, as living rurally we do have to often rely on private vehicles for travel; better connections through advanced public transport would help lessen our carbon impact and save congestion on the roads which is becoming a major problem locally - particularly with the Airport close by. It is essential that the network for electric vehicle charging is suitable and meets growing demand. I would love to see the reopening of the old Wrington Vale railway into an active travel route, this is being championed by our councillor Tom Dawe.			
SP11: Historic and natural environment	Yes		Yes	Yes	I strongly agree with this as Wrington is a village which prides itself on its historical land, with beautiful old constructions that make up its identity and distinctiveness. Our village is a Special Area of Conservation. I completely agree also that biodiversity and all species of wildlife must continue to be protected and			

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					conserved.			
SP13: Waste	Yes		Yes	Yes				

Name: Naomi Williams **I.D:** 62774145

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Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I want Backwell to remain as a village and not become any busier with extra cars. If we had this additional housing the village would become a town and the people who live in Backwell and the wildlife would suffer.			

Name: Natalia Banasiak **I.D:** 62865665

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	1. Overdevelopment Beyond Capacity Backwell already has approval for 800 new homes—a 40% increase in the village's size. Adding another 1,000 houses would result in extreme overdevelopment, fundamentally changing the character of the area. 2. Unrealistic and Ineffective Road Proposal The proposed road will not solve traffic congestion on Station Road, Backwell Common, or Chapel Hill, nor will it effectively serve Nailsea's traffic. Engineering a road under or over the railway would be prohibitively expensive and may not even be feasible. 3. Infrastructure Deficit Despite the planned growth, Backwell faces a shortage of school places and lacks investment in health services and leisure facilities. The existing infrastructure cannot support such a large increase in population. 4. Disproportionate Housing Allocation Backwell is being asked to take more houses than any other village in North Somerset and even a higher growth percentage than towns. It accounts for 7% of the district's housing allocation compared to Clevedon's 2%, which is disproportionate and unjustified. 5. No Evidence of Need or Viability There is no needs assessment or viability analysis to justify an additional 1,000 homes in Backwell. This raises serious questions about the soundness of the plan. 6. Lack of Employment Opportunities Backwell is not an employment hub; most residents commute elsewhere. Adding more housing without local jobs will increase traffic and carbon emissions. 7. No Social Cohesion Assessment The plan does not include an impact assessment on social cohesion, which is critical when introducing such rapid and large-scale growth. 8. Loss of High-Quality Agricultural Land The development would destroy Grade 1 agricultural land currently used for food crops and grazing. Only 7% of this land remains in North Somerset. Government policy requires protecting "our best and most versatile land" to safeguard food security—this proposal directly contradicts that. 9. Environmental and Biodiversity Harm The development would destroy wildlife habitats and harm biodiversity in an already nature-depleted country. It threatens the Brockley Maternity Roost and SSSI, home to rare Lesser and Greater Horseshoe Bats that rely on this land for food. 10. Unfunded and Uncertain Infrastructure Delivery The Infrastructure Delivery Plan lacks proper analysis, costings, and funding guarantees for the new road and			

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					essential services. Without these, the plan is undeliverable. 11. Flood Risk Backwell Common and surrounding areas are prone to flooding, which would worsen with more housing. Backwell Lake and adjacent fields—where roads and housing are planned—are on a floodplain that floods regularly. 12. Affordable Housing Policy Creates Funding Gap Government policy requires 50% affordable housing on Greenbelt land, which reduces developer contributions toward infrastructure, making delivery even less viable. 13. Unsustainable Growth Pace The sheer scale and speed of growth, combined with the required infrastructure investment, is destabilizing, unsustainable, and undeliverable. 14. Transport Hub Limitations Backwell railway station is not fit for purpose. It is inaccessible for people with mobility issues and poses challenges for families with young children, undermining claims that it can support strategic growth.			

Name: Natalie Jennings **I.D:** 62863681

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Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The proposed development of 1,817 new homes in Nailsea would lead to a total over development of our town. New primary schools would be required, and with no locations and firm funding provisions in place, this would not facilitate the proposed population increases to the town. The new link road, under the rail crossing is likely to be very expensive with problematic engineering given the proximity to the River Kenn. The plans will lead to the permanent loss of Grade 2 Agricultural land which is of good quality and high yielding, as a result of the housing development to the south of Nailsea. The town's existing health and leisure provisions are already under considerable pressure and would become unacceptably pressured without firm investment committed to developing these facilities further. Proposed sites for development in Nailsea are recognised foraging sites for Greater and Lesser Horseshoe bats. Proposed homes adjacent to the Moor End Spout Nature Reserve, would destroy wild life habitats and biodiversity in our town, since the site hosts many protected species. The proposed development to the west and south of Backwell Lake (reservoir) mean that new roads and housing will be in the floodplain which does flood regularly. Plans are not currently in place for accident blackspots at Wraxhall Hill, Stone Edge Batch and Portbury Lane, which will see a marked increase in vehicle movements. The railway station is already not fit for purpose as a transport hub, since it remains inaccessible for people with mobility issues and presents considerable challenges for adults travelling with small children. Greenfield Cresent playing field is not protected under Local Green Space Policy LP15. Land to the north of Nailsea is proposed to be removed from the green belt and will be replaced to the south. Positively, the new section of green belt to the south is a greater size than the area being removed and will replace the strategic gap. The proposed new road would not serve Nailsea's traffic or relieve congestion on Station Road, nor would it help traffic moving from Backwell to the M5.			

Name: Natalie Matthews **I.D:** 32616705

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Macrae Road, Ham Green, Easton in Gordano/Pill	No	• Positively prepared • Justified • Effective • Consistent	No	No	Plan is NOT JUSTIFIED: No "Exceptional Circumstances" to build on the Green Belt. The council can only build on the Green Belt in "exceptional circumstances". They have failed to prove this. They should be: Building on Brownfield Sites First: Prioritising derelict or previously used land across North Somerset before destroying our green fields. Building More Densely in Towns: Increasing the number of homes in urban centres like Weston-super-Mare, not sprawling into villages. Working with Neighbours: They have not demonstrated that they have properly asked neighbouring councils			

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		with national policy			including Bristol to take their fair share of housing. 2. The Plan is NOT POSITIVELY PREPARED: It's unfair and ignores local democracy. Disproportionate and Unfair: Our village has 2.3% of North Somerset's population but is being forced to take 4.6% of the new housing. This is double our fair share. Ignores Our Neighbourhood Plan: 81% of us voted for a Neighbourhood Plan that limits new housing to 150-200 homes. The council is ignoring this democratic vote. 3. The Plan is NOT EFFECTIVE: Our infrastructure cannot cope.Traffic Gridlock: The M5 junction and the A369 are already at a standstill. Adding over 1,500 extra cars from these developments is unsustainable and dangerous. Overwhelmed Services: Our GP surgeries and schools are already full. There is no concrete plan to increase capacity for 2,650 new residents. 4. The Plan is NOT CONSISTENT WITH NATIONAL POLICY: It fails to protect the Green Belt. Destroying Village Character: The plan will merge our villages and turn them into a suburb of Bristol, destroying the open countryside that makes our community special. Harm to Nature: Building on these green fields will cause irreversible harm to local wildlife and landscapes. I object to the North Somerset Local Plan because it is unsound. I am writing as a long term resident of Pill who has watched this community grow and thrive, since moving to the village in 2005, and immediately fell in love with its character, its sense of community, and the beautiful green spaces that surround us. We are now raising our two children - a 14-year-old son and an 11-year-old daughter - who are growing up with the same freedoms and connections to nature that I enjoyed as a child. The proposed allocation of 1,060 homes on our Green Belt threatens to destroy everything that makes this village special. This plan fails all four tests of soundness required by the National Planning Policy Framework. 1. The Plan is NOT JUSTIFIED: No "Exceptional Circumstances" to Build on the Green Belt The council can only build on the Green Belt in "exceptional circumstances". They have failed to prove this. They should be: Building on Brownfield Sites First - Prioritising derelict or previously used land across North Somerset before destroying our green fields. Where is the complete Brownfield Land Register? Why are these sites not being developed first? Building More Densely in Towns - Increasing the number of homes in urban centres like Weston-super-Mare, Clevedon, and Portishead - not sprawling into villages. There is no evidence the Council has maximised density in sustainable urban locations. Working with Neighbours - They have nott shown that they've properly asked neighbouring councils including Bristol, South Gloucestershire, and Bath & North East Somerset to take their fair share of housing. Where are the Statements of Common Ground proving genuine cooperation? The sites are not "grey belt": The government's grey belt policy is for derelict land and car parks, not pristine countryside. Pill Green is 45 hectares of undeveloped fields that strongly prevent urban sprawl from Bristol. Under the official guidance, if land strongly contributes to even one Green Belt purpose, it cannot be grey belt. Without this evidence, there are no exceptional circumstances. The Plan is NOT justified. 1,500 extra cars from these developments is unsustainable and dangerous. Overwhelmed Services: Our GP surgeries and schools are already full. There is no concrete plan to increase capacity for 2,650 new residents. 4. The Plan is NOT CONSISTENT WITH NATIONAL POLICY: It fails to protect the Green Belt. Destroying Village Character: The plan will merge our villages and turn them into a suburb of Bristol, destroying the open countryside that makes our community special. Harm to Nature: Building on these green fields will cause irreversible harm to local wildlife and landscapes. I object to the North Somerset Local Plan because it is unsound. I am writing as a lifelong resident of Pill who has watched this community grow and thrive over the decades. My wife moved here in 2005, and like so many who discover this village, she immediately fell in love with its character, its sense of community, and the beautiful green spaces that surround us. We are now raising our two children - a 14-year-old son and an 11-year-old daughter - who are growing up with the same freedoms and connections to nature that I enjoyed as a child. The proposed allocation of 1,060 homes on our Green Belt threatens to destroy everything that makes this village special. This plan fails all four tests of soundness required by the National Planning Policy Framework. 1. The Plan is NOT JUSTIFIED: No "Exceptional Circumstances" to Build on the Green Belt The council can only build on the Green Belt in "exceptional circumstances". They have failed to prove this. They should be:			

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					Building on Brownfield Sites First - Prioritising derelict or previously used land across North Somerset before destroying our green fields. Where is the complete Brownfield Land Register? Why are these sites not being developed first? Building More Densely in Towns - Increasing the number of homes in urban centres like Weston-super-Mare, Clevedon, and Portishead - not sprawling into villages. There is no evidence the Council has maximised density in sustainable urban locations. Working with Neighbours - They have nott shown that they've properly asked neighbouring councils including Bristol, South Gloucestershire, and Bath & North East Somerset to take their fair share of housing. Where are the Statements of Common Ground proving genuine cooperation? The sites are not "grey belt": The government's grey belt policy is for derelict land and car parks, not pristine countryside. Pill Green is 45 hectares of undeveloped fields that strongly prevent urban sprawl from Bristol. Under the official guidance, if land strongly contributes to even one Green Belt purpose, it cannot be grey belt. Without this evidence, there are no exceptional circumstances. The Plan is NOT justified. 2. The Plan is NOT POSITIVELY PREPARED: It's Unfair and Ignores Local Democracy Disproportionate and Unfair Our village has 2.3% of North Somerset's population but is being forced to take 4.6% of the new housing. This is double our fair share. Why should our small community bear this disproportionate burden while larger towns are not asked to take theirs? Ignores Our Neighbourhood Plan 81% of us voted for a Neighbourhood Plan that limits new housing to 150-200 homes. The council is proposing 1,060 homes - more than five times this limit. This is a betrayal of local democracy and the community's expressed wishes. A plan that is fundamentally unfair and ignores the democratic will of residents is NOT positively prepared. 3. The Plan is NOT EFFECTIVE: Our Infrastructure Cannot Cope This is where the plan completely fails. The infrastructure simply does not exist to support this development. Traffic Gridlock: The M5 Junction 19 and the A369 are already at a standstill every day. I experience this personally - what should be a 5-minute journey to the motorway regularly takes 20-30 minutes during peak hours. Adding over 1,500 extra cars from these developments, plus the 11,300 additional vehicles from Long Ashton and South West Bristol developments, will create complete gridlock. My son will be learning to drive in the next couple of years, and I fear for his safety on roads that are already dangerous and overcrowded. Where is the evidence that National Highways has approved this level of growth? Where is the funded scheme to upgrade Junction 19? It does not exist. Overwhelmed Services: Our GP surgeries and schools are already full. I already wait weeks for a GP appointment for my family. The Heywood Practice serves 6,700 patients and will face a 39% increase with 2,650 new residents. There is no concrete, funded plan to expand healthcare capacity. The plan mentions a new primary school but doesn't state where it will be located, when it will be delivered, or what will happen to the children who arrive before it is built. What about St Katherine's School - can it accommodate 200-300 additional secondary pupils? Vague promises of "co-ordinated infrastructure delivery" are meaningless without a detailed Infrastructure Delivery Plan showing costs, funding, and timescales. This does not exist. The Railway Line is Not a Solution The Portishead-Pill-Bristol railway line is not yet delivered, and even when it is, it will be a single-track branch line with limited service frequency. The proposed station is not easily accessible from the development sites. This does not make Pill a sustainable location for 1,060 homes. A plan that promises houses but cannot deliver the infrastructure is NOT effective. 4. The Plan is NOT CONSISTENT WITH NATIONAL POLICY: It Fails to Protect the Green Belt Destroying Village Character The plan will merge our villages and turn them into a suburb of Bristol, destroying the open countryside that makes our community special. My daughter loves to walk our dog on the footpaths that cross Pill Green. If this development goes ahead, those fields - the green lung of our village - will be buried under 600 houses. Where will she walk then? The Green Belt exists to prevent urban sprawl, to stop towns merging, and to protect the character of historic communities like ours. This plan does the exact opposite. Harm to Nature			

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					Building on these green fields will cause irreversible harm to precious local wildlife and landscapes. These are not derelict brownfield sites - they are living, breathing countryside that should be protected for future generations. The plan breaches the fundamental purposes of the Green Belt and is NOT consistent with national policy. My Request to the Planning Inspector For the reasons outlined above, I respectfully request that the Planning Inspector: 1. Finds the North Somerset Local Plan 2041 unsound due to failure of all four tests of soundness 2. Recommends the deletion of sites HE2015, HE206, HE20491, HE201097, and HE201065 from the Plan 3. Requires the Council to publish a robust Green Belt assessment proving these sites are grey belt (which they cannot do) 4. Requires the Council to publish a detailed Infrastructure Delivery Plan with costs, funding, and timescales before any Green Belt sites are allocated 5. Requires the Council to demonstrate genuine cooperation with neighbouring authorities through proper Statements of Common Ground 6. Requires the Council to respect the democratically adopted Neighbourhood Plan and limit growth to 150-200 dwellings I am not against all development. I have seen sensitive, small-scale growth in this village that has brought new families and new life to Pill. But this is not that. This is a plan to increase the size of our community by 40% in one go, with no regard for the infrastructure, the environment, or the people who already live here. This is not nimbyism. This is about protecting a way of life, a sense of place, and a community that has existed for generations. I want my children to grow up in the same village I did - not in a sprawling suburb of Bristol with gridlocked roads and overwhelmed services. The plan is unsound.			

Name: Natasha Bowey **I.D:** 62862337

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Justified • Effective	No	Unsure	I believe the North Somerset Local Plan 2041: Pre-submission plan (for houses to be built in Tower Farm and Black Rock) for the following reasons: I believe the NSC has not properly considered: Alternative brownfield or greenfield sites with far lower ecological impact, both in Portishead and across North Somerset Opportunities to increase housing density on proposed brownfield sites, which could remove the need to develop Tower Farm and Black Rock The strategic ecological importance of these sites in protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor. The fact that both areas were added to the Green Belt in the late 1980s due to their high ecological value National planning policy allows Green Belt changes only in exceptional circumstances – and these have not been demonstrated. In addition: Neither site can provide safe or suitable access Development would create unacceptable transport impacts, failing national soundness tests. In relation to the transport – before you mention the plans for Portishead to have a railway, you should bear in mind that when I moved to Portishead 22 years ago we were promised a railway at that time, 22 years on and we are still waiting, so I will believe we will get the railway when the train is on its platform.			

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					Whoever planned on putting this housing scheme in place obviously haven’t been to Portishead during the mornings, lunchtimes and early evenings when the traffic often comes to gridlock – this is especially bad anywhere near the schools. For the above reasons, Tower Farm and Black Rock should be removed from the Local Plan. I do not think any modifications would make it legally compliant or sound. I believe the only way to make it legally compliant and sound in respect to the issues I have raised is for Tower Farm and Black Rock to be removed from the Local Plan totally.			
Black Rock, north of Clevedon Road	No	• Justified • Effective	No	Unsure	I believe the North Somerset Local Plan 2041: Pre-submission plan (for houses to be built in Tower Farm and Black Rock) for the following reasons: I believe the NSC has not properly considered: Alternative brownfield or greenfield sites with far lower ecological impact, both in Portishead and across North Somerset Opportunities to increase housing density on proposed brownfield sites, which could remove the need to develop Tower Farm and Black Rock The strategic ecological importance of these sites in protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor. The fact that both areas were added to the Green Belt in the late 1980s due to their high ecological value National planning policy allows Green Belt changes only in exceptional circumstances – and these have not been demonstrated. In addition: Neither site can provide safe or suitable access Development would create unacceptable transport impacts, failing national soundness tests. In relation to the transport – before you mention the plans for Portishead to have a railway, you should bear in mind that when I moved to Portishead 22 years ago we were promised a railway at that time, 22 years on and we are still waiting, so I will believe we will get the railway when the train is on its platform. Whoever planned on putting this housing scheme in place obviously haven’t been to Portishead during the mornings, lunchtimes and early evenings when the traffic often comes to gridlock – this is especially bad anywhere near the schools. For the above reasons, Tower Farm and Black Rock should be removed from the Local Plan. I do not think any modifications would make it legally compliant or sound. I believe the only way to make it legally compliant and sound in respect to the issues I have raised is for Tower Farm and Black Rock to be removed from the Local Plan totally.			

Name: Nathan Littlewood **I.D:** 62847137

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I am submitting this objection to the proposed allocation of nearly 900 additional houses on land east of Backwell under Policy LP3 of the North Somerset Local Plan 2041 (Regulation 19). This proposal is unjustified, inconsistent with national and local planning policy and does not adhere to principals of sustainability. Grounds of Objection 1. Disproportionate and Unfair Growth Backwell has already had multiple developments approved recently, representing a 40% increase in village size. Adding nearly 900 more houses would far exceed growth levels in much larger settlements such as Clevedon. This is unfair, disproportionate, and not in the best interests of current or future residents. This conflicts with the National Planning Policy Framework (NPPF 2024, para. 11 & 35) which requires plans to be “justified” and “the most appropriate strategy” when considered against reasonable alternatives. 2. Unsustainable Transport Strategy The proposed link road duplicates existing infrastructure. The B3130 already provides a direct route between Bristol and Nailsea, making the new road unnecessary and a waste of public resources. It will do nothing to alleviate current traffic problems through Backwell along the A370. The Local Plan requires development to accord with the North Somerset Place and Movement Framework, yet the proposed road undermines sustainable transport principles by encouraging car dependency rather than prioritising public transport and active travel. This conflicts with NPPF para. 104–106, which require transport policies to promote sustainable modes and reduce reliance on private cars. 3. Flood Risk and Climate Resilience Backwell Common, adjacent areas and parts of the A370 are already prone to flooding. The proposed development lies on or near floodplains, including land around Backwell Lake. The Local Plan requires a “comprehensive and coordinated approach to surface water management,” yet no robust Flood Risk Assessment (FRA) or funded mitigation strategy has been provided. This fails to meet NPPF para. 159–161, which require development to avoid flood risk and not increase vulnerability to climate change. 4. Failure of Sustainability Principles Backwell is not an employment hub; most residents commute to Bristol or elsewhere. Allocating even more land for commuters is unrealistic and contrary to the principle of locating jobs near housing. The proposal does not reduce commuting or traffic congestion, undermining the NPPF’s presumption in favour of sustainable development, which requires balancing economic, social, and environmental objectives. A more sustainable distribution would direct growth to towns such as Clevedon, Portishead, and other towns of North Somerset that have existing infrastructure, employment opportunities, and transport capacity. 5. Heritage and Landscape Harm The Local Plan itself acknowledges the need for a heritage-led masterplan and buffer zones to protect Backwell Farleigh Conservation Area and views to Tyntesfield and Wraxall. Large-scale housing on Grade 1 agricultural land irreversibly damages the rural setting, undermining NPPF para. 174–176, which require protection of valued landscapes and heritage assets. Government policy (NPPF para. 174b) requires protection of “best and most versatile agricultural land” to safeguard food security. Allocating this land for housing contradicts national policy. The proposed allocation for Backwell is unsound because it: • Is unjustified (disproportionate growth compared to other settlements). • Is ineffective (fails to deliver sustainable transport or flood resilience). • Is inconsistent with national policy (NPPF requirements on sustainability, flood risk, heritage, and agricultural land). I therefore request that the allocation of nearly 900 houses east of Backwell be removed from the Local Plan, and that housing growth be redirected to more sustainable locations.			

Name: Nathan Pottecary **I.D:** 58067841

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Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national	No	No	The proposed allocation of land at Tower Farm for approximately 400 homes is wholly unacceptable. This site is directly adjacent to Weston Big Wood, an ancient woodland and Site of Nature Conservation Interest (SNCI), managed by the Woodland Trust and backed by the Avon Wildlife Trust. This vibrant woodland is a cornerstone of the Gordano Valley ecological network and comprises a nationally significant habitat mosaic of open grassland, wetland, and woodland. Not Justified: There is a glaring absence of robust and published alternatives assessment proving that this sensitive site is the only or most suitable option for further development. The potential destruction of the best and most versatile (BMV) farmland (designated			10-year strategy 2020-2030.pdf

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		policy			as Grade 2/3a according to the Agricultural Land Classification dataset) and the imminent risk of irreversible damage to the ancient woodland categorically render this allocation inappropriate. Not Consistent with National Policy: This allocation is in direct violation of the National Planning Policy Framework (NPPF) paragraphs 180–182, which clearly stipulate that any development leading to the loss or deterioration of irreplaceable habitats, such as ancient woodland, must be refused unless there are wholly exceptional circumstances. The Council's reference to an "ecological buffer" is vague, unenforceable, and wholly inadequate to address indirect impacts like root-zone damage, hydrological alterations, or wildlife disturbance. The Woodland Trust and the Avon Wildlife Trust emphasize that once ancient woodland is damaged, it is irretrievable. Moreover, the Framework mandates the delivery of biodiversity net gain, yet this allocation fails to provide a clear mechanism to ensure such an outcome. Not Positively Prepared: The location aggravates existing pressures in Portishead. Schools, healthcare services, and transport infrastructure are already stretched (for instance, the A369 corridor). This outlying site would inevitably lead to increased private vehicle usage and pollution, violating NPPF paragraphs 104–106, which advocate for supporting sustainable travel patterns. Not Effective: The feasibility of delivery is contingent on multiple unresolved dependencies, including new school provisions, contributions to bus services, off-site biodiversity management, and enhancements to rights-of-way and buffer zones. The lack of a phasing plan, funding mechanism, or legal agreement to secure these essential elements means this allocation cannot be classified as deliverable within the plan period as stipulated in NPPF paragraph 35(c). Landscape & Connectivity: The boundary between farmland and woodland is a critical ecological and landscape transition zone. Development in this area would fragment habitats, undermine the Gordano Valley wildlife corridor, and degrade the rural character of the fringe. Even with a proposed buffer, the visual and ecological impacts on the woodland and surrounding landscape would be severe. Drainage & Hydrology: Construction and development will inevitably alter surface water runoff and lead to soil compaction on the former farmland, jeopardising the hydrological regime that supports the adjacent ancient woodland. The risks of nutrient runoff, disrupted infiltration, and damage to the woodland root zone are significant and unacceptable. Cumulative Impact: When assessed alongside other allocations in the Portishead area, such as Black Rock north of Clevedon Road, the cumulative pressure on ecology, infrastructure, and transport becomes overwhelming. This undermines the Council's commitments to nature recovery and sustainable growth. There is no modification, short of entirely withdrawing the allocation, that could make this site suitable for development. Given its close proximity to ancient woodland, any loss would be irreversible and cannot be adequately mitigated. This land must be preserved as undeveloped green space, managed to enhance biodiversity and promote sustainable public access, in accordance with the Avon Wildlife Trust's 2030 Strategy and the national "30 by 30" nature recovery goals. I unequivocally reject the North Somerset Local Plan 2041 for the Tower Hill Farm location.			

Name: National Farmers Union **I.D:** 63085185

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP8: Housing					The National Farmers' Union (NFU) represents over 44,000 farming and growing businesses across England and Wales. The NFU supports farmers, growers, agricultural workers, and rural communities across a diverse range of sectors, encompassing all agricultural life, campaigning for a stable and sustainable future. The NFU has a number of members with farming and growing businesses across North Somerset. Our aim is to support members to champion British agriculture and horticulture and campaign for a stable and sustainable future for British farmers. It is critical that farming businesses within the county remain economically and environmentally sustainable, as a valued part of Somerset. We welcome the opportunity to provide input to this consultation in relation to the proposed Somerset Local Plan and its vision, policy framework and delivery. The farming community continues to face formidable challenges including the ongoing impacts of the Ukraine war, labour shortages and input cost inflation which is disproportionately impacting agriculture. Alongside these challenges farmers are working under increasingly changeable climate conditions. Successive governments have acknowledged that food security is national security, and with this background it is more important than ever that we support farming businesses to develop and modernise to secure their ongoing operation. Farming has shaped our landscapes, creating varied fabrics and bringing value to local and rural economies. Our landscapes are living, working landscapes that are constantly changing through continuous management by farmers through grazing, cropping and cultivations, and management of boundaries. We welcome the Local Plan's recognition of the countryside as a valuable resource and its commitment to protecting the best and most versatile (BMV) agricultural land. High-quality farmland underpins food security and supports resilient farm businesses that deliver benefits for climate and nature. NFU members strongly support the principle that Grades 1 and 2 land should be safeguarded from development, and we would like to see this commitment strengthened with clear wording that exceptions will only apply in cases of genuine necessity and with full restoration plans. We stress the importance of ensuring that objectives for nature recovery and climate resilience are practical and work alongside food production. Agriculture plays a vital role in delivering environmental outcomes while producing food, and planning policy should reflect this dual purpose. We welcome recognition of water as a critical resource for food production and urge greater support for water management infrastructure on farms, which will be essential for future resilience. The Local Plan should remain open to a range of approaches to achieving net zero, including recognising the positive contributions farming can make through energy crops, renewable energy generation, and land management practices. We also welcome policies that enable farm diversification, rural workers' housing and infrastructure development, as these are key to building resilient businesses and supporting the rural economy. Whilst we acknowledge the need for public access to the countryside, it is essential to recognise that this is a working landscape. Increased access must consider biosecurity, wildlife, animal and public safety, and landowner rights. We would welcome options for funded fencing along footpaths where appropriate, as well as improved signage to promote responsible access and protect both livestock and visitors. We would like to see clarity on terms such as "regenerative land use practices", along with practical guidance for farms to adopt these practices. Many farms already employ techniques that could be considered regenerative without using the label. Finally, we stress the principle of "the right tree in the right place," ensuring that woodland expansion does not occur on BMV land and that food production remains a priority. Summary The NFU welcomes the Local Plan's approach to countryside development and support of development for agriculture. The Local Plan must recognise the essential role of agriculture in delivering food security, climate resilience, and a thriving rural economy. Protecting the best and most versatile land, supporting farm infrastructure, and enabling sustainable practices are critical to achieving these goals, alongside policies that allow diversification and innovation. We urge the Council to ensure planning decisions work in harmony with productive farming, safeguarding this vital sector while balancing environmental objectives for future generations.			North Somerse Council Local Plan 2026-2041 - NFU consultation response.docx

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Policy DP53: Best and most versatile land					The National Farmers' Union (NFU) represents over 44,000 farming and growing businesses across England and Wales. The NFU supports farmers, growers, agricultural workers, and rural communities across a diverse range of sectors, encompassing all agricultural life, campaigning for a stable and sustainable future. The NFU has a number of members with farming and growing businesses across North Somerset. Our aim is to support members to champion British agriculture and horticulture and campaign for a stable and sustainable future for British farmers. It is critical that farming businesses within the county remain economically and environmentally sustainable, as a valued part of Somerset. We welcome the opportunity to provide input to this consultation in relation to the proposed Somerset Local Plan and its vision, policy framework and delivery. The farming community continues to face formidable challenges including the ongoing impacts of the Ukraine war, labour shortages and input cost inflation which is disproportionately impacting agriculture. Alongside these challenges farmers are working under increasingly changeable climate conditions. Successive governments have acknowledged that food security is national security, and with this background it is more important than ever that we support farming businesses to develop and modernise to secure their ongoing operation. Farming has shaped our landscapes, creating varied fabrics and bringing value to local and rural economies. Our landscapes are living, working landscapes that are constantly changing through continuous management by farmers through grazing, cropping and cultivations, and management of boundaries. We welcome the Local Plan's recognition of the countryside as a valuable resource and its commitment to protecting the best and most versatile (BMV) agricultural land. High-quality farmland underpins food security and supports resilient farm businesses that deliver benefits for climate and nature. NFU members strongly support the principle that Grades 1 and 2 land should be safeguarded from development, and we would like to see this commitment strengthened with clear wording that exceptions will only apply in cases of genuine necessity and with full restoration plans. We stress the importance of ensuring that objectives for nature recovery and climate resilience are practical and work alongside food production. Agriculture plays a vital role in delivering environmental outcomes while producing food, and planning policy should reflect this dual purpose. We welcome recognition of water as a critical resource for food production and urge greater support for water management infrastructure on farms, which will be essential for future resilience. The Local Plan should remain open to a range of approaches to achieving net zero, including recognising the positive contributions farming can make through energy crops, renewable energy generation, and land management practices. We also welcome policies that enable farm diversification, rural workers' housing and infrastructure development, as these are key to building resilient businesses and supporting the rural economy. Whilst we acknowledge the need for public access to the countryside, it is essential to recognise that this is a working landscape. Increased access must consider biosecurity, wildlife, animal and public safety, and landowner rights. We would welcome options for funded fencing along footpaths where appropriate, as well as improved signage to promote responsible access and protect both livestock and visitors. We would like to see clarity on terms such as "regenerative land use practices", along with practical guidance for farms to adopt these practices. Many farms already employ techniques that could be considered regenerative without using the label. Finally, we stress the principle of "the right tree in the right place," ensuring that woodland expansion does not occur on BMV land and that food production remains a priority. Summary The NFU welcomes the Local Plan's approach to countryside development and support of development for agriculture. The Local Plan must recognise the essential role of agriculture in delivering food security, climate resilience, and a thriving rural economy. Protecting the best and most versatile land, supporting farm infrastructure, and enabling sustainable practices are critical to achieving these goals, alongside policies that allow diversification and innovation. We urge the Council to ensure planning decisions work in harmony with productive farming, safeguarding this vital sector while balancing environmental objectives for future generations.			North Somerse Council Local Plan 2026-2041 - NFU consultation response.docx

Name: National Grid (Electricity Distribution) South West Plc **I.D:** 63136321

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Policy DP63: Infrastructure delivery and development contributions	No	• Effective	Unsure	Unsure		Policy DP63 and the accompanying Infrastructure Delivery Plan do not make specific reference to electricity infrastructure, which makes it challenging for NGED to provide detailed feedback at this stage. However, we strongly encourage that, where appropriate, masterplans include provision for the electricity infrastructure required to support future development. This may include space for new substations and associated assets to ensure sufficient capacity for the area. The justification for the policy refers to new development providing “connection to utilities”. It should go further to explain the need for additional utility infrastructure, e.g. sub-stations to ensure sufficient capacity.		251211 Rep Reg 19.pdf

Name: National Grid Electricity Transmission **I.D:** 63183425

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Policy DP63: Infrastructure delivery and development contributions							New Infrastructure Demand for electricity is expected to rise as the way NGET power our homes, businesses and transport changes. As the nation moves towards net zero, the fossil fuels that once powered the economy will be replaced with sources of low-carbon electricity, such as offshore wind farms. The UK Government has committed to reach net zero emissions by 2050. This means achieving a balance between the greenhouse gases put into the atmosphere and those taken out. Decarbonising the energy system is vital to this aim. NGET’s infrastructure projects in England and Wales will support the country’s energy transition and make sure the grid is ready to connect to more and more sources of low carbon electricity generated in Britain. The way NGET generate electricity in the UK is changing rapidly, and NGET are transitioning to cheaper, cleaner and more secure forms of renewable energy such as new offshore windfarms. NGET need to make changes to the network of overhead lines, pylons, cables and other infrastructure that transports electricity around the country, so that everyone has access to clean electricity from these new renewable sources. These changes include a need to increase the capability of the electricity transmission system between the North and the Midlands, and between the Midlands and the South. It is also needed to facilitate the connection of proposed new offshore wind, and subsea connections between England and Scotland, and between the UK and other countries across the North Sea. Accordingly, we request that the Council is cognisant of the above. NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets. Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance. NGET’s ‘Design guidelines for development near pylons and high voltage overhead power lines’ promote the successful development of sites crossed by existing overhead lines and the creation of well⟐designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: https://www.nationalgrid.com/document/345326/download The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.NGET’s statutory safety clearances are detailed in their Technical Guidance Note ‘Third-party guidance for working near National Grid Electricity Transmission equipment’, which can be downloaded here:	North Somerset Local Plan 2041 Pre-Submission Consultation - NGET Response.pdf

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							https://www.nationalgrid.com/document/349291/download	

Name: National Highways **I.D:** 43203041

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SP1: Sustainable Development							We welcome the strategic policy objectives to maximise the use of effective public transport and encourage the creation of liveable neighbourhoods. DfT Circular 01/2022 (paragraph 12) advises that new development should facilitate a reduction in the need to travel by private car and should be focussed on locations that are or can be made sustainable. It goes on to state that “Developments in the right place and served by the right sustainable infrastructure delivered alongside or ahead of occupancy must be a key consideration when planning for growth in all local authority areas”. We therefore welcome the policy objectives to support job creation at accessible locations and enable the delivery of supporting infrastructure.	NSC Reg19 Local Plan Consultation.pdf
SP3: Spatial strategy							National Highways supports Policy SP3 that gives priority to new development in or close to urban areas. The principal location for new development is Weston-super-Mare, with four additional strategic development locations at Wolvershill (north of Banwell), Woodspring (south-west of Bristol), Nailsea and Backwell, and Pill and Easton-in-Gordano. We support the proposed spatial strategy being focussed on larger settlements with existing or future opportunities for sustainable travel. Such an approach has the greatest potential to reduce travel demands, particularly those longer-distance journeys reliant on use of the SRN. Notwithstanding the suitability of this approach, National Highways will continue to review the supporting transport evidence to ensure that any residual cumulative issues for the SRN are acknowledged and addressed as necessary.	NSC Reg19 Local Plan Consultation.pdf
SP5: Towns							In line with the spatial strategy, National Highways note that Policy SP5 promotes development in towns given their range of services, facilities and jobs, and accessibility by sustainable transport modes. Policy SP6 seeks to restrict new development in less sustainable locations outside settlement boundaries. This is supported due to the likelihood that development in such locations would encourage car use.	NSC Reg19 Local Plan Consultation.pdf
SP8: Housing							Between 2026 and 2041, North Somerset Council plans to deliver at least 23,700 new dwellings, in line with the government's Local Housing Needs Assessment (2025). Major growth areas include Weston-super-Mare (6,660 allocated dwellings plus 1,070 expected windfall), Wolvershill (3,300 dwellings), a new Woodspring development southwest of Bristol (3,500 dwellings), Nailsea and Backwell (3,500 plus	NSC Reg19 Local Plan Consultation.pdf

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							228 windfall), and Pill and Easton-in-Gordano (1,100 dwellings). Clevedon and Portishead will see smaller allocations, with Clevedon accommodating 258 dwellings plus 330 expected windfall dwellings, and Portishead 562 dwellings plus up to 785 at Wyndham Way and 254 windfall. Across villages and wider rural areas, the plan seeks to allocate 1,830 dwellings, with an additional 1,118 expected from small sites. National Highways supports the principle of concentrating housing development within or adjacent to existing built up areas that already have an existing range of sustainable transport links. Nevertheless, new development in urban areas will inevitably generate additional travel demands that may impact on the SRN, whether for longer distance travel to the north and south, or movements across the M5 via J19 or J21.	
SP9: Employment							Policy SP9 proposes that Weston-super-Mare will remain the main focus for employment growth, with the committed Weston Villages development, allocated employment land at the J21 Enterprise Area, and additional employment land within the strategic locations at Wolvershill, Woodspring, and Nailsea and Backwell. The spatial distribution of employment land is supported by National Highways, but we will seek to ensure that the cumulative impacts of employment travel are planned for and addressed as necessary.	NSC Reg19 Local Plan Consultation.pdf
SP10: Transport							Whilst the policy objectives are supported, with a focus on improving safety, reducing the need to travel and promoting sustainable travel, it should be noted that National Highways will continue to seek appropriate transport investment and capacity enhancements where the residual cumulative impacts of development are severe. We will continue to liaise with North Somerset Council and their consultants to identify any requirements for further transport investment in light of the findings of the Transport Assessment and follow-on operational assessment work for SRN junctions. We note that the policy is supportive of improvements to strategic transport facilities at Bristol Airport and the Royal Portbury Dock. Both sites have implications for SRN travel as international gateways, and the Royal Portbury Dock is accessed directly from M5 J19. National Highways would therefore take an interest in any proposals to improve transport facilities for either site.	NSC Reg19 Local Plan Consultation.pdf
Policy LP1: Strategic location: Wolvershill (north of Banwell)							The policy proposes a major mixed-use development at Wolvershill, north of Banwell, for around 3,300 homes, a business park and supporting infrastructure. The development is to be guided by a comprehensive masterplan and Delivery Plan with phased delivery tied to infrastructure provision. Appropriate mechanisms will be required to ensure the timely and efficient delivery of infrastructure. The policy requires that development proposals must create attractive, accessible, safe and direct active travel routes to local facilities. The site lies to the east of the M5 motorway,	NSC Reg19 Local Plan Consultation.pdf

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							and active travel routes will therefore include three crossing points over the M5, comprising the Wolvershill Road and Knightcott Road overbridges and an existing accommodation bridge. National Highways has been consulted on planning applications for 2,655 homes and employment on the site, and work is ongoing to demonstrate the SRN impacts of the proposed development, alongside the wider allocation for 3,300 homes. As part of the application process, National Highways is in discussions with landowners regarding the required scope of improvements to the accommodation bridge over the M5. It is welcome that the policy refers to effective management and treatment of surface water, noise mitigation requirements, and landscaping adjacent to the M5 motorway. Given the location of the site alongside the motorway, environmental impacts of the proposed development and the motorway itself will require careful attention. Whilst we consider that policy wording appropriately highlights the requirements for the site, National Highways will continue to explore these matters with landowners as part of the live applications for the site. The policy advises that the development should not preclude any future planning and delivery of a new motorway junction on the M5 south of J21. National Highways is aware of the aspiration locally for a new motorway junction to the east of Weston-super-Mare, but this does not currently feature in any National Highways delivery programme. Without prejudice to our ongoing review of the Local Plan transport evidence, we understand that North Somerset Council is looking to future-proof a potential location that may be required to underpin growth beyond the plan period. It will be important to ensure that any option for a new motorway junction has due regard for the safety and operational integrity of the M5. We recommend that further consideration of junction design, spacing and implications for National Highways asset should inform any setting aside of land and have separately written to the Council on this matter. The policy requires provision of a package of transport measures as identified in the Infrastructure Delivery Plan (IDP). Comments on the IDP are set out later in this letter. It is noted Policy LP1 does not link the Wolvershill development to the M5 J21 Bypass Scheme referred to in Schedule 7 of the Pre-Submission Plan. The Bypass Scheme is shown on the Policies Map and would connect Wolvershill Road and the A370 to the east of the M5. Such a link could impact on future use of Wolvershill Road and associated active travel provision, and further discussion on this proposal would be welcomed by National Highways.	
Policy LP2: Strategic location:							A new mixed-use strategic growth location is proposed at Woodspring on land released from the Green Belt to accommodate up to 3,500 dwellings. Whilst the proposed	NSC Reg19 Local Plan Consultation.pdf

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Woodspring (south west of Bristol)							allocation is located some distance from the SRN, National Highways welcome the need for developers to work together to produce a single masterplan and a Delivery Plan to outline the delivery and phasing of required infrastructure.	
Policy LP3: Strategic location: Nailsea and Backwell							The policy proposes that Nailsea and Backwell will see coordinated expansion with around 3,500 new homes and at least six hectares of employment land, supported by transport infrastructure investment and active travel measures. National Highways welcomes the requirement for a strategic and coordinated approach to transport investment, particularly to address the cumulative impacts of proposed development. We also welcome the policy wording that, “Development proposals will require specific phasing conditions and/or obligations to be secured to ensure any required supporting infrastructure is delivered at the appropriate time”. We are aware of the potential for these developments to have an adverse impact on M5 J19 and J20. In this context we note that the AECOM Transport Assessment highlights the need for improvements at M5 J20 and also assumes improvements at M5 J19. Capacity enhancements at M5 J20 and Ettlingen Way are highlighted in the IDP but no improvements are referenced at M5 J19. It should be reviewed to what extent the Nailsea and Backwell strategic location contributes to cumulative traffic demands and impacts at each SRN junction. Subject to the findings of this exercise, it may be appropriate to make direct reference to the potential SRN improvements in Policy LP3 as supporting infrastructure for the proposed strategic location, with associated requirements for developers to demonstrate delivery and funding mechanisms.	NSC Reg19 Local Plan Consultation.pdf
Policy LP4: Strategic location: Pill and Easton-in-Gordano						The AECOM Transport Assessment has highlighted capacity constraints at M5 J19, with a concept capacity enhancement included in modelling work to date. Proposed allocations in the Pill and Easton-in-Gordano strategic location, alongside potential active travel improvements along Marsh Lane, have the potential to increase traffic demands via M5 J19. National Highways will continue to work with AECOM and North Somerset Council to demonstrate cumulative traffic impacts for the junction. Subject to the outcomes of this work, it may be necessary to amend policy wording to highlight any significant adverse impacts and/or a need to contribute to any mitigation measures.	The policy proposes the allocation of four housing sites totalling up to 1,100 dwellings at Pill and Easton-in-Gordano. We note that the Portishead-Pill-Bristol rail line has secured government funding and is currently due to be delivered in 2028, providing much improved public transport accessibility for the area. National Highways welcomes the requirement set out in policy that all developments must contribute to infrastructure in a strategic and co-ordinated approach, and that sites near the M5 must include noise and pollution mitigation.	NSC Reg19 Local Plan Consultation.pdf
Policy LP11: Transport infrastructure, allocations and safeguarding							This policy allocates or safeguards land (as defined on the Policies Map and set out in Schedule 7) for the delivery of transport schemes, the improvement of existing services and the creation of sustainable transport links and facilities. In addition to the specific schemes identified in Schedule 7, the policy also lists a number of schemes proposed for delivery during the plan period, including potential capacity improvements at M5 J20 and Ettlingen Way, Clevedon.	NSC Reg19 Local Plan Consultation.pdf

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							We note that no reference is made to capacity improvements at M5 J19, the M5 J21 bypass included in Schedule 7, or any safeguarding of land for a new junction south of M5 J21, implying these schemes are not proposed for delivery during the plan period. National Highways would welcome further confirmation of proposals for each location and their status within the plan. Subject to the ongoing review of the AECOM Transport Assessment and further traffic modelling for SRN junctions, it may yet be necessary to specifically reference additional transport infrastructure improvements under Policy LP11.	
Policy LP11: Transport infrastructure, allocations and safeguarding							Schedule 7: Transport infrastructure, allocations and safeguarded routes This schedule forms part of Policy LP11 (Transport Infrastructure, allocations and safeguarding) and Policy DP16 (Active Travel Routes). National Highways offer the following observations: ◈ We note reference to a J21 Bypass Scheme but this is not referenced in wider policies (for example LP1) or the AECOM Trasport Assessment. National Highways would welcome further information in respect of the proposed infrastructure. ◈ We welcome the inclusion of buffer areas around M5 J19, J20 and J21. We suggest that the buffer shown on the Policies Map for M5 J20 should extend further west to include the full extent of Ettlingen Way to protect land for the LP11 Ettlingen Way Capacity Improvement (which is not listed in Schedule 7). ◈ We note reference to 'Royal Portbury Dock access under the M5'. We would welcome further detail regarding this proposal and any implications for National Highways asset or M5 J19. ◈ We note the inclusion of transport schemes and access arrangements for the Wolvershill Strategic Development and the upgrade to an existing accommodation bridge to link Parklands Village and Wolvershill. We would highlight that traffic modelling work for the Wolvershill site is continuing and the scope of necessary transport schemes for the site remains to be agreed. ◈ We note that no safeguarding is shown for a new M5 J21A on the Policies Map. We understand that restrictions will be imposed on relevant development to prevent impacting a future junction, but the formal safeguarding of land is not proposed. North Somerset Local Plan Stage 7 Transport Assessment The Pre-Submission Plan is supported by a Stage 7 Transport Assessment (TA) prepared by Aecom (Rev 2.0 October 2025). The TA presents the findings of strategic traffic modelling for the Local Plan but does not at this stage provide operational assessments for the three motorway junctions included in the authority area. National Highways has previously commented	NSC Reg19 Local Plan Consultation.pdf

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							on assessment inputs and is currently reviewing modelled traffic demand and assignment figures supplied by AECOM. It is anticipated that the assessment of SRN impacts and requirements for mitigation will remain under discussion with AECOM and North Somerset Council beyond the Regulation 19 consultation, with National Highways undertaking operational assessment work for M5 J19. However, the following comments and observations are made in the interim: ◈ It is noted that AECOM have accounted for a potential concept improvement scheme at M5 J19 to reduce queues on the southbound off-slip, but the proposal is not listed in Schedule 7. The proposal does not currently feature within National Highways forward plans, and it remains to be determined whether improvements are required to accommodate Local Plan impacts. ◈The TA identifies that the Northern Way/Ettlingen Way junction and M5 J20 will be at or near capacity by 2041. The reports suggests that small-scale interventions (signalisation, slip road improvements, lane adjustments) are likely to be sufficient to address congestion issues. National Highways require further operational assessments for the junction to demonstrate performance, alongside a drawing of any mitigation proposals impacting the SRN. ◈ The TA advises that M5 J21 will be approaching or exceeding capacity by 2041 with significant congestion forecast for Weston-super-Mare. We understand that further operational assessment work is being undertaken as part of the Wolvershill development. We look forward to reviewing this work in due course. ◈ We note that the TA has not modelled or provided any commentary on the M5 J21 Bypass scheme referred to in Schedule 7. Similarly, no mention is made of a potential new motorway junction south of M5 J21. We infer that these schemes are included for safeguarding purposes only with possible delivery in the next or later Local Plan. However, clarification on this matter would be beneficial.	
Policy LP12: Bristol Airport					Land at Bristol Airport will be released from the Green Belt to reflect the operational requirements of the consented 12 million passengers per annum. National Highways supports the need for all airport development to be accompanied by clear surface access proposals that will increase the use of public transport and minimise congestion and other local impacts. We welcome policy support for improving surface access to the			NSC Reg19 Local Plan Consultation.pdf

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					Airport. We also note reference to securing improvements where necessary to the local highway network, and proposals for increased passenger throughput beyond the consented position. Any proposals for further Airport expansion will need to demonstrate SRN travel demands as part of any future planning application and appropriate mitigation would need to be identified for any significant adverse impacts.			
Policy LP14: Royal Portbury Dock							We welcome the recognition that further development of Dock facilities is likely to require improvements at M5 J19 (whether for junction capacity, road safety or accessibility reasons) to make the development acceptable in planning terms. M5 J19 currently operates under constraint at peak times with long slip road queues. There are currently no facilities for pedestrians and cyclists at the junction. We therefore support the policy requirement for potential improvements to support any intensification of the Port's role as a strategic employment location.	NSC Reg19 Local Plan Consultation.pdf
Policy LP22: Epic employment campus							The policy supports proposals for a campus style office development between Long Ashton and Bristol in line with planning consents for the site. We note that policy support is linked to the prioritisation of sustainable travel. National Highways is supportive of this position, as the applicant's proposals for sustainable travel and occupier-led travel initiatives was a key factor in National Highways accepting that the Epic development would have limited impact on the SRN.	NSC Reg19 Local Plan Consultation.pdf
Policy DP14: Highway safety, traffic and provision of infrastructure associated with development							This policy states that development likely to have a severe residual cumulative impact on transport routes, traffic congestion or on the character and function of the surrounding area, will only be permitted where acceptable mitigation measures are delivered. Mitigating infrastructure will need to be delivered within an agreed timeframe. National Highways are supportive of the policy, which is broadly in line with SRN policy set out in the DfT Circular 01/ 2022. We also welcome reference to consulting National Highways on Transport Assessments for development with the potential to adversely affect the safe operation of the M5 motorway. We support the Local Plan approach of identifying and coordinating necessary infrastructure investment. However, for the avoidance of doubt, National Highways is likely to recommend planning conditions to secure transport investment should it be necessary to avoid unacceptable or severe residual impacts associated with any individual or cumulative development proposals.	NSC Reg19 Local Plan Consultation.pdf
Policy DP15: Active and sustainable transport							The policy requires new development to be designed and located to minimise the need to travel and support the prioritisation of active travel and public transport. It highlights that development will be expected to contribute to the delivery of sustainable transport strategies to manage the	NSC Reg19 Local Plan Consultation.pdf

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							cumulative impacts of growth and is welcomed by National Highways.	
Policy DP18: Travel Plans							The policy requires Travel Plans for all development which will generate significant amounts of movements. The policy advises that planning conditions or planning obligations will require adoption of the Travel Plan prior to occupation and its successful implementation post occupation. Whilst we understand that a future Supplementary Planning Document (SPD) will set out more details in respect of the development, implementation and monitoring of Travel Plans, we would suggest that the policy wording could be amended to refer to the requirement to monitor Travel Plan outcomes and implement remedial actions should a Travel Plan fail to achieve its targets. We consider this an important element of the shift to vision-led planning.	NSC Reg19 Local Plan Consultation.pdf
Policy DP20: Airport related car parking							The policy prioritises the provision of Airport related parking within the Bristol Airport boundary. Airport related parking (including off-site park and ride provision) outside of the Airport boundary will only be permitted where there is a demonstrable need and is consistent with the aims and objectives of the Airport Surface Access Strategy and the Joint Local Transport Plan. We are supportive of the Airports efforts to increase sustainable travel and would not wish for these efforts to be undermined by increased satellite parking facilities which could encourage car-borne travel. We also welcome the requirement that proposals outside of the Airport boundary should not result in severe unmitigated residual cumulative traffic impacts, or create a significant constraint to the delivery of any planned improvements to the transport network or allocated sites.	NSC Reg19 Local Plan Consultation.pdf
Policy DP63: Infrastructure delivery and development contributions						Policy DP63: Infrastructure delivery and development contributions National Highways support the policy which requires infrastructure to be “provided in step with new development and co-ordinated through the Infrastructure Delivery Plan”. It is stated that development proposals will be expected to contribute towards the cost of infrastructure. We support the coordination of investment in necessary infrastructure and regular reviews of the Infrastructure Delivery Plan. Nevertheless, in our response to the earlier North Somerset Local Plan 2039 Pre-Submission Consultation we commented that, where a highway improvement is required to accommodate traffic generated by a specific development and to avoid unacceptable impacts, mitigation may need to be secured by way of planning conditions to any consent, or in some cases via a funding agreement, as per paragraph 52 of DfT Circular 01/2022. We therefore repeat our suggestion that additional text is added to policy DP63 to emphasise that	Policy DP63: Infrastructure delivery and development contributions National Highways support the policy which requires infrastructure to be “provided in step with new development and co-ordinated through the Infrastructure Delivery Plan”. It is stated that development proposals will be expected to contribute towards the cost of infrastructure. We support the coordination of investment in necessary infrastructure and regular reviews of the Infrastructure Delivery Plan. Nevertheless, in our response to the earlier North Somerset Local Plan 2039 Pre-Submission Consultation we commented that, where a highway improvement is required to accommodate traffic generated by a specific development and to avoid unacceptable impacts, mitigation may need to be secured by way of planning conditions to any consent, or in some cases via a funding agreement, as per paragraph 52 of DfT Circular 01/2022. We therefore repeat our suggestion that additional text is added to policy DP63 to emphasise that where infrastructure investment is necessary to enable the development to proceed, then this may need to be secured by condition.	NSC Reg19 Local Plan Consultation.pdf

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						where infrastructure investment is necessary to enable the development to proceed, then this may need to be secured by condition. Infrastructure Delivery Plan We have reviewed the Draft Infrastructure Delivery Plan (IDP) and associated IDP Transport Schedule dated October 2025. We accept that the IDP is a 'live' document and that further amendments may be made prior to submission of the plan and throughout the Examination process. However, based on a review of the IDP Schedule the following items are of interest to National Highways: ◈ TR65: M5 J21 capacity improvements northbound – currently under construction and understood to be part of bridge maintenance scheme. ◈ TR66: M5 J21 bypass linking Wolvershill Road to A370 – funding not currently identified. The schedule advises that other long-term schemes associated with reducing severance and/or improving access to the SRN within the Weston-super-Mare area are to be kept under review. ◈ TR69: Wolvershill strategic site: proposed upgrade of the existing Wolvershill Road bridge over the M5 to enhance active travel connectivity – identified developer contributions/ grant funding. ◈ TR70: Wolvershill strategic site: active travel route between the development and Worle Railway Station & District Centre - Summer Lane Bridge. Understood to be the existing accommodation bridge over the M5 - identified developer contributions/ grant funding. ◈ TR75: M5 J21 - improved signalisation. Identified to be funded through development contributions. ◈ TR77: A370 Somerset Avenue approach to M5 J21. Scheme to improve capacity on approach to M5 J21, identified to be delivered through development contributions. ◈ TR83: Enhancements to M5 J20/Ettlingen Way to increase capacity. The schedule notes that the specific scheme has yet to be identified, with options including signalisation; introducing a free-flow slip from Ettlingen Way to the M5 northbound; along with minor widening or road marking changes. We will continue to review the IDP Transport Schedule as further operational assessment work is completed to inform an understanding of SRN impacts. We note that the draft IDP Schedule makes no reference to any capacity improvement scheme at M5 J19 despite the	Infrastructure Delivery Plan We have reviewed the Draft Infrastructure Delivery Plan (IDP) and associated IDP Transport Schedule dated October 2025. We accept that the IDP is a 'live' document and that further amendments may be made prior to submission of the plan and throughout the Examination process. However, based on a review of the IDP Schedule the following items are of interest to National Highways: ◈ TR65: M5 J21 capacity improvements northbound – currently under construction and understood to be part of bridge maintenance scheme. ◈ TR66: M5 J21 bypass linking Wolvershill Road to A370 – funding not currently identified. The schedule advises that other long-term schemes associated with reducing severance and/or improving access to the SRN within the Weston-super-Mare area are to be kept under review. ◈ TR69: Wolvershill strategic site: proposed upgrade of the existing Wolvershill Road bridge over the M5 to enhance active travel connectivity – identified developer contributions/ grant funding. ◈ TR70: Wolvershill strategic site: active travel route between the development and Worle Railway Station & District Centre - Summer Lane Bridge. Understood to be the existing accommodation bridge over the M5 - identified developer contributions/ grant funding. ◈ TR75: M5 J21 - improved signalisation. Identified to be funded through development contributions. ◈ TR77: A370 Somerset Avenue approach to M5 J21. Scheme to improve capacity on approach to M5 J21, identified to be delivered through development contributions. ◈ TR83: Enhancements to M5 J20/Ettlingen Way to increase capacity. The schedule notes that the specific scheme has yet to be identified, with options including signalisation; introducing a free-flow slip from Ettlingen Way to the M5 northbound; along with minor widening or road marking changes. We will continue to review the IDP Transport Schedule as further operational assessment work is completed to inform an understanding of SRN impacts. We note that the draft IDP Schedule makes no reference to any capacity improvement scheme at M5 J19 despite the inclusion of a concept improvement scheme in the modelling work. The need for improvements at this and other SRN junctions will be discussed and reviewed with North Somerset Council and AECOM.	

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						inclusion of a concept improvement scheme in the modelling work. The need for improvements at this and other SRN junctions will be discussed and reviewed with North Somerset Council and AECOM.		
Wolvershill (north of Banwell)							We welcome the need for development adjacent to the M5 motorway in Pill and Easton-in-Gordano to undertake detailed noise modelling to assess noise from the nearby M5. National Highways receives many ineligible requests for compensation from homes in new developments built close to existing motorways, and the early consideration of potential noise issues, masterplanning and mitigation is therefore recommended. We suggest the requirement for detailed noise modelling is also applied to the Wolvershill development (Policy LP1) given its proximity to the M5. The Pre-Submission Plan requires that development of the Land west of Trenchard Road site should not preclude any new motorway junction south of M5 J21. We understand the same restriction is proposed for the Wolvershill site (Policy LP1).	NSC Reg19 Local Plan Consultation.pdf
Land at Lodway Farm							We welcome the need for development adjacent to the M5 motorway in Pill and Easton-in-Gordano to undertake detailed noise modelling to assess noise from the nearby M5. National Highways receives many ineligible requests for compensation from homes in new developments built close to existing motorways, and the early consideration of potential noise issues, masterplanning and mitigation is therefore recommended.	NSC Reg19 Local Plan Consultation.pdf
Land east of Gordano Services							We welcome the need for development adjacent to the M5 motorway in Pill and Easton-in-Gordano to undertake detailed noise modelling to assess noise from the nearby M5. National Highways receives many ineligible requests for compensation from homes in new developments built close to existing motorways, and the early consideration of potential noise issues, masterplanning and mitigation is therefore recommended.	NSC Reg19 Local Plan Consultation.pdf

Name: National Trust **I.D:** 8113089

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Poplar Farm, Nailsea	No	• Consistent with national policy	Unsure	Unsure	In respect of the proposed allocation of Poplar Farm, Nailsea - we consider the allocation unsound in its current form, taking into account NPPF chapter 16 on conserving and enhancing the historic environment. Specifically in respect of Cadbury Camp Iron Age hill fort and "the desirability of sustaining and enhancing the significance of heritage assets". Cadbury Camp, located on the Tickenham Ridge, is open access land and has sweeping views to the south and south west. The Popular Farm site lies due south, and effectively 'juts out' from the urban mass of Nailsea.	A site requirement should be added for 'Tree boundaries to be retained and created to maintain rural views from Cadbury Camp' or words to that effect (similar to the site requirement for 'Land off Pound Lane Nailsea').		

Name: Natural England **I.D:** 51511393

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SP11: Historic and natural environment					Whilst we welcome the specific reference to the establishment and delivery of North Somerset Nature Parks in this policy, we strongly recommend that the Definition of Nature Parks includes reference to the fact that a key feature of Nature Parks will be grazing, preferably using cattle. “Greater Horseshoe bat populations are sustained by foraging habitat which consists primarily of permanently-grazed pastures interspersed with blocks or strips of deciduous woodland or substantial hedgerows.” For Lesser Horseshoe bats, “it has been found that landscapes that were most important contained a high proportion of woodland, parkland and grazed pasture, linked with linear features, such as overgrown hedgerows.” Where a requirement for a Nature Park as mitigation for loss of bat foraging habitat and landscape connectivity has been established, it is key that each Nature Park provides a diversity of prey species for Horseshoe bats. Grazing will be an essential part of land management to achieve this. The requirement to graze areas of land will play a part in determining the locations, sizes and layouts of Nature Parks, due to the need to balance the needs of livestock against factors such as public access. It will be essential that these factors are considered at the outset when masterplanning the strategic development locations, in particular. We also recommend reference to a clear vision for Nature Parks, perhaps through use of a Case Study or Studies to inform the evidence base. Nature Parks can provide multiple ecosystem services, but their primary purpose will be to protect, enhance and connect Horseshoe bat habitat.	We strongly recommend that the Definition of Nature Parks includes reference to the fact that a key feature of Nature Parks will be grazing, preferably using cattle. We also recommend reference to a clear vision for Nature Parks, perhaps through use of a Case Study or Studies to inform the evidence base.		Reg 19 Soundness Response Dec 2025.docx
Policy LP2: Strategic location: Woodspring (south west of Bristol)					As this major allocation is within 600m of a significant Lesser Horseshoe bat maternity roost , our recommendation is that the policy should make clear that, as part of the Nature Park requirement, the development will need to include a generous woodland buffer at the extreme western edge.	The policy should make clear that, as part of the Nature Park requirement, the development will need to include a generous woodland buffer at the extreme western edge.		Reg 19 Soundness Response Dec 2025.docx
Policy DP34: Green infrastructure					We welcome the reference in this policy to the connections between Green Infrastructure within development and green infrastructure corridors, key green infrastructure assets, and the Local Nature Recovery Strategy. Nature Parks should be included in this list. Our recommendation is that an ambitious Green Infrastructure policy should require new Green Infrastructure to not just reflect these assets but connect to and enhance them.	Nature Parks should be included in this list. Our recommendation is that an ambitious Green Infrastructure policy should require new Green Infrastructure to not just reflect these assets but connect to and enhance them.		Reg 19 Soundness Response Dec 2025.docx
Policy DP35: Nature conservation					Habitats Regulations Assessment (AECOM, October 2025) Recreational Pressure and Disturbance - Catchments: We support the recommendation at paragraph 4.15 to use a 7km buffer for potential recreational impacts on the Severn Estuary SAC/SPA. This is supported by recent research, as outlined in the report, and would be consistent with approaches being taken by other authorities around the Severn Estuary. The 7km catchment would capture all the major settlements in the District. A survey bespoke to North Somerset would also inform the details of where mitigation measures would be best targeted to those parts of the SAC/SPA/Ramsar site within the District. We also support the conclusion at paragraph 4.16 that a 7km ZoI for recreational impacts can be considered precautionary for Chew Valley Lake SPA and for Avon Gorge Woodlands SAC. Bat SAC sites and Functionally Linked Land (Paragraph 4.26): The HRA should note the recent update to the Bat SAC Guidance SPD (consultation period just ended at time of writing), which extends the Bat Consultation Zones based on the most recent evidence. Juvenile Sustenance Zones (Band A) are extended to a radius of 5km around maternity sites for Greater Horseshoe bats and to 600m around maternity sites for Lesser Horseshoe bats. Band B is extended to	It is therefore our recommendation that the requirement for a Recreation Management Strategy should be clearly set out in policy. Policy LP2: Woodspring does not currently contain this wording and our recommendation is that the wording recommended by the HRA should be incorporated. Our strong recommendation is that the recommended text regarding atmospheric pollution is included in policy in order to highlight the issue and make it clear that development of a model which accounts for the effects of		Reg 19 Soundness Response Dec 2025.docx

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					12km for Greater Horseshoe bats and 2.3km for Lesser Horseshoe bats. Band C is extended to 16km for Greater Horseshoe bats and to 6km for Lesser Horseshoe bats. These figures derive from the most up to date evidence from the North Somerset Greater Horseshoe bat maternity colony. The HRA concludes that an 8km zone is a reasonably precautionary distance for defining the area of greatest importance for a Greater Horseshoe bat colony. We accept this precautionary figure and welcome paragraph 6.61 which notes that both the Wolvershill and Woodspring allocations should be considered from the outset for the importance of the habitat used by Greater Horseshoe bats in these areas. We support the conclusion that 4km is a reasonably precautionary distance for defining the area of greatest importance for a Lesser Horseshoe bat colony. Recreation Management Strategy for the Severn Estuary SPA/Ramsar/SAC: Paragraph 6.15 of the HRA concludes that the North Somerset Local Plan should contain a Recreation Management Strategy …"at least in outline (including a developer charging strategy) when the NSLP [is] submitted for Examination and available for implementation by the time of adoption of the Local Plan. The NSLP would also need a policy identifying the recreation management strategy, the core catchment that would be covered, what the management strategy would broadly entail and the principle behind the developer charging scheme." Paragraph 6.16 contains recommended policy wording allowing for the development of Recreation Management Strategies for the Severn Estuary SPA/Ramsar/SAC site. Paragraph 6.22 concludes that, with the inclusion of the two points above in the Local Plan, there is sufficient policy framework in place to justify a conclusion of no adverse effects on the integrity of the Severn Estuary through recreational pressure. The Regulation 19 Local Plan does not contain the policy wording recommended above. Only the Justification text to Policy DP35 mentions that "there may be a need for mitigation which proposals will have to address." The justification text goes on to state that, "Subject to further investigation, this may require the preparation of recreational management strategies for the Severn Estuary SPA/Ramsar site and Avon Gorge Woodlands SAC, and air quality impacts of increased traffic on the A4 and A369 within 200m of Avon Gorge Woodlands SAC, and in both cases working with adjacent local authorities." The HRA has concluded that a Recreation Management Strategy is likely to be a requirement in order to prevent adverse impacts on the Severn Estuary SPA/Ramsar site from recreational pressure arising from development allocated by the Local Plan. It is therefore our recommendation that the requirement for a Recreation Management Strategy should be clearly set out in policy. We will continue to support the Council in the preparation of the evidence base to underpin a Recreation Management Strategy or Strategies, as well as options for specific features of the strategy/ies. It remains our view that visitor surveys will need to be specifically targeted to highly sensitive areas for SPA species, as well as areas of Functionally Linked Land, and that locally focussed management strategies may be most appropriate. Recreational pressure on the Avon Gorge Woodlands SAC: As the Woodspring allocation is the main allocation in the Local Plan delivering residential development within the catchment of the SAC, paragraph 6.32 of the HRA specifically recommends the adoption of similar wording for the Woodspring allocation to that used in the Bristol Local Plan. This wording acknowledges the potential for recreational pressures on the SAC arising from the development of new homes in this location. Policy LP2: Woodspring does not currently contain this wording and our recommendation is that the wording recommended by the HRA should be incorporated. Loss of Functionally Linked Habitat – Horseshoe bats: At paragraph 6.81, the HRA concludes that the Local Plan contains sufficient policy framework to protect Functionally Linked Land associated with the North Somerset and Mendip Bats SAC and thus ensure no adverse effects on the SAC. We support this conclusion, subject to our first point about the importance of grazing, above.	development across local authority areas will require co-operation and adequate time for its development.		

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					Atmospheric Pollution: Paragraph 6.93 recommends specific policy text to set a framework for “down the line” investigation of air quality issues as part of the masterplanning of land use allocations, both for North Somerset and in combination with neighbouring authorities. We note that policy DP35 contains reference to these investigations as part of the HRA process and the justification text for DP35 specifically mentions the A4 and A369 close to Avon Gorge Woodlands SAC. Our strong recommendation is that the recommended text is included in policy in order to highlight the issue and make it clear that development of a model which accounts for the effects of development across local authority areas will require co-operation and adequate time for its development.			

Name: Neil Archibald **I.D:** 62676993

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Land to the west of Elborough						I am submitting this representation to object to the proposed allocation HE20637, HE20237 & HE201040 in the Publication Local Plan 2039. The site lies south of Banwell Road and adjoins Elborough. My objection is based on material planning grounds relevant to the tests of soundness. 1. Brownfield Context – Why Previous Elborough Development was approved, Elborough’s recent growth occurred solely on the former Aerojet’s industrial site, a derelict and redundant brownfield plot. Redevelopment was justified because it regenerated previously developed land, removed obsolete structures, and did not extend the previously developed land into open countryside. The above allocations are entirely undeveloped agricultural land forming part of Elborough’s rural setting, making its proposed allocation fundamentally different and unjustified. 2. Unsustainable Location and Car Dependency. Elborough lacks additional essential services including a school, GP surgery, shop, with limited public transport, with additional housing. Residents would be dependent on private cars for daily needs. Safe pedestrian or cycling routes to services would result in a trip greater than 15mins. The nearest shops is either Asda filling station or Co-op in Banwell, both over 1.5 miles from the centre of proposed development. 3. Highway Constraints. Banwell Road already experiences severe congestion and limited pedestrian safety. Additional vehicle movements from this site would worsen traffic pressures and increase safety risks. No evidence has been provided to show that safe access or active travel improvements are deliverable. In providing footpaths, bus stops, cycle paths and visibility spays, will increase the width of the highway known as Banwell Road. In turn, forcing the proposed development further towards the Flood Zone. Development to the north will put a strain on the old Banwell Road, with further congestion on the A371. 4. Landscape and Settlement Impact. The site forms part of the open rural landscape that defines the setting of Elborough. Development would introduce a prominent urban edge, eroding village character and contributing towards the merger with Locking village. 5. Ecology Objection. Sites HE20637, HE20237 & HE201040 lies within a sensitive countryside corridor that supports a range of native species and contributes to the ecological network around Elborough. The site contains established native hedgerows, which are priority habitats and important movement routes for wildlife. Development would fragment these corridors and permanently remove high-value habitat. The area for development is a designated area known as Density Band C; this is an area for consultation in protecting Lesser Horseshoe Bats. The fields and surrounding ditches support birds, owls, amphibians, and small mammals. Without robust ecological evidence, the allocation cannot be considered justified or deliverable. 6. Drainage and Flooding Risks. Sites HE20637, HE20237 & HE201040 sits within a low-lying landscape where water naturally collects from all directions. The fields regularly display standing water after rainfall, indicating poor infiltration and a high-water table. The area relies on a historic network of rhynes and drainage ditches already close to capacity. Increasing impermeable surfaces			

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						would intensify runoff, raising flood risk to existing homes. This would ultimately place residents buildings insurance at high policy value, or uninsurable. There is clear and outstanding evidence of regular flooding in this area of Banwell Road above and beyond the indication of the flood Zone map. 7. Hutton Parish Council Response. Hutton Parish Council has also objected to the inclusion of approx. 400 houses and related growth around Elborough, drawing on extensive evidence from the Hutton Parish Survey Report (Feb 2021). The survey showed overwhelming community opposition to development beyond the settlement boundary (86%) and specifically near Elborough (83%). • The Parish Council highlights several material planning issues that directly support this objection. • The loss of green landscape and strategic gaps between Hutton, Elborough and Locking. • The absence of safe pedestrian or cycling routes to essential village facilities. • Lack of local amenities and community infrastructure. • Severe limitations on the local road network, including narrow rural lanes and increases in traffic through the Hutton 20mph zone. • The unsustainable scale of growth proposed relative to available services, schools, and public transport. Their findings reinforce that HE20637, HE20237 & HE201040 is neither appropriate nor sustainable, and that its allocation conflicts with both community evidence and the Parish Council's long-standing strategy to protect open countryside and maintain distinct settlement identities. 8. Other near and or Future Developments. There are also several nearby sites that already have planning permission, and allocated, or are earmarked for future development that sit in far more sustainable and strategic locations than HE20637, HE20237 & HE201040, under the "Call For Land" scheme. The new Banwell bypass will unlock development clusters with the space and capacity to deliver the supporting infrastructure that new housing requires, including shops, healthcare provision, schools and safe transport links. In contrast, Weston-Super-Mare, Locking, Locking Parklands, Banwell and West Wick all contain areas specifically identified for growth, where services, road capacity, public transport and active-travel connections already exist or can be viably expanded. These locations are demonstrably more capable of contributing to North Somerset's housing need without dispersing development into isolated rural land such as HE20637, HE20237 & HE201040. Conclusion For the reasons above, HE20637, HE20237 & HE201040 should be removed from the Local Plan. I request that this objection is formally recorded and considered at examination.		
Land north of Banwell Road, Locking /Elborough						I am submitting this representation to object to the proposed allocation HE20637, HE20237 & HE201040 in the Publication Local Plan 2039. The site lies south of Banwell Road and adjoins Elborough. My objection is based on material planning grounds relevant to the tests of soundness. 1. Brownfield Context – Why Previous Elborough Development was approved, Elborough's recent growth occurred solely on the former Aerojet's industrial site, a derelict and redundant brownfield plot. Redevelopment was justified because it regenerated previously developed land, removed obsolete structures, and did not extend the previously developed land into open countryside. The above allocations are entirely undeveloped agricultural land forming part of Elborough's rural setting, making its proposed allocation fundamentally different and unjustified. 2. Unsustainable Location and Car Dependency. Elborough lacks additional essential services including a school, GP surgery, shop, with limited public transport, with additional housing. Residents would be dependent on private cars for daily needs. Safe pedestrian or cycling routes to services would result in a trip greater than 15mins. The nearest shops is either Asda filling station or Co-op in Banwell, both over 1.5 miles from the centre of proposed development. 3. Highway Constraints. Banwell Road already experiences severe congestion and limited pedestrian safety. Additional vehicle movements from this site would worsen traffic pressures and increase safety risks. No evidence has been provided to show that safe access or active travel improvements are deliverable. In providing footpaths, bus stops, cycle paths and visibility spays, will increase the width of the highway known as Banwell Road. In turn, forcing the proposed development further towards the Flood Zone. Development to the north will put a strain on the old Banwell Road, with further congestion on the A371. 4. Landscape and Settlement Impact. The site forms part of the open rural landscape that defines the setting of Elborough. Development would introduce a prominent urban edge, eroding village character and contributing towards the merger with Locking village. 5. Ecology Objection. Sites HE20637, HE20237 & HE201040 lies within a sensitive countryside corridor that supports a range of native species		

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					and contributes to the ecological network around Elborough. The site contains established native hedgerows, which are priority habitats and important movement routes for wildlife. Development would fragment these corridors and permanently remove high-value habitat. The area for development is a designated area known as Density Band C; this is an area for consultation in protecting Lesser Horseshoe Bats. The fields and surrounding ditches support birds, owls, amphibians, and small mammals. Without robust ecological evidence, the allocation cannot be considered justified or deliverable. 6. Drainage and Flooding Risks. Sites HE20637, HE20237 & HE201040 sits within a low-lying landscape where water naturally collects from all directions. The fields regularly display standing water after rainfall, indicating poor infiltration and a high-water table. The area relies on a historic network of rhynes and drainage ditches already close to capacity. Increasing impermeable surfaces would intensify runoff, raising flood risk to existing homes. This would ultimately place residents buildings insurance at high policy value, or uninsurable. There is clear and outstanding evidence of regular flooding in this area of Banwell Road above and beyond the indication of the flood Zone map. 7. Hutton Parish Council Response. Hutton Parish Council has also objected to the inclusion of approx. 400 houses and related growth around Elborough, drawing on extensive evidence from the Hutton Parish Survey Report (Feb 2021). The survey showed overwhelming community opposition to development beyond the settlement boundary (86%) and specifically near Elborough (83%). • The Parish Council highlights several material planning issues that directly support this objection. • The loss of green landscape and strategic gaps between Hutton, Elborough and Locking. • The absence of safe pedestrian or cycling routes to essential village facilities. • Lack of local amenities and community infrastructure. • Severe limitations on the local road network, including narrow rural lanes and increases in traffic through the Hutton 20mph zone. • The unsustainable scale of growth proposed relative to available services, schools, and public transport. Their findings reinforce that HE20637, HE20237 & HE201040 is neither appropriate nor sustainable, and that its allocation conflicts with both community evidence and the Parish Council's long-standing strategy to protect open countryside and maintain distinct settlement identities. 8. Other near and or Future Developments. There are also several nearby sites that already have planning permission, and allocated, or are earmarked for future development that sit in far more sustainable and strategic locations than HE20637, HE20237 & HE201040, under the "Call For Land" scheme. The new Banwell bypass will unlock development clusters with the space and capacity to deliver the supporting infrastructure that new housing requires, including shops, healthcare provision, schools and safe transport links. In contrast, Weston-Super-Mare, Locking, Locking Parklands, Banwell and West Wick all contain areas specifically identified for growth, where services, road capacity, public transport and active-travel connections already exist or can be viably expanded. These locations are demonstrably more capable of contributing to North Somerset's housing need without dispersing development into isolated rural land such as HE20637, HE20237 & HE201040. Conclusion For the reasons above, HE20637, HE20237 & HE201040 should be removed from the Local Plan. I request that this objection is formally recorded and considered at examination.			

Name: Neil Wolstencroft **I.D:** 32388897

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Policy LP4: Strategic location: Pill and	No	Justified	No	No	The Central Government imposed a new housing target on North Somerset Council. This target does not accommodate environmental constraints such as flood risk, transport or local infrastructure requirements. Pill and Easton Gordano is a small village of circa 2000 dwellings. It has been disproportionately targeted for new dwellings by North Somerset council. Out of the 8,600 dwellings proposed in the update plan, 1,100 are earmarked for Pill and EIG. This represents approximately 12.5% of the new dwellings despite Pill and EIG comprising less than 2% of the dwelling in North	The plan needs to be referred back to North Somerset Council for review and update. The plan	Not Applicable	

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Easton-in-Gordano					Somerset. There was no public consultation on this planning held in Pill and EIG. Other areas in North Somerset held open public consultations in the local area for members of the public to view and comment on the plans. The previously agreed local plan which was approved by ballot by the local residents has been largely ignored by North Somerset Council. None of the large development sites currently in the proposal were in the previous version of the local plan. The developments in Pill are on prime green belt land (especially Pill Green). Central Government policy is to develop on brownfield sites or failing that low quality agricultural land. This has been confirmed to me in writing by my MP Sadik Al Hassan. In conclusion the plan is not sound, legally compliant, sustainable or prepared in line with North Somerset Councils Duty to co-operate	needs to have a realistic housing target for the area that will enable the council to meet local infrastructure, environmental, transport and other constraints in the Pill and EIG area.		

Name: Nempnett Thrubwell Parish Council **I.D:** 62792161

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SP7: Green Belt						The summary of the provided policies is as follows: Nempnett Thrubwell Parish Council expresses concerns about the release of Green Belt land at Bristol Airport and argues that the proposed compensatory areas do not adequately offset these losses. Felton Common's omission from the Local Plan is highlighted, with a call for explicit protection measures.		
SP10: Transport						On transport infrastructure, the council insists on thorough consultation regarding the Mass Transit link to Bristol Airport, emphasising the need for rural communities to be considered.		
Policy LP12: Bristol Airport						On transport infrastructure, the council insists on thorough consultation regarding the Mass Transit link to Bristol Airport, emphasising the need for rural communities to be considered. Regarding Bristol Airport's growth, support is given to a mass transit link only if directly tied to passenger increases, with a firm stance against expansion beyond 12 million passengers per annum unless transit provision is in place. The council requests stronger policy wording to include reductions in impacts, especially night flights, and advocates for cumulative environmental and economic assessments for any future airport expansion.		

Name: Network Rail **I.D:** 39402529

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Policy LP3: Strategic location: Nailsea and Backwell					Policy LP3: Strategic location: Nailsea and Backwell We welcome proposals that new growth here be well connected to the station but would note the limited facilities and accessibility currently available at the station. It would be desirable for improvements to the station to be funded and planned alongside the housing growth (acknowledging the difficulties associated with the elevated location of the current station). This has been previously mentioned in local plan responses to North Somerset Council We would suggest the plans for the Cross-Rail road link under the railway to the east of the existing station provide an opportunity to consider whether a new, improved station could be built adjacent to the new road. Grove Farm Allocation We consider that the plan should be positively prepared, justified, effective, and consistent with			Network Rail LDP comments.pdf

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					national policy. In relation to transport and infrastructure, we support policies that promote sustainable growth and integrated transport solutions., however we wish to highlight the following regarding the Grove Farm allocation. It should be noted that NR previously made comments on the EIA Scoping opinion in 2023/2024 for the proposed development at Grove Farm where we lodged an objection due to the increase in risk the development would cause to Grant Mills Footpath Level Crossing. We have since continued the objection to this site as without appropriate mitigation for the level crossing NR can not deem the development acceptable in safety terms due to the impact a development of this size with have on the use, and risks associated, of Grant Mills. Network Rail have provided both the Local Planning Authority and the developer with the costs of suitable mitigation. If development proceeds on this site allocation, appropriate mitigation will be necessary. This should be in the form of a grade-separated crossing or a suitable diversion of the Public Right of Way (PROW). The local plan policy should explicitly acknowledge this requirement by including policy wording that ensures the need to assess and provide mitigation at this location. As Network Rail is a publicly funded organisation with a regulated remit, it would be unreasonable to expect Network Rail to finance rail improvements arising from commercial development. Therefore, it is appropriate that developer contributions are secured to fund such improvements. We have previously included policies in other local plans for similar schemes: • The Cherwell Local Plan 2011-2031 (Part 1) Partial Review – Oxford's Unmet Housing Need- Policy PR8 – Land East of the A44 (see attachment for detailed policy wording) • Sedgemoor District Council Local Plan 2011 – 2032 (Adopted 20 February 2019) -Policy D14 - Managing the Transport Impacts of Development (page 133) (see attachment for detailed policy wording) Any development of land which would result in a material increase or significant change in the character of traffic using rail crossings should be refused unless, in consultation with Network Rail, it can either be demonstrated that the safety will not be compromised, or where safety is compromised serious mitigation measures would be incorporated to prevent any increased safety risk as a requirement of any permission. The plan should include a specific policy for this site, requiring Assessment of the impact of development on this level crossing. The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the rail volume or a material change in the character of traffic using a level crossing over a railway:- • (Schedule 4 (j) of the Town & Country Planning (Development Management Procedure) Order, 2015) requires that "…development which is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway" (public footpath, public or private road) the Planning Authority's Highway Engineer must submit details to both the Secretary of State for Transport and Network Rail for separate approval.			
Policy LP11: Transport infrastructure, allocations and safeguarding					Network Rail welcome the safeguarded 10 m corridor along rail routes. We have previously queried the continued safeguarding of the 'Southern Rail Chord', which appears to hark back to a historic idea for a new alignment, and does not feature in current strategic plans for the local network. With regards to the extension and reopening of platforms, Network Rail seek further clarification on whether there is a specific driver behind each of the platform extensions. Is there a specific operational or capacity issue driving these proposals, particularly in relation to current or anticipated passenger demand? We recognise the need to extend platforms at Worle to accommodate future XC train services however, the justification for similar works at Yatton, Nailsea, and Weston Milton is less clear.			Network Rail LDP comments.pdf

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					We also wish to emphasise our support for the development of integrated transport hubs at railway stations, which will enhance connectivity and improve the overall passenger experience.			
Policy DP32: Waste management facilities					Under this policy, the carrying of waste to/from Western-super-mare by rail is favoured. Network Rail are supportive of growth in rail freight but note that investment would be required in suitable loading/ unloading facilities there. Our freight team can assist with discussing what would be possible.			Network Rail LDP comments.pdf
Grove Farm					We consider that the plan should be positively prepared, justified, effective, and consistent with national policy. In relation to transport and infrastructure, we support policies that promote sustainable growth and integrated transport solutions., however we wish to highlight the following regarding the Grove Farm allocation. It should be noted that NR previously made comments on the EIA Scoping opinion in 2023/2024 for the proposed development at Grove Farm where we lodged an objection due to the increase in risk the development would cause to Grant Mills Footpath Level Crossing. We have since continued the objection to this site as without appropriate mitigation for the level crossing NR can not deem the development acceptable in safety terms due to the impact a development of this size with have on the use, and risks associated, of Grant Mills. Network Rail have provided both the Local Planning Authority and the developer with the costs of suitable mitigation. If development proceeds on this site allocation, appropriate mitigation will be necessary. This should be in the form of a grade-separated crossing or a suitable diversion of the Public Right of Way (PROW). The local plan policy should explicitly acknowledge this requirement by including policy wording that ensures the need to assess and provide mitigation at this location. As Network Rail is a publicly funded organisation with a regulated remit, it would be unreasonable to expect Network Rail to finance rail improvements arising from commercial development. Therefore, it is appropriate that developer contributions are secured to fund such improvements. We have previously included policies in other local plans for similar schemes: • The Cherwell Local Plan 2011-2031 (Part 1) Partial Review – Oxford's Unmet Housing Need- Policy PR8 – Land East of the A44 (see attachment for detailed policy wording) • Sedgemoor District Council Local Plan 2011 – 2032 (Adopted 20 February 2019) -Policy D14 - Managing the Transport Impacts of Development (page 133) (see attachment for detailed policy wording) Any development of land which would result in a material increase or significant change in the character of traffic using rail crossings should be refused unless, in consultation with Network Rail, it can either be demonstrated that the safety will not be compromised, or where safety is compromised serious mitigation measures would be incorporated to prevent any increased safety risk as a requirement of any permission. The plan should include a specific policy for this site, requiring Assessment of the impact of development on this level crossing. The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the rail volume or a material change in the character of traffic using a level crossing over a railway:- • (Schedule 4 (j) of the Town & Country Planning (Development Management Procedure) Order, 2015) requires that "…development which is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway" (public footpath, public or private road) the Planning Authority's Highway Engineer must submit details to both the Secretary of State for Transport and Network Rail for separate approval.			Network Rail LDP comments.pdf
Corridor							Network Rail welcome the	Network Rail

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extending 10 metres either side of the railway land boundary fence to allow for access and double track							safeguarded 10 m corridor along rail routes.	LDP comments.pdf
Weston Southern Rail Chord – potential future alignment					We have previously queried the continued safeguarding of the 'Southern Rail Chord', which appears to hark back to a historic idea for a new alignment, and does not feature in current strategic plans for the local network.			Network Rail LDP comments.pdf
Weston-super-Mare railway station – bay platform re-opening					With regards to the extension and reopening of platforms, Network Rail seek further clarification on whether there is a specific driver behind each of the platform extensions. Is there a specific operational or capacity issue driving these proposals, particularly in relation to current or anticipated passenger demand? We recognise the need to extend platforms at Worle to accommodate future XC train services however, the justification for similar works at Yatton, Nailsea, and Weston Milton is less clear. We also wish to emphasise our support for the development of integrated transport hubs at railway stations, which will enhance connectivity and improve the overall passenger experience.			Network Rail LDP comments.pdf
Weston Milton railway station					With regards to the extension and reopening of platforms, Network Rail seek further clarification on whether there is a specific driver behind each of the platform extensions. Is there a specific operational or capacity issue driving these proposals, particularly in relation to current or anticipated passenger demand? We recognise the need to extend platforms at Worle to accommodate future XC train services however, the justification for similar works at Yatton, Nailsea, and Weston Milton is less clear. We also wish to emphasise our support for the development of integrated transport hubs at railway stations, which will enhance connectivity and improve the overall passenger experience.			Network Rail LDP comments.pdf
Worle railway station					With regards to the extension and reopening of platforms, Network Rail seek further clarification on whether there is a specific driver behind each of the platform extensions. Is there a specific operational or capacity issue driving these proposals, particularly in relation to current or anticipated passenger demand? We recognise the need to extend platforms at Worle to accommodate future XC train services however, the justification for similar works at Yatton, Nailsea, and Weston Milton is less clear. We also wish to emphasise our support for the development of integrated transport hubs at railway stations, which will enhance connectivity and improve the overall passenger experience.			Network Rail LDP comments.pdf
Yatton railway station					With regards to the extension and reopening of platforms, Network Rail seek further clarification on whether there is a specific driver behind each of the platform extensions. Is there a specific operational or capacity issue driving these proposals, particularly in relation to current or anticipated passenger demand? We recognise the need to extend platforms at Worle to accommodate future XC train services however, the justification for similar works at Yatton, Nailsea, and Weston Milton is less clear. We also wish to emphasise our support for the development of integrated transport hubs at railway stations, which will enhance connectivity and improve the overall passenger experience.			Network Rail LDP comments.pdf
Nailsea Backwell railway station								Network Rail LDP comments.pdf
Weston-super-Mare railway station							We wish to emphasise our support for the development of integrated transport hubs at railway stations, which will enhance connectivity and	Network Rail LDP comments.pdf

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							improve the overall passenger experience.	
Weston Milton railway station							We wish to emphasise our support for the development of integrated transport hubs at railway stations, which will enhance connectivity and improve the overall passenger experience.	Network Rail LDP comments.pdf
Worle railway station – including Transport Hub and railway station car park expansion							We wish to emphasise our support for the development of integrated transport hubs at railway stations, which will enhance connectivity and improve the overall passenger experience.	Network Rail LDP comments.pdf
Yatton railway station							We wish to emphasise our support for the development of integrated transport hubs at railway stations, which will enhance connectivity and improve the overall passenger experience.	Network Rail LDP comments.pdf
Nailsea Backwell railway station							We wish to emphasise our support for the development of integrated transport hubs at railway stations, which will enhance connectivity and improve the overall passenger experience.	Network Rail LDP comments.pdf

Name: Nic Wills **I.D:** 62549569

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I completely disagree with the proposal to add an additional 1000 houses to Backwell. We are such a small area with very limited resources that it is just not sustainable for this area. Backwell has already had over 800 new houses approved and any more would lead to complete overdevelopment and destruction of this village. As a long time resident here, I do understand that new houses need to be built for our growing population, however, these lands that the new houses are proposed to be built on, are known to be a floodplain, houses valuable wildlife and (not only losing the green belt) it is high-quality agricultural land. As residents, we struggle enough to get a doctor appointment, let alone with a further 1000+ residents. I notice that there has been no proposal to invest in any health or leisure facilities. The local roads are not fit for purpose as it is…..with out further traffic. When station road has been closed (either due to roadworks or an accident) all the traffic goes through the back roads of moorfield/westfield and its absolute chaos – with lorries and large vans trying to negotiate the small roads. The proposed new road which will come out onto station road (near Backwell lake) would potentially divert traffic away from the crossroads, but to what cost? These fields flood constantly, so having a load of tarmac on there is surely only going to make it worse? When I attended the meeting, not only was the road there, there was a traffic hub and potentially warehouse buildings. Where exactly will all the water go that runs off bucklands batch? I will be one big tarmac runway. And has anyone actually taken a look at the roads under the railway bridges on Backwell			

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					common? Whenever there is huge downpours, cars always get stuck under there due to flooding of over 6ft. When I attended the first meeting, there was talk of building a new school. Has anyone actually checked that Backwell needs it? There is a deficit in school places as it is. Plus the new development of 515 homes has already agreed to a new school. Backwell has no employment here. yes it is close to commute to Bristol or Weston, but the train station is inaccessible for anyone with mobility issues and families with children in buggies. I would reject this whole plan.			

Name: Nicholas Ball **I.D:** 62850273

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SP10: Transport	No	• Consistent with national policy	Unsure	No	No proper assessment of the suitability of the only access road , the A369, has been carried out.	My comment is to doubt the soundness of the proposal as it would appear no proper assessment of the suitability of the only access road , the A369, has been carried out. The A369 has been at full capacity for some time, more recently Bristol has introduced a Pollution Charging Zone for which the A369 is exempt and the A369 has seen a big increase in traffic particularly HGVs. It is also a main route to Bristol Airport which itself is rapidly expanding There are 4 problem areas for the A369 which have been ignored, 1) The junction with the M5, difficulty accessing the A369 causes queuing stationery traffic on the motorway which is a concern to the authorities. 2) At Abbots Leigh the A369 narrows on the brim of a hill and buses and HGVs are too wide to pass each other causing tailbacks. 3) Where the A369 meets the long Ashton bypass there are frequently long tail backs particularly at rush hour or when there are events at Ashton Gate Stadium. 4) The road often floods in the Leigh woods area The report suggests the proposed new rail link from Portishead to Bristol with a stop at Pill will help, but omits to mention the train proposals are for just a single 3 carriage train once an hour which is unlikely to have any room when it gets to Pill. A proper assessment of the issues facing the A369 in view of the extra traffic created by the development		

Name: Nicholas Rossiter **I.D:** 62741249

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Nightingale Gardens, Nailsea	No	• Positively prepared • Justified • Effective	Unsure	Unsure	I am writing as a resident of nailsea to lodge a formal and strong objection to the above-referenced planning application. This proposal is fundamentally flawed and, if approved, would cause catastrophic and irreversible damage to the existing community, primarily due to the complete lack of necessary supporting infrastructure and community facilities. The proposed scale of development is wholly disproportionate to the capacity of nailsea and amounts to a destruction of the town's character and viability, rendering it unsustainable for both new and existing residents. 1. Inadequate Physical Infrastructure and Utility Capacity The current infrastructure of nailsea already under strain and is entirely incapable of supporting the significant increase in demand that this development would create: Road Network & Traffic: The local road network, consisting primarily of narrow B-roads, and already busy main roads is inadequate for the projected increase in traffic. This will lead to severe and dangerous congestion, impacting emergency service access and daily commutes. The current proposal lacks credible plans for necessary road widening, new junctions, or robust traffic calming measures that are proportionate to the development size. Drainage and Flooding: The existing drainage and sewage systems are aging and frequently struggle during heavy rainfall. Adding hundreds of new properties will overwhelm these systems, significantly increasing the risk of flooding and environmental damage in the area. Utilities: There has been no compelling evidence provided that the utility providers (water, gas, electricity) have			

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					confirmed the capacity to serve this development without causing service disruption, pressure drops, or voltage issues for existing properties. 2. Overburdening of Essential Public Services and Facilities The proposal fails to account for the impact on essential public services, which are already operating at or beyond maximum capacity: Healthcare Services (GPs and Clinics): Access to local healthcare is already a critical issue, with waiting times for routine GP appointments currently exceeding [e.g., two weeks]. The influx of hundreds of new residents will immediately collapse the existing healthcare provision, making access to basic medical care impossible for the entire community.			

Name: Nick Bowler **I.D:** 31072737

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Vision, Strategic Priorities and Sustainability Objectives	Unsure	• Consistent with national policy	Unsure	Unsure	I am concerned about potential housing developments adjacent to Elborough Village, both in the fields across the Banwell Road, and in the field between Elborough Village and Elborough Farm. I feel that these developments would be in direct conflict with the following: Extracts from the “Vision” • To prioritise the location of new development close to places with a wide range of services, facilities and job opportunities. • To reduce car use, encourage walking and cycling, and high quality and effective public transport. • To address the decline in the town centres • To prioritise the importance and delivery of green spaces when considering new development, support priority habitats and species, and safeguard areas at risk of flooding.	Potential housing developments adjacent to Elborough Village, both in the fields across the Banwell Road, and in the field between Elborough Village and Elborough Farm should be excluded from the plan as they are on agricultural land. They include established hedges and trees which are home to a variety of wildlife including roosting bats, badgers, hedgehogs and deer. These fields are integral to the character of the village and developments would adversely affect the environment and residents.		
Sustainable development objectives	Unsure		Unsure	Unsure	I am concerned about potential housing developments adjacent to Elborough Village, both in the fields across the Banwell Road, and in the field between Elborough Village and Elborough Farm. I feel that these developments would be in direct conflict with the following: Extract from “Sustainable development objectives” 2.5 Achieve healthy living opportunities – promoting good access to healthcare centres, open spaces, public rights of way, walking and cycling opportunities, and outdoor leisure activities. 3.2 Minimise vulnerability to all forms of flooding, now or in the future, without increasing flood risk elsewhere. 3.4 Minimise impact on, and where appropriate enhance, sensitive landscapes. 3.6 Protect and where possible enhance biodiversity, geodiversity and green infrastructure and allow its adaptation to climate change, particularly with respect to protected habitats and species.	Both of these potential housing developments adjacent to Elborough Village, both in the fields across the Banwell Road, and in the field between Elborough Village and Elborough Farm should be excluded from the plan. There are no pavements along the road into Hutton making walking and cycling difficult, if not dangerous. There are no local healthcare centres, shops or other facilities which could be accessed on foot or cycle. The area is very low lying (approximately 10 metres above sea level, and is already subject to flooding. More roads and driveways would add to this problem. These developments would adversely affect the natural environment and biodiversity.		

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Strategic Policies	No	• Consistent with national policy		Unsure	I am concerned about potential housing developments adjacent to Elborough Village, both in the fields across the Banwell Road, and in the field between Elborough Village and Elborough Farm. I feel that these developments would be in direct conflict with the following: Policy SP1: Sustainable development • Prioritise walking and cycling, maximise the use of effective public transport and encourage the creation of liveable neighbourhoods; • Protect valued natural and historic assets and support green infrastructure and biodiversity; Policy SP2: Climate change • Reduce the risk of flooding both now and in the future, taking account of predicted sea level rises and the impact on areas vulnerable to coastal change; • Deliver green infrastructure and provide a net gain in biodiversity; Policy SP10: Transport • Delivery of attractive, safe, and inclusive routes for walking and cycling which are well integrated into existing networks and provide access to effective and frequent public transport; Policy SP11: Historic and natural environment • Conserve and enhance the landscape and scenic beauty of the Mendip Hills National Landscape and the wildlife and cultural heritage, including ensuring that development in its setting is sensitively located and designed to avoid or minimise adverse impacts; • Protect the best and most versatile agricultural land; • Conserve, restore and enhance priority habitats, ecological networks and the protection and recovery of priority species; • Ensure that the design and construction of spaces and buildings encourages wildlife and biodiversity; • Support the establishment and delivery of North Somerset Nature Parks to protect and enhance internationally important bat habitats, foraging opportunities and connectivity through the landscape, and mitigate the impacts of development; • Retain existing trees and support new planting, including street trees, and woodland creation to help increase district-wide canopy cover;	Both of these potential housing developments adjacent to Elborough Village, both in the fields across the Banwell Road, and in the field between Elborough Village and Elborough Farm should be excluded from the plan. They would not support the following policies; Policy SP1: Sustainable development • Prioritise walking and cycling, maximise the use of effective public transport and encourage the creation of liveable neighbourhoods; • Protect valued natural and historic assets and support green infrastructure and biodiversity; Policy SP2: Climate change • Reduce the risk of flooding both now and in the future, taking account of predicted sea level rises and the impact on areas vulnerable to coastal change; • Deliver green infrastructure and provide a net gain in biodiversity; Policy SP10: Transport • Delivery of attractive, safe, and inclusive routes for walking and cycling which are well integrated into existing networks and provide access to effective and frequent public transport; Policy SP11: Historic and natural environment • Conserve and enhance the landscape and scenic beauty of the Mendip Hills National Landscape and the wildlife and cultural heritage, including ensuring that development in its setting is sensitively located and designed to avoid or minimise adverse impacts; • Protect the best and most versatile agricultural land; • Conserve, restore and enhance priority habitats, ecological networks and the protection and recovery of priority species; • Ensure that the design and construction of spaces and buildings encourages wildlife and biodiversity; • Support the establishment and delivery of North Somerset Nature Parks to protect and enhance internationally important bat habitats, foraging opportunities and connectivity through the landscape, and mitigate the impacts of development; • Retain existing trees and support new planting, including street trees, and woodland creation to help increase district-wide canopy cover;		
Land to the west of Elborough	No	• Consistent with national policy	Unsure	Unsure	I am concerned about potential housing developments adjacent to Elborough Village, both in the fields across the Banwell Road, and in the field between Elborough Village and Elborough Farm. I feel that these developments would be in direct conflict with the following: Extracts from the “Vision” • To prioritise the location of new development close to places with a wide range of services, facilities and job opportunities.	Both of these potential housing developments adjacent to Elborough Village, both in the fields across the Banwell Road, and in the field between Elborough Village and Elborough Farm should be excluded from the plan. These fields are agricultural land and integral to the character of the village. They are populated with established trees and hedges which are home to many species of wildlife including bats, deer, badgers, hedgehogs and birds. These green areas are a key reason for many people moving into the area and the loss of them would be detrimental to the environment and to the residents.		

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					• To reduce car use, encourage walking and cycling, and high quality and effective public transport. • To address the decline in the town centres • To prioritise the importance and delivery of green spaces when considering new development, support priority habitats and species, and safeguard areas at risk of flooding. I feel that these developments would be in direct conflict with the following: Policy SP1: Sustainable development • Prioritise walking and cycling, maximise the use of effective public transport and encourage the creation of liveable neighbourhoods; • Protect valued natural and historic assets and support green infrastructure and biodiversity; Policy SP2: Climate change • Reduce the risk of flooding both now and in the future, taking account of predicted sea level rises and the impact on areas vulnerable to coastal change; • Deliver green infrastructure and provide a net gain in biodiversity; Policy SP10: Transport • Delivery of attractive, safe, and inclusive routes for walking and cycling which are well integrated into existing networks and provide access to effective and frequent public transport; Policy SP11: Historic and natural environment • Conserve and enhance the landscape and scenic beauty of the Mendip Hills National Landscape and the wildlife and cultural heritage, including ensuring that development in its setting is sensitively located and designed to avoid or minimise adverse impacts; • Protect the best and most versatile agricultural land; • Conserve, restore and enhance priority habitats, ecological networks and the protection and recovery of priority species; • Ensure that the design and construction of spaces and buildings encourages wildlife and biodiversity; • Support the establishment and delivery of North Somerset Nature Parks to protect and enhance internationally important bat habitats, foraging opportunities and connectivity through the landscape, and mitigate the impacts of development; • Retain existing trees and support new planting, including street trees, and woodland creation to help increase district-wide canopy cover;	Both of these potential housing developments adjacent to Elborough Village, both in the fields across the Banwell Road, and in the field between Elborough Village and Elborough Farm should be excluded from the plan. They would not support the following policies; Policy SP1: Sustainable development • Prioritise walking and cycling, maximise the use of effective public transport and encourage the creation of liveable neighbourhoods; • Protect valued natural and historic assets and support green infrastructure and biodiversity; Policy SP2: Climate change • Reduce the risk of flooding both now and in the future, taking account of predicted sea level rises and the impact on areas vulnerable to coastal change; • Deliver green infrastructure and provide a net gain in biodiversity; Policy SP10: Transport • Delivery of attractive, safe, and inclusive routes for walking and cycling which are well integrated into existing networks and provide access to effective and frequent public transport; Policy SP11: Historic and natural environment • Conserve and enhance the landscape and scenic beauty of the Mendip Hills National Landscape and the wildlife and cultural heritage, including ensuring that development in its setting is sensitively located and designed to avoid or minimise adverse impacts; • Protect the best and most versatile agricultural land; • Conserve, restore and enhance priority habitats, ecological networks and the protection and recovery of priority species; • Ensure that the design and construction of spaces and buildings encourages wildlife and biodiversity; • Support the establishment and delivery of North Somerset Nature Parks to protect and enhance internationally important bat habitats, foraging opportunities and connectivity through the landscape, and mitigate the impacts of development; • Retain existing trees and support new planting, including street trees, and woodland creation to help increase district-wide canopy cover;		
Land north of Banwell Road, Locking /Elborough	No	• Consistent with national policy	Unsure	Unsure	I am concerned about potential housing developments adjacent to Elborough Village, both in the fields across the Banwell Road, and in the field between Elborough Village and Elborough Farm. I feel that these developments would be in direct conflict with the following:	Both of these potential housing developments adjacent to Elborough Village, both in the fields across the Banwell Road, and in the field between Elborough Village and Elborough Farm should be excluded from the plan. These fields are agricultural land and integral to the character of the village. They are populated with established trees and hedges which are home to many		

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					Extracts from the “Vision” • To prioritise the location of new development close to places with a wide range of services, facilities and job opportunities. • To reduce car use, encourage walking and cycling, and high quality and effective public transport. • To address the decline in the town centres • To prioritise the importance and delivery of green spaces when considering new development, support priority habitats and species, and safeguard areas at risk of flooding. I feel that these developments would be in direct conflict with the following: Policy SP1: Sustainable development • Prioritise walking and cycling, maximise the use of effective public transport and encourage the creation of liveable neighbourhoods; • Protect valued natural and historic assets and support green infrastructure and biodiversity; Policy SP2: Climate change • Reduce the risk of flooding both now and in the future, taking account of predicted sea level rises and the impact on areas vulnerable to coastal change; • Deliver green infrastructure and provide a net gain in biodiversity; Policy SP10: Transport • Delivery of attractive, safe, and inclusive routes for walking and cycling which are well integrated into existing networks and provide access to effective and frequent public transport; Policy SP11: Historic and natural environment • Conserve and enhance the landscape and scenic beauty of the Mendip Hills National Landscape and the wildlife and cultural heritage, including ensuring that development in its setting is sensitively located and designed to avoid or minimise adverse impacts; • Protect the best and most versatile agricultural land; • Conserve, restore and enhance priority habitats, ecological networks and the protection and recovery of priority species; • Ensure that the design and construction of spaces and buildings encourages wildlife and biodiversity; • Support the establishment and delivery of North Somerset Nature Parks to protect and enhance internationally important bat habitats, foraging opportunities and connectivity through the landscape, and mitigate the impacts of development; • Retain existing trees and support new planting, including street trees, and woodland creation to help increase district-wide canopy cover;	species of wildlife including bats, deer, badgers, hedgehogs and birds. These green areas are a key reason for many people moving into the area and the loss of them would be detrimental to the environment and to the residents. They would not support the following policies; Policy SP1: Sustainable development • Prioritise walking and cycling, maximise the use of effective public transport and encourage the creation of liveable neighbourhoods; • Protect valued natural and historic assets and support green infrastructure and biodiversity; Policy SP2: Climate change • Reduce the risk of flooding both now and in the future, taking account of predicted sea level rises and the impact on areas vulnerable to coastal change; • Deliver green infrastructure and provide a net gain in biodiversity; Policy SP10: Transport • Delivery of attractive, safe, and inclusive routes for walking and cycling which are well integrated into existing networks and provide access to effective and frequent public transport; Policy SP11: Historic and natural environment • Conserve and enhance the landscape and scenic beauty of the Mendip Hills National Landscape and the wildlife and cultural heritage, including ensuring that development in its setting is sensitively located and designed to avoid or minimise adverse impacts; • Protect the best and most versatile agricultural land; • Conserve, restore and enhance priority habitats, ecological networks and the protection and recovery of priority species; • Ensure that the design and construction of spaces and buildings encourages wildlife and biodiversity; • Support the establishment and delivery of North Somerset Nature Parks to protect and enhance internationally important bat habitats, foraging opportunities and connectivity through the landscape, and mitigate the impacts of development; • Retain existing trees and support new planting, including street trees, and woodland creation to help increase district-wide canopy cover;		

Name: Nick Siangolis **I.D:** 62715361

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land to the west of Elborough	Unsure		Unsure	Yes		Regulation 19 Objection – Sites HE20637, HE20237 & HE201040 (South of Banwell Road, Elborough) I am submitting this representation to object to the proposed allocation of sites HE20637, HE20237 and HE201040 within the Publication Local Plan 2039. These parcels of land lie to the south of Banwell Road, directly adjoining the village of Elborough. My objection is based solely on material planning considerations relevant to the tests of soundness. 1. Brownfield Context – Why Previous Elborough Development Was Approved Elborough's most recent expansion took place exclusively on the former Aerojets industrial site, a long-disused, derelict brownfield area. Redevelopment of that site was justified because it regenerated previously developed land, removed redundant buildings and did not extend the village into open countryside. In contrast, the current proposed allocations comprise entirely undeveloped farmland which forms part of Elborough's rural backdrop. They are not brownfield, do not regenerate existing development, and would constitute a clear outward extension into open countryside. The justification that applied to the former industrial site is not applicable here. 2. Unsustainable Location and Car Dependency Elborough does not contain core services such as a GP surgery, school, shop, or regular public transport. As a result, residents of these allocations would be dependent on the private car for almost all day-to-day journeys. Walking or cycling to essential facilities would exceed a realistic 15-minute travel distance. The closest shops (Asda fuel station or the Co-op at Banwell) are more than 1.5 miles away from the central area of the proposed allocation. The site therefore fails to meet the criteria for a sustainable location. 3. Highway Constraints Banwell Road is already constrained, with existing congestion and limited provision for pedestrians. Additional vehicle movements generated by the proposed developments would intensify traffic pressures and worsen existing safety issues. There is no evidence demonstrating that safe access, footways, cycle provision or visibility splays can be delivered within the existing highway boundary. Introducing these elements would require road widening, pushing development closer to the identified flood zone. Furthermore, additional traffic to the north would place further pressure on the old Banwell Road and exacerbate congestion on the A371. 4. Landscape and Settlement Impact The site forms part of the open rural landscape that frames and defines the setting of Elborough. Development would impose a hard urban edge on the village, eroding its rural character and contributing to settlement coalescence with Locking. This would undermine the distinct identity of the village. 5. Ecology Objection Sites HE20637, HE20237 and HE201040 lie within an ecologically sensitive countryside corridor that supports a variety of native species and contributes to the wider habitat network surrounding Elborough. The land contains established hedgerows that qualify as priority habitats and provide important wildlife movement routes. Development would sever these corridors and result in the permanent loss of high-value habitat. The area also falls within Density Band C, triggering consultation requirements for the protection of the Lesser Horseshoe Bat. Local fields and drainage ditches already support birds, owls, amphibians and small mammals. Without detailed, credible ecological evidence, the allocation cannot be considered justified or deliverable. 6. Drainage and Flooding Risks		

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						The proposed allocations sit within a naturally low-lying landscape where water accumulates from several directions. Standing water is frequently visible following rainfall, indicating a high water table and poor drainage capacity. The area relies on an ageing network of rhynes and ditches that already operate close to capacity. Introducing large areas of hard surfacing would significantly increase runoff, heightening flood risk to neighbouring properties. There is substantial real-world evidence of recurring flooding along Banwell Road that exceeds the limitations of the mapped flood zones. 7. Hutton Parish Council Response Hutton Parish Council has lodged a formal objection to the proposed addition of around 400 homes and associated development around Elborough. Their objection is supported by extensive evidence collected for the Hutton Parish Survey Report (February 2021), which found: • 86% opposed development outside the settlement boundary • 83% opposed development specifically around Elborough The Parish Council raises multiple planning concerns consistent with this objection: • Loss of green landscape and erosion of strategic gaps between Hutton, Elborough and Locking • Lack of safe pedestrian or cycling routes to essential facilities • Insufficient local amenities and community infrastructure • Severely limited road network capacity, including narrow rural lanes and pressure on the 20mph zone in Hutton • Unsustainable levels of growth that exceed existing service capacity Their conclusions strongly reinforce that the proposed allocations are not suitable or sustainable and would conflict with established community evidence and policy aims to preserve village identity and open countryside. 8. Other Nearby and Future Developments There are several more suitable sites — already permitted, allocated, or anticipated — located in areas with far greater sustainability credentials than HE20637, HE20237 and HE201040. The Banwell bypass will support development in more strategic growth areas that have the space and infrastructure to provide essential facilities such as schools, healthcare, shops and safe transport links. Furthermore, Weston-super-Mare, Locking, Locking Parklands, West Wick and Banwell all include locations explicitly identified for growth where services, active-travel routes, public transport and road capacity already exist or can be feasibly expanded. These locations can contribute to the district's housing needs without displacing development into isolated rural land that cannot support it. Conclusion For the reasons set out above, I request that sites HE20637, HE20237 and HE201040 are removed from the Local Plan. Please ensure that this objection is formally recorded and fully considered at examination.		
Land north of Banwell Road, Locking /Elborough	Unsure		Unsure	Unsure				
Land north of Banwell Road, Locking	Unsure		Unsure	Yes		Regulation 19 Objection – Sites HE20637, HE20237 & HE201040 (South of Banwell Road, Elborough) I am submitting this representation to object to the proposed allocation of sites HE20637, HE20237 and HE201040 within the Publication Local Plan 2039. These parcels of land lie to the south of Banwell Road, directly adjoining the village of Elborough. My objection is based solely on material planning		

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/Elborough						considerations relevant to the tests of soundness. 1. Brownfield Context – Why Previous Elborough Development Was Approved Elborough's most recent expansion took place exclusively on the former Aerojets industrial site, a long-disused, derelict brownfield area. Redevelopment of that site was justified because it regenerated previously developed land, removed redundant buildings and did not extend the village into open countryside. In contrast, the current proposed allocations comprise entirely undeveloped farmland which forms part of Elborough's rural backdrop. They are not brownfield, do not regenerate existing development, and would constitute a clear outward extension into open countryside. The justification that applied to the former industrial site is not applicable here. 2. Unsustainable Location and Car Dependency Elborough does not contain core services such as a GP surgery, school, shop, or regular public transport. As a result, residents of these allocations would be dependent on the private car for almost all day-to-day journeys. Walking or cycling to essential facilities would exceed a realistic 15-minute travel distance. The closest shops (Asda fuel station or the Co-op at Banwell) are more than 1.5 miles away from the central area of the proposed allocation. The site therefore fails to meet the criteria for a sustainable location. 3. Highway Constraints Banwell Road is already constrained, with existing congestion and limited provision for pedestrians. Additional vehicle movements generated by the proposed developments would intensify traffic pressures and worsen existing safety issues. There is no evidence demonstrating that safe access, footways, cycle provision or visibility splays can be delivered within the existing highway boundary. Introducing these elements would require road widening, pushing development closer to the identified flood zone. Furthermore, additional traffic to the north would place further pressure on the old Banwell Road and exacerbate congestion on the A371. 4. Landscape and Settlement Impact The site forms part of the open rural landscape that frames and defines the setting of Elborough. Development would impose a hard urban edge on the village, eroding its rural character and contributing to settlement coalescence with Locking. This would undermine the distinct identity of the village. 5. Ecology Objection Sites HE20637, HE20237 and HE201040 lie within an ecologically sensitive countryside corridor that supports a variety of native species and contributes to the wider habitat network surrounding Elborough. The land contains established hedgerows that qualify as priority habitats and provide important wildlife movement routes. Development would sever these corridors and result in the permanent loss of high-value habitat. The area also falls within Density Band C, triggering consultation requirements for the protection of the Lesser Horseshoe Bat. Local fields and drainage ditches already support birds, owls, amphibians and small mammals. Without detailed, credible ecological evidence, the allocation cannot be considered justified or deliverable. 6. Drainage and Flooding Risks The proposed allocations sit within a naturally low-lying landscape where water accumulates from several directions. Standing water is frequently visible following rainfall, indicating a high water table and poor drainage capacity.		

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						The area relies on an ageing network of rhynes and ditches that already operate close to capacity. Introducing large areas of hard surfacing would significantly increase runoff, heightening flood risk to neighbouring properties. There is substantial real-world evidence of recurring flooding along Banwell Road that exceeds the limitations of the mapped flood zones. 7. Hutton Parish Council Response Hutton Parish Council has lodged a formal objection to the proposed addition of around 400 homes and associated development around Elborough. Their objection is supported by extensive evidence collected for the Hutton Parish Survey Report (February 2021), which found: • 86% opposed development outside the settlement boundary • 83% opposed development specifically around Elborough The Parish Council raises multiple planning concerns consistent with this objection: • Loss of green landscape and erosion of strategic gaps between Hutton, Elborough and Locking • Lack of safe pedestrian or cycling routes to essential facilities • Insufficient local amenities and community infrastructure • Severely limited road network capacity, including narrow rural lanes and pressure on the 20mph zone in Hutton • Unsustainable levels of growth that exceed existing service capacity Their conclusions strongly reinforce that the proposed allocations are not suitable or sustainable and would conflict with established community evidence and policy aims to preserve village identity and open countryside. 8. Other Nearby and Future Developments There are several more suitable sites — already permitted, allocated, or anticipated — located in areas with far greater sustainability credentials than HE20637, HE20237 and HE201040. The Banwell bypass will support development in more strategic growth areas that have the space and infrastructure to provide essential facilities such as schools, healthcare, shops and safe transport links. Furthermore, Weston-super-Mare, Locking, Locking Parklands, West Wick and Banwell all include locations explicitly identified for growth where services, active-travel routes, public transport and road capacity already exist or can be feasibly expanded. These locations can contribute to the district's housing needs without displacing development into isolated rural land that cannot support it. Conclusion For the reasons set out above, I request that sites HE20637, HE20237 and HE201040 are removed from the Local Plan. Please ensure that this objection is formally recorded and fully considered at examination.		

Name: Nick Wallum **I.D:** 62837409

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and	No	• Effective	Unsure	Unsure	There is a need for housing nationally and in North Somerset. However, the A369 is unable to take anymore traffic for seven reasons: 1) it is recognised to be at capacity 2) There are frequent and dangerous traffic jams on the M5 to enter the A369 at the Gordano exit 3) There are frequent queues of over 30 minutes where the A369 meets the Cumberland Basin at Long Ashton, 4) the world recognised Clifton Suspension bridge cannot take anymore wear, with traffic tailing back for 20 minutes each morning onto the A369, 5) The road narrows dangerously at the George pub in Abbots Leigh	Substantial reduction in building plans on the A369. Significant		

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Easton-in-Gordano					where two commercial vehicles are unable to pass side by side and where there is no option to widen, 6) Traffic is now being diverted from the A4 Portway by map apps onto the A369, 7) Planned airport expansions will add flow onto the A369. The assertation that non car based travel will reduce the load is ridiculous. In addition, Pill and Easton-in-Gordano infrastructure cannot handle further housing for example, critical schools, health and shopping.	investment in infrastructure. More trains then planned on the new portishead to bristol line.		

Name: Nicky Connell **I.D:** 29270145

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP12: Bristol Airport	No	• Justified	Unsure	Unsure	I am confused! I have objected to the expansion of the airport on a number of occasions. I recall that previous objections from various bodies, including the North Somerset Council, resulted in planning for further expansion being refused. this was overruled by central government. Now the airport is able to go ahead with further expansion which involves development on the green belt. What is the point of asking people what they think when the owners of the airport seem to get whatever they want. Where will this end?!			

Name: Nicky Williams **I.D:** 62849857

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I wish to register my strong objection to the proposed allocation of additional housing and associated infrastructure in Backwell. The scale, location and timing of this development are inappropriate, unsustainable, and contrary to both local and national policy for the reasons set out below. 1. Overdevelopment and Disproportionate Housing Burden Backwell already has over 800 new homes approved—representing a 40% increase in the size of the village. Adding a further 1,000 dwellings would constitute severe overdevelopment and fundamentally alter the character of the community. Backwell has been allocated a higher number of houses than any other village in North Somerset, and even a higher proportional growth rate than many towns. The village is expected to absorb 7% of the district's total housing requirement, compared with only 2% allocated to Clevedon. This level of growth is unjustified and disproportionate. 2. Lack of Need or Viability Assessment No credible needs analysis or viability assessment has been presented to justify an additional 1,000 homes. Backwell is not an employment centre, and the majority of residents commute elsewhere for work. No assessment has been provided regarding the impact such large-scale growth would have on social cohesion or the long-term sustainability of the community. 3. Insufficient Infrastructure and Public Services Despite the large number of new homes already approved, Backwell is experiencing a deficit in school places and there has been no investment in health services, leisure facilities or community infrastructure. The village cannot reasonably support another major housing increase without significant and guaranteed improvements, none of which have been demonstrated. The Infrastructure Delivery Plan lacks meaningful analysis, clear costings, or funding guarantees for the proposed road or supporting services. 4. Transport and Traffic Concerns The proposed road would not effectively serve Nailsea's traffic, nor would it relieve congestion on Station Road, Backwell Common or Chapel Hill. Delivering a road under or over the railway would be extremely costly and potentially unfeasible. Designating this area for strategic growth when access infrastructure is uncertain, unfunded and technically questionable is irresponsible.			

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					5. Environmental and Biodiversity Harm The development would result in the loss of Grade 1 agricultural land currently used for food production and grazing. Only 7% of this high-quality land remains in North Somerset. National policy clearly states that “we must protect our best and most versatile land” in order to safeguard food security; these proposals directly contradict this principle. In addition, the plans pose significant risk to local wildlife. The area contains valuable habitats in an already nature-depleted country and supports rare species, including Lesser and Greater Horseshoe Bats that rely on the land for foraging. The proposals threaten the Brockley Maternity Roost and the adjacent SSSI, causing irreversible ecological harm. 6. Flood Risk and Unsuitable Land Backwell Common, Backwell Lake (Reservoir), and the surrounding fields are part of a known floodplain and flood regularly. Adding large-scale housing and roads in these areas would increase surface runoff, exacerbate existing flooding problems, and put residents and property at unacceptable risk. Proceeding without robust mitigation—and on land known to flood—is indefensible. 7. Green Belt and Landscape Impact The proposals would result in the loss of Green Belt land and high-quality agricultural landscapes, significantly eroding the rural character of the area. While Government policy requires 50% affordable housing on Green Belt land, this simultaneously reduces the financial contributions available for infrastructure—further undermining the deliverability of necessary services. 8. Unsustainable Growth Timeline The volume of development proposed, combined with the required infrastructure, is destabilising, unsustainable, and undeliverable within the timescales suggested. There is no assurance that road improvements, utilities, or community facilities would be delivered in time—or at all—to support the new housing. 9. Inadequate Railway Station Facilities Backwell’s railway station is not fit for purpose as a transport hub. It remains inaccessible for people with mobility difficulties and challenging for families with young children. Expanding the population while relying on an inaccessible and inadequate station runs counter to sustainable transport objectives. The proposed development is unjustified, disproportionate and unsupported by essential infrastructure, environmental safeguards, or credible evidence of need. It poses unacceptable risks to community wellbeing, local character, agricultural land, biodiversity and flood resilience. I therefore strongly urge that this proposal be rejected.			

Name: Nicola M **I.D:** 62831873

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I do not think the plan is sound as we already have three/four developments in process in Backwell which are going to significantly increase the load on local services and transportation. Without these developments being finished additional planning applications should be paused until there is tangible data on the strain it will put on the area. The new road plan lacks any detail and in my opinion will not solve any of the current and impending traffic issues due to the proposed location. There is no plan to increase the capacity in local schools and as the area is very popular for young families the people moving to the area will force locals to not be able to attend the schools within Backwell. The areas being looked at for planning are very boggy and prone to flooding and I would expect the housing being built to possibly be uninsurable due to these facts. The plans take away the agricultural land which is used to grow crops, as a country we should not have to import products that can be grown locally. The increase in the number of homes and associated roads and access plan severely affect the local environment and habitats of local species.	I believe any further plans to build should be paused and only considered once the current small and large developments have been mostly completed so officials then have the relevant facts to make a properly informed decision.	I do not support this	

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					Overall the amount of building already in progress plus the increase in traffic for the amount of houses being built will have a severe effect on air quality. This is then creating more pollution similar to that in the city which I believe many current residents moved here to avoid.			

Name: Nicola Payne **I.D:** 62851009

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land to the west of Elborough	No	• Effective	Unsure	Unsure	Huge flood risk. Last year we had issues with floods coming from the green belt land, running into Elborough and flooding the lower fields where the planned development is. There would not be sufficient infrastructure in place to prevent flooding into lower fields or coming back into Elborough. We've lived here since 2011 and every year the surrounding fields flood and can take months to drain. The Land already floods but this will only increase in frequency due to increased impermeable surfaces. Inadequate drainage exacerbating flood risk which according to environment agency will impact this area by the year 2050 Roads; There potentially could be 600+ cars in addition to our current traffic turning out onto a small country road. Going either towards Hutton, a small village with an issue with a bottle neck by the school already, or turning up onto Locking moor road, which is already over capacity, especially at peak times. Again there is not the infrastructure in this small location to allow for more cars, it will not cope with increase congestion. Also would be issues with air pollution and noise pollution. There will be increased danger to pedestrians, horse riders and cyclists which frequent this road regularly, due to it's rural location. There will be a strain on local services, potential over burdening of local schools and healthcare facilities in the area. There WILL NOT be enough GP provision for all of these houses. The local hospital A and E department closes at 10pm, the nearest hospital is then 25 miles away in Bristol. If the single motorway access point allows you to get there! There are no local bus services in this area, including school buses. highway safety is dreadful. Noise; Unacceptable noise levels during development. We are a small village situated right next door to the potential development that will take years. The drilling of foundations will have to be pile driven due to the extensive flood plains. This will cause major disturbance to current residents. Mud; How can you possibly manage all the mud that will come out of the site and damage the already existing village homes and the road? At times the road has been impassable between Elborough, Locking and Hutton, due to flooding and mud. There will be additional light pollution, additional noise pollution, during and after the development and loss of privacy to current residents of our small village. This is virgin agricultural, green belt land. Elborough village itself was only permitted on a brown field site when the old BAJ factory works were demolished. How can the council be considering a development on green belted agricultural land?? It will be hugely detrimental to the design and character of the current village and surroundings. And a destruction of valuable open land. The proposed development will be out of scale, high density and will have a harmful visual impact to the local environment. Wildlife; We have regular visitors across those fields of Deer, Owls, Buzzards, Bats. Badgers. This will be detrimental to the local wildlife in every possible way. You will be destroying their natural habitats. Bio-diversity loss, impact on protected species such as the local newts. Bats, mature trees and hedgerow habitats. Over burdening of local facilities such as water and sewage facilities	I believe this proposal contravenes specific policies in the local planning framework; example; Green belt settlement boundaries, housing density and lack of infrastructure to allow for increased traffic flow. Destruction of natural habitats and environment, destroying local wildlife and plants, on an existing flood plain.		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					The development will have a detrimental effect on current house prices. This has been a quiet, sort after area for 20 years. How can you possible put the current residents through the massive impact of a huge development and then devalue their houses also?? This is not the correct location for 315 homes. The local facilities, roads, environment simply will not cope.			
Land north of Banwell Road, Locking /Elborough		• Effective	Unsure	Unsure	Huge flood risk. Last year we had issues with floods coming from the green belt land, running into Elborough and flooding the lower fields where the planned development is. There would not be sufficient infrastructure in place to prevent flooding into lower fields or coming back into Elborough. We've lived here since 2011 and every year the surrounding fields flood and can take months to drain. The Land already floods but this will only increase in frequency due to increased impermeable surfaces. Inadequate drainage exacerbating flood risk which according to environment agency will impact this area by the year 2050 Roads; There potentially could be 600+ cars in addition to our current traffic turning out onto a small country road. Going either towards Hutton, a small village with an issue with a bottle neck by the school already, or turning up onto Locking moor road, which is already over capacity, especially at peak times. Again there is not the infrastructure in this small location to allow for more cars, it will not cope with increase congestion. Also would be issues with air pollution and noise pollution. There will be increased danger to pedestrians, horse riders and cyclists which frequent this road regularly, due to it's rural location. There will be a strain on local services, potential over burdening of local schools and healthcare facilities in the area. There WILL NOT be enough GP provision for all of these houses. The local hospital A and E department closes at 10pm, the nearest hospital is then 25 miles away in Bristol. If the single motorway access point allows you to get there! There are no local bus services in this area, including school buses. highway safety is dreadful. Noise; Unacceptable noise levels during development. We are a small village situated right next door to the potential development that will take years. The drilling of foundations will have to be pile driven due to the extensive flood plains. This will cause major disturbance to current residents. Mud; How can you possibly manage all the mud that will come out of the site and damage the already existing village homes and the road? At times the road has been impassable between Elborough, Locking and Hutton, due to flooding and mud. There will be additional light pollution, additional noise pollution, during and after the development and loss of privacy to current residents of our small village. This is virgin agricultural, green belt land. Elborough village itself was only permitted on a brown field site when the old BAJ factory works were demolished. How can the council be considering a development on green belted agricultural land?? It will be hugely detrimental to the design and character of the current village and surroundings. And a destruction of valuable open land. The proposed development will be out of scale, high density and will have a harmful visual impact to the local environment. Wildlife; We have regular visitors across those fields of Deer, Owls, Buzzards, Bats. Badgers. This will be detrimental to the local wildlife in every possible way. You will be destroying their natural habitats. Bio-diversity loss, impact on protected species such as the local newts. Bats, mature trees and hedgerow habitats. Over burdening of local facilities such as water and sewage facilities The development will have a detrimental effect on current house prices. This has been a quiet, sort after area for 20 years. How can you possible put the current residents through the massive impact of a huge development and then devalue their houses also?? This is not the correct location for 315 homes. The local facilities, roads, environment simply will not cope.	I believe this proposal contravenes specific policies in the local planning framework; example; Green belt settlement boundaries, housing density and lack of infrastructure to allow for increased traffic flow. Destruction of natural habitats and environment, destroying local wildlife and plants, on an existing flood plain.		

Name: Nigel Allen **I.D:** 58242721

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	‣ Justified ‣ Effective	Unsure	Yes	I am a resident of The Downs, in Portishead, close to the site where 400 new homes have been proposed. This development concerns me on a number of grounds which I will briefly outline. First and foremost, I am NOT a 'NIMBY'; regardless of the reasons, I accept there is a need to build more homes in the North Somerset (NS) region to accommodate the rising population. Nonetheless, as a Portishead resident since 1998 - when the population was over three times less than it currently is, before further expansion - I am of the opinion that Portishead has reached 'saturation'. The travel infrastructure has hardly changed and getting in or out of the town now takes four or five times longer than it once did. Overall, the sense of community that once was a key attraction of this town has disappeared. The proposed site on the land at Tower Farm is currently designated Green Belt, and incorporates nearby SSSI sites which would be very negatively impacted from both an environmental and conservation perspective if the development, as outlined, were to go ahead. There are numerous other sites - designated both Brown (ideally) and Green Belt - within the district that should be utilised. These would not impact on the SSSI areas which, in my opinion, offer up an 'exceptional' condition that planners should take into consideration. Additionally, development at Tower Farm would have a negative impact on social conditions. It is effectively at the 'top' of the town - almost 100m higher than the 'floor' where retailers and other amenities are located. 400 homes would equate to c.1,200 people and c.750+ cars. The road infrastructure would not be able to cope with the extra traffic as people commuted to work, used the town's amenities or, even, the new train line (the station for which is some distance from the proposed area). It would especially create added congestion around school times which, currently, is already a major problem in the High Down (Down Road) School vicinity. This school is also currently at capacity and there are is no significant retail area that could serve an additional 400 dwellings. Surgeries and other essential service are also only located at the base of the town, so not easily accessible. The topography is also not conducive to movement on foot or bike (even an electric bike) which would also become more dangerous for the elderly, disabled and those with children were the traffic levels to increase.	The Town Council has identified a number of other Brown and Green Belt sites around the town which should be given much greater consideration as a priority; these provide better access to amenities, potentially have benefits for the town's economies and do not have such negative environmental and conservation impact.		

Name: Nigel Cooke **I.D:** 31037185

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Vision, Strategic Priorities and Sustainability Objectives	Yes		Yes	Yes				
Strategic Priorities	Yes		Yes	Yes				
Sustainable development objectives	Yes		Yes	Yes				
Strategic Policies	Yes		Yes	Yes				
SP1: Sustainable Development	Yes		Yes	Yes				
SP2: Climate Change	Yes		Yes	Yes				
SP3: Spatial strategy	Yes		Yes	Yes				
SP4: Placemaking	Yes		Yes	Yes				
SP5: Towns	Yes		Yes	Yes				
SP6: Villages and rural areas	Yes		Yes	Yes				
SP7: Green Belt	Yes		Yes	Yes				

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SP8: Housing	Yes		Yes	Yes				
SP9: Employment	Yes		Yes	Yes				
SP10: Transport	Yes		Yes	Yes				
SP11: Historic and natural environment	Yes		Yes	Yes				
SP12: Minerals	Yes		Yes	Yes				
SP13: Waste	Yes		Yes	Yes				
Policy LP7: Settlement boundaries	Yes		Yes	Yes				
Policy LP9: Extent of the Green Belt	Yes		Yes	Yes				
Policy LP12: Bristol Airport	Yes		Yes	Yes				
Policy LP13: Air safety	Yes		Yes	Yes				
Policy DP34: Green infrastructure	Yes		Yes	Yes				
Policy DP35: Nature conservation	Yes		Yes	Yes				
Play area and Glebe Field off Church Walk, Wrington	Yes		Yes	Yes				
The Old Quarry off Wrington Hill, Wrington	Yes		Yes	Yes				
Land at the junction of Alburys with West Hay Road, Wrington	Yes		Yes	Yes				

Name: Nigel Gorringe **I.D:** 62444737

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No		Unsure	Unsure	This does not take into account the already chaotic traffic issues that affect The Downs, The Deans and Down Road during school drop-off and collection times. During these periods we already experience difficulties entering and leaving our homes. The proposal shows only a single access point by re-routing The Downs and that will cause unbearable congestion, especially at the above times. The ecological buffer proposed is insufficient to protect Weston Big Wood. With an increased population so close to this protected woodland it could become a playground and lost forever. Consider the local population and the disturbance this increase of 400+ houses will cause to an already overgrown town. A town that has expanded inexorably over the last 20+ years. What about the infrastructure to service the new houses - power, water, gas, telecoms, health provisions, education and how will this affect an already over-stretched town? I do not support the Tower Farm 400+ houses proposal. What about the infrastructure to service the new houses - power, water, gas, telecoms, health provisions, education and how will this affect an already over-stretched town?			
Land at Tower Farm	No		No	Unsure	The proposed development of Green Belt land at Tower Farm is not sound as it provides a safety buffer between existing housing and Weston Big Wood — an ancient woodland and an SSSI which will be severely jeopardized due to the proximity to 400+ new houses. This woodland is a part of the Gordano Valley ecological corridor and development will impede the natural movement of wildlife or worse kill it off altogether. The removal of Green Belt status can only be achieved in exceptional circumstances, there are no exceptional circumstances			

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					applicable in this case only following a dictat from a much maligned Labour government. 400+ houses at Tower Farm would greatly exacerbate the traffic congestion at the junction of The Downs and Down Road particularly at school drop-off and collection times. Public transport along Down Road is the X4 only in one direction every 20 minutes or so and the X10 occasionally. The site is on top of a steep hill and walking/cycling for many will be impossible thus producing extra traffic flows. There seems to be little thought on the impact on services in Portishead - schools, health care, transport, etc. The North Somerset Local Plan 2041: Pre-submission Plan should remove Tower Farm completely as being an ecologically important site and totally unsuitable for any development. Access to this site would be difficult with perhaps as many as 400 to 600 cars exiting and returning daily. The proposal is unsound at it gives no indication how the concerns above will be addressed. The site should remain as protected Green Belt as it is totally unsuitable for development. I do not support this proposal in it's current form.			

Name: Nigel Pearce **I.D:** 62769793

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Justified	No	Unsure	I feel that you are building on green belt land that has been occupied by wild life for hundreds of years and now you plan to build on their habitat. They are being pushed out when there are other grey areas that can be built on. We have lived in Ham Green for over forty years and have observed a large variety of wild life habiting in the Ham Green Fields. I attached photos of Deer and Pheasants, we have at present a fox and cubs running around several gardens and there is a stream in this area which attracts a lot of wild life.	You could build on the grey site HB201056. The site by the services HE206 and HE20491. The other two areas HE2015 and HE201097 leave for the wild life.		Deer.JPG Phasants.JPG Video Deer.mp4

Name: Nigel Robert Power **I.D:** 62860289

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No		Unsure	Unsure	Backwell has already had several development locations identified, with about 800 houses across the sites. This represents a 40% increase in the population of Backwell. A further 889 houses at Backwell East will bring that up to an 80% increase, with no additional supporting infrastructure such as Doctors, Dentists, and there is already a deficit in school places. New leisure facilities would be needed to support the health and well-being of residents. The number of houses approved or proposed in Backwell means that the village is being told to take more than any other village in North Somerset. If this development at Backwell East went ahead Backwell would take a higher percentage of North Somerset's housing allocation than larger and better resourced towns such as Clevedon. The land identified at Backwell East is agricultural land, used for crops and grazing. It is Grade 1, high quality land, and if it goes then another piece of the Country's food security goes with it. Part of the land towards the railways line is prone to flooding which is an important drainage sump for the village. More housing would increase the risk of flooding in the village. There are already problems when there is heavy rainfall on Backwell Hill with water running down to Farleigh Road. The fields at Backwell are home to a variety of wildlife, with old hedges and trees providing cover and homes for many. They			

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					are also important for the bats at the Brockley Maternity Roost which is populated by rare Lesser and Greater Horseshoe bats. The idea for the proposed road is absolutely ridiculous. The land is wet, the route is transected by the railway line, and the cost would be astronomical, in the £millions. Where would the finance come from? Furthermore, the embankment is not stable so any plan to go under or over the railway would present many engineering difficulties. The railway is identified in the plan as a strategic transport hub. However, Backwell Station dates back to Victorian times, has short platforms unsuitable for cross-country trains and is inaccessible for people with mobility issues, including people with pushchairs on the northern side. There have been attempts to solve this issue for many years, but the engineering challenges are too difficult to overcome. Finally, no social cohesion impact assessment appears in the Plan. An 80% increase in the number of households in the village (which would become a town), would certainly have a considerable impact on social cohesion. The land at Backwell East must be removed from the Local Plan.			

Name: Nikki Hunt **I.D:** 62849761

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	‣ Justified ‣ Consistent with national policy	No		The proposed allocation of Land at Tower Farm (≈ 400 homes) lies immediately beside Weston Big Wood — an ancient woodland and Site of Nature Conservation Interest (SNCI) managed by Woodland Trust and supported by Avon Wildlife Trust. The woodland forms part of the Gordano Valley ecological network and a nationally important habitat mosaic of open grassland, wetland and woodland. Not Justified There is no robust published alternatives assessment demonstrating that this sensitive site is the only or most appropriate option for growth. The loss of best and most versatile (BMV) farmland (Grade 2/3a by reference to the ALC dataset) and the risk of irreversible damage to the ancient woodland make this allocation unsuitable. Not Consistent with National Policy The allocation conflicts with the National Planning Policy Framework (NPPF) paragraphs 180–182, which require that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland) should be refused unless wholly exceptional reasons exist. The Council's reference to an "ecological buffer" is vague, unenforceable and insufficient to address indirect impacts such as root-zone damage, hydrological change or wildlife disturbance. The Woodland Trust and Avon Wildlife Trust state that ancient woodland is irrecoverable once damaged. Moreover the Framework requires delivering biodiversity net gain, yet the allocation offers no sure mechanism to achieve the outcomes. Not Positively Prepared The location intensifies existing pressures in Portishead: schools, healthcare and transport infrastructure are already under strain (for example the A369 corridor). This peripheral site would likely increase private vehicle usage and pollution rather than support sustainable travel patterns, contrary to NPPF paragraphs 104–106. Not Effective Delivery depends on multiple unresolved dependencies: new school provision, bus service contributions, off-site biodiversity management, and upgrades to rights-of way/buffer zones. No phasing plan, funding mechanism or legal agreement is published to secure these. Without such mechanisms the allocation cannot be considered deliverable within the plan period (NPPF paragraph 35(c)). Landscape & Connectivity The farmland/woodland edge acts as a critical ecological and landscape transition zone. Development here would fragment habitat, diminish the Gordano Valley wildlife corridor and erode the rural fringe character. Even with a buffer the visual and ecological intrusion into the woodland and surrounding landscape would be significant.			

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					Drainage & Hydrology Construction and built development would alter surface-water run-off and soil compaction on the former farmland, potentially affecting the hydrological regime that sustains the adjacent ancient woodland. The risk of nutrient runoff, altered infiltration and woodland root zone damage is material. Cumulative Impact When considered alongside other allocations in the Portishead area (such as Black Rock north of Clevedon Road), the combined pressure on ecology, infrastructure and transport is significant and undermines the Council's commitments to nature recovery and sustainable growth. No modification short of removing the allocation entirely would make this site appropriate. Given its direct adjacency to ancient woodland, its loss would be irreversible and cannot be mitigated sufficiently. The land should instead be retained as undeveloped green space, managed to enhance biodiversity and provide sustainable public access, in line with the Avon Wildlife Trust's 2030 Strategy and national "30 by 30" nature recovery goals. I do not support the the North Somerset Local Plan 2041 for the Tower Hill Farm location.			
Black Rock, north of Clevedon Road	No	• Justified • Consistent with national policy	No	No	Not Justified – Unsuitable location requiring off-site ecological mitigation The allocation of approximately 100 dwellings at Black Rock is not justified because the Council itself acknowledges that key environmental and ecological requirements cannot be met on-site, and must instead be located "off-site on land to the south-west". This approach directly conflicts with NPPF paragraph 180(a), which requires avoidance of impact before remediation or off-site compensation is considered. The need for offset land demonstrates the inherent unsuitability of the site for development. There is no published evidence of less sensitive alternative sites being considered and discounted. Not Consistent with National Policy – Failure to protect and enhance biodiversity The approach of relying on off-site mitigation and a "suitable ecological buffer" illustrates a reactive rather than preventative approach to biodiversity protection. NPPF paragraphs 180–182 require Local Plans to conserve habitats, prevent deterioration of irreplaceable habitat, and deliver net gains for biodiversity. The allocation fails this by offloading its ecological burden onto unspecified land, without securing long-term management or legal protection for compensatory habitats. It also conflicts with the Avon Wildlife Trust's 2030 Strategy, which emphasises restoration of 30 per cent of land for nature and enhancing landscape connectivity in the Gordano Valley. Not Positively Prepared – Unsustainable pattern of growth The site lies on the western approach to Portishead along Clevedon Road, where public transport is limited and local services are minimal. Residents would be heavily reliant on private vehicles to access schools, health care and employment. The fact that footways and new bus stop contributions are required underlines existing infrastructure inadequacy. This car-dependent pattern of development conflicts with the sustainable transport objectives of NPPF paragraphs 104–106. Not Effective – Unclear delivery and infrastructure dependencies The site depends on multiple off-site and third-party mitigations including ecological offset land, new footway construction, bus service contributions and delivery of a section of the Gordano Greenway. No clear funding mechanism, responsible delivery body, or phasing plan is identified in the Plan. Consequently, the allocation lacks deliverability and fails the effectiveness test under NPPF paragraph 35(c). Landscape & Setting The site lies within open countryside forming part of the rural setting of Portishead and the Gordano Valley. The expansion westwards into this part of the countryside would diminish the settlement edge, reduce landscape openness, and risk urbanising what should remain a transitional zone between town and countryside.			

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					Agriculture & Soils The farmland in question is likely to be of best and most versatile quality (Grade 2/3a) and its loss for housing is not justified when less sensitive land could be used. The Plan does not robustly demonstrate why this agricultural land must be released. Hydrology & Ecology Development on this edge farmland may affect surface-water drainage, soil compaction and wildlife connectivity into the adjoining woodlands and wetland systems associated with the Gordano Valley. The cumulative effect of development pressure in the area further stresses the ecological network. Cumulative Impact Combined with the Tower Farm allocation and other nearby proposals, the Black Rock site would add to cumulative ecological, transport and infrastructure burdens around Portishead – contrary to the Council's stated nature-recovery and sustainable growth objectives. No modification would make this allocation acceptable. The need for off-site mitigation and multiple infrastructure dependencies shows the site is environmentally and logistically unsuitable for housing. The allocation should be removed entirely from Schedule 1. Instead, the land should remain open countryside, contributing to biodiversity and landscape value, in line with the Avon Wildlife Trust's 2030 Strategy, Woodland Trust guidance and national biodiversity objectives. I do not support the the North Somerset Local Plan 2041 for the Black Rock location			

Name: Nikki Parsons **I.D:** 39305057

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Churchill Avenue	No	‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	No	I would like to raise the following points - * the field is used by the surrounding community as a play area for children, dog walking and every year, there are groups and families that congregate for BBQ's and parties on the field * there are 4/5 blocks of flats adjacent to Penny Fields. I counted three floors on each block. I would assume there are at least 6 separate flats in each block (possibly as many as 12).That amounts to at least 24 Flats (maybe as many as 48!). Penny Field is the back garden for these residents and their families, their open space, needed for exercise, health and well being. Under any Equalities Impact Assessment, the reduction of green space would adversely affect lower income households, which would include residents in these flats. * the area with the River running through is an area for wildlife (although the state of the River is another problem). Every year there are birds, ducks and swans that nest along side the field as well as slowworms, toads and frogs all breeding. Building on the field will disturb and, most likely, upset the environment for these animals to continue to use this habitat. Penny Field has been identified by WECA because of the presence of priority species. Also, the field is located on a Green Infrastructure Corridor under NSC's own policy. Penny Field must be protected and made a local green space. Under local planning policy, Penny Field is the perfect area for local green space designation because it it fits in the top 24% of sites based on Policy alignment. Two petitions from Clevedon Town Council (2022 and 2025) with a total of 600+ signatures has been presented as a call to protect Penny Field. Penny Field	There are none - do not develop this area. The impact on the local community, flora and fauna would be devastating.		

Name: Nikki Tailor **I.D:** 62758625

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	Unsure		No	No	1. Lack of justified evidence for the site allocation opposite my property The Plan does not provide robust, proportionate evidence explaining why this specific location has been chosen for housing compared with reasonable alternatives. There is insufficient assessment of environmental, infrastructure and community impacts in this immediate area, and therefore the allocation is not “justified” as required by the Tests of Soundness. 2. Inadequate consideration of infrastructure capacity The proposed development opposite my home has not been supported by clear evidence showing that local roads, drainage, parking, schools, health services and utilities can accommodate the additional demand. The Plan does not demonstrate that the necessary infrastructure will be delivered in a timely manner, so it is not “effective”. 3. Failure to properly assess local environmental impacts The site allocation does not appear to be supported by sufficient analysis of impacts on landscape character, residential amenity, traffic, air quality, noise, and loss of open space. Without this evidence, the Plan cannot be considered positively prepared or environmentally sound. 4. Insufficient public engagement and clarity of information The consultation materials do not clearly explain the rationale for selecting this site or the detailed implications for existing residents. This raises concerns about whether the Plan meets legal requirements for transparency and meaningful public participation under the planning regulations. 5. Duty to Cooperate concerns There is no clear evidence that the Council has actively cooperated with neighbouring authorities or relevant bodies regarding the cumulative effects of development in this area, including cross-boundary transport and infrastructure pressures. Without documented, constructive engagement, the Plan does not meet the Duty to Cooperate. For these reasons, I believe the Plan in its current form is not sound, not legally compliant, and does not satisfy the Duty to Cooperate.	There is nothing you can do	No	

Name: Norma Parfitt **I.D:** 55732129

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Vision, Strategic Priorities and Sustainability Objectives	No	‣ Justified ‣ Effective	Yes	Unsure				

Name: O Beckinsale **I.D:** 62850881

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Backwell already has over 800 new homes approved, a 40% increase on current numbers.. I cannot understand how another 800 houses can work without significant investment in local services inc medical and school.. so far with the current house build projects I have yet to see any plans to improve, increase either of these.. This is not about moaning about building houses in the village I live in but a genuine fear that Backwell will be a worse place to be a resident in the future. I am lucky that my children have been through the local schools already but future families will not have the same benefits of living in Backwell and North Somerset in general that I have had since moving here 37 years ago. in addition the car traffic is horrific getting into Bristol, forget about trying to get down the long Ashton bypass after 7.30am and before 9am.. this is only going to get worse.	Stop approving every single housing development. Seems like it is a green light for every development right now		

Name: O Cullen **I.D:** 50932513

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Grove Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Agricultural land desecrated, wildlife destroyed, lives impacted unreasonably. Where are these people going to work, shop, relax. There is no room. It is utter madness, all to massage the pathetic egos of a talentless body of parliamentarians who are ideologically programmed to destroy the countryside. It is spiteful and harmful and completely unnecessary. No doctors, no dentists, poor transport links, regular flooding. There is an airport for the benefit brigade to fly to Malaga, I suppose, but then what will they do for the remaining 50 weeks of the year? Unconscionable. Can't wait for next election.			
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The area simply does not have the room or need for extra housing. The infrastructure is very poor, the Doctors could not cope, the traffic would be even more appalling, the train station has no disability access, the Dentist is full, the shops are useless, the destruction to wildlife would be devastating and the whole valley is susceptible to flooding, which hard-core and tarmac would exacerbate and lead to serious damage (and justifiable causes for court proceedings in the event of loss to others as the water is moved onto property). The roads are in poor condition anyway and they would suffer inordinately. There is nothing here for such an influx of people, no work, few businesses, so they would add to the mass of commuters clogging up Bristol and harming the climate catastrophically. Can we not wait until this government collapses and more reasonable minds take over?			

Name: O Gillespie **I.D:** 21176513

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	In its 2025 report the Climate Change Committee lists key risk areas for the UK - extreme weather affecting food production and nature, risk of drought, risk of flooding etc. So this plan to cover grade 1 agricultural land with housing is mad - there is only 7% of this high quallity land left in North Somerset - we NEED crops and food more than ever in the face of climate change. What happened to the Government's "we must protect our best and most versatile land" policy? Backwell Common and surrounding areas are prone to flooding - more housing will increase this threat. Backwell Lake and adjacent fields where new roads and housing are planned are on a regularly flooding floodplain. Backwell already has lots of new housing approved increasing the village substantially - additional numbers would be overdevelopment and put a great strain on local services, roads etc And the so called " key element" of a railway station would in fact be overwhelmed with such a large increase in people using it and the already crowded car park. The A370 is a busy road, often with slow moving traffic - which is particularly busy in the summer and comes to a standstill when there are problems on the M5. Thousands of extra cars will make it completely impossible. Why is Backwell being so targetted with housing? It is a village and yet it is being told to build more houses than any other village or indeed, percentage wise, local towns. To put 950 houses onto the green fields is like putting a whole new village inside Backwell. In spite of this proposed increase in housing there are no plans for extra school places, for new health services or leisure facilities. The lack of infrastructure cannot support another 1,000 houses. The Infrastructure Delivery Plan lacks funding guarantees for a new road and new services. The Uk is one of the most nature depleted countries and this proposal would destroy much needed hedgerows and mature trees which provide habitats for wildlife. As well as affecting rare Lesser and Greater Horseshoe Bats. Considering how many houses are already approved in Backwell this proposal presents a huge volume of growth on top of those within an unreasonably short period of time - basically it is destabilising, unsustainable and undeliverable.			

Name: O Hollis **I.D:** 62866017

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Not a sound plan. 800 houses already approved in Backwell a village. another 1000 houses and a road across Green Belt grade 1 land used for agriculture not sound. Village already being increased by 40%. This new proposal mean increase to 80%. No longer an rural village but a town with not the infrastructure to keep the population safe and educated to a basic standard. The village regularly gets flooded and down on Backwell Common the various streams and brooks already break their banks and cause flooding in gardens and the road and bridges under the railway line. I new larger road dug further under the bridge to allow double decker buses and lorries means this will also flood. Also the increased surface run off of another 1000 houses the other side of the railway bridge will increase the flooding to a new level. Plus climate change predictions will add on top of this. The damage to the wild life is unneeded especially as they are already struggling. This area is a small Green belt land of many diverse animals. The land needs to be protected for our children's children for food and the wildlife. In tern our own human health.			

Name: Oliver Ellis **I.D:** 47564161

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared • Justified • Effective	No	No	The transport plan is not properly funded and will not work. It has come to the wrong conclusions and councillors have been ignored. It will leave thousands of houses being built with no effective infrastructure causing chaos on the roads, making the quality of air worse for people, slowing the economy down by creating gridlock as the roads are not suitable and the plan is inadequate. Nailsea has already had more than its fair share of houses with many more ready to be built as they have had planning permission. The extra proposed houses will be the step to far for what the town can take with the ridiculous parking charges causing parking issues on the road side and the road network not being able to cope. The roads are often very busy and the new transport plan in the local plan will only make things worse with its unrealistic claims. More green space is proposed to be lost in this plan. Nailsea has lost so much already. It will cause more social isolation from lack of out door spaces to meet, contribute to more mental health issues from lack of open green space and reduce space to be active. Poplar Farm should be removed from the sites allocation. The fields flood, there is a gas pipe running underneath it and the road infrastructure is dangerous with no pavements on North Street. Children walk along this road and under law they have the right to have a safe route to walk to school. This also goes against NSC's active travel policy. North Steet and the West End Lanes are active travel routes. Adding roughly 200 cars to the area, on top of what is already being developed, will further put off people from active travel, pushing more people into there cars. The Lanes already have a low percentage of active travel use due to fear of being hit by a motorised vehicle. This goes against nation active travel guidance.	The transport plan need to be completely changed to be financially realistic and to understand the really challenges of each area and an appropriate to plan to deal with it. Until this happens, housing sites in Nailsea should be withdrawn.	No. See above.	

Name: Oliver Stubbs **I.D:** 30471969

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP10: Strategic gaps	No	• Positively prepared • Justified • Effective	Unsure	No	I disagree with the nature and extent of the strategic gap to the West of Hillier’s Lane in Churchill. This is neither justified nor positive, it is ill conceived. The policy is knee jerk and inconsistent with previous allowed development to the East of Hillier’s Lane. This is inconsistent with the policy of allowing development adjoining the settlement boundary. There is already a natural strategic gap in the form of Old Farm, Churchill Green. This is farm land which is mainly apple orchards. Why does North Somerset council feel the need to dictate the future potential use of land? This will devalue the land and potentially mean it will not be maintained nor managed as effectively in the future.	Don’t allocate the land West of Hillier’s Lane as strategic gap land, leave it as it is. The policy is knee jerk and inconsistent with previous allowed development to the East of Hillier’s Lane.		

Name: Oliver.Carver **I.D:** 62731329

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Vision, Strategic Priorities and Sustainability Objectives	No	• Justified	No	No	Sound - has this plan been positively prepared? It does not appear to be. It also does not appear to be justified, effective or consistent with National Policy. Legal - This does not appear to be legally compliant in any way Finally, from what I've read this doesn't not meet the duty to cooperate. The council has not properly engaged with neighbouring authorities and and statutory bodies	Scrap the plans.		

Name: Olivia Stuart-Hunt **I.D:** 62777633

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I’m writing as a young resident of Backwell to strongly object to the proposed housing development and new road. This plan would completely change the village in ways that don’t make sense and aren’t fair to the people who live here. 1. Backwell is already taking too much growth We’ve already got 800 new houses approved—that’s about a 40% increase for the village. Adding another 1,000 homes would be overdevelopment, plain and simple. Backwell isn’t a town, and this level of growth would ruin its character. 2. The new road won’t fix traffic The road won’t actually solve congestion on Station Road, Backwell Common, or Chapel Hill. Plus, building it under or over the railway sounds super expensive and maybe not even possible. So why risk it? 3. No extra schools, doctors, or places to go Even with the houses already approved, there aren’t enough school places. There’s no plan for more health services or leisure facilities either. How can we add 1,000 more homes when the basics aren’t covered? 4. Backwell is being treated unfairly Backwell is getting more houses than any other village in North Somerset—even more growth than some towns! We’re expected to take 7% of the district’s housing, while Clevedon only takes 2%. That’s not balanced.			

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					5. No proof we even need these houses here There’s no proper analysis showing why Backwell needs this many extra homes. And no clear plan for how it would all work financially. 6. Backwell isn’t a jobs hub Most people here commute. Adding more houses just means more cars on the road and more traffic. That’s not sustainable. 7. No thought about community impact There’s no assessment of how this will affect social cohesion. Dumping this much growth on a small village without planning for community spaces will make Backwell feel disconnected. 8 & 9. Losing the best farmland The land they want to build on is Grade 1 agricultural land—the best quality for growing food. There’s only about 7% of this land left in North Somerset. Government policy says we should protect it for food security, but this plan ignores that. 10 & 11. Wildlife will suffer Building here would destroy habitats and harm biodiversity. It even threatens the Brockley Maternity Roost and rare bats that rely on this land. The UK is already one of the most nature-depleted countries—why make it worse? 12. No clear funding for infrastructure The Infrastructure Delivery Plan doesn’t show proper costings or guaranteed funding for the road or services. So how do we know any of this will actually happen? 13, 14 & 15. Flood risk is real Backwell Common and the fields near Backwell Lake flood regularly. Building houses and roads there will make flooding worse and put people at risk. 16. Affordable housing rules make funding harder Green Belt policy requires 50% affordable housing, which means developers pay less towards infrastructure. So again—how will the road and services be funded? 17. Too much, too fast This level of growth in such a short time is destabilizing and unsustainable. There’s no proper phasing to make sure infrastructure comes first. 18. The train station isn’t ready Backwell station isn’t accessible for people with mobility issues and is hard for families with young kids. It’s not a proper transport hub, so the claim that this development is sustainable doesn’t hold up. This plan is unfair, unrealistic, and harmful. It ignores infrastructure needs, environmental protection, and community wellbeing. Backwell is being asked to take way more than its share, and the proposals don’t even meet basic government policies on land protection and flood safety.			

Name: Olivia Summerell **I.D:** 58550113

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	• Justified • Effective • Consistent with	No	No	I am writing to formally object to the North Somerset Local Plan 2041:pre-submission plan (Reg 19) for the proposed development. The development of this site, which is designated as Green Belt land, would have serious environmental consequences and significantly increase the risk of flooding in the area. 1. Green Belt Protection & Environmental Impact	as above	as above	

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		national policy			The Green Belt exists to prevent urban sprawl, protect the countryside, and maintain open spaces for biodiversity and public well-being. This development would permanently destroy an area of natural land, causing: • Irreversible Loss of Green Space: The Green Belt designation ensures that land remains open and undeveloped for the benefit of both people and wildlife. If this development is approved, it sets a dangerous precedent for further encroachment on protected land. • Harm to Biodiversity: The proposed site supports diverse wildlife, including protected species such as [mention any known wildlife in the area]. The destruction of their habitat would lead to a decline in local biodiversity, disrupting the delicate ecological balance. • Increased Pollution: The loss of trees and vegetation will reduce the natural ability of the land to absorb pollutants, leading to increased air and noise pollution. The additional traffic and construction activity will worsen air quality, negatively impacting the health of residents. • Loss of Carbon Sequestration: Green Belt areas play a crucial role in absorbing carbon dioxide and mitigating climate change. Removing natural vegetation for development will contribute to increased carbon emissions and reduce the area's ability to combat climate change effects. 2. Increased Flood Risk The proposed site is in an area already at risk of flooding, and development will significantly worsen the situation. Key concerns include: • Loss of Natural Drainage: Green Belt land acts as a natural sponge, absorbing rainwater and preventing excessive surface runoff. Paving over this land with impermeable surfaces such as concrete and asphalt will reduce the area's ability to absorb rainwater, increasing flood risk in the immediate and surrounding areas. • Overloaded Drainage Systems: Existing drainage infrastructure may already be struggling to cope with rainfall. Additional surface water runoff from the development could overwhelm drainage systems, leading to more frequent and severe flooding, which could affect nearby homes and businesses. • Climate Change Considerations: With climate change leading to more extreme and unpredictable weather, it is crucial to safeguard areas that naturally mitigate flooding. Removing natural flood defenses, such as fields and grasslands, will only exacerbate the issue. 3. Conflict with National & Local Planning Policies The National Planning Policy Framework (NPPF) states that Green Belt land should only be developed in "exceptional circumstances." This proposal does not meet that threshold and contradicts the fundamental principles of Green Belt protection. Additionally, the development conflicts with local flood risk management policies, which prioritize sustainable land use and flood mitigation strategies.			

Name: Oriel Wright **I.D:** 62747969

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Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	It would lead to over development of the town. The proposed road will not serve Nailsea's traffic or relieve congestion in Station Road which is already dangerously over used putting pedestrians (especially schoolchildren) at risk. The surrounding lanes will become log-jammed. Grade 2 agricultural land will be lost.			

Name: Owain Thatcher **I.D:** 62860385

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land west of Rodney Road	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The field to the east of West Leigh Primary School should be removed from the Grove Farm / Rodney Road housing allocation as it is not required to meet housing targets in the North Somerset Draft Local Plan. It currently provides a vital green buffer between the school and the new Rodney Road development, and has real present and future value for children, families and the wider community. The land functions as an important environmental buffer between the school and surrounding housing, helping reduce noise, air pollution, overheating and loss of biodiversity affecting children. Further, Policy LP3 prioritises the provision of new green infrastructure and open space. This field already fulfils that purpose and should be protected, not built on. It is nonsensical to justify the destruction of existing green infrastructure and open space, which has established environmental value, with promises of creation of new such areas. Development here would represent avoidable harm to children's outdoor provision, at a time when national policy strongly emphasises active travel, outdoor learning, physical activity and mental wellbeing. The site has strong potential for designation as Local Green Space, as it is demonstrably special to the local community, local in character and offers clear recreational, educational, health and ecological benefits.			
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell already has 800 new houses approved: a 40% increase for the village. The existing deficit in school places has been ignored; and there is no proposed investment in health services, leisure facilities, or the train connections which are being disproportionately relied on to justify this tick-box overdevelopment. Grade 1 agricultural land should not be built on: there is only 7% of this quality land left in North Somerset. Further, development of such land is contrary to Government policy: 'we must protect our best and most versatile land'. Food security risks being undermined. Part of the area is a flood plain which is necessary to avoid existing houses flooding. The proposal will put more pressure on the plains than can be handled, resulting in more serious flooding to existing and new houses. The land provides much needed habitats for a range of species – which is crucial: the UK is one of the world's most nature-depleted countries. Once the habitats are destroyed, the animals cannot survive and creation of mitigating habitats is insufficient. Rare lessor and greater Horseshoe bat populations will be adversely impacted.			

Name: P Abrahams **I.D:** 32585025

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SP7: Green Belt	No	• Consistent with national policy	No	Yes	1) While Policy DP12 is mostly similar to the previous DM12 and previous NPPF where it clarifies the circumstances in which infilling is not regarded as inappropriate development outside of a settlement boundaries in the Green Belt, it does contradict itself twice within the following two statements and thus makes the Local Plan unsound. Page 139 Outside of settlement boundaries and in the smaller settlements and hamlets which do not have a settlement boundary limited infilling is inappropriate development and likely to harm the openness of the Green Belt. Page 142 The remaining smaller settlements and hamlets have been assessed as having an open character which contributes to the openness of the Green Belt. Infilling in these locations would be inappropriate development in the Green Belt. 2) Infilling on previously developed sites in the Green Belt outside of the settlement boundaries is appropriate development provided it meets with certain listed criterion's. 3) Those infill sites will clearly be within the smaller settlements and hamlets and thus the above two statements should include a note to those exceptions which the policy lists on page 140 under the title "Redevelopment and infilling on previously developed sites in the Green	Within Appendix 1: Glossary on page 361 under Previously developed land: "land in built-up areas such as private residential gardens" which its excluded from being previously developed land. Suggest placing a note or reference so to ensure non-built up rural residential gardens can be classed as previously developed due to the the court case, Dartford Borough Council v The Secretary of State for Communities and Local Government & Ors [2017] EWCA Civ 141 (14 March 2017)		Appeal Decision 3347328.pdf Appeal Decision 3347517.pdf 25_P_1774_TDC-NORTH_SOMERSET_OFFICER_REPORT-3536754 for local plan.pdf 20_P_2648_FUL-NORTH_SOMERSET_OFFICER_REPORT-3037409 for local plan.pdf 20_P_0721_FUL-NORTH_SOMERSET_OFFICER_REPORT-2960939 for local plan.pdf Local Plan - Infilling on PDL - DP12 - 11th Dec 2025 (7).pdf

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					Belt outside settlement boundaries’. 4) Without including those exceptions it could be interpreted by planning officers and potential applicants that infilling is inappropriate development in the Green Belt on all types of land classification, which would lead to a reduction in the council’s calculated windfall sites, which further makes the Local Plan unsound 5) In those smaller settlements and hamlets new dwellings would be inappropriate on Greenfield land, but not in the case where sites are classed as being Previously Developed Land where infilling is an allowable exception. Ref the High Court Case, Dartford Borough Council v The Secretary of State for Communities and Local Government & Ors [2017] EWCA Civ 141 (14 March 2017) 6) I therefore suggest those two statements are amended to read something like the following: Page 139; Outside of settlement boundaries and in the smaller settlements and hamlets which do not have a settlement boundary, limited infilling is inappropriate development and likely to harm the openness of the Green Belt, unless it meets with one of the NPPF exception’s such as Previously Developed or Grey Belt Land. Page 142 The remaining smaller settlements and hamlets have been assessed as having an open character which contributes to the openness of the Green Belt. Infilling in these locations would be inappropriate development in the Green Belt, unless it meets with one of the NPPF exception’s such as Previously Developed Land or Grey Belt Land. Substantial harm to the openness 7) The previously 2023 NPPF test, for infill development on previously developed land in the Green Belt at para 149 (g), was that it should; " not have a greater impact on the openness of the Green Belt than the existing development”. 8) In 2016 North Somerset had added 3-criterion’s within DM12 and carried those forward without change to DP12, two criterion’s related to the new dwellings size and position while the third related to sustainability. 9) But the NPPF test was revised within the recent December 2024 version that simplified and broadened the exception. 10) The test within para. 154 (g) is now simply that the development should ; ”not cause substantial harm to the openness of the Green Belt”. 11) This change in the threshold of harm is the only criteria in this NPPF policy, no other safeguards or even measures on its sustainability location were included. 12) The latter I believe is due to those sites being more rural than urban and because there is already an NPPF policy for extra allowances at rural locations that’s covered in Section 9. Promoting sustainable transport where on page 31 within para 110 it states;			

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					’However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making’. 13)Therefore to be consistent with national policy the new local plan it should firstly include, “should not cause substantial harm to the openness of the Green Belt” 14) And secondly either remove the sustainability criterion or ensure it is worded so to reflect that sites in a rural location would normally have a lesser sustainability criterion when compared to an urban location as per para 110 of the NPPF. 15) Please also consider that the NPPF included a sustainability criterion within the new policy for Grey Belt Land at para 155 (c) where it states “that the development would be in a sustainable location, with particular reference to paragraphs 110 and also 115 of the Framework”. 16) Not including a sustainable criterion within the Framework for Green Belt infill but within Grey Belt might also suggest that there’s a lower sustainability bar for Previously Developed Land within the Green Belt than within Grey Belt Land! 17) Recent appeal decisions interpreting the 2024 National Planning Policy Framework (NPPF) have established that "sustainable location" for rural dwellings is a proportionate planning judgment rather than a rigid checklist that replicates urban mobility standards. Planning inspectors have found that because opportunities to maximise sustainable transport vary significantly between urban and rural areas, rural sites do not need to meet the same stringent accessibility benchmarks as urban ones. 18) Inspectors have now recognise that it is not appropriate to replicate "metropolitan mobility standards in inherently rural places”. 19) Proportionate Judgments: A sustainable location in a rural or "grey belt" context is defined by realistic access to services and transport appropriate to the proposal's scale, rather than a total absence of car dependency. 20) NPPF Paragraph 155 and Transport: The 2024 NPPF revisions (specifically referencing paragraphs 110 and 115) emphasise managing growth to promote sustainable transport while explicitly acknowledging that rural areas have different capacities for this. 21) Flexibility for "Grey Belt" Land: Development on "Grey Belt" land (Green Belt land that does not strongly contribute to core purposes) may be approved even if it only has one "tangible non-car options". 22) Sites that were previously dismissed as inaccessible in rural areas has now be argued successfully where evidence showed realistic non-car options for some trips and negligible traffic impact. 23) To support my above comments I have listed just a few granted applications and appeals. 24) Appeal Ref: APP/V1505/W/24/3347517 Land West of Corner Road, North of Approach Road, Crays Hill, Basildon CM11 2UT - Decision date: 26 June 2025 - Appeal Allowed. While the Council and Inspector adjudged			

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					the site not to be infilling due to the loose grain of development and therefore would not meet any of the exceptions set out at paragraph 154 of the Framework, the Inspector when assessing the site for it's Grey Belt credentials stated on page 2. The Council has not contended that the appeal site is in an unsustainable location, having regard to access to facilities and services. I saw that the roads immediately adjacent to the site are quiet in nature, and although they do not have footpaths or street-lighting, there is no suggestion that pedestrian access would be unsafe. Access by pedestrian means would not always be attractive, particularly in darkness, but these stretches of road are relatively short, and a footway and lighting can be found once London Road is reached. The evidence also indicates that access to public transport can be found in Crays Hill, within reasonable walking distance. For these reasons, I find that the proposal would be in a sustainable location for the purposes of paragraph 155 of the Framework. As criterion (d) of paragraph 155 would not apply in this instance as the proposal would not amount to major development, and having found that the proposal would otherwise meet the relevant criteria for Grey Belt development, I conclude that it would not comprise inappropriate development in the Green Belt. The proposal would accord with paragraphs 153 and 155 of the Framework, and it is not, therefore, necessary for me to consider the effect of the proposal upon the openness of the Green Belt, nor is it necessary for very special circumstances to justify a grant of planning permission to be demonstrated. 25) Appeal Ref: APP/M3645/W/24/3347328 Woodside House, Copthorne Bank, Copthorne, Surrey RH10 3JD. Proposal to demolish one existing dwelling, garage and outbuildings and construct two detached dwellings and one detached garage. Was judged to be Grey Belt Land and on page 4 the Inspector wrote the following: This section of Copthorne Bank has a rural character but, due to the presence of existing dwellings in the vicinity of the site, the proposed development would not be in an isolated location. Furthermore, the highway connects the site with nearby settlements including Copthorne with Burstow, Smallfield, and Domewood. Whilst there are bus stops nearby, Copthorne Bank is subject to a 50mph speed limit and there are no footpaths along this section. Future occupants would therefore be dependent on use of a private car to meet their day-to-day needs. However, paragraph 110 of the Framework recognises that opportunities to maximise sustainable transport solutions will vary between urban and rural areas. The proposal would result in a net increase of one dwelling on the site, and therefore the volume of traffic movements associated with the proposed development would be small. The proposed development would utilise the existing vehicular access and there would be space for the parking and turning of vehicles within the site. The local highway authority did not object to the proposal. Therefore, I am content the proposal would not have significant impacts on the capacity of the transport network, congestion, or highway safety. Within the context of its rural location, I am satisfied the proposal would be in a sustainable location, as required by criterion (c) of Framework paragraph 155, that fulfils the requirements of paragraphs 110 and 115 of the Framework. 26) 25/P/1774/TDC Erection of one detached dwelling at Hillview Naish Lane, Barrow Gurney, BS48 3ST was granted by the Case Officer on 7th			

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					November 2025. The Case Officer concluded that the proposed dwelling that would be sited within the garden of Hillview was considered to be limited infilling on Previously Developed Land in the Green Belt outside of a settlement boundary. 27) And to show consistency for over the last 5-years both 20/P/0721/FUL and 20/P/2648/FUL each for one new infill dwelling between existing dwellings on Old Weston Road Flax Bourton were both judged to be Previously Developed Land and granted due to the exceptions within the NPPF and DM12. 28) Consequently, the new Local Plan should not be stating on page 139 and 142 that limited infilling is inappropriate development outside of settlement boundaries and in the smaller settlements and hamlets and likely to harm the openness of the Green Belt unless it includes a proviso for the allowable NPPF exceptions, that of 'infilling on Previously Developed Land in the Green Belt outside settlement boundaries' and for the Grey Belt Land exception. 29) Otherwise this would lead to confusion by Planning Officers and in not allowing potential sites to come forward, thus not maximising the full use of previously developed land. 30) This surly makes the Local Plan unsound as it doesn't agree with the NPPF and current DM12 policies and is not just prioritising Greenfield sites over infilling on Previously Developed Land but disallowing them altogether. 31) It's mentioned numerous times that the development of previously developed land is actively encouraged in national and local planning guidance. The National Planning Policy Framework notes: "Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value" 32) Windfall figures are homes that become's unexpectedly available for housing that were not specifically identified in a local development plan. Based on past trends from the last five years it is forecasted that a further 1,118 windfall homes will come forward on small sites across villages, smaller settlements and the rural areas. 33) I've highlighted just a few of the many windfall sites that were granted by being classed as infill on PDL in the Green Belt over the last 5-years. Consequently as the new Local Plan could now disallow infilling outside of settlement boundaries, which is clearly contrary to NPPF policy 154 (g) and to their own current policy in DM12 for infilling on previously developed sites in the Green Belt outside settlement boundaries then doesn't those windfall forecasted figures of 1,118 further homes becomes an unsound number!			
Policy DP12: Development in the Green Belt	No	Consistent with national policy	No	Yes	1) While Policy DP12 is mostly similar to the previous DM12 and previous NPPF where it clarifies the circumstances in which infilling is not regarded as inappropriate development outside of a settlement boundaries in the Green Belt, it does contradict itself twice within the following two statements and thus makes the Local Plan unsound. Page 139 Outside of settlement boundaries and in the smaller settlements and hamlets which do not have a settlement boundary limited infilling is	Policy DP12: Page 139; should be amended to read. Outside of settlement boundaries and in the smaller settlements and hamlets which do not have a settlement boundary, limited		

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					inappropriate development and likely to harm the openness of the Green Belt. Page 142 The remaining smaller settlements and hamlets have been assessed as having an open character which contributes to the openness of the Green Belt. Infilling in these locations would be inappropriate development in the Green Belt. 2) Infilling on previously developed sites in the Green Belt outside of the settlement boundaries is appropriate development provided it meets with certain listed criterion's. 3) Those infill sites will clearly be within the smaller settlements and hamlets and thus the above two statements should include a note to those exceptions which the policy lists on page 140 under the title "Redevelopment and infilling on previously developed sites in the Green Belt outside settlement boundaries'. 4) Without including those exceptions it could be interpreted by planning officers and potential applicants that infilling is inappropriate development in the Green Belt on all types of land classification, which would lead to a reduction in the council's calculated windfall sites, which further makes the Local Plan unsound 5) In those smaller settlements and hamlets new dwellings would be inappropriate on Greenfield land, but not in the case where sites are classed as being Previously Developed Land where infilling is an allowable exception. Ref the High Court Case, Dartford Borough Council v The Secretary of State for Communities and Local Government & Ors [2017] EWCA Civ 141 (14 March 2017) 6) I therefore suggest those two statements are amended to read something like the following: Page 139; Outside of settlement boundaries and in the smaller settlements and hamlets which do not have a settlement boundary, limited infilling is inappropriate development and likely to harm the openness of the Green Belt, unless it meets with one of the NPPF exception's such as Previously Developed or Grey Belt Land. Page 142 The remaining smaller settlements and hamlets have been assessed as having an open character which contributes to the openness of the Green Belt. Infilling in these locations would be inappropriate development in the Green Belt, unless it meets with one of the NPPF exception's such as Previously Developed Land or Grey Belt Land. Substantial harm to the openness 7) The previously 2023 NPPF test, for infill development on previously developed land in the Green Belt at para 149 (g), was that it should; " not have a greater impact on the openness of the Green Belt than the existing development". 8) In 2016 North Somerset had added 3-criterion's within DM12 and carried those forward without change to DP12, two criterion's related to	infilling is inappropriate development and likely to harm the openness of the Green Belt, unless it meets with one of the NPPF exception's such as Previously Developed or Grey Belt Land. Policy DP12: page 140. Delete the criterions under infilling on previously developed sites and only insert "Infilling should not cause substantial harm to the openness of the Green Belt" so to be consistent with the latest version of the NPPF. Policy DP12: Page 142 should be amended to read. The remaining smaller settlements and hamlets have been assessed as having an open character which contributes to the openness of the Green Belt. Infilling in these locations would be inappropriate development in the Green Belt, unless it meets with one of the NPPF exception's such as Previously Developed Land or Grey Belt Land Policy DP2: on page 117 should be amended to read - "Residential gardens are excluded from the definition of previously developed land. Within Appendix 1: Glossary on page 361 under Previously developed land: "land in built-up areas such as private residential		

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					the new dwellings size and position while the third related to sustainability. 9) But the NPPF test was revised within the recent December 2024 version that simplified and broadened the exception. 10) The test within para. 154 (g) is now simply that the development should ; ”not cause substantial harm to the openness of the Green Belt”. 11) This change in the threshold of harm is the only criteria in this NPPF policy, no other safeguards or even measures on its sustainability location were included. 12) The latter I believe is due to those sites being more rural than urban and because there is already an NPPF policy for extra allowances at rural locations that’s covered in Section 9. Promoting sustainable transport where on page 31 within para 110 it states; ’However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making’. 13)Therefore to be consistent with national policy the new local plan it should firstly include, “should not cause substantial harm to the openness of the Green Belt” 14) And secondly either remove the sustainability criterion or ensure it is worded so to reflect that sites in a rural location would normally have a lesser sustainability criterion when compared to an urban location as per para 110 of the NPPF. 15) Please also consider that the NPPF included a sustainability criterion within the new policy for Grey Belt Land at para 155 (c) where it states “that the development would be in a sustainable location, with particular reference to paragraphs 110 and also 115 of the Framework”. 16) Not including a sustainable criterion within the Framework for Green Belt infill but within Grey Belt might also suggest that there’s a lower sustainability bar for Previously Developed Land within the Green Belt than within Grey Belt Land! 17) Recent appeal decisions interpreting the 2024 National Planning Policy Framework (NPPF) have established that "sustainable location" for rural dwellings is a proportionate planning judgment rather than a rigid checklist that replicates urban mobility standards. Planning inspectors have found that because opportunities to maximise sustainable transport vary significantly between urban and rural areas, rural sites do not need to meet the same stringent accessibility benchmarks as urban ones. 18) Inspectors have now recognise that it is not appropriate to replicate "metropolitan mobility standards in inherently rural places”. 19) Proportionate Judgments: A sustainable location in a rural or "grey belt" context is defined by realistic access to services and transport appropriate to the proposal's scale, rather than a total absence of car dependency. 20) NPPF Paragraph 155 and Transport: The 2024 NPPF revisions	gardens" which its excluded from being previously developed land. Suggest placing a note or reference so to ensure non-built up rural residential gardens can be classed as previously developed due to the the court case, Dartford Borough Council v The Secretary of State for Communities and Local Government & Ors [2017] EWCA Civ 141 (14 March 2017)		

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					(specifically referencing paragraphs 110 and 115) emphasise managing growth to promote sustainable transport while explicitly acknowledging that rural areas have different capacities for this. 21) Flexibility for "Grey Belt" Land: Development on "Grey Belt" land (Green Belt land that does not strongly contribute to core purposes) may be approved even if it only has one "tangible non-car options". 22) Sites that were previously dismissed as inaccessible in rural areas has now be argued successfully where evidence showed realistic non-car options for some trips and negligible traffic impact. 23) To support my above comments I have listed just a few granted applications and appeals. 24) Appeal Ref: APP/V1505/W/24/3347517 Land West of Corner Road, North of Approach Road, Crays Hill, Basildon CM11 2UT - Decision date: 26 June 2025 - Appeal Allowed. While the Council and Inspector adjudged the site not to be infilling due to the loose grain of development and therefore would not meet any of the exceptions set out at paragraph 154 of the Framework, the Inspector when assessing the site for it's Grey Belt credentials stated on page 2. ---------- 8. The Council has not contended that the appeal site is in an unsustainable location, having regard to access to facilities and services. I saw that the roads immediately adjacent to the site are quiet in nature, and although they do not have footpaths or street-lighting, there is no suggestion that pedestrian access would be unsafe. Access by pedestrian means would not always be attractive, particularly in darkness, but these stretches of road are relatively short, and a footway and lighting can be found once London Road is reached. The evidence also indicates that access to public transport can be found in Crays Hill, within reasonable walking distance. 9. For these reasons, I find that the proposal would be in a sustainable location for the purposes of paragraph 155 of the Framework. As criterion (d) of paragraph 155 would not apply in this instance as the proposal would not amount to major development, and having found that the proposal would otherwise meet the relevant criteria for Grey Belt development, I conclude that it would not comprise inappropriate development in the Green Belt. 10. The proposal would accord with paragraphs 153 and 155 of the Framework, and it is not, therefore, necessary for me to consider the effect of the proposal upon the openness of the Green Belt, nor is it necessary for very special circumstances to justify a grant of planning permission to be demonstrated. ---------- 25) Appeal Ref: APP/M3645/W/24/3347328 Woodside House, Copthorne Bank, Copthorne, Surrey RH10 3JD. Proposal to demolish one existing dwelling, garage and outbuildings and construct two detached dwellings and one detached garage. Was judged to be Grey Belt Land and on page 4 the Inspector wrote the following: ------28) This section of Copthorne Bank has a rural character but, due to the presence of existing dwellings in the vicinity of the site, the proposed development would not be in an isolated location. Furthermore, the highway connects the site with nearby settlements including Copthorne			

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					with Burstow, Smallfield, and Domewood. -------29) Whilst there are bus stops nearby, Copthorne Bank is subject to a 50mph speed limit and there are no footpaths along this section. Future occupants would therefore be dependent on use of a private car to meet their day-to-day needs. However, paragraph 110 of the Framework recognises that opportunities to maximise sustainable transport solutions will vary between urban and rural areas. --------(30) The proposal would result in a net increase of one dwelling on the site, and therefore the volume of traffic movements associated with the proposed development would be small. The proposed development would utilise the existing vehicular access and there would be space for the parking and turning of vehicles within the site. The local highway authority did not object to the proposal. Therefore, I am content the proposal would not have significant impacts on the capacity of the transport network, congestion, or highway safety. --------(31) Within the context of its rural location, I am satisfied the proposal would be in a sustainable location, as required by criterion (c) of Framework paragraph 155, that fulfils the requirements of paragraphs 110 and 115 of the Framework. ---------- 26) 25/P/1774/TDC Erection of one detached dwelling at Hillview Naish Lane, Barrow Gurney, BS48 3ST was granted by the Case Officer on 7th November 2025. The Case Officer concluded that the proposed dwelling that would be sited within the garden of Hillview was considered to be limited infilling on Previously Developed Land in the Green Belt outside of a settlement boundary. 27) And to show consistency for over the last 5-years both 20/P/0721/FUL and 20/P/2648/FUL each for one new infill dwelling between existing dwellings on Old Weston Road Flax Bourton were both judged to be Previously Developed Land and granted due to the exceptions within the NPPF and DM12. 28) Consequently, the new Local Plan should not be stating on page 139 and 142 that limited infilling is inappropriate development outside of settlement boundaries and in the smaller settlements and hamlets and likely to harm the openness of the Green Belt unless it includes a proviso for the allowable NPPF exceptions, that of ‘infilling on Previously Developed Land in the Green Belt outside settlement boundaries’ and for the Grey Belt Land exception. 29) Otherwise this would lead to confusion by Planning Officers and in not allowing potential sites to come forward, thus not maximising the full use of previously developed land. 30) This surly makes the Local Plan unsound as it doesn’t agree with the NPPF and current DM12 policies and is not just prioritising Greenfield sites over infilling on Previously Developed Land but disallowing them altogether. 31) It’s mentioned numerous times that the development of previously developed land is actively encouraged in national and local planning guidance. The National Planning Policy Framework notes: “Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value”			

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					32) Windfall figures are homes that become's unexpectedly available for housing that were not specifically identified in a local development plan. Based on past trends from the last five years it is forecasted that a further 1,118 windfall homes will come forward on small sites across villages, smaller settlements and the rural areas. 33) I've highlighted just a few of the many windfall sites that were granted by being classed as infill on PDL in the Green Belt over the last 5-years. Consequently as the new Local Plan could now disallow infilling outside of settlement boundaries, which is clearly contrary to NPPF policy 154 (g) and to their own current policy in DM12 for infilling on previously developed sites in the Green Belt outside settlement boundaries then doesn't those windfall forecasted figures of 1,118 further homes becomes an unsound number!			

Name: P Child **I.D:** 21308961

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I am writing to formally object to the proposed development of 889 new dwellings in Backwell. When combined with the 800+ homes already approved (some currently under construction), this represents a massive 40% expansion of the village. This level of growth constitutes gross overdevelopment. Disproportionate Allocation Backwell has been assigned a housing allocation significantly higher than any other village in North Somerset, and even higher than the towns in terms of percentage growth. It is unreasonable that Backwell is expected to absorb 7% of the district's total allocation, while a town like Clevedon is only allocated 2%. Infrastructure and Feasibility The current Infrastructure Delivery Plan is fundamentally flawed. It lacks the necessary costings and detailed analysis to prove viability. Specifically: Roads: There is no guaranteed funding for the proposed new road. Furthermore, I see no evidence that a new road would successfully relieve congestion on Station Rd, Backwell Common, or Chapel Hill. Engineering a crossing over or under the railway line appears financially and physically unrealistic. Current Failures: The current developments in the village are causing chaos, with developers failing to adhere to agreed stipulations regarding dust, road damage, and access. There is no confidence that standards would be upheld for a project of this magnitude. Services: There is no needs analysis for the 1,000+ total new households. Our schools lack capacity, and there has been zero investment in health or leisure facilities during my time here. Sustainability and Transport Backwell offers very little local employment, necessitating commuting. However, the transport infrastructure is not fit for purpose. Rail: The station is not a viable transport hub. It lacks accessibility for disabled users or parents with young children, and the platforms are too short for many trains. Bus: Rush hour services to Bristol are frequently full, late, or cancelled. Traffic: Adding 1,000+ commuters will inevitably deadlock the local area. The suggestion that people will travel by bike or bus is largely a fantasy. Environmental Impact This proposal involves the destruction of Grade 1 Agricultural Land. With only roughly 7% of such land remaining in North Somerset, and amidst a climate crisis, we should be following government policy to protect food security, not concreting over it. Additionally, this development threatens local biodiversity, including rare bat species, and			

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					lacks any social cohesion impact assessment. Finally, flooding remains a material concern. Backwell Common, the Lake, and adjacent fields are on a floodplain. Increasing the concrete footprint will exacerbate runoff and worsen the regular flooding that already disrupts local transport. This plan is undeliverable and unsustainable.			

Name: P Davies **I.D:** 10383585

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	1) Backwell is getting a disproportionate % of the proposed development (7%) compared, for example with Clevedon - 2% , which is a much larger town. No viability analysis appears to have been conducted, nor any need for 1,000 new homes been justified. 2) The high use of agricultural land for development will seriously reduce food production and is contrary to Government policy which clearly states such land must be protected to safeguard our food security. 3) Backwell already has development approved for 800 houses, a 40% increase for the village. These further proposals are unsustainable, totally destabilising and undeliverable as the existing infrastructure, particularly in the following respects, is wholly inadequate:- a) There is no provision for the huge increase in school places which will be required b) Doctors surgeries will be overwhelmed as, again, no suitable expansion of health services is envisaged in the proposals c) Existing roads which are already log-jammed with traffic will not cope with a massive increase in vehicle movements which will be generated by this volume of additional houses 4) The proposed development will undoubtedly cause increased flooding in areas around Backwell Common and Backwell Lake which are already at risk and prone to flooding. 5) There will be an adverse effect on wildlife habitats and harm caused to biodiversity in the whole area. 6) Developers will have little left to offer towards improving the infrastructure required to support such development as there will be a requirement for 50% affordable housing on the Greenbelt land. In summary, the proposals for this Plan are not properly costed, lack any adequate infrastructure plans to deal effectively with such massive growth in housing and all its consequences and fail to show a justifiable need to impose such a destabilising measure of growth on a small village. A fundamental rethink and scaling back is required. Philip and Sheila Davies			

Name: P Evans **I.D:** 62848929

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Justified	No	No	I am not a lawyer and have not had legal training so these are the comments of a layman but I do not believe that there has been any local involvement or consultation with these plans. We have had no public meetings or exhibitions held in the village unlike other areas designated as a strategic location. These plans, if enacted, will destroy the green belt only to be released in exceptional circumstances. Only the developers will make big profits from this destroying the green belt for future generations. I do not believe that suitable brownfield sites have been considered or even consulted upon. Surely North Somerset council must consider brownfield sites. There are not suitable road links. J19 of the M5 is already saturated and being assessed. The A369 is already clogged at peak times. The infrastructure is not currently suitable for additional housing. Nearly all the green space in and around the village will lost if this goes ahead.	North Somerset Council need a complete rethink. Cut down dramatically on the use of green belt, only to be used in exceptional circumstances and consider brownfield sites. Proper consultation must take place in the village and surrounding areas for any revised plans. I do not consider the current plans to be suitable for the reasons mentioned.		

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					These developments will create a major flood hazard. We see so many homes being flooded on the television for being built in unsuitable areas.			
Land north of Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I do not consider the North Somerset Local Plan 2041 to be sound, and in particular I focus responses in relation to the proposed allocation of land north of Nailsea for inclusion in the Local Plan for development. The plan fails to meet the four tests of soundness in paragraph 36 of the National Planning Policy Framework (NPPF): • Not Positively Prepared – The plan does not demonstrate that Nailsea's constrained B-road network to the north of the town, with long-standing bottlenecks and places where two vehicles cannot safely pass, can safely or sustainably support the proposed level of development. There is no credible infrastructure or funding strategy to address these constraints. • Not Justified – The evidence base does not show that the north Nailsea allocation is the most appropriate strategy compared with reasonable alternatives. I cannot find evidence of sufficient engagement with neighbouring authorities and infrastructure to justify inclusion, and the site's extensive drainage, flood and access issues indicate that it was not objectively chosen. As an aside, the June Cabinet Meeting waived this land through with vague references to the need for housing; the mobile library debate was given more air time. • Not Effective – The allocation depends on mitigation measures that are vague or uncosted, including a 20 mph internal route and contributions to unspecified transport schemes. These do not address the fundamental capacity and safety problems identified in the Nailsea and Backwell Transport Strategy or the site requirements schedule. • Not Consistent with National Policy – The proposal conflicts with several NPPF requirements, including: • safe and suitable access and sustainable transport; • Green Belt protection (no exceptional circumstances have been demonstrated for its release); • flood risk (the site lies on sloping land draining toward a river that floods regularly); and • on protecting biodiversity and natural networks (the site forms part of a green wildlife corridor identified in the Council's Nature Emergency Toolkit). The plan also fails to reference the North Somerset Nature Toolkit at all, despite it being adopted by the Council to guide development under its declared Nature Emergency. This omission further undermines justification and consistency. The site requirements themselves acknowledge major engineering and drainage constraints, while making no reference to the Exoleum underground fuel pipeline that crosses the site — a serious safety and deliverability omission. Finally, the allocation conflicts with the Wraxall & Failand Neighbourhood Plan (2022–2038), which forms part of the statutory Development Plan and emphasises protection of the Green Belt, rural character, and transport safety. For these reasons, the plan is not positively prepared, not justified, not effective, and not consistent with national policy. It cannot therefore be considered sound in its current form. 2. Do you consider the North Somerset Local Plan 2041: Pre-submission Plan to be legally compliant?" I do not consider the North Somerset Local Plan 2041 to be legally compliant, particularly in relation to the proposed allocation of land north of Nailsea. The Council's own Duty to Co-operate Statement of Compliance (October 2025, pp. 11, 16–17, 20 and 32) confirms that engagement with key partners—including National Highways, the Environment Agency, and neighbouring authorities—remains "ongoing." This indicates that effective	I would suggest from studying the documents that the Land North of Nailsea be removed in full from the Local Plan. Reason: The allocation is not positively prepared, not justified, not effective and not consistent with national policy due to unresolved access on constrained B-roads, Green Belt harm (no demonstrated exceptional circumstances), flood-risk and drainage issues (including an overland flood route and strict SuDS limits), biodiversity and corridor fragmentation, omission of the Exolum pipeline constraint.		

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					cooperation had not been completed before the Plan's publication. There is no evidence of targeted engagement concerning the severe access constraints and flood risks affecting the land north of Nailsea. The Plan also fails to integrate or even reference the Council's adopted North Somerset Nature Toolkit, despite the Council having declared a Nature Emergency and promoting this Toolkit as a framework for biodiversity, drainage and landscape protection. Its omission calls into question whether the Plan has been prepared in full accordance with the Council's own environmental. Furthermore, the Plan makes no reference to the Exolum underground fuel pipeline that runs through the north Nailsea site. This is a nationally significant item of infrastructure, and the operator is a non-statutory consultee. The absence of consultation evidence or safety assessment suggests that the Plan has not been prepared in consultation with all relevant bodies, contrary to legal requirements. In addition, the allocation conflicts with the Wraxall & Failand Neighbourhood Plan (2022–2038), and undermines the latter's policies on Green Belt protection, settlement character, and transport safety. As a statutory body Sport England are also required to be consulted in connection with the any loss or alteration of sports facilities. For these reasons, I do not consider the Plan legally compliant. 3. Do you consider the North Somerset Local Plan 2041: Pre-submission Plan to comply with the Duty to Co-operate?" I do not consider the North Somerset Local Plan 2041 to comply with the statutory Duty to Co-operate, particularly in relation to the proposed allocation of land north of Nailsea. The Duty to Co-operate Statement of Compliance (October 2025) itself (pages 11, 16–17, 20 and 32) admits that discussions with key partners were still "ongoing" at the time of publication. This demonstrates that the Council has not completed effective cooperation with all relevant authorities and infrastructure bodies before submitting the Plan. There is no clear evidence of substantive joint working with Bristol City Council, National Highways, the Environment Agency, or Exolum UK Ltd (the operator of the strategic underground fuel pipeline crossing the site) on the specific issues of access, flood risk, or infrastructure capacity for north Nailsea. The absence of consultation with these statutory bodies means the Plan cannot be regarded as having been prepared "constructively, actively and on an ongoing basis." The existence and proximity of a high pressure aviation fuel pipeline must call into question the very safety of the site and the ability of any prospective purchasers to obtain finance to purchase any of the new residential units. Failure to consult properly on this matter alone could lay the Council open to subsequent legal action. There is no evidence that the Council has engaged meaningfully with the principles of its own North Somerset Nature Toolkit or with neighbouring authorities on biodiversity connectivity, contrary to current requirements. For these reasons, the Plan does not comply with the legal Duty to Co-operate and should not be submitted for examination until evidence of full engagement and signed Statements of Common Ground with the relevant bodies are provided. I consider it to be neither sound nor legal for the reasons given above. It also directly contradicts the Wraxall & Failand Neighbourhood Plan and would substantially alter the nature of the Parish of Wraxall.			

Name: P Gregory **I.D:** 8124577

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Land at Tower Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	The proposed allocation of Land at Tower Farm for 400 homes lies close to Weston Big Wood — a precious ancient woodland and Site of Nature Conservation Interest (SNCI). The woodland needs to be considered with the surrounding area and forms part of the Gordano Valley ecological network and a nationally important habitat mosaic of open grassland, wetland and woodland. This plan is not Justified There is no robust published alternatives assessment demonstrating that this sensitive site is the only or most appropriate option for growth. The risk of irreversible damage to the ancient woodland make this allocation unsuitable. There are other possible locations. The plan is not consistent with National Policy The allocation conflicts with the National Planning Policy Framework (NPPF) paragraphs 180–182, which require that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland) should be refused unless wholly exceptional reasons exist. The reference to an 'ecological buffer' is too vague, unenforceable and insufficient to address indirect impacts such as root-zone damage, hydrological change or wildlife disturbance. The NPPF requires delivering biodiversity net gain, yet the allocation offers no clear mechanism for ensuring that outcome. The plan is not positively prepared The location intensifies existing pressures in Portishead: schools, healthcare and transport infrastructure are already under strain. This peripheral site would likely increase private vehicle usage and pollution rather than support sustainable travel patterns, contrary to NPPF paragraphs 104–106. The site is too far from the town's amenties: High Street, Library, Surgeries etc to be a sustainble solution for most people. The plan is not effective Delivery depends on multiple unresolved dependencies: new school provision, bus service contributions, off-site biodiversity management, and upgrades to rights-of-way/buffer zones. No phasing plan, funding mechanism or legal agreement is published to secure these. Without such mechanisms the allocation cannot be considered deliverable within the plan period. Landscape & Connectivity The farmland/woodland edge acts as a critical ecological and landscape transition zone. Development here would fragment habitat, diminish the Gordano Valley wildlife corridor and erode the rural fringe character. Even with a buffer the visual and ecological intrusion into the woodland and surrounding landscape would be significant and unacceptable. Drainage & Hydrology Construction and built development is bound to alter surface-water run-off and soil compaction on the former farmland, potentially affecting the hydrological regime that sustains the adjacent ancient woodland. The risk of nutrient runoff, altered infiltration and woodland root zone damage would be substantial. Cumulative Impact When considered alongside other allocations in the Portishead area (such as Black Rock), the combined pressure on ecology, infrastructure and transport is significant and undermines the Council’s commitments to nature recovery and sustainable growth. This site is completely inappropriate for development. No modification would make this site appropriate. The adjacent ancient woodland is pricless and nothing can be done to mitigate any damage to it. The land should instead be retained as undeveloped green space, managed to enhance biodiversity and provide sustainable public access. I do not support the the North Somerset Local Plan 2041 for the Tower Hill Farm location.			10067.JPG

Name: P Herbert **I.D:** 39304385

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Overdevelopment of the village - a 40% increase in the Village's size for this development is not sustainable. There is not the medical, dentistry, primary schools or road infrastructure to support this. The A370 is already at saturation in busy periods. There is no industry in Backwell, only an assortment of very small business employing few people. All new residents will have to commute to Bristol. At busy times it is impossible to catch the train as we are the last stop before Bristol and the station cannot cope with disabled people. This country has relatively little grade 1 agricultural land and to destroy this land is a dereliction of duty to future generations Wildlife would be adversely impacted, particularly rare bat roosts			

Name: P Horrigan **I.D:** 58585889

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Land at Leighton Crescent					Response to NSC local plan 1. The Area is a High Value Landscape 2. The Proposal borders an AONB 3. That part of Bleadon Hill as well as being a narrow country road has no footpath. 4. The whole area is unsustainable with no buses, and is inaccessible to walkers, the disabled, children in pushchairs and, the elderly. 5. Limited work opportunities. 6. Oversubscribed Schools, GP And Dental Surgeries. 7. No shops within convenient walking distance. 8. Negative effect on wildlife including Bats, Deer, Badgers all having little protection. 9. Unsafe for dog walkers and Horse Riders. 10. More houses mean more speeding cars and more pollution.			

Name: P Howells **I.D:** 62862913

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	This is a response from me (Phil Howells) and my wife (Jo Howells). Backwell already has 800 new houses approved, a 40% increase for the village. These additional numbers would lead to complete overdevelopment. The proposed Road would not effectively serve Nailsea traffic or relieve congestion on station Road, Backwell Common or Chapel Hill. Engineering the road under or over the railway would be highly expensive and possibly unfeasible. Despite this increase, there is a deficit in school places and no investment in health services or leisure facilities. The lack of infrastructure and services cannot support another 1,000 houses. Backwell is allocated a higher number of houses than any other village in North Somerset and even a higher growth percentage than towns. Backwell is expected to take 7% of the district housing allocation compared to Clevedon’s 2%. There is no needs or viability analysis for an extra 1000 houses. Backwell is not an employment Hub most residents commute. Why not join up with Bristol and build where people will most likely travel to? Some joined up thinking is needed - there is land on the outskirts of Bristol with better travel links which could be built on, leaving Backwell as a nice village to visit etc. No social cohesion impact assessment has been provided Grade one agricultural land currently used for food crops and grazing. There is only 7% of this high-quality land left in the			

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					whole of North Somerset. Why build on it? Government policy states that we must protect our best and most versatile land to safeguard food security. The proposals contradict this policy and undermine food security. Development would destroy valuable wildlife habitats and further harm biodiversity in one of the world's most nature depleted countries. The proposals threaten the Brockley Maternity Roost and SSSI with rare Lesser and Greater Horseshoe Bats relying on the land for food. The Infrastructure Delivery Plan lacks analysis and costings, and there are no funding guarantees for the new road or services. Backwell common and surrounding areas are prone to flooding, which would be aggravated by more housing. Concerns about the strategic growth location designation include the impact on the area's character, the loss of Greenbelt and high-quality agricultural land, the risk of flooding and uncertainty over if the road can be funded and delivered on time to support the proposed housing. The proposed road would just funnel more traffic into an already clogged route into Bristol. Also, why build more roads when there is an emphasis on bus and train transport, and bus lanes which have just been put in make car travel even more congested. Where is the joined up thinking? Backwell Lake (reservoir) and adjacent fields, where the new roads and housing is planned are on a floodplain which floods regularly. Government policy requires 50% affordable housing on Greenbelt land, but this reduces the funds developers contribute towards infrastructure. The sheer volume of growth with the required investment infrastructure and services over such a short destabilising, unsustainable and undeliverable. The railway station is not fit for purpose as a transport hub; it remains inaccessible for people with mobility issues and presents serious challenges when travelling with young children. There are plenty of other options to provide the sort of housing that is needed to help the people of Backwell. For example, Fairfield School is no longer operating and houses could be built on that site. Also, if the junior school and infant schools were combined on the senior school site with some new buildings, the land from the junior school and infant school could be used for housing, and also include more community resources, modernise the pool etc. This is developing on existing developed sites and makes more sense than building on grade one agricultural land. Many people use the land that it is proposed to build on to exercise walk themselves and their dogs play with their children just getting out into nature. These proposals don't really take that into consideration.			

Name: P Jones **I.D:** 30797793

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at North West Nailsea	No	• Positively prepared • Justified • Effective	Unsure	Unsure	NSC have not properly considered the traffic impacts to Tickenham roads and lanes which are currently seriously congested and unsafe for cyclists and pedestrians. These roads/lanes cannot support the increase in new homes proposed by the Local Plan. The footpaths through Tickenham are woefully inadequate for pedestrians on this busy main link road to Nailsea and beyond. The footpaths are either non existent or where they do exist they are too narrow or the adjacent road narrows to such an extent that HGVs and even light vans overhang the pavement. Pedestrians and cyclists cannot safely make the short journeys to Nailsea or	Nailsea needs to have a new link road to Clevedon and the motorway. This strategic infrastructure needs to be put in place prior to the development of further		

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					Backwell. In fact pedestrians would have to spend most of the journey walking in a live carriageway. There are a number of pinch points on the highway where HGVs are unable to pass. This occurs around Moor Lane, in the centre of the village, where the carriageway narrows to under 5.5m, at the junction with Church Lane and at Stone Edge Batch. The Cause Way, a single track ancient road across the moor, has already become an over used rat run following the new housing developments in Engine Lane, and this situation will only worsen. The village itself has already seen a number of infill developments over the last few years which has increased the number of access points on to the main road. There are over 130 points of access on to Clevedon Road. A 20mph speed restriction was considered for the village but not fully supported by the residents. The village is well over a mile in length, a 20mph limit over this distance would have frustrated through traffic to the point where they would attempt to overtake and expose residents pulling out of their drives to significant risk. The potential significant increase in traffic from the sites identified in the local plan will generate a similar risk.	housing sites in the Nailsea and Backwell area. Tickenham needs to have a robust, consistent and safe network of footpaths and cycle paths that allows residents to safely make short journeys the length of the village and to Nailsea and Clevedon.		

Name: P Lamb **I.D:** 62812961

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No		No	No	We object to the development of greenfield site at East Farleigh due the large number of dwellings planned and the lack of adequate facilities to accommodate the new residents proposed. Also the A370 is already too congested. It is most inappropriate to build on designated Green Belt land...	Relocate this housing development to Ashton Vale, which is closer to Bristol and with a suitable road structure, in contrast to Backwell with a much longer commuter distance involved.		

Name: P Margerison **I.D:** 58557537

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	‣ Consistent with national policy	Unsure	Unsure	The Tower Farm area was added to the Green Belt in the late 1980s due to their high ecological value. National planning policy allows Green Belt changes only in exceptional circumstances. These have not been demonstrated. Weston Big Wood (WBW), adjacent to the Tower Farm area, is a nature reserve and a biological Site of Special Scientific Interest. The Tower Farm area acts as an important wildlife corridor between WBW, the coastline along the Bristol Channel & the Gordano Valley. The proposal to build 400 houses on Green Belt land would cause significant ecological disturbance & damage to the abundant flora & fauna. The Tower Farm area is used & enjoyed by a significant number of Portishead residents for recreational purposes. The site also cannot provide suitable access. It would create unacceptable transport impacts exiting The Downs onto Down Road which is a major arterial road for the town. This would exacerbate the already significant level of traffic & inconsiderate parking by High Down School. Remove the Tower Farm area from the Local Plan. Don't build on a Green Belt site.			

Name: P Moran **I.D:** 62598241

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent	Unsure	Unsure	I have very serious concerns about the effectiveness and justification for the proposed plan. 1. The proposed new road would not serve Nailsea’s traffic or relieve congestion on Station Road, not would it help traffic travelling from Backwell towards the M5. 2. Development is proposed west and south of Backwell Lake – the new roads and housing will be in the floodplain, which floods regularly.			

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		with national policy			3. The proposed new link road under the rail crossing is likely to be extremely expensive and the engineering very problematic due to the proximity to the River Kenn. 4. The railway station at the heart of the 'transport hub' is not fit for purpose – it remains inaccessible for people with mobility issues and presents serious challenges when travelling with young children. 5. Transport modelling shows there will be notable increases in vehicle movements on the network of rural lanes around Nailsea. There are no clear, workable plans to mitigate against this. The lane will therefore become congested and unsafe for pedestrians, cyclists and horse riders. 6. Additional development will place immense pressure on the town's existing health and leisure provision. There will be no direct investment to combat this pressure. 7. All proposed development sites in Nailsea have been assessed to be foraging locations for the rare Greater and Lesser Horseshoe Bats – which are protected species.			

Name: P Parsons **I.D:** 63107137

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell					Having lived in the Backwell area for over 40 years, I have very strong objections to the proposed building of 1000 new houses in Backwell considering there have already been 800 houses approved. My objections are as follows: This is Grade 1 agricultural land used for crops and grazing, and there is only 7% of this land left in the whole of North Somerset. Serious threat to wildlife habitats. The proposed site is on a flood plain. Backwell is not an area of high employment, therefore more and more people would have to commute. There is not enough infrastructure t support the proposed new homes - transport facilities, road and railway, schools and medical centres would all be abysmally lacking. Backwell appears to have been allotted a much higher percentage of new housing than other villages in North Somerset. I trust that you will consider my objections very carefully and treat them with the seriousness they deserve - and act on them.			

Name: P Ramos **I.D:** 21230369

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	Positively prepared	Unsure	Unsure	We moved to Backwell just over 10 years ago with our 2 boys. We moved here predominantly to enjoy good walks, wildlife, nature and to teach our boys about the importance of those things. We have seen in recent times, many of our much-loved walks and nature disappear as planning applications for housing continue at a pace. Around 800 houses at Grove Farm, where we enjoyed watching the rare Horseshoe Bats feeding during			

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		• Justified • Effective • Consistent with national policy			the evening time and cows grazing all year round, Farleigh Fields with families of deer, badgers, foxes and any number of wildlife and witnessing the crops being harvested by local farmers, Rodney Road – a field full of daisies and buttercups which my children would run through and collect on their way to school – have all now been allocated for housing. Those fields are gone. In a village which has just under 2,000 houses, this additional 800 is a lot! A 40% increase and I'm told no agreed extra funded infrastructure or services, just the loss of our nature, wildlife, biodiversity and farmland. And now we face another 1,000 houses on Backwell East, Grade 1 Farmed Greenbelt land. Another walk we have done and indeed I have sat and painted many times over the past 10 years. This is 50 Hectares of high yield land, which has always, quite rightly, been protected. I am astonished and frankly dismayed that this land is even being considered. We cannot as a village sustain any more housing, and we cannot afford to lose anymore of our green fields and farmland, there will be nothing left. I have no issue with sensible housing numbers, but this is complete overdevelopment, with no thought or consideration for the impact on people's lives and well-being and the future of our farmers and food security. I want my children to have somewhere to live, but I also want them to be able to enjoy life in a semi-rural village with fresh air, walks, wildlife and nature. As well as affordable food that is not being shipped halfway around the world, damaging our environment and at a price set by other countries. COVID and the war in Ukraine showed us a glimpse of that future. I therefore write to formally object to North Somerset Council's Local Plan and ask that the Land at Backwell East be removed and protected. The Plan is Unsound in it's current form as it fails to address a sensible balance as I have described above.			

Name: P Roberts **I.D:** 58089473

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP11: Transport infrastructure, allocations and safeguarding	No	• Effective	No	No	The proposed Portishead developments, would increase car usage contrary to the statement in the plan to reduce, because of their remoteness from existing facilities, and major transport routes. The increase burden on existing road structures which are already struggling to cope at peak hours of the day, would significantly add to local air pollution, and hazards.			
Land north of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	This site is land at present designated green belt. It is an area of fields separating the north end of Nailsea settlement from Tickenham & Wraxall settlement boundaries, the very definition of a green belt. Other reasonable options have not been fully exhausted such as brownfield sites or unban infilling. It does not in any part fulfil the government description of 'Greybelt' The roads at each end of the site are small often narrower than B roads with well known pinch points eg Stone-edge Batch where a meeting of any HGV or large vans or buses create long jams now. The station is 5 miles away & the roads already too crowded & narrow for safe cycling. there is no pavement at either end of the site. It would mean even more cars. As the previous owner of the Fishing Lakes at the northern border of the site I can attest to the regular & persistent flooding of the whole of the lower slopes of the valley often to a depth of 2-3 feet in our shop & bungalow. On applying for permission to rebuild our flood damaged buildings the environment agency required us to build the entire place raised 2m above the ground & provide an upper story as an escape hatch. Building over this area will increase the run off & flood risk greatly in spite of the developers suggestion of a water butt at each house & small extra ponds. The valley is a haven of wildlife between the settlements, everything from swans, egrets, kingfishers to voles, otters, deer & ravens. The loss of the green strip would greatly reduce this nature conservation wildlife corridor There is a strategic high pressure aviation fuel pipeline running along the slope straight through the whole site how will this be managed?	This plan is in direct conflict with the Wraxall & Failand Neighbourhood plan 2022-2038 which has been legally adopted by the Council & is part of the Development Plan protecting Green Belt & road safety.		

Name: P Shields **I.D:** 62812033

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell is a VILLAGE, not a town. It already has approval for 800 new house which represents an increase in size of 40%. These proposed additional numbers would totally destroy the character of the village and represent complete overdevelopment. Food security should be a priority nationally, and building on good quality farmland should be avoided wherever possible. This land is Grade 1 agricultural land - far too valuable for crops to be built on. We are too reliant on imports for food. There is only 7% if this high-quality land left in the whole of North Somerset so every acre is precious and should not be built on. Brownfield sites should be developed first. Government policy states that “we must protect our best and most versatile land” to safeguard food security. These proposals go against this policy and undermine food security. The proposals involve building on greenbelt land. Backwell is not an employment hub. Most residents commute to Bristol and Weston for work. More houses means more communters. There is already a deficit in school places. Health services and leisure facilities are not adequate for the current population. These services cannot support another 1000 houses. The road network is at capacity already with the village frequently gridlocked. Local roads are overloaded, with narrow country lanes being used as rat-runs. Many of the local roads have no pavement and current traffic already causes a huge danger to pedestrians and cyclists. Children walking to school are put at risk daily. The proposed new road link would not relieve the congestion – Station Road would still have to absorb huge amounts of extra traffic. There is no funding for the new road link, and the cost to get it under or over the railway would be prohibitive. Backwell Common and Chapel Hill are already far too busy for the size of the lanes. Backwell has been allocated a higher number of houses than any other village in North Somerset, being expected to take 7% of the district’s housing allocation. This is not feasible or sensible in a rural village – development should be focused on the towns where shops and employment are more accessible. Backwell Lake and adjacent fields, where the new roads and housing are planned are on floodplain. These fields are required to absorb excess rainfall to prevent further flooding downstream. The development would destroy valuable wildlife habitats and harm biodiversity. Rare species like Lesser and Greater Horseshoe Bats rely on this land for food and the proposals would threaten the Brockley Maternity Roost and SSSI. The railway station is not fit for purpose as a busier transport hub for the proposed growth in population. It is not accessible to passengers in wheelchairs or those with pushchairs. There is no plan to improve this situation and no funding allocated for such. In summary, this proposal represents massive overdevelopment in a rural area where services and facilities are just not suitable for such growth.	Allocate necessary housing close to towns where people work, shop and attend leisure activity. Please do not destroy the rural villages.		

Name: P Stefan **I.D:** 62851937

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Churchill Avenue	No	• Justified	Unsure	Unsure	As one of few remaining green spaces for residents and a conservation area, the development of the site should not go ahead as planned. Alternative proposals to retain protected green space and introduce affordable homes put forward by councillors including Luke Smith have been ignored. This development is against the wishes of residents who are not against new homes, but are against the complete erasure of green spaces. The land should be designated a local green space, for example: According to the Statement of Biodiversity under the Local Nature Recovery Strategy Toolkit, priority species are present (Swift, House Sparrow, Hedgehog). Therefore this is a priority site under LNRS. It is also situated on a Green Infrastructure Corridor.			

Name: P Sterndale **I.D:** 29025697

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP7: Green Belt	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Development of the areas around Pill & Easton-in-Gordano has previously been limited due to its location within the Green Belt. Land should only be released from the Green Belt 'in exceptional circumstances' (Section 13 of the NPPF). However, exceptional circumstances only apply if the Local Plan has maximised the use of brownfield sites available within North Somerset, which it has not. Two examples are the Castlewood site in Clevedon, and the Old Mill Road site in Portishead. There has been insufficient consideration to increasing housing density in larger towns and cities. The assertion that all of the proposed allocations in Pill and Easton in Gordano will be required to deliver 50% affordable housing (as is necessary to justify building on green belt land) is already recognised as 'challenging' in the 'additional sites viability addendum' to the Local Plan, and will not be achievable. In any event they are unlikely to be 'affordable' to residents who live in areas of Pill recognised as being amongst the 40% most deprived neighbourhoods.	Remove the five proposed sites in Pill and Easton in Gordano from the Local Plan		
SP10: Transport	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Development on the five proposed sites in Pill & Easton-in-Gordano relies heavily on the Portishead – Pill – Bristol Railway line which it states has secured government funding and is due to be delivered by 2028, and would provide direct rail links to Bristol Temple Meads railway station. However, the railway does not yet exist, and as campaigns for it to be built have been going on for at least 25 years, with many promises made and then broken, its future is in fact by no means secured. If it is built, then there will only be 2 trains per hour, and passenger predictions suggest that the trains will already be full when they leave Portishead, with no room left for passengers from Pill. The direct road access to the A369 will be via an already busy junction which is frequently congested at peak times already. Junction 19 of the M5 is already saturated and frequently grinds to a halt. It is made worse by the Services being accessed from the roundabout. The junction cannot cope with any increase in traffic. The National Highways report stated that transport modelling is needed to assess the cumulative impact on junction 19, but the results of that investigation are unknown. It is therefore not known if the Council has either received the report or taken note of its findings. It is clear that major redesign of the Junction would be necessary.	The Transport policy needs review.		
Land at Lodway Farm	No		No	No	The access points to this site are totally unsuitable for the heavy increase in traffic. The junction with the A369 is already congested at peak times and entry onto the A369 is often very difficult with long delays. Junction 19 of the M5 is already saturated. The roundabout is often completely clogged up and accidents are numerous. There are frequent accidents/ incidents on the M5 leading to its closure, with local roads unable to cope with the increased volume of traffic. the Local Plan does not include comments from National Highways and their advice is essential to assess viability of this site. The site is too close to the M5. Although the problem of noise is mentioned, three lanes of traffic are frequently at a standstill on that section of the motorway, producing unacceptable levels of pollution. Remove this site from the Local Plan.			
Land east of Gordano Services	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The access points to this site are totally unsuitable for the heavy increase in traffic. The junction with the A369 is already congested at peak times and entry onto the A369 is often very difficult with long delays. Junction 19 of the M5 is already saturated. The roundabout is often completely clogged up and accidents are numerous. There are frequent accidents/ incidents on the M5 leading to its closure, with local roads unable to cope with the increased volume of traffic. The Local Plan does not include comments from National Highways and their advice is essential to assess viability of this site. The site is too close to the M5. Although the problem of noise is mentioned, three lanes of traffic are frequently at a standstill on that section of the motorway, producing unacceptable levels of pollution.	Remove this site from the Local Plan		
Pill Green	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	I live very close to this site and was unaware of its proposed inclusion in the Local Plan. I was unaware of any consultation and the Council held no local events in Pill or Easton in Gordano to hear residents views despite the scale of the developments. The area around Markham Brook is the recognised site of an ancient woodland. Ancient woodlands have developed over centuries and are now amongst the most fragile and rare of all landscapes in the country. Once damaged they cannot be restored. The damage to the environment outweighs any argument for building on this green belt land . It is unclear where or how a safe crossing over Markham Brook could be achieved. There will be unacceptable impact on both the natural environment and wildlife in this area. The increase in traffic will exacerbate an already congested A369 and a saturated Junction 19 of the M5. The area around Markham Brook has a recognised flood risk, as the valley and parts of the surrounding land are within the Environment Agency's flood Zone 3. This indicates a high probability of flooding.	Remove this site from the Local Plan		
Land at Pill Road	No	• Positively prepared	No	No	I live very close to this site and was unaware of its proposed inclusion in the Local Plan. I was unaware of any consultation and the Council held no local events in Pill or Easton in Gordano to hear residents views despite the scale of the developments. The area around Markham Brook is the recognised site of an ancient woodland. Ancient woodlands have developed over centuries and are now amongst the most fragile and rare of all landscapes in the country. Once damaged			

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		• Justified • Effective • Consistent with national policy			they cannot be restored. The damage to the environment outweighs any argument for building on this green belt land . It is unclear where or how a safe crossing over Markham Brook could be achieved. There will be unacceptable impact on both the natural environment and wildlife in this area. The increase in traffic will exacerbate an already congested A369 and a saturated Junction 19 of the M5. The inevitable increase in water run-off, despite mitigation, will cause flooding further down hill in the centre of Pill, and area already prone to flooding. Remove this site from the Local Plan			

Name: P W **I.D:** 62832769

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No		Unsure	Unsure	The proposal for another 1,000 houses, on top of the 800 new houses already approved, With NO new infrastructure or services planned to support this dramatic population jump is clearly not a plan that has been thought through with the existing or new residents in mind. The railway station is not currently fit for purpose as a transport hub, remaining inaccessible for people with mobility issues and challenging for those with young children. There are no propsals to improve this for the benefit of current and new residents to Backwell. I object that the proposed development is on precious GRADE 1 Agricultural GREENBELT Land. This land east of Backwell is the highest quality agricultural land, currently used for food crops and grazing. Only **7%** of this Grade 1 land is left in the whole of North Somerset. Government policy clearly states we must protect our best land to safeguard food security making these proposals a direct contradiction. This development would destroy valuable wildlife habitats and harm biodiversity including the Brockley Maternity Roost and Site of Special Scientific Interest, as rare Lesser and Greater Horseshoe Bats rely on this land for food. Backwell Common, Backwell Lake, and the adjacent fields are on a floodplain that floods regularly. Aggravating this flood-prone area with more housing is highly irresponsible and will cost the local council in repairs and dealing with issues.	The proposed growth for Backwell is unsustainable, and undeliverable due to the lack of infrastructure, the destruction of critical wildlife habitats and the unacceptable threat to our Grade 1 Greenbelt. I urge the Independent Inspector to reject this flawed plan without significant ammendments to ensure that the residents current and new have suitable transport infrastructure, medical facilities, recreational facilities, fully planned and funded schooling in line with the village growth and an appropriate level of fully funded biodiversity improvements.		

Name: P Windsor **I.D:** 21214465

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I am opposed to the huge allocation of housing in Backwell in the Local Plan for North Somerset. The allocation in this Plan is NOT SOUND due to the following ⛛ Backwell has already recently had 800 new houses approved, this is an additional 40% increase in households. The plan for Backwell includes a further allocation of 889 houses for the village which is completely unsustainable for the area. The proposed road would not effectively serve Nailsea traffic and would not relieve congestion in Backwell, particularly Station Road, Backwell Common and Chapel Hill. The construction of this road is unlikely to be feasible due to the huge expense of engineering around the railway line and the prohibitive costs involved. The lack of infrastructure cannot support the proposed increase in housing, there is already a deficit in school places and limited medical services in the village. There has been no improvement in infrastructure to support the 800 houses already approved, let alone the further 889 indicated in the plan. Backwell is allocated a higher number of houses than any other village in North Somerset, and even a higher percentage than towns. For example, the village of Backwell is expected to take 7% of the housing allocation compared to 2% for the town of Clevedon. There is no needs or viability analysis for an extra 1000 homes in Backwell. Backwell is not an employment hub, most residents need to commute to Bristol, Weston Super Mare or similar locations. No social cohesion impact assessment has been completed. The proposed development is on Grade 1 Agricultural Land which is currently used for crops and grazing, there is only 7% of this land left in the whole of North Somerset. Government Policy states that we must protect our best and most versatile land to safeguard food security - this proposal contradicts this policy and undermines our food security. This development would destroy valuable wildlife habitats and further harm biodiversity in our nature depleted country. The proposed development also threatens the Brockley Maternity Roost and SSSI as the rare Lesser and Greater Horseshoe Bats rely on this land for food. The Infrastructure Delivery Plan lacks analysis and costings and there are no funding guarantees for new roads or services in this plan. Backwell Common and the surrounding area are prone to flooding, this will only be aggravated by more housing development. The designation of Backwell as a strategic growth location is concerning, particularly the impact on the character of the area, the loss of Greenbelt and Grade 1 Agricultural Land, the risk of flooding and uncertainty over whether the road can be funded and delivered on time to support the increase in housing. Backwell Lake (Reservoir) and the adjacent fields, where the road and housing are planned, is a flood plain which floods regularly. Government Policy requires 50% affordable housing on Greenbelt Land, this is unlikely to be delivered, and reduces the funds that developers will contribute to providing infrastructure. The sheer volume of growth in this area with the required investment in infrastructure and services to support the housing over such a short time scale would be destabilising, unsustainable and undeliverable. The railway station is not fit for purpose as a transport hub - it remains inaccessible for people with mobility issues and services are limited and at capacity.			

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					To conclude, the proposed huge development at Backwell is not sustainable and the allocation of this housing in Backwell in the Local Plan is NOT SOUND.			

Name: P Wright **I.D:** 62654721

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Consistent with national policy	No	No	The release of Green Belt at the development by the M5 in Easton in Gordano and other areas of Pill and Easton in Gordano are being proposed and pressured by developers before other Brownfield sites have been considered. The traffic at the J19 M5 roundabout is already at capacity and the traffic heading into Bristol at peak times is overloaded on the A369. The new train line, if and when it is operational, will not relieve the additional traffic pressures commuting into Bristol caused by this over development in the local area. It will ruin habitat and the Green Belt should not be built on here.			

Name: PJ Trenchard **I.D:** 29245537

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at North West Nailsea	No		Unsure	Unsure	Tickenham has not been properly consulted about the additional traffic the large scale developments will generate. The B3130 and B3128 plus local country lanes are already at capacity. The pavements are narrow or non existent making it unsafe for the 100 children to access the village school. The planners even comment on the unsafe road when making a decision and Developers are told they have to contribute towards school transport. Tickenham is mainly a ribbon development where the majority of houses have independent driveways making it currently difficult to join the stream of passing vehicles. We do not receive regular postal deliveries as the Posties find it difficult to deliver house to house. Large HGVs making deliveries to existing Retail & Warehousing in Nailsea regularly create a bottleneck at Stone Edge Batch Junction. More houses in this area will mean additional problems. More development means more construction vehicles using this narrow road. The single lane Causeway is a favourite rat run for commuters wishing to join the B3130. This road is totally inadequate for the volume and weight it carries. Land North of Southfield Road frequently floods. Both this site and Pound Lane site are in the greenbelt which should be preserved. Pound Lane site also includes a Nature Reserve. If these developments proceed it would link Tickenham with Nailsea and Tickenham should be kept as a village not a suburb of Nailsea. When the Motorway is closed due to a major incident the traffic is diverted through Tickenham. I do not understand why Clevedon has not been targeted for more housing and industrial development. It is close to Junction 20 which already has provision for another road to be built to link with the Long Ashton by-pass taking the majority of traffic away from Tickenham, Failand, Wraxall. This was planned 50 years ago! If you build a house you first put in the foundations. If you plan to built 4000 additional houses around a small town with existing inadequate road links, you need to plan the infastructure first!			

Name: Padraig McKeon **I.D:** 62798465

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective	Unsure	Unsure	Issue: Soundness of Land East of Backwell strategic growth allocation Position: The Plan is unsound and not justified, not effective, and not consistent with national policy. Change sought: Removal or significant reduction of the Backwell housing allocation unless and until a fully evidenced, costed, deliverable infrastructure strategy is produced.	I believe the Backwell strategic allocation is unsound and requires the following modifications to make it justified, deliverable, and consistent with national policy: Reduce or remove the Backwell allocation until full evidence is provided on transport, flooding, schools,		

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		• Consistent with national policy			_____ 1. The scale of development in Backwell is unjustified Backwell already has around 800 new homes approved, representing a 40% increase in the size of the village. The Local Plan proposes to add a further 1,000 homes, creating an unprecedented level of expansion with no credible justification, and no evidence that this location can sustainably absorb such growth. Backwell is allocated 7% of the district's total housing growth, despite being a small village with limited services and no employment hub. This is a higher percentage than some towns. There is no clear evidence base demonstrating why Backwell, above all other settlements, should carry such a disproportionate burden. _____ 2. Infrastructure evidence is missing, incomplete, or unconvincing There is no detailed infrastructure needs assessment for the additional 1,000 dwellings. Key service areas—schools, health, public transport, road capacity, and community facilities—are already under strain. • School places: There is a current deficit and no committed investment to provide additional capacity. • Health facilities: No investment plan exists to support an expanded population. • Leisure / community facilities: No new provision is identified. Without this evidence, the Plan is not effective, and cannot be considered deliverable. _____ 3. The transport strategy is flawed and unproven The proposed road infrastructure does not demonstrate that it will relieve traffic in Nailsea or ease congestion on Station Road, Backwell Common, or Chapel Hill. Engineering a route across, under, or over the railway is likely to be costly, technically difficult, and may prove undeliverable. There is no funded plan, no costings, and no assurance that the road can be delivered in time to match the housing. As a result, the transport proposals do not meet the tests of soundness. Backwell railway station is also not fit for purpose as a transport hub: access is poor, capacity is limited, and there are significant challenges for users with mobility impairments and for families with children. The Plan does not address these issues. _____ 4. Backwell is not an employment centre Most Backwell residents commute. Allocating a very large housing expansion to a location without jobs increases car dependency, congestion, and carbon emissions. This is inconsistent with national policy on sustainable development and contradicts the Local Plan's own sustainability objectives. _____ 5. There is no social cohesion or community impact assessment Despite proposing the largest proportional expansion of any NSC village, the Plan offers no assessment whatsoever of social cohesion, community integration, or service impact. Such analysis is essential for a strategic allocation of this magnitude. _____ 6. The development threatens the remaining high-quality agricultural land Backwell includes areas of Grade 1 Best and Most Versatile (BMV) agricultural land, which are essential for food production. Only around 7% of North Somerset's BMV land remains. Government policy requires that this land be protected. The Backwell allocation contradicts NPPF policy on safeguarding BMV agricultural land, rendering the Plan inconsistent with national policy. _____ 7. Severe harm to biodiversity and protected habitats	health, and environmental constraints. Backwell already has ~800 homes approved; the additional 1,000 homes are not justified. Publish a costed and deliverable Infrastructure Delivery Plan before adoption, including firm funding sources, phasing, and timelines for road improvements, school places, health services, drainage, and utilities. Remove development from flood-prone areas, including Backwell Common and fields around Backwell Lake/ Reservoir. Require a full Level 2 Strategic Flood Risk Assessment for Backwell. Withdraw the proposed new link road unless detailed engineering feasibility, environmental impact, flood modelling, and confirmed funding are provided. Without this, it is undeliverable. Require improvements to Backwell Station (step-free access, parking, turning/circulation space) to be committed and funded before major housing is delivered. Protect Grade 1 Best and Most Versatile agricultural land by removing all BMV land from development boundaries in line with national policy. Strengthen biodiversity protection, removing land within Horseshoe Bat habitats/flight corridors linked to the Brockley SSSI maternity roost, and requiring a robust mitigation strategy. Require a detailed education and health capacity assessment, with a funded plan for additional school places and GP provision as a pre-condition of development. Carry out a proper alternatives assessment showing why Backwell has been chosen over less constrained sites. Include a Social and Community Impact Assessment due to the scale of growth proposed for a small village. Until these changes are made, the Backwell allocation remains unjustified, undeliverable, and inconsistent with the NPPF tests of soundness		

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					Development in this location would destroy or fragment important wildlife habitats, including areas relied upon by Lesser and Greater Horseshoe Bats associated with the Brockley Maternity Roost and SSSI. No adequate mitigation is identified. This conflicts with national policy requirements relating to biodiversity protection and net gain. _____ 8. Flood risk is not properly addressed Significant parts of Backwell Common and surrounding fields are subject to regular flooding. The Plan proposes new homes and a new road across land that is clearly unsuitable. The associated Backwell Lake/Reservoir area also sits within a floodplain that floods frequently. This raises serious concerns about the deliverability, safety, and climate resilience of the allocation. _____ 9. Funding uncertainties undermine deliverability The Infrastructure Delivery Plan does not include costings, sources of funding, or confirmed delivery mechanisms for the new road, school provision, flood mitigation, or health services. Without guaranteed infrastructure funding, the growth allocation is undeliverable, and therefore fails the soundness test of effectiveness. _____ 10. Green Belt and landscape harm The designation of Backwell as a “strategic growth location” causes: • loss of Green Belt, • harm to valued landscapes, • erosion of village identity, • and reduction of high-quality agricultural land. These impacts are not justified by evidence, and no alternatives appear to have been properly assessed. _____ 11. Affordable housing requirement weakens infrastructure funding Government policy requires 50% affordable housing on Green Belt land. This significantly reduces the financial contributions developers can make towards schools, health facilities, traffic improvements, and other infrastructure, making Backwell even less viable as a strategic allocation. _____ 12. The overall scale and pace of growth is destabilising Attempting to deliver more than 1,800 new homes (including those already permitted) in a short period would overwhelm Backwell’s infrastructure and services. The growth is: • unsustainable, • not supported by evidence, • not aligned with local capacity, and • unlikely to achieve policy objectives. Taken together, the proposals render the Backwell allocation unsound.			

Name: Pamela Garment **I.D:** 62776609

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	No more houses are needed in Backwell; new shops bank doctors appointments would be required to accommodate so many new residents; The new extended road is completely unnecessary- it goes over fields that deer badgers and foxes use daily and floods constantly. Station Road that it would join already has 8 roads or car park access joining it and is dangerous already with 2 near fatal accidents in the last year or so and many minor ones. School children amass on the pavements and frequently spill into the road which in itself is dangerous due to the speed cars hurtle down. Bucklands Batch having yet another junction to navigate is asking for one of them to be killed. The station bridge is only single lane and already there are long queues back from that at rush hours and this new junction would only add to the chaos. A totally unnecessary road extension costing millions that could be spent on improving existing roads.	if the houses need to be built then so be it but the extra road joining Station Road is a complete waste or money and not needed		

Name: Pamela Robbins **I.D:** 62771169

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm					With Regards To The Above Subject I am - along with very many others Extremely Concerned with the proposed development of this area of Tower Farm Portishead Down - Black Rock & Weston Big Wood North Somerset Council is not Properly Considering the implications of this ill-conceived project & have Avoided or Ignored the opportunity to increase housing density on areas which would have less ecological impact. The Unwanted Increase In Traffic in the surrounding area will add even more to the current Heavily Congested Roads we have to deal with on a Daily Basis along with the potential to Further Damage our residents & our children's Health Also not considered - These areas were added in the 1980's to the Green Belt because of the High Ecological Value & this should only be altered in the Most Exceptional Circumstances - these not having yet been demonstrated - Neither site can provide safe or suitable access - these woodlands are Our Planets Lungs - don't deprive us of that The damage to the The Biodiversity Of Our Wildlife is likely to be No Less Than Catastrophic There is a current wide spread desire for more community facilities & amenities which would be further stretched by the impact of this project & it would also impact heavily on the already thin infrastructure with its lack of healthcare - schools - retail outlets & the other associated facilities we lack - a Strange & Somewhat Unfathomable Use of the Recreational Space at Merlin Park only beggars belief - Why suggest The Addition of Pointless Allotments & Extra Football Pitches ? When there are just Absolutely No Facilities for Parking - Toilets or Changing Rooms for that potential number of up to One Hundred people & cars in an already crowded Small & Narrow Circular Road - What about the other folk who regularly use this space - what about the dog walkers - what about those who use the area for exercise. With the increase in traffic taking up parking spaces making the estate more congested than it already is my fear is how would any emergency vehicals gain access. This has not been thought through very carefully at all It is also considered a Major Concern & The Potential For Flood Risk to the Lower Portishead & Gordano Valley to Promote or Undertake even more Heavy Construction Work in the Portishead Down - Black Rock & Big Wood Areas along with the inevitable Climate Change & Those Altered Weather Patterns that we will have no protection against This Proposed Development Is A Time Bomb Waiting To Be Released Upon An Unsuspecting Audience - It Must Be Reconsidered			
Black Rock, north of Clevedon Road					With Regards To The Above Subject I am - along with very many others Extremely Concerned with the proposed development of this area of Tower Farm Portishead Down - Black Rock & Weston Big Wood North Somerset Council is not Properly Considering the implications of this ill-conceived project & have Avoided or Ignored the opportunity to increase housing density on areas which would have less ecological impact.			

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					The Unwanted Increase In Traffic in the surrounding area will add even more to the current Heavily Congested Roads we have to deal with on a Daily Basis along with the potential to Further Damage our residents & our children's Health Also not considered - These areas were added in the 1980's to the Green Belt because of the High Ecological Value & this should only be altered in the Most Exceptional Circumstances - these not having yet been demonstrated - Neither site can provide safe or suitable access - these woodlands are Our Planets Lungs - don't deprive us of that The damage to the The Biodiversity Of Our Wildlife is likely to be No Less Than Catastrophic There is a current wide spread desire for more community facilities & amenities which would be further stretched by the impact of this project & it would also impact heavily on the already thin infrastructure with its lack of healthcare - schools - retail outlets & the other associated facilities we lack - a Strange & Somewhat Unfathomable Use of the Recreational Space at Merlin Park only beggars belief - Why suggest The Addition of Pointless Allotments & Extra Football Pitches ? When there are just Absolutely No Facilities for Parking - Toilets or Changing Rooms for that potential number of up to One Hundred people & cars in an already crowded Small & Narrow Circular Road - What about the other folk who regularly use this space - what about the dog walkers - what about those who use the area for exercise. With the increase in traffic taking up parking spaces making the estate more congested than it already is my fear is how would any emergency vehicals gain access. This has not been thought through very carefully at all It is also considered a Major Concern & The Potential For Flood Risk to the Lower Portishead & Gordano Valley to Promote or Undertake even more Heavy Construction Work in the Portishead Down - Black Rock & Big Wood Areas along with the inevitable Climate Change & Those Altered Weather Patterns that we will have no protection against This Proposed Development Is A Time Bomb Waiting To Be Released Upon An Unsuspecting Audience - It Must Be Reconsidered			

Name: Paola Davis **I.D:** 50254849

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	This development would substantially increase the size of Backwell as it currently stands. Around 800 homes have already been approved—representing a 40% expansion of the village—and adding further housing would negatively impact its character and identity. The existing infrastructure will already be under significant strain from the 800 new homes, let alone any additional ones proposed here. There is insufficient information about how essential services such as schools, GP practices, and dentists will be expanded to meet increased demand. Furthermore, the road network is not equipped to handle the rise in traffic that this level of development would bring. The main road between Backwell and Nailsea is already prone to congestion, is narrow in several sections, and reduces to a single lane when buses or larger vehicles pass through. The pavement does not run continuously on one side but instead switches sides the length between Backwell crossroads and the station, making it unsuitable for people with accessibility needs and unsafe for school children. With the extra residents this development would introduce, these conditions would become even more hazardous, and there is no possibility of widening the pavement due to private properties directly bordering the road. Additionally, Backwell Common and Backwell Bow are not viable high-volume alternatives; whenever Station Road is closed, these routes become rat runs, posing significant dangers to drivers, pedestrians, cyclists, and horse riders. Increased traffic from further development would only exacerbate these risks. I also have significant environmental concerns, including the presence of multiple floodplains and areas already prone to flooding, which are either earmarked for development or would be further impacted by the additional housing. A rare bat colony is known to exist in Brockley, relying on the surrounding land for feeding. The proposed development would destroy wildlife habitats, reduce biodiversity, and lead to the loss of land currently used for crops and grazing, as well as the erosion of valuable greenbelt space.			

Name: Parish Councils Airport Association **I.D:** 51490785

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SP7: Green Belt	Yes		Yes	Yes				Local Plan Consultation - Parish Councils Airport Association comments.pdf
Policy LP9: Extent of the Green Belt	Yes		Yes	Yes	The PCAA recognise that the land at Bristol Airport under the 12 mppa planning consent is to be released. We do not believe that the new area of Green Belt proposed south of Nailsea and west of Backwell is adequate to compensate for loss of green belt at the Airport or proposed new housing developments to be in constructed on proposed release of future Green Belt.			
Policy LP11: Transport infrastructure, allocations and safeguarding	Yes		Yes	Yes	The PCAA expect further consultation on the route of the Mass Transit and Bristol Airport. It is not currently possible to comment on route and the potential impacts of residents and the environment.			
Policy LP12: Bristol Airport	Yes		Yes	Yes	The PCAA support the mass transit link and suggest that the delivery of the mass transit is linked to passenger growth at the Airport. Bristol Airport predicts that growth to 15 mppa will be in the mid 2030's. The Local Plan covers the time period to 2041. The Airport has made known that it wishes to grow to 20 mppa. If the airport expands past 12 mppa then a mass transport plan will be needed. The paragraph on the impacts of airport operations and any new airport development on the living conditions of residents should include the word 'REDUCE' as well as mitigation. The PCAA note that use the word reduce in relation to nighttime flights in the justification of Policy LP12, but the word needs to be in the actual policy. On climate change the Government has been advised by the Environmental Audit Committee 25 October in a report titled 'Airport expansion and climate and nature targets 'to produce a cumulative assessment of emissions of all airport expansion plans and how it relates to the Net Zero target'. We expect NSC to include a cumulative assessment of emissions is necessary of airport expansion plans within the policy LP12.	The paragraph on the impacts of airport operations and any new airport development on the living conditions of residents should include the word 'REDUCE' as well as mitigation. The PCAA note that use the word reduce in relation to nighttime flights in the justification of Policy LP12, but the word needs to be in the actual policy. On climate change the Government has been advised by the Environmental Audit Committee 25 October in a report titled 'Airport expansion and climate and nature targets 'to produce a cumulative assessment of emissions of all airport expansion plans and how it relates to the Net Zero target'. We expect NSC to include a cumulative assessment of emissions is necessary of airport expansion plans within the policy LP12.	The PCAA support the mass transit link and suggest that the delivery of the mass transit is linked to passenger growth at the Airport.	
Policy LP13: Air safety	Yes		Yes	Yes	The Bristol Airport Master Plan detailed an extension to the runway. Currently there is a Bristol Airport consultation on proposed lighting for Felton Common. Felton Common is a public open space that is within a defined Air Safety Zone. The PCAA question whether the Common and the replacement land will become higher risk due to the extended runway and lighting and need to be re–categorised as such. The PCAA view the replacement land under the Airport's ownership as unsafe for recreational use under the Air Safety Policy LP13 and not suitable for mitigation.			

Name: Parker Strategic Land **I.D:** 43217217

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SP3: Spatial strategy	Yes		Yes	Yes			In terms of the spatial strategy identified in the Pre-Submission Plan Document, PSL are in general support of the strategy identified. Policy SP3 (Spatial strategy) within the Pre-Submission Plan states that: “Priority will be given to locating new residential and mixed-use development in or close to urban areas where there is an existing or proposed wide range of facilities, services and jobs, and there are opportunities to encourage active and sustainable travel, particularly at locations which are currently, or have the potential to be, well served by public transport.” The supporting justification for Policy SP3 outlines that “where an authority cannot meet its identified need for homes at sustainable locations outside the Green Belt this amounts to exceptional circumstances and the authority should review Green Belt boundaries to meet these needs in full. Due to the constrained nature of North Somerset including large areas at risk of flooding and the Mendip Hills National Landscape it is not possible to meet the government’s standard methodology housing need figure for North Somerset outside of the Green Belt in a sustainable way.” It is considered that the above approach is in line with the requirements of the NPPF and is supported. The supporting justification goes onto outline that “Green Belt sites that have been identified are located in the most sustainable locations on the edges of urban areas.” The allocation of the site at Tower Farm is considered to align with the spatial strategy and allocating Green Belt sites in sustainable locations, being on the edge of the existing settlement, adjacent to an existing school and within a town expected to benefit from a new railway station by 2028. The above spatial strategy is supported by PSL as it ensures the delivery of suitable and sustainable sites, including Tower Farm.	North Somerset Reg 19 Pre-Submission Plan - Portishead final 9.12.25.pdf North Somerset Local Plan Pre-submission Plan - Representation form Part B Policy SP3 Spatial Strategy.docx
SP5: Towns	Yes		Yes	Yes				North Somerset Reg 19 Pre-Submission Plan - Portishead final 9.12.25.pdf North Somerset Local Plan Pre-submission

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								Plan - Representation form Part B Policy SP5 Towns.docx
SP7: Green Belt	No	‣ Justified ‣ Effective	Yes	Yes	This representation therefore supports the removal of Land at Tower Farm from the Green Belt and allocation to meet the housing land shortfall. Concern however is raised regarding the affordable housing requirement for the site, and the approach to primary school contributions, which is explained in more detail below. In addition, we also wish to bring to your attention that there is an error relating to the draft allocation boundary for the site as shown in the Council's draft policies map. The boundary line needs to be updated to be consistent with that shown in Appendix 2 (see attached). The change sought is to remove a small additional parcel of land from the Green Belt and include that as part of the housing allocation.	Amendment to boundary requested - see attached.		North Somerset Reg 19 Pre-Submission Plan - Portishead final 9.12.25.pdf
Policy DP43: Affordable housing (including rural exception schemes)	No	‣ Justified ‣ Effective	Yes	Yes	Affordable Housing Provision Viability The affordable housing requirements for the site have been defined by the 'Golden Rules' for housing development on Green Belt land. This requirement is identified within Policy SP7 (Green Belt) of the Pre-submission Plan, which states that "New residential development will only be permitted on land released from the Green Belt, as defined on the Policies Map, where it is demonstrated how the development meets the 'Golden Rules' requirements as set out in the NPPF." As set out in the policy review above, Paragraph 67 of the NPPF sets out the requirement for affordable housing to "be set at a higher level than that which would otherwise apply to land which is not within or proposed to be released from the Green Belt" and "at least 50% of the housing to be affordable, unless this would make the development of these sites unviable". This requirement is taken through to Policy DP43 of the Pre-submission Plan, which states that: "Developments will be expected to provide 50% affordable housing on land released from the Green Belt as set out in Policy SP7, and other Green Belt sites, 30% on greenfield sites and 20% on previously developed land, all at nil public subsidy. If these requirements cannot be met this will need to be fully justified with clear evidence set out in a viability assessment which must demonstrate that all grant funding sources have been fully explored." The supporting justification to this policy notes that the North Somerset Local Housing Needs Assessment (ORS 2025) identifies an overall affordable housing need over the plan period ranging from 6,646 to 10,577 dwellings (28%–45% of the total housing requirement). It notes that this high level of need is a priority for the Council and the Local Plan will seek to maximise delivery taking account of the constrained nature of North Somerset and viability evidence. However, it goes onto acknowledge the Dixon Searle viability study (2025), which illustrates how challenging affordable housing delivery is in North Somerset. While the viability evidence is the starting point for considering overall delivery, the policy reflects the importance of maximising opportunities for affordable housing delivery. It acknowledges that where proposals cannot deliver the relevant policy requirement, these will be subject to viability assessment which must take account of all potential sources of grant funding. The percentages provided by the viability evidence (or as updated through other relevant evidence) will be used as guidance to the expected level of nil subsidy provision. In terms of the viability evidence prepared for the Local Plan, the 2025 Additional			North Somerset Reg 19 Pre-Submission Plan - Portishead final 9.12.25.pdf

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					Sites Viability Addendum states in paragraph 1.1.9: “A number of the sites that form part of the strategic allocations in the Local Plan are within the Green Belt. The Council’s emerging policy on affordable housing will require 50% affordable housing in line with the ‘Golden Rules’ set out by the current Government. Further Guidance is awaited from government on the link between viability and the ‘Golden Rules’ as set out in the NPPF and PPG. However, it remains unclear as to whether, if evidence from plan-making viability shows that delivering 50% affordable housing (in conjunction with all other typical development requirements) would make development theoretically unviable, the requirement may be reduced accordingly or whether an increased affordable housing requirement would exist regardless of the local plan viability assessment outcomes. At this stage we have tested the strategic site allocations only to the point at which viability become negative.” This identifies that the council has not assessed the viability of Green Belt sites such as Land at Tower Farm yet and are therefore unable to assess whether 50% affordable housing is achievable. It is recommended that this work is undertaken to allow an appropriate level of affordable housing to be defined within the Plan for these Green Belt sites. More significantly, with the benefit of the viability work carried out to date, the Regulation 19 Plan identifies a requirement for non-Green Belt greenfield sites to deliver 30% affordable housing. The same 30% requirement is contained in the adopted Local Plan. If it has therefore been determined that greenfield sites can only deliver 30% affordable housing how does the Council expect greenfield sites in the Green Belt to deliver an extra 20% affordable housing? There is no logical justification for such sites to do so. Indeed, paragraph 67 of the NPPF states: ““at least 50% of the housing to be affordable, unless this would make the development of these sites unviable”. The robust evidence in the form of the adopted and the draft Local Plan is that anything more than 30% renders the delivery of greenfield sites unviable. It is therefore recommended that the affordable housing requirement on sites inside and outside the Green Belt be reduced to 30%.			
Land at Tower Farm	No	• Justified • Effective	Yes	Yes	These representations have been prepared by Ridge and Partners LLP on behalf of Parker Strategic Land Ltd (‘PSL’) in response to North Somerset’s Local Plan: Pre-Submission Plan 2041 Consultation, which is being carried out between 30 October and 12 December 2025. PSL is supporting the allocation of the Land at Tower Farm, Portishead (hereafter referred to as ‘the Site’), which has been promoted in previous representations that were made to the North Somerset Local Plan Regulation 19 Additional Sites Consultation (2025), and the North Somerset Local Plan Regulation 19 consultation (2024). Previous representations have outlined that the Site is suitable, available and achievable for development. A Vision Document, prepared by Stantec, demonstrates what can be achieved on the Site and has been submitted to the Council with previous representations, and is included in Appendix 1. This representation therefore supports the removal of Land at Tower Farm from the Green Belt and allocation to meet the housing land shortfall. Concern however is raised regarding the affordable housing requirement for the site, and the approach to primary school contributions, which is explained in more detail below. In addition, we also wish to bring to your attention that there is an error relating to the draft allocation boundary for the site as shown in the Council’s draft policies map. The boundary line needs to be updated to be consistent with that shown in Appendix 2. The change sought is to remove a small additional parcel of land from the Green Belt and include that as part of the housing allocation.			North Somerset Reg 19 Pre-Submission Plan - Portishead final 9.12.25.pdf

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					Site Location and Context The Site is located to the south of the existing built-up area of Portishead, with The Downs and Tower Road bordering the northern boundaries of the Site. High Downs Infants and Junior Schools also lie adjacent to the northern boundary. To the west is Merlin Park and the Avon and Somerset Police Headquarters beyond. The Site is currently used for agricultural purposes, with seven field parcels defined by hedgerows. Several farm buildings are located at the Site's northern boundary, accessed from Tower Road, which have been disused for many years and are in a derelict condition. Proposed Allocation of Tower Farm, Portishead In line with the evidence base highlighted above, Land at Tower Farm is included as a proposed allocation site for residential development within Policy SP7 of the Pre-Submission Plan document. The Site is proposed to be removed from the Green Belt, and is now within the settlement boundary for Portishead. PSL are in full support of the allocation of Land at Tower Farm for housing in the new North Somerset Local Plan. As demonstrated from the above assessment, it has been identified that there are exceptional circumstances for Green Belt release, and suitable sites have then been identified. The Site's allocation has come as a result of an extensive assessment of potential sites, with the Site and others being considered to have weak contributions to the Green Belt (as highlighted in the GBA). The Site is also identified as a potential grey belt site which, in line with the guidance within the NPPF, should be favourably considered. As set out above, it is considered that development at the edge of Portishead and the number of forecast dwellings is appropriate and sustainable. It has been demonstrated within this representation, as well as previous representations submitted to the Council, that the site is in a logical and sustainable location for new development to help meet North Somerset's housing needs. It will also ensure that other areas within North Somerset, particularly Weston-Super-Mare, are not subject to significantly disproportionate and unsustainable levels of growth. Site Specific Policy Considerations Schedule 1 of the Pre-Submission Plan sets out the housing allocations and broad locations of the Local Plan (as linked to Policy LP5: Housing and employment allocations), setting out the indicative dwelling capacities and the specific site requirements. Schedule 1 identifies the following requirements for any development at Land at Tower Farm: "Land to be provided for new primary school or potential expansion of infant and junior school if required, along with financial contribution towards primary, secondary, post 16 and early years school places and family centre services. The precise educational arrangements are to be agreed with the local authority in advance of a planning application. Suitable ecological buffer to be provided to Weston Big Wood to south of site and future management and maintenance of this area to be secured			

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					Site-wide masterplan required at outline planning application stage. Public Rights of Way to be upgraded, in particular LA14/7/10, to make route less steep and suitable for cycles. Active travel connections required to The Downs, St Marys Road/Wetlands Lane. Contribution to bus service provision required." PSL has specific comments regarding the education requirement, as well as the general approach to affordable housing for Green Belt sites. Education Requirements We support and emphasise the need for flexibility to be retained in the policy with the use of the words 'if required'. It is understood that early years provision, primary school provision, and secondary school provision, is currently funded by CIL payments, with the exception of Strategic Development Areas. The Local Plan consultation does not appear to allocate the site as a Strategic Development Area, which are limited to Wolvershill, Woodspring, Nailsea and Backwell, Pill and Easton-in-Gordano. As such, it is considered that requesting a final contribution from the Tower Farm development would be essentially double counting. Although the wording in relation to the primary school 'or' potential expansion is considered to be appropriate, it is requested that the requirement for financial contributions is removed from the policy wording. Concern is also raised regarding the need for educational arrangements to be agreed with the council in advance of the application. This is raised as things can often change during the determination period of an application, which could affect the form of educational arrangements that would be viable or appropriate. Affordable Housing Provision Viability The affordable housing requirements for the site have been defined by the 'Golden Rules' for housing development on Green Belt land. This requirement is identified within Policy SP7 (Green Belt) of the Pre-submission Plan, which states that "New residential development will only be permitted on land released from the Green Belt, as defined on the Policies Map, where it is demonstrated how the development meets the 'Golden Rules' requirements as set out in the NPPF." As set out in the policy review above, Paragraph 67 of the NPPF sets out the requirement for affordable housing to "be set at a higher level than that which would otherwise apply to land which is not within or proposed to be released from the Green Belt" and "at least 50% of the housing to be affordable, unless this would make the development of these sites unviable". This requirement is taken through to Policy DP43 of the Pre-submission Plan, which states that: "Developments will be expected to provide 50% affordable housing on land released from the Green Belt as set out in Policy SP7, and other Green Belt sites, 30% on greenfield sites and 20% on previously developed land, all at nil public subsidy. If these requirements cannot be met this will need to be fully justified with clear evidence set out in a viability assessment which must demonstrate that all grant funding sources have been fully explored." The supporting justification to this policy notes that the North Somerset Local			

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					Housing Needs Assessment (ORS 2025) identifies an overall affordable housing need over the plan period ranging from 6,646 to 10,577 dwellings (28%–45% of the total housing requirement). It notes that this high level of need is a priority for the Council and the Local Plan will seek to maximise delivery taking account of the constrained nature of North Somerset and viability evidence. However, it goes onto acknowledge the Dixon Searle viability study (2025), which illustrates how challenging affordable housing delivery is in North Somerset. While the viability evidence is the starting point for considering overall delivery, the policy reflects the importance of maximising opportunities for affordable housing delivery. It acknowledges that where proposals cannot deliver the relevant policy requirement, these will be subject to viability assessment which must take account of all potential sources of grant funding. The percentages provided by the viability evidence (or as updated through other relevant evidence) will be used as guidance to the expected level of nil subsidy provision. In terms of the viability evidence prepared for the Local Plan, the 2025 Additional Sites Viability Addendum states in paragraph 1.1.9: “A number of the sites that form part of the strategic allocations in the Local Plan are within the Green Belt. The Council’s emerging policy on affordable housing will require 50% affordable housing in line with the ‘Golden Rules’ set out by the current Government. Further Guidance is awaited from government on the link between viability and the ‘Golden Rules’ as set out in the NPPF and PPG. However, it remains unclear as to whether, if evidence from plan-making viability shows that delivering 50% affordable housing (in conjunction with all other typical development requirements) would make development theoretically unviable, the requirement may be reduced accordingly or whether an increased affordable housing requirement would exist regardless of the local plan viability assessment outcomes. At this stage we have tested the strategic site allocations only to the point at which viability become negative.” This identifies that the council has not assessed the viability of Green Belt sites such as Land at Tower Farm yet and are therefore unable to assess whether 50% affordable housing is achievable. It is recommended that this work is undertaken to allow an appropriate level of affordable housing to be defined within the Plan for these Green Belt sites. More significantly, with the benefit of the viability work carried out to date, the Regulation 19 Plan identifies a requirement for non-Green Belt greenfield sites to deliver 30% affordable housing. The same 30% requirement is contained in the adopted Local Plan. If it has therefore been determined that greenfield sites can only deliver 30% affordable housing how does the Council expect greenfield sites in the Green Belt to deliver an extra 20% affordable housing? There is no logical justification for such sites to do so. Indeed, paragraph 67 of the NPPF states: ““at least 50% of the housing to be affordable, unless this would make the development of these sites unviable”. The robust evidence in the form of the adopted and the draft Local Plan is that anything more than 30% renders the delivery of greenfield sites unviable. It is therefore recommended that the affordable housing requirement on sites inside and outside the Green Belt be reduced to 30%. Allocation Boundary As outlined in the introduction section, there is an error relating to the draft allocation boundary for the site as shown in the Council’s draft policies map. It is requested that the boundary of the allocation is updated to be consistent with that			

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					shown in Appendix 2. The change sought is to remove a small additional parcel of land from the Green Belt and include that as part of the housing allocation. SEE FULL REPRESENTATIONS ATTACHED			

Name: Pat South **I.D:** 62640737

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Houses already approved is a 40% increase to the village. By the time the road over/under the railway line is passed it will be too expensive. Why do we have to take the highest population growth when Clevedon has so few? We should be feeding our own country not building over prime growing land. We should not be upsetting wildlife habitats including the greater and lesser horseshoe bats. The area on Backwell common is already prone to flooding and the building of more houses will make this worse and cause more expense to the council and the residents.			

Name: Patricia Gilbert **I.D:** 49668225

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	• Effective	Yes	Yes	Increase in housing is 'numbers driven' and too much power has been given to too few large developers. The variety and type of housing planned is unimaginative and lacks diversity. It will not meet the needs of the whole community. There is too much reliance on building conventional houses with gardens when many existing residents want to downsize and live in 1 or 2 bed apartments without gardens to maintain, in an accessible locations. Too much green and productive farmland and countryside around towns is being sacrificed. Not enough emphasis on building higher density accommodation on brown field sites. This will result in urban sprawl, loss of productive farmland and loss of wildlife habitats. Lack of adequate infrastructure. In Nailsea roads are inadequate to cope with increased traffic. Services are already stretched and will get worse.	Oblige developers to invest in infrastructure projects, such as roads, before approving plans to build any more houses. This is routine practice in some European countries Carry out in depth surveys to establish housing need in the area and aspirations of downsizers, before allowing developers to build more houses on sprawling estates.		

Name: Patricia Godfrey **I.D:** 32593857

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Land east of Gordano Services	Unsure		Unsure	Unsure				Response to consultation Document December 12th 2025.docx

Name: Patrick Clements **I.D:** 51416353

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Dark Lane, Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure		This plan is not sound, many reasons including : Existing road system and proposed new roads inadequate for the increase in population. Existing facilities, car parking etc insufficient for increase in demand on top of already permitted development. Loss of agricultural land. Backwell being asked to take more housing in proportion to its present housing state than is reasonable and will become a small town.			

Name: Patrick Smallbone **I.D:** 58510465

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at North West Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	Unsure	Local Plan 2041: Objection to proposed Green Belt release - Land Yeo Valley, North of Nailsea. It is my understanding that the North Somerset Local Plan 2041 was developed based upon guidance within the Arup Strategic Green Belt Assessment Interim Report (30 October 2025). The Arup document confirms that their interim report 'has been prepared to support North Somerset Council's Submission Draft Local Plan consultation (Regulation 19) for their Local Plan 2041. This report provides an overall summary of the findings of the SGBA Update for Green Belt parcels within the North Somerset administrative boundary and an interim conclusion of 'fundamentally important' areas of Green Belt within North Somerset based on assessments undertaken to date, accounting for new policy and guidance set out in the NPPF (2024) and PPG (2025).' I am submitting this response to challenge the reliance on "professional judgement" in the Strategic Green Belt Assessment (SGBA) (Arup, 2025) used to justify the release of Green Belt at Land Yeo Valley, (LYV) north of Nailsea. The SGBA is methodologically consistent but inherently flawed. Labels such as "moderate" or "weak contribution" are opinion based, without benchmark, justification or reference. Its reliance on professional judgement produces subjective outcomes, excludes critical environmental and social evidence and fails to demonstrate the exceptional circumstances required by National Planning Policy Framework. (NPPF-para.145) I therefore suggest that the proposed Local Plan 2041 is unsound and request that the proposed release of LYV land be rejected, and that the site remain within the Green Belt. The SGBA acknowledges that 'this report takes into account the particular instructions and requirements of our client'. This admission undermines the independence of the evidence base. It demonstrates that the methodology was shaped by the commissioning authority's brief, which in my view prioritises identifying parcels for potential release rather than safeguarding the Green Belt's ecological integrity and community wellbeing. Reliance on such consultant outputs risks privileging development pressures over the statutory purposes of Green Belt Policy set out in NPPF 2024 (NPPF Section 13). A sound Local Plan must rest on impartial evidence, not reports constrained or influenced by client directives. The SGBA assessment methodology, which is inherently subjective, considers only the five statutory Green Belt Purposes (NPPF – para. 145). It ignores wider values such as ecological corridors, food production, climate resilience, flood plain and community wellbeing. These omissions undermine the conclusions of the SGBA and so the result is a distorted picture that undervalues the real contribution of the LYV land. Arup applied the five ((a) to (e)) GB purposes from (NPPF-143) preventing sprawl, preventing towns merging, safeguarding countryside, preserving historic towns, encouraging regeneration. Each land parcel	No valid demonstrable circumstances have been offered within the Arup Strategic Green Belt Assessment Interim Report (30 October 2025) to change the status of this parcel and the findings within this interim report should be rejected and a review undertaken to generate a balanced and more considered view on behalf of their client.		North Somerset Local Plan 2041_ 09 December 2025V1ps.pdf North Somerset Local Plan 2041_Arup Commentary 09 December 2025 V1ps.pdf

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					considered in the SGBA was assessed against these purposes with descriptors ‘strong,’ ‘moderate’ or ‘weak’ contributions being used. These descriptors are not based on measurable data (like biodiversity counts or soil productivity) but on professional opinion and interpretation. The SGBA notes that ‘PPG (2025) provides guidance on how to assess purposes (a), (b) and (d), and provides illustrative features to assess contribution of the Green Belt to these purposes. These illustrative features have informed the criteria that have been applied. ‘No national guidance exists for purposes (c) and (e), as such, the assessment criteria for these purposes is based on previous experience, best practice and recent examples. Where possible, consideration has been given to the need to respect local circumstances and the unique characteristics that affect the way the NPPF Green Belt purposes are appraised.’ Such subjectivity, without benchmark evidence, demonstration of recent experience, best practice and recent examples, particularly for (c) and (e), cannot meet the (NPPF-145/146) requirement for exceptional circumstances to justify Green Belt release. Councils are under government pressure to deliver housing numbers, however, the evidence supporting Green Belt release must be independent and robust, not shaped by housing targets, or any other form of bias, but through a process of genuine objectivity. The SGBA assessment presents itself as balanced, yet its reliance on professional judgement in certain areas, without substantive evidence, means it can be challenged as flawed, incomplete or unproven. The NPPF, at paragraph 44, states that: “the right information is crucial to good decision-making particularly where formal assessments are required. Parcels P005 and P006, which are identified as potential areas for release, are wrongly scored as ‘moderate’ contributors to Green Belt purposes. They are critical in preventing sprawl, maintaining separation between settlements and safeguarding countryside character. The Assessment’s parcel table underplays these functions, reflecting the client led instructions rather than presenting impartial evidence. Releasing these parcels would undermine NPPF 2024 para.145 and set a precedent for further erosion of the Green Belt. In respect of parcel P006, the assessment is fundamentally flawed in resect of two of the five main purposes of Green Belt (NPPF 2024 Detailed Policy Review) – specifically b) and c) which are rated as ‘moderate’ and that should be ‘strong’. Exceptional Circumstances do not apply in this case because they would fundamentally undermine the most critical elements of this Green Belt parcel. The report for P006 plays down the ‘openness’ aspect disproportionately and ignores that the parcel prevents coalescence between Nailsea, Long Ashton and Bristol fringe. The P006 Green Belt should be judged on permanence and not convenience for development. Further, Footnote 7 applies, because this area Tickenham, Nailsea and Kenn Moors is a designated 129-hectare biological SSSI. Therefore, no valid demonstrable circumstances have been offered within the SGBA to change the status of this parcel and the findings within this interim report should be rejected and a review undertaken to generate a balanced and more considered view on behalf of their client. This can only conclude that the SGBA was tailored to North Somerset Council’s instructions, to meet the Councils planning needs, and is not an impartial analysis. It prioritises development pressures over NPPF purposes, undermining its reliability as a valid source of guidance. In respect of specific matters, I would like to raise the following points. 1. Loss of Green Belt The proposed area for development (Land North of Nailsea) focusses on a wide swathe of land between Wraxall and the Nailsea/Tickenham border. This land is recognised green belt and deserves protection in recognition of the multiple benefits the land brings to the local communities and the preservation of the demarcation between Wraxhall, Nailsea and Tickenham. Without this separation the area will degenerate into an urban sprawl, lacking green space and any form of planned infrastructure to support the increase in traffic and demands for essential local facilities. In addition, the allocation for north Nailsea conflicts with the Wraxall & Failand Neighbourhood Plan			

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					(2022–2038), which has already been adopted by the Council and forms part of the legal Development Plan. That plan strongly protects the Green Belt, rural character and road safety. 2. Threat to local environment and business Development in the Land North of Nailsea will have a detrimental impact on the immediate area, by taking away a huge area of open land which is greatly valued by both the local and neighbouring communities as a wildlife refuge, a quiet, green open and safe space for adults and children which is comforting and promotes wellbeing. The Fishing Lakes immediately to the north of the development will be adversely affected by the encroaching construction due to loss of passing wildlife which is an important part of the visitor attraction for those fishing and many others who visit the facility for the relaxing, outdoor natural space. The pollution resulting from any significant construction in this area and its in-use life is likely to damage the ecology of the local environment. The North Somerset Local Plan 2041 does not consider the risk of contamination of local springs which should be safeguarded and their continued flow paths given consideration. 3. Loss of wildlife corridor Wildlife depends on this green corridor (Land North of Nailsea) which runs almost uninterrupted between the north of Long Ashton to Clevedon and beyond into the Somerset Levels, for safe passage between habitat and secluded breeding grounds. Development in this area will destroy this natural movement corridor and will deprive wildlife of the safe movement they depend upon for survival. This will be a tragic, irreversible and unnecessary situation because alternative solutions to the destruction of this natural and precious facility are available. 4. Land North of Greenfield Crescent / Sports Field The fields forming the green belt in this area (Land North of Nailsea) act as a natural sponge, attenuating the flow of water to the Land Yeo, which is a narrow river that collects storm water run-off from the surrounding areas which are largely marshland, within a designated flood plain, and which are waterlogged for most of the autumn and winter. The Land Yeo in the area directly north of the proposed development area is narrow, no longer maintained by the Environment Agency, heavily overgrown in parts and is regularly in flood. The river, adjacent to the B3130 at the western end of the proposed development breaches in heavy rain and flows across the B3130 close to Jacklands Bridge because the river cannot contain the storm water run-off. Development in the proposed area will obviate the attenuation function provided by the fields, replacing them with hard surfaces, paths, and roads and driveways, overloading the capacity of the Land Yeo that cannot currently cope with heavy rainstorms. 5. Light pollution There is no reference in the North Somerset Local Plan 2041 to limit the negative effects caused by the significant levels of artificial light that will result from development in this area (Land North of Nailsea) that is currently uninhabited green belt with extremely low artificial light levels during dark hours. It is widely accepted that artificial outdoor light disrupts the natural patterns of wildlife (birds, pollinators, and mammals), obscures views of the night sky and generally reduces human wellbeing. There is a wide variety of wildlife that will be adversely affected by artificial light, for example, Horseshoe Bats that thrive in the area. Development in this area (North of Nailsea) will have long-term, irreversible and damaging consequences across the immediate area and will adversely affect the environment, wildlife and residents across a much wider geographical area. 6. Danger to wildlife Development in this area (Land North of Nailsea) will restrict the land available for existing and future wildlife. Some will undoubtedly be forced away forever as their environment is destroyed. Some larger mammals may attempt to remain in a reduced habitat, forcing them into contact with the negative aspects of the any development such as new roads and buildings. The consequence will be a permanent, damaging impact upon a vast variety of birds, mammals, insects and reptiles that have used these facilities for hundreds of years and whose future, should development in this area (Land North of Nailsea) proceed, is undoubtedly eradication.			

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					7. Pollution The green belt area (Land North of Nailsea) is a completely natural area comprising marsh and wetlands, with grassland for grazing and agricultural use. There is nothing to generate any pollution to the land other than the occasional agricultural vehicle being used. Any development in this area (Land North of Nailsea) will generate significant levels of pollution resulting in lower air quality due to combustion engines (vehicles, garden equipment), biological contaminants from household outdoor processes, rubber particulate from car tyres, oils and fuels. All of these will drain from the newly developed area and contaminate the Land Yeo to the detriment of flora, forna and humans. Wastewater / sewage discharge from the new development will cause contamination when the main sewerage system is surcharged and the contents of the sewerage system flow into the environment, contaminating the roads, footpaths, the green belt to the west of the B3130, and the Land Yeo itself. During any construction period the surrounding areas including the Land Yeo, will be contaminated through combustion engines, paints, solvents, chemicals, construction debris and dirt. Clearing the green belt land cover will result in soil erosion leading to silt-bearing run-off and sediment pollution to the Land Yeo which is already suffering from maintenance neglect because the Environment Agency no longer maintain this river and so flow rates are severely restricted in numerous locations along this vital drainage channel. 8. Travel / commuting Nailsea has relatively few significant employers and so most of the working population commutes daily. The main vehicle routes from the proposed development area (Land North of Nailsea) to Bristol and Weston super Mare, via the A370, or towards Clevedon and the M5, via Tickenham depend upon the B3130. The B3130 does not have capacity for substantial additional vehicle movements per day particularly at the two pinch points (east and west of the site) where the road serving the new development connects the B3130. Nailsea and Backwell railway station is a small village facility with hardly any amenities, a part time ticket office, relatively little dry waiting space, no toilet facilities and limited car parking. The additional load on these basic facilities from any development in the Land North of Nailsea will lead to an increase in on-road parking in the Nailsea / Backwell area, overcrowding on the narrow platforms, and frustration with the limited and problematic ticket purchasing/ collection facilities. 9. Local road networks (B3130 / B3138) The B3130 between Jacklands Bridge (BS21) and the junction with the B3138 (Tickenham Hill) at Stone Edge Batch is very narrow with no footpaths on either carriageway. Traffic flow is regularly halted for several minutes because two goods vehicles, lorries or buses cannot pass each other over a significant distance, requiring extended careful manoeuvring, or more difficult backing-up, to re-start traffic flows. This scenario is a regular occurrence during the daily rush-hour periods but occurs sporadically throughout the day depending upon vehicle types and timing of movements. The additional log jams and tail backs that will result from the increased vehicular traffic stemming from any development in this area (Land North of Nailsea) will cause delays to commuters, school buses and emergency services, reduce air quality, increase general pollution and noise. Traffic jams and stationery vehicles consume vast amounts of energy needlessly, and the resulting carbon footprint cannot possibly be justified based on an increased number of residential dwellings in an area that has inadequate supporting infrastructure. 10. Flooding and dangers to life and property The storm water run-off from the proposed development area (Land North of Nailsea) is accommodated by the Land Yeo from the east of the proposed development, close to Wraxhall and to the west of the development at Jacklands Bridge and beyond through Tickenham and Clevedon. The river cannot cope with periods of heavy rainfall throughout the year. This is particularly so since the Environment Agency no longer remove seasonal vegetation, nor will dredging be continued as has been completed in previous years. Any development in this area will cause more intense run-off volumes within a shorter space of time. This will lead to more regular flooding of the Land Yeo, more regular breaching, and overflows to the B3130 at Jacklands Bridge, across the narrow pedestrian footpath, generating hazards to road users and pedestrians. There is a genuine threat to public and life safety in terms of road users and pedestrians resulting from development of the Land North of Nailsea.			

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					The result of high-water levels in the Land Yeo will be experienced throughout its lower-level catchment area, detrimentally affecting businesses and residential accommodation between Watercress Farm, Wraxhall House and all the way to Clevedon. 11. Economic restraints The Land Yeo used to be maintained on a regular basis by a combination of the Environment Agency and the Lead Local Flood Authority, whereby vegetation was removed, and dredging carried out to ensure the river was free flowing. In addition, the spillway adjacent the B3130 at Jacklands Bridge was regularly inspected, maintained and operated to prevent overtopping or breaching of the Yeo at this location. The maintenance of the Land Yeo and spillway no longer takes place, resulting in more frequent overtopping and flooding of the surrounding areas. These maintenance activities, within and outside the proposed development site will involve cleaning, removing vegetation, desilting and dredging to address the consequences of the proposed building project. 12. Other options There are alternative brownfield sites in Nailsea in the Blackfriars's Road area and the Coates Industrial Estate, where the redevelopment of outmoded areas would be viable and where infrastructure such as roads and utility services already exist. Such redevelopment would benefit the community because it would be a better use of existing built-up areas, without the need to destroy green belt and damage the local environment in a permanent manner. 13. Loss of wellbeing It is recognised by many learned organisations, for example the National Institute of Health, that green open spaces are beneficial in terms of mental health and wellbeing. Individuals have less mental distress, less anxiety and depression when living in areas with more green space compared with less greenspace. Health and access to green spaces are intricately linked and so to remove a widely appreciated and extensively used area of green belt to provide residential accommodation in an area with limited local employment and where brownfield areas are available for positive redevelopment would be an irreversible and damaging mistake. 14. Construction traffic The impact upon the local environment and disruption caused by the construction process due to development of the Land North of Nailsea will cause prolonged disruption, congestion and inconvenience to residents, businesses and school transport for a prolonged period, possibly four to five years. 15. School traffic There are several schools and key school transport routes near the proposed development area (Land North of Nailsea). Construction in this area will have a devastating effect upon children walking to / from school past the development site. In addition, the likely delays to school buses, taxis and car share / rota schemes will be overwhelming. 16. Emergency vehicle response times The fire, police and ambulance facilities are co-located in Nailsea at the junction of the B3130 and Pound Lane. This area is on the immediate western boundary of the proposed development site (Land North of Nailsea). Any development in this area will generate a substantial volume of vehicle movements, to and from the area, via the B3130 at the east and west junctions. This increased vehicular activity will cause delays and tailbacks because the road infrastructure cannot accommodate existing traffic flows at busy times, particularly at specific pinch points. Any significant construction works will cause similar traffic disruption due the number of HGVs and general construction traffic needing access to the development site. As a result, both short and long term, the ability of the emergency services to deploy quickly from their current location will be severely compromised because they depend upon the B3130 to reach the A370, Tickenham, Bristol, Bristol Airport and the M5 motorway. 17. The Causeway (west Nailsea to Tickenham passing Tickenham Church) A narrow route exists between the west of Nailsea and the B3130 at Tickenham (passing by Tickenham Church). This route is often used as a shortcut by motorists to avoid the regularly congested B3130 at the			

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					Stone Edge Batch (B3130/B3128) junction. Emergency vehicles occasionally use this route for expediency on route to Tickenham, Clevedon and or the M5 motorway. The Causeway is also used to move livestock between pastures which can interrupt traffic flow for between 15 and 20 minutes. Should development in this area (Land North of Nailsea) progress, this Causeway shortcut is likely to become a more favoured route for motorists trying to avoid the B3130 and the B3128 pinch points. This will lead to more tailbacks, increased accident risk, increased delays to emergency vehicle response times and saturation of the road network in the southwest of Nailsea towards Backwell, which already has a major limiting traffic flow interrupter due to the bridge at Nailsea and Backwell railway station. Overall, any proposed development will result in regular peak hour traffic gridlock across Tickenham, Nailsea and Backwell. 18. Pipeline – there is a strategic high-pressure aviation fuel pipeline running right across the site. This is not mentioned as a constraint. End. PDF attached with photographs.			

Name: Paul Borthwick **I.D:** 29557665

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Policy DP46: Housing Type and Mix	No	• Effective	Unsure	No	Your plans will effect people going into the 22nd century, we need better designed buildings then we have seen over the last 30 years and better designed housing estates then we have seen built in North Somerset in the last 30 years. All you plans do is, massively increase the traffic jams, as you don't seem to have planned for small village models if amenities within walking distance, and each housing estate being self sufficient. Where as what we currently have is endless housing estates, we're people without a car are isolated and incapable of being part of a community. Where there is a lack of public transport to help people to integrate better. Currently we see rural housing estates being built with no connection to existing infrastructure or villages. Farm land has been developed into small housing estates, where everyone has to drive to get to the local village, shops, school, and doctors. An example is the housing estate on the Blagden Aquarium, or at Hewish of the main road. We see currently new housing estates like Mead Fields, lacking Disabled Access, with a massive lack of dropped kerbs and tactile crossing points. If a Disabled Person was to live in a property here, they would not be able to go far, out side. The current plan for 5% Accessible Accommodation M(4)3. Until you give property developers an out. By saying it depends on local demand. We know from consultation with the Disabled Access Group, that you do not know how many people need Accessible Accommodation M4(3). I guess you rely on the local social housing list to see how many Disabled People are on this list. However a lot of Disabled People who need a M4(3),are not currently on the housing list, as they are currently living in what they believe is the best available housing, even if it is Inaccessible. 3% of the General Population are Wheelchair Users, and 1% are, Several Visually Impaired. We would add 1% for Disabled People with complex additional needs that means they also need a M4(3) Accommodation. That's 5% of the General Population or 10,000 people living in substandard unsuitable Accommodation for them. The we add the situation were we now have M4(3)a and b. Which	I would want to see a needs analysis for each urban area you are looking to build on. Looking at the current provision for Accessible Accommodation, remembering that Adaptable Accommodation M4(2) is very unlikely to ever be Accessible. How many Disabled People who have requirement for a fully Accessible M4(3)b. Live in these towns and villages. Whether they currently have Accessible Accommodation that is adequate for there needs. And, then increase the demand for Accessible Accommodation by 10%,to future proof developments for more Disabled People and Elderly People who will become Disabled with age.		

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					sounds like a cope out, so that property developers can build Accessible Accommodation, but them sell them to those who don't need Accessible Accommodation. This is BS More of the same as we have seen over the last 30 years of homing Development is not going to help an Aging population, in North Somerset, an area that is more and more a commuter area, with most people working in Bristol, Avonmouth, North Filton, and soon Bridgewater. We need to think smarter about where we build, what we build and how we transport people to work and to other activities.			

Name: Paul Chaffe **I.D:** 39391361

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	We do not feel the plan is sound for the following reasons: The size of Backwell is already increasing by 40%. Any additional housing will overdevelop the village, transforming it into a town, but with insufficient facilities to support the increased population. Schools, GP surgeries, Dentists etc will be unable to support the higher population. The proposed road across Backwell common will not alleviate traffic problems already evident in the village. There is no funding guarantee from North Somerset (NS) to pay for the construction of a new road. With NS approaching bankruptcy, it seems highly unlikely that this road will ever be built, further aggravating traffic congestion in the village, and along the A370. Backwell Common and land around Backwell Lake frequently flood. This could be exacerbated by the construction of new housing. Despite the fact that Backwell is not a large employment hub, it is being allocated more houses than any other village in North Somerset. Residents will no doubt mostly commute to neighbouring towns and cities for employment, adding to road congestion and pollution. Additionally, Nailsea and Backwell railway station is inaccessible for people with mobility issues, forcing more people to use the road network. The land proposed for development is Grade 1 agricultural land and should be protected to support the nation’s food security. It also provides feeding grounds for the Lesser and Greater Spotted Horseshoe Bats. Local wildlife habitat will be lost, reducing the quality of life for existing residents.			

Name: Paul Churchill **I.D:** 58311073

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	As a Portishead resident and frequent visitor to Weston Big Wood I feel it is vital we do everything possible to protect this vulnerable woodland, it would appear being in the green belt is no longer protection for ancient woodland or SSSi’s. By removing the green belt and allowing development you are opening the door to development which on these two sites would damage the biodiversity to an irreparable point where we lose forever this delicate and wonderful location. In section DP35 of your draft plan you state “development within or in proximity to a Site of Special Scientific Interest (SSSI) or National Nature Reserve that is likely to have a direct or indirect adverse effect on its biodiversity or geological interest will not normally be permitted”. I truly believe the impact would be felt not only here in Weston Big Wood with lose of rare endangered flora and fauna but as a vital wildlife corridor the impact will extend in both directions, north to the Severn	remove Tower and Black Rock from the list, identify other locations which do not impact on locations such as ancient woodland / SSSI's		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					estuary and south to the Mendips and Somerset Levels, as such your statement in DP35 would stop any development on these sites, so these sites should be removed from the list and replaced with sites which will not adversely effect Weston Big Wood. I would also like to bring to your attention the below list, which your plan breaches. Section 40 of Natural Environment and Rural Communities Act 2006. Para 124 of the National Planning Policy Framework. Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land Para 188 of the National Planning Policy Framework. Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework, take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries. Para 192 of the National Planning Policy Framework. To protect and enhance biodiversity and geodiversity, plans should: (a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity 68 ; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation 69 ; and (b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.			
Black Rock, north of Clevedon Road	No	‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	As a Portishead resident and frequent visitor to Weston Big Wood I feel it is vital we do everything possible to protect this vulnerable woodland, it would appear being in the green belt is no longer protection for ancient woodland or SSSi's. By removing the green belt and allowing development you are opening the door to development which on these two sites would damage the biodiversity to an irreparable point where we lose forever this delicate and wonderful location. In section DP35 of your draft plan you state "development within or in proximity to a Site of Special Scientific Interest (SSSI) or National Nature Reserve that is likely to have a direct or indirect adverse effect on its biodiversity or geological interest will not normally be permitted". I truly believe the impact would be felt not only here in Weston Big Wood with lose of rare endangered flora and fauna but as a vital wildlife corridor the impact will extend in both directions, north to the Severn estuary and south to the Mendips and Somerset Levels, as such your statement in DP35 would stop any development on these sites, so these sites should be removed from the list and replaced with sites which will not adversely effect Weston Big Wood. I would also like to bring to your attention the below list, which your plan breaches. Section 40 of Natural Environment and Rural Communities Act 2006. Para 124 of the National Planning Policy Framework. Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land Para 188 of the National Planning Policy Framework. Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework, take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries. Para 192 of the National Planning Policy Framework. To protect and enhance biodiversity and geodiversity, plans should: (a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity 68 ; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation 69 ; and	remove Tower and Black Rock from the list, identify other locations which do not impact on locations such as ancient woodland / SSSI's		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					(b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.			

Name: Paul Fricker **I.D:** 51429473

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No		Unsure	Unsure	Response to the NSC Reg 19 Local Plan 2041 I strongly object to the development proposals in this plan on the following grounds: Backwell is a well established VILLAGE, which was one of the first villages to respond to the previous local plan, which was very well supported by a very high percentage of the residents, taking into account a sustainable increase in dwellings. As a village, we have already had 800 new dwellings approved, which is an increase of 40% and already an overdevelopment that is not sustainable with the current infrastructure. The additional proposals are totally unrealistic and will increase the population by an estimated 80 - 85%. You will be hard pressed to find figures like this anywhere else in the country. In the last three days, there have been crashes on the near by motorway networks that has caused the A370 main road through Backwell to become grid-locked. The current road network is very often highly congested even prior to the completion of the addition of the approved new 800 dwellings. The new proposed road to link-up Nailsea and Backwell is planned to be routed under the railway line which is known by the residents as a serious flood plain, and in fact just further along the track, national news channels have reported cars floating in flood water under an existing bridge. Having recently spoken to the developers, they've estimated it will be at least 10 years before this section of their development plan is likely to be completed, and claim the threat of flooding can be overcome by engineered solutions. The cost of this would be met by private enterprise? This cost will be astronomical, highly likely to create another bottle neck, and highly unlikely to solve existing congestion, and almost certainly will not meet future requirements. The existing population of Backwell is 2500. If the conservative average inhabitants of each of the approved 800 dwellings is three, that would be an increase of 2400 people and as Backwell is a commuter village, an estimated 1200 additional vehicles. The infrastructure of our village is totally inadequate to sustain such an increase, in relation to Schools, dentist, doctors, parking, leisure facilities, or medical supplies (Pharmacists). Despite the fact that Backwell is a village, the proposed population growth is higher than any other village or town in North Somerset or, in fact, most of the country. Backwell has a very limited opportunity for employment and is predominantly a commuter village. and there are quite a few roads/country lanes with no pavements or street lighting. By increasing the number of dwellings on such a large scale will only exacerbate the current congestion problems, increase the likelihood of collisions and endanger pedestrians, especially children going to school. Much of the proposed areas of development is on Grade 1 Agricultural Land, used for grazing and crop production. There is a very limited area of such high quality land left in the whole of North Somerset. to build on this land contravenes Government policy stating 'we must protect our best and most versatile land to safeguard food security. There are some rare species of wildlife and flowers in the areas proposed for development, including Door Mice, Lesser and Greater Horseshoe Bats, Common Newts, Grass Snakes, Adders, a vast array of Butterflies and Moths, Orchids, Short-eared, Tawny, Barn and Little Owls. This is not an exhaustive list. The existing railway station is very well used but access to the platforms is limited to able-bodied individuals and the trains are frequently overcrowded during rush hours. the station is a great asset to the village. However, in its current status it is inadequate for such a likely increase of capacity need. Much of the proposed development is on Green Belt. The use of green belt must be fully justified and not used if there is an alternative site. I put it to you that there are many more alternative suitable sites in other areas of North Somerset, which are			

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					not Green Belt. Some of the proposed development areas are on flood plain. such large developments will only exacerbate this problem and to engineer out this problem would be very expensive and almost certainly would not be effective and or move the flooding problem to another area, which will probably be to the existing long-term residents along the A370 The village currently has its own identity and character. The proposed developments are going way too far too fast. It will cause a severe problem to the mental well being of many villagers that have lived in this country village for many years and some for the whole of their lives. It will create severe problems with people getting adequate access to Schools, Medical Services and parking. the increased traffic congestion will have a detrimental effect to residents well-being due to pollution and cause frustration and anxiety to drivers caught in bottle-necks. There will be an increased risk of collision and endangerment to pedestrians, especially school children. Paul Fricker. Backwell Resident.			

Name: Paul Gardner **I.D:** 58507233

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP7: Green Belt	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	I am a resident of Portishead who witnessed the severe degradation and fragmentation of Weston Big Wood during Covid. The Tower farm and Black Rock sites in Portishead are green belt. In 1988 the area of Green Belt on Portishead Down which is where these sites are located was actually EXTENDED. Even in 1998 the special nature of Portishead Down was recognised. Nothing has changed locally to justify thee redesignation of these sites as grey belt. Government Policy is for "low quality green belt land to be released" This land is exactly the opposite - high quality green belt land which should be redesignated to receive bio diversity net gain credits so that the biodiversity degradation of the last 50 years can be reversed.	Amend policy SP7 to remove reference to Tower Farm, Portishead and Black Rock, Portishead – therefore retaining these two sites within the Green Belt		Response for policy SP7 - why policy is not sound DRAFT 251210.docx
SP8: Housing	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Portishead has seen massive housing growth over the last 30 years (tripling in size of population) It has a large infrastructure deficit covering all forms of infrastructure (sustainable transport community space, amenities, local services etc etc). The independent housing needs assessment carried out by AECOM for the Portishead Neighbourhood Plan in 2021 assessed the housing need to be much lower than the housing numbers being proposed for Portishead in the Neighbour hood Plan. The AECOM study also highlighted there was no need for any more 4-bed properties in Portishead, Please also see attached document	Amend policy SP8 to reduce the proportion of housing supply proposed for Portishead to better reflect the level of services and infrastructure capacity		Response for policy SP8 - why policy is not sound DRAFT 251210.docx
Policy LP5: Housing, employment and mixed use allocations	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	see attached document	Removal of Land at Tower Farm and Black Rock, north of Clevedon Road as housing allocations and retention within the Green Belt		Response for policy LP5 - why policy is not sound DRAFT 251210.docx
Land at Tower Farm	No	• Positively prepared	No	No	I am a resident of Portishead who witnessed the severe degradation and fragmentation of Weston Big Wood during Covid. The Tower farm and Black Rock sites in Portishead are green belt. In 1988 the area of Green Belt on Portishead Down which is where these sites are located was actually EXTENDED. Even in 1998 the special nature of Portishead Down was recognised. Nothing has	Retain the Land at Tower farm in the Green Belt. Remove it from the list of sites for development and protect the		PTC Tower Farm reformatted 20251209.docx

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
		• Justified • Effective • Consistent with national policy			changed locally to justify thee redesignation of these sites as grey belt. Government Policy is for "low quality green belt land to be released" This land is exactly the opposite - high quality green belt land which should be redesignated to receive bio diversity net gain credits so that the biodiversity degradation of the last 50 years can be reversed.	land, Weston Big Wood and The Gordano Valley for people to enjoy forever.		
Black Rock, north of Clevedon Road	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	I am a resident of Portishead who witnessed the severe degradation and fragmentation of Weston Big Wood during Covid. The Black Rock and Tower Farm sites in Portishead are green belt. In 1988 the area of Green Belt on Portishead Down which is where these sites are located was actually EXTENDED. Even in 1998 the special nature of Portishead Down was recognised. Nothing has changed locally to justify thee redesignation of these sites as grey belt. Government Policy is for "low quality green belt land to be released" This land is exactly the opposite - high quality green belt land which should be redesignated to receive bio diversity net gain credits so that the biodiversity degradation of the last 50 years can be reversed. Amend policy SP7 to remove reference to Tower Farm, Portishead and Black Rock, Portishead – therefore retaining these two sites within the Green Belt. Remove the sites from the list of sites for development.			Black Rock reformatted 20251209.docx

Name: Paul Goddard **I.D:** 58533409

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP1: Strategic location: Wolvershill (north of Banwell)	No	• Justified	Unsure	Unsure	1. Inadequate and inconsistent consultation Throughout the preparation of the plan and subsequent use of subcontractors, there has been no consistent or meaningful engagement with residents living in the affected area. This land was previously designated as Green Belt, meaning any proposed development requires the highest possible standard of transparency, community involvement, and evidence of exceptional circumstances. However: Wain Estates did not undertake adequate public consultation, Consultation materials have been inconsistent, incomplete, and in some cases misleading, and Communications with the Local Planning Authority (LPA) have contained statements that contradict facts on the ground. This falls well below the expectations set out in the NPPF's requirement for early, proportionate and effective engagement with local communities, and undermines both public confidence and the integrity of the planning process.	Missed strategic opportunity: Weston-super-Mare as an affordable commuter alternative to Bristol Weston-super-Mare is situated less than 30 minutes from Bristol by train, offering a realistic and attractive location for the large number of young professionals and key workers currently priced out of Bristol's housing market. A properly planned housing strategy should: Prioritise the creation of well-located, affordable flats and apartments in accessible areas such as central WSM. Such a plan would provide much greater quantity of dwellings versus the loss of green belt. Support sustainable transport patterns by maximising proximity to existing rail infrastructure. Regenerate existing neighbourhoods and previously developed land to accommodate this demographic. Instead, this proposal places significant housing growth on the outskirts, on Green Belt land, in a location that is less connected, less sustainable, and less aligned with the needs of the very demographic the Council claims it wishes to support. WSM has the potential to become a thriving commuter town, helping to relieve housing pressure in Bristol. This opportunity is undermined by an		

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					2. Lack of justification for need, scale, type, and location of housing The applicant has not demonstrated any robust evidence of local housing need that would justify a development of this scale or type in this specific location. Key points include: Weston-super-Mare has significant numbers of vacant or under-used properties within its existing housing stock. No clear strategy has been presented for regenerating or re-occupying existing homes, despite national policy prioritising the effective use of land, particularly previously developed or existing housing assets. The proposed housing mix does not reflect a proven, locally evidenced need; rather, it mirrors speculative market-led assumptions. The NPPF requires that LPAs and developers prioritise brownfield land, existing housing regeneration, and design-led, need-based development. This proposal does not satisfy those principles. 3. Evidence of weak local demand for the proposed housing type A directly comparable development at the edge of Banwell — completed in 2025 — demonstrates clear market saturation: 50% of the houses remain unsold, despite being of the same size, price point, and typology as those proposed at Wolvershill. This strongly indicates insufficient demand for further like-for-like market housing. Approving another large-scale estate of the same character would risk long-term under-occupancy, contrary to planning objectives that require developments to be economically sustainable, responsive to local demand, and deliverable. This undermines the applicant's justification and calls into question the development's viability and long-term contribution to housing supply. 4. Failure to demonstrate "exceptional circumstances" for former Green Belt release As this site formerly formed part of the Green Belt, the applicant must clearly evidence exceptional circumstances. None have been demonstrated.	approach that relies on peripheral, car-dependent, Green Belt development rather than targeted regeneration and sustainable urban intensification. Economic and social regeneration opportunities are being ignored A well-designed policy for WSM should be oriented towards: Revitalising the town centre, Reversing decline in leisure and retail, and Stimulating the local service economy through increased footfall and resident spending. However, large estates on former Green Belt land do not support these goals because: They create dispersed growth rather than a consolidated, economically beneficial resident base near the town's core. They divert investment away from the renewal of struggling central areas. They fail to leverage the existing infrastructure (rail, retail, commercial) that could support a more dynamic and sustainable economy. A strategy focused on attracting young professionals—who are currently unable to buy in Bristol—would be economically transformative for WSM. Yet this proposal does not align with such a strategy, nor does it appear the Council has considered this alternative vision before opting to release Green Belt land.		

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					The NPPF is clear that Green Belt release must only occur where: all alternative options have been exhausted, the development responds to a specific and proven local need, and impacts are fully justified and unavoidable. Given the presence of unused homes, under-occupied new estates, and available redevelopment opportunities elsewhere in WSM, these tests have not been met. Conclusion For the reasons set out above—including inadequate consultation, lack of need, evidence of market oversupply, and failure to justify use of former Green Belt land			

Name: Paul Hinkley **I.D:** 40005185

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Churchill Avenue								
Land north of Churchill Avenue					Penny Field must be protected and made a Local Green Space. Under local planning policy, Penny Field is the perfect candidate for Local Green Space designation because it'd be in the top 24% of sites based on policy alignment. Clevedon Town Council, two petitions (2022 and 2025) of 600+ signatures and the consultation for Clevedon Placemaking Strategy all call to protect Penny Field. penny Field is a prime candidate for Local Nature Recovery, as identified by WECA, due to the pressure of three priority species. pent Field is also located on a Green Infrastructure Corridor under NSC'S own policy. Under any Equalities Assessment the reduction of green space would adversely affect lower income households.	Penny Field must be protected and made a Local Green Space. Under local planning policy, Penny Field is the perfect candidate for Local Green Space designation because it'd be in the top 24% of sites based on policy alignment. Clevedon Town Council, two petitions (2022 and 2025) of 600+ signatures and the consultation for Clevedon Placemaking Strategy all call to protect Penny Field. penny Field is a prime candidate for Local Nature Recovery, as identified by WECA, due to the pressure of three priority species. pent Field is also located on a Green Infrastructure Corridor under NSC'S own policy. Under any Equalities Assessment the reduction of green space would adversely affect lower income households.		

Name: Paul Keen **I.D:** 21232289

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	The Local Plan whilst considering the traffic impacts of the isolated additional housing developments mentioned in the Local Plan does not address overall traffic growth over the 15- year period of the Local Plan, nor provide a strategic view of how traffic will be routed through key transport routes in North Somerset. 1.1. This is important because the proposed housing developments may restrict options to provide adequate transport routes for traffic growth within and through North Somerset. 1.2. Without key strategic routes being identified and allocated within the plan increasing traffic volumes will be routed through rural areas and villages using existing roads that are unfit for current traffic volumes/types and not able to support increased traffic volumes. 1.3. The key arterial routes to Nailsea are based on country lanes that have not been upgraded over the last 60 years despite considerable growth in the size and commercial use of Nailsea. This presents severe bottlenecks and capacity constraints in meeting current traffic demand. 1.4. The traffic growth assessment needs to consider the following in the context of the roads serving North Somerset: 1.4.1. Impact of adding 24,010 new dwellings in North Somerset, the expansion of Bristol Airport, the additional 34,000plus dwellings by 2040 in the Bristol Local Authority and the increased number of dwellings in other surrounding Local Authorities. These together with the growth of traffic using the South Bristol ring road including the new Epic pharmaceutical headquarters (Collitor Way joining A370) will all have a major effect on the already congested roads in the Nailsea and Tickenham area. 2. The Local Plan does not address existing traffic issues in impacted villages and rural lanes/roads which will be subject to a 25% proportional increase in traffic through the increased number of homes alone. 2.1. There are approximately 97,000 dwellings in North Somerset. Adding 24,010 dwellings will therefore increase traffic volumes by approximately 25% and on key routes this increase will be much higher. 2.2. Current road activity puts the Tickenham roads and lanes at or near capacity without additional infrastructure. 2.3 Ability to access My road due to number of vehicles blocking entrance - caused my traffic jams at Stoneedge Batch. Road is impassible for two large commercial vehicles. No safety in catching bus to Clevedon. Need a new road from Nailsea through to the M5.			

Name: Paul Kent **I.D:** 32267297

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP1: Sustainable Development	No	‣ Positively prepared	Unsure	Unsure	1 There has been a lack of communication with the many community groups. 2 There has been poor or rushed consultation allowing little time for face to face discussions. 3 There has been few tours/visits by North Somerset staff to listen to the experience of people who live here. 4 There has been little apparent learning from the recent Ham Green housing development which was controlled by property developers who showed little concern of residents and made no analysis of the impact housing has caused.	1 Involve community members/groups and listen to what people say they need - e.g. positioning of social housing, improved cycling and walkway routes, major traffic control measures and careful listening to local ecology, landscape, woodland and recreational/sporting communities. 2 The recently completed Neighbourhood Plan chaired by Prof Murray Stewart with members of the Parish Councils of Pill, Easton in Gordano and Abbots Leigh contains a huge range of positive suggestions which need to be clearly shared. 3 Your short guide to the Local Plan (2041) is exceptionally helpful. Put alongside the Neighbourhood Plan there could be a very positive response to the North Somerset Local Plan but this can only be achieved by regular honest discussions between us all.		

Name: Paul Lane **I.D:** 51456033

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared	Unsure	Unsure	This is clearly over development; there is already a large (40% increase) The railway station is not fit for purpose, inaccessible for people with motability issues, and difficult when travelling with children. There is no viable analysis for extra 1000 houses			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
		• Justified • Effective • Consistent with national policy			The proposed road would not serve Nailsea traffic or change the significant increase in traffic moving through narrow station road where children already run the gauntlet from Nailsea/Station to Backwell school. No evidence of a social cohesion impact assessment Bio diversity will be deeply affected and never recovered, wildlife habitats destroyed forever Government policy states “we must protect our best and most versatile land” to safeguard food security. This is being IGNORED. Why aren’t golf courses, empty city building and commercial facilities being converted into dwellings? Flooding already occurs in this area, with only adding to the demand not providing new remedies this will cause significant damage. Absolutely zero infrastructure announced, increased cars, emissions, drain on services to brink of collapse. Disruption to quality of life for all residents old and new.			
Backwell Lake	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	This is clearly over development; there is already a large (40% increase) The railway station is not fit for purpose, inaccessible for people with motability issues, and difficult when travelling with children. There is no viable analysis for extra 1000 houses The proposed road would not serve Nailsea traffic or change the significant increase in traffic moving through narrow station road where children already run the gauntlet from Nailsea/Station to Backwell school. No evidence of a social cohesion impact assessment Bio diversity will be deeply affected and never recovered, wildlife habitats destroyed forever Government policy states “we must protect our best and most versatile land” to safeguard food security. This is being IGNORED. Why aren’t golf courses, empty city building and commercial facilities being converted into dwellings? Flooding already occurs in this area, with only adding to the demand not providing new remedies this will cause significant damage. Absolutely zero infrastructure announced, increased cars, emissions, drain on services to brink of collapse. Disruption to quality of life for all residents old and new.			

Name: Paul Madge **I.D:** 62691649

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The proposed development of Land at Tower Farm is next to Weston Big Wood which is an ancient woodland and Site of Nature Conservation Interest (SNCI) managed by Woodland Trust and supported by Avon Wildlife Trust. The woodland forms part of the Gordano Valley ecological network and a nationally important habitat Not Justified There is no robust published alternatives assessment demonstrating that this sensitive site is the only or most appropriate option for growth. The risk of irreversible damage to the ancient woodland make this allocation unsuitable. Not Consistent with National Policy The allocation conflicts with the National Planning Policy Framework (NPPF) paragraphs 180–182, which require that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland) should be refused unless wholly exceptional reasons exist. Not Positively Prepared The location intensifies existing pressures in Portishead: schools, healthcare and transport infrastructure are already under strain. The plan seems to be based on people being able to cycle to and from the proposed new railway station, however no one of average fitness could cycle this route due to the incline. I believe this would be dangerous and result in injuries or worse, if people are encouraged to do this.			

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					The access via Down Road is also too narrow and congested already and this will multiply the situation making it also potentially dangerous. Not Effective Delivery depends on multiple unresolved dependencies: new school provision, bus service contributions, off-site biodiversity management, and upgrades to rights-of-way/buffer zones. Portishead is already over developed and no modification would make this site appropriate. Given its direct adjacency to ancient woodland, its loss would be irrevtersible and cannot be mitigated sufficiently. I do not support this at all.			

Name: Paul Morris **I.D:** 62563265

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	As a resident of Backwell for 40 years I find the proposed plan to be poorly thought out and a potential disaster for our future generations. Housing growth is important and should be carefully planned in a proportional way where the location and facilities are the most suitable, this plan is lacking in sustainability and is legally unsound. This plan will see the population of Backwell grow by 80% with no planned infrastructure to support the additional 1000 houses. How can this be good “Town Planning”? Where are the new schools? What about medical needs? Backwell has been disproportionately allocated housing (7%) in comparison to other villages with Clevedon only receiving 2%. Portishead has also received 7% but the population would only grow by 14%. How is this a balanced plan ? Government policy states we must protect our most versatile land to safeguard food security; why do you plan to build on it? This is Grade 1 agricultural land and should be protected. Having a “Buffer” between developments does not justify taking away this land. The proposed new road crosses the railway track, this is an extremely costly thing to do but there is no information on who will be paying for this or how this will happen. Going over or under the existing track surely cannot be feasible? Where is the social cohesion impact assessment to accompany this plan? Where is the infrastructure delivery plan analysis and costings document? This plan has clearly not been well thought out and looks like someone has just “landed” a pin. I’m no planning expert but even I can see that.			

Name: Paul N **I.D:** 57923841

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land south of Nailsea	No	• Justified • Effective • Consistent with national policy	No	Unsure	I have already provided detailed comments in respect of the Backwell elements of the Plan under a separate comment. These additional comments are in respect of the proposed South Of Nailsea (Backwell Lake) development 1. The Plan (and previous versions thereof) have upheld the principle of maintaining a straegic gap between Nailsea (a town) and Backwell (a village).This is supported by a majority of local residents. This proposed development seriously reduces this strategic gap making it INCONSISTENT WITH POLICY 2. The proposed development wil exacerbate traffic issue between Nailsea and Backwell, already			

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					recognised as a concern. There are no proposals that appropriately address this making the plan INEFFECTIVE. 3. Backwell Lake and surrounding fields are proposed are on a floodpain, Even with current drainage ditches and the area of floodplain available to hold water, a number of the key surrounding roads such as Backwell Common and Backwell Bow flood regularly. Adding further development to the floodplain will worsen this, and is therefore non-sensical and an INEFFECTIVE response to an existing problem.			
Land east of Backwell	Unsure	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	Unsure	Not sound There are multiple reasons why the Plan is not sound. I set out below some of my observations with a particular focus on the Backwell elements: Backwell is a village. Current planning approvals already seek to increase the size of the village by approximately 40%. These new proposals would lead to a massive further increase which are completely disproportionate to the size of the village and would completely change the character of the village. This is UNJUSTIFIED. The plan itself identifies that growth should be focused on more established towns. The allocation to Backwell by far exceeds the allocation to towns (for example it will result in a 80% increase in Backwell's population compared to just 6% for Clevedon. This is also UNJUSTIFIED and INCONSISTENT WITH POLICY. The village does not have the infrastructure to support this level of development. There is already a shortfall in school places, medical services are already at capacity, limited number of shops and there is serious traffic congestion (see comments below). Hence the proposed development is not sustainable or EFFECTIVE. Backwell have very few jobs, nearly all residents commute into Bristol, mainly by road. Adding 1000 houses will result in a huge increase in the scale of commuting with no effective plan to resolve current traffic problems. This is neither sustainable or EFFECTIVE - there are far better sites for housing nearer Bristol. The plan places a strategic growth location on Greenbelt, high quality agricultural land that is currently used for both crops and animal grazing. There is only 7% of this high quality land left in the whole of North Somerset. Government policy requires that "we must protect our best and most versatile land". Therefore the proposals are INCONSISTENT WITH POLICY. It is generally accepted that traffic in Backwell is already excessive with regular congestion on both the A370 and Station Road. This is prior to the developments already approved (particularly Grove Farm, Dark Lane and Rodney Road (which are the "wrong" side of the Backwell crossroads for commuting to Bristol. The plans for a new relief road from Nailsea are vague and will not meaningfully relieve the problem, just adding a second congestion point at the point it meets the A370. As well as the impact on Backwell , it will put far more traffic through Flax Bourton. This is neither sustainable or EFFECTIVE. Furthermore the propsoed relief road route is poorly thought out requiring engineering over or under the railway line which will be expensive, disruptive and possibly unfeasible. It will also pass across land that is highly susceptible to flooding (Backwell Common and Backwell Bow/Chapel Hill regularly flood). No proper feasibility study for this road has been provided and no costings prepared. There are no clear proposals, with appropriate costings and analysis, for the level of social infrastucture needed to support developments of the magnitude proposed. As well as the additional road capacity needed, with a proposed 80% growth in population, there will be a need for additional schools, medical services and leisure facilities. There are no indications of how these will be provided or funded. Furthermore, Goverment Policy requires that Greenbelt develpment should contain 50% affordable housing. This means that developers will have less ability/willingness to contribute to infrastructure. As the infrastructure need to support the proposed level of development is so great, this is implicitly INCONSISTENT WITH POLICY. Not legally compliant	The feedback from previous consultations should be properly considered and the Plan should be based on the stated principles of focusing growth on the major towns. Growth should be sustainable and take account of key factors such as employment and transport. Greenbelt land, particularly high quality agricultural land should be preserved. The current proposals for Backwell do none of these. The level of development in Backwell should be scaled back to be proportionate insize with other towns and villages and should allow the character of the village to be maintained. The currently approved developments already are excessive and nothing further should be permitted, at least not until infrastructure needs have first been addressed. It will be more sustaintable and effective to focus development on sites closer to the employment hubs of Bristol, Weston and Portishead. Rather than concentrating housing developments in a small number of areas that cannot sustain the levels being proposed, it will be far more effective to instead have smaller scale developments spread across a wider range of locations. More effort should be made to identify and redevelop disused sites rather than destroying Greenbelt and agricultural land.		

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					I believe the plan ignores the requirement to engage and consult in a meaningful manner with the local population. A previous version of this plan was consulted in approximately 12 months ago and resulted in widescale objection and disagreement with the proposals for the Backwell area. These have all been completely ignored in this latest version of the Plan and none of the key points noted above have been taken into consideration. This to me demonstrates that there has been no meaningful attempt to take account of the views of local residents, in breach of the requirements of the Town and Country Planning Regulations 2012. A development of this scale, and the impact of points above could lead to a lack of social cohesion within the village. No impact assessment of this has been provided, indeed there has been no proper viability analysis of the impact of 1000 extra houses in the village. As noted above, no proper feasibility study for the Backwell relief road has been provided despite this being a critical need to support much of the proposed development.			

Name: Paul Nott **I.D:** 51326337

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	As a resident of Backwell, we already live in a village which has grown beyond that which the infrastructure was designed to support. Our schools are full, our roads are beyond capacity and the services are no longer sufficient. I am astounded that we are now being told to further expand by such an amount. Whilst there may be a need for increased numbers of houses in North Somerset, unfortunately Backwell just isn't a suitable place for this. Backwell has already had 800 new houses approved. This is a 40% increase and has so far come without any increase in service or amenity provision. Traffic through the village is at a dangerous level. As we are encouraged to think about the environment, children walk to school. Neither Station Road nor the pavements along it are wide enough for the current increase in traffic. There just isn't the space to increase the width of either. We already have construction sites in the village and the amount of lorries, which have to mount the pavements at times as the roads are unsuitable for their size, increases the danger to the local children. The suggestion of a new road across the land East of Backwell has not been properly thought through. Before any houses can be agreed, this road needs to be properly planned. Driving it across the flood plain and negotiating the railway line is going to make it cost prohibitive. If it was viable it would have already been built. There cannot be houses agreed before this has been looked at in enough detail. Surely the cost and the engineering of creating this is prohibitive? It also wouldn't solve the problem of congestion on Station Road, Backwell common or Chapel Hill. With Government policy stating that 'we must protect our best and most versatile land' to safeguard food security, it is obvious that these planning proposals directly contradict this Government policy. This destruction of high quality agricultural land would increase the need for buying in and transporting food – surely something which goes against every current environmental plan. That is without the damage done to habitats locally and biodiversity. Constructing houses in a village that does not provide employment opportunities beyond the services we need here is short sighted. It will simply increase the level of traffic on the roads. Station Road is already dangerously busy and increasing the number of houses in the village where the vast majority of people will need to commute by car for employment will inevitably cause additional congestion and danger to the pedestrians. Neither the footpaths, nor the roads are wide enough to cope already. It is the main route for children walking to all the village schools. Surely it would be more beneficial to develop new housing in areas where people actually have employment and are not required to commute? Much is made of Backwell having a train station. For this to be advantageous it requires significant investment. Lifts to the platforms to increase accessibility would be a good start. The single track railway bridge is already unsuitable and with a further increase in traffic would be increasingly congested. Village services are already over capacity without the actual space to expand them. Again, it must be a better idea to build new housing in areas which actually have the space to expand the current facilities or build new ones? If Backwell had the space for a bigger medical centre, more schools or more essential facilities they would already exist! The Infrastructure Delivery Plan lacks analysis and costings with no funding guarantees for either the new road or services. Permission cannot simply be granted for new homes without a guarantee that other essential services will be made available. If there is not funding available in the current economic climate, then it must be concluded that any new developments must be built in places larger than Backwell where such a big increase in residents is more in proportion to their current population and existing services. The volume of growth which Backwell is being told to accept is inappropriate and unsustainable.			

Name: Paul Pownall **I.D:** 62840833

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Justified	No	No	I am commenting on the Pre-submission Plan relevant to Eastern-in-Gordano, Pill and lHam Green ie sites HE 2O6, HE20491, HE2015, and HE201097. This is based on the "Residential Proformas" under the section "Evidence Base" The evidence for each site is based on a number of of "Objectives" and each "Objective" is graded "positive, negative,or negligible" with a further grading of "minor(+)" or "minor(-)" to "significant (++)" or "significant (- -)" I challenge the notion that a "robust and credible evidence base" has been applied to the above sites and to prove this I have chosen two of these objectives to comment on namely Objective 1.1 and Objective 3.3 referring to the two sites at the extremities of the above mentioned area Objective 1.1 states " Ensure a range of job opportunities are easily accessible without having to use a car" Your criteria for this Objective is " the site is within 2km of Clevedon,Nailsea, and Portishead or 5km from Weston-super-Mare or the centre of Bristol". I presume these distances are "as the Crow flies" and I have used OS EXPLORER 154 BRISTOL WEST& PORTISHEAD Map to check the distances of the above sites. To the west, the nearest site to Sainsburys, Portishead (the closest local job provider),is HE206 (for which I could find no "Residential Proforma).This site is 3.75km away - 87.5% outside your criteria of 2km. The nearest site to Bristol City Centre is HE201097 which is 6km away and yet this was graded as "minor(+)". Why? -it is 20% outside your criteria. What tolerances are you working to?! Obviously all the other sites are further away Objective 3.3 states "Reduce the need to travel by car to minimise environmental impacts....." Your criteria for this objective is "The site is within 1.8km of a railway station" . Do you mean the non existent Pill Station which has been planned for a decade and still may not be built (HS2 springs to mind) or the station at Shirehampton which is certainly within 1.8km for all the above sites, but local residents would have to swim across the Avon to abide by the criteria? YET YOU GRADED THIS SIGNIFICANT(++) for site HE 201097, the sample site I referenced. Based on these examples from your "Evidence Base" section of the Pre-submission Plan 2041how on earth can we trust your assessments, which at best are sloppy and at worst devious.	Start again and be more rigorous. Make access to these "Residential Proformas"much easier. There was no logic in the order of presentation.		

Name: Paul Reid **I.D:** 62805793

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell already has 800 new houses approved, a 40% increase for the village. These additional numbers would lead to complete overdevelopment and near doubling of the size of Backwell. There are no credible plans for infrastructure to support such a massive increase in size of the village. There are limited employment opportunities in Backwell, so increase in traffic to support commute into (mainly) Bristol would cripple and already struggling road system. The proposed road would not effectively serve Nailsea's traffic or relieve congestion on Station Road, Despite this increase, there is a deficit in school places and no investment in health services or leisure facilities. The lack of infrastructure and services cannot support another 1,000 houses. Backwell is allocated a higher number of houses than any other village in North Somerset, and even a higher growth percentage than towns. Backwell is expected to take 7% of the district's housing allocation, compared to Clevedon's 2%. Development would destroy valuable wildlife habitats and further harm biodiversity in one of the world's most nature-depleted countries. The Infrastructure Delivery Plan lacks analysis and costings, and there are no funding guarantees for the new road or services. Backwell Common and surrounding areas are prone to flooding, which would be aggravated by more housing. Backwell Lake (Reservoir) and adjacent fields, where the new roads and housing is planned are on a floodplain, which			

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					floods regularly. The sheer volume of growth with the required investment infrastructure and services over such a short period is destabilising, unsustainable and undeliverable. The railway station is not fit for purpose as a transport hub; it remains inaccessible for people with mobility issues and presents serious challenges when travelling with young children.			

Name: Paul Rosser **I.D:** 62783809

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Churchill Avenue	Unsure	• Effective	Unsure	No	1. Publication of the plan has been poor. I only heard of it recently from a neighbour. There has been no general publication by any means which is brought to public attention. 2. Policy LP5: Housing, employment and mixed use allocations has a section for housing on "Land north of Churchill Avenue" and has an "indicative capacity" of 44 dwellings and "Access off Wordsworth Road". Because of the low levels of employment sites in Clevedon, 44 dwellings will result in a minimum of 44 extra vehicles to access work opportunities using the roads approaching Wordsworth Rd. These roads are unsuitable for extra vehicle use, due to the many bends, and are already dangerous - with a crash outside our house in recent years. Therefor this method of access is not suitable for the additional level of traffic a development of this size would entail. 3. The proposed access point It is also not suitable for construction traffic to access the site because of the Weight limit/restriction over the river at the Old Church Road/ Coleridge Vale Road North junction. 4. Also recent problems with plants clogging the flow of the Land Yeo has highlighted the need to keep clear access for the Environment Agency, or any other party to have good access to clear future plant growth to avoid aggravated flooding risk of the immediate area.and the housing up river from the site.	make a major reduction in the number of dwellings proposed, to reduce the potential traffic flow, allow good access to the river for clearing growth, and to ensure adequate space is left for the "Local Green Space designation" in future to ensure that it is more than just a bit of grass alongside the river (which would be too dangerous for allocation as a children's play area.)		
Great Western Road	No	• Positively prepared • Justified • Effective	Unsure	No	any proposed development in the current car parking area adjacent to Great Western Road does not take into account the fact that the carpark is a necessary resource to maintain the viability of the local shops in Clevedon's centre. Most days this car park is anything from 50% to 100% utilised (I know this as I walk through it most days) with people struggling to find any parking space on Thursday's market days.. Although I understand the need to try to reduce car travel, the fact that planning permission is given for large car parks at most supermarkets and out of town/edge of town supermarkets or retail centres obviously recognises the fact that car parks are essential for the viability of shopping outlets.	Do not allow any building on the car park, and retain it for shopper carparking.		
Castlewood		• Positively prepared • Justified • Effective	No		The Consultation states that: "The towns will be the main focus for employment growth given their accessibility, labour supply and range of services and facilities. Opportunities to provide business development which supports self-containment and reduces out-commuting through the re-use of land and premises will be encouraged, especially where it supports the vitality and viability of town centres." Therefore the Castlewood site, which has been an employment centre for many decades should be retained for employment use only (or primarily). Losing such a significant employment site for residential use will simply mean more	Do not include this site for residential use, and retain it for employment use.		

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					people living in Clevedon and working elsewhere, which will add to traffic volumes and congestion.			

Name: Paul Segar **I.D:** 62776065

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Sustainable development objectives	Yes		Yes	Yes			I agree that planning for new housing should be sustainable and not require car use to access jobs, shops, schools or leisure facilities. Green field sites in villages which developers prefer should not be permitted without good walking, cycling or public transport to these facilities. Consequently, the use of agricultural land for development should be minimised in preference to use of brown field sites (in towns).	
SP1: Sustainable Development	Yes		Yes	Yes			I support the sustainable development points above, particularly not permitting new developments where walking and cycling are not feasible, and car use is inevitable to access any facilities, such as Wrington where I live. Developers should not be permitted to develop agricultural land, and brownfield sites used instead, together with completion the sites for which developers already have permissions	
SP2: Climate Change	Yes		Yes	Yes			I agree with all the points above, particularly prioritising active modes of transport and public transport over car use. In Wrington, recent housing development on agricultural sites has already contributed to increased flooding and a loss of green infrastructure and biodiversity, and should be avoided in future if at all possible.	
SP3: Spatial strategy	Yes		Yes	Yes			I strongly agree that new developments should be close to urban areas, where active transport can be used and there are a wide range of employment opportunities and facilities. Developments in rural and village areas, such as Wrington, should only be on brownfield sites or within existing village boundaries, and not be on valuable agricultural land.	
SP4: Placemaking	Yes		Yes			I agree with the above points. It is especially important to protect and enhance the local character of communities, such as Wrington, which has a number of important heritage assets. Unsympathetic development of smaller communities can easily override the local character and degrade the sense of place.		
SP6: Villages and rural areas	Yes		Yes	Yes			I agree with the points above, particularly the need to maximise opportunities to reduce travel, especially by car, and the need to for housing to reflect local needs rather than what developers choose to maximise their profitability.	
SP7: Green Belt	Yes		Yes	Yes			I have a concern that in some circumstances Green Belt land may be requested by developers in preference to other non-Green Belt sites, e.g. brown field sites. In my view, Green Belt sites should only be released for development once all other available sites have been, or are in the process of being,	

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							developed.	
SP10: Transport	Yes			Yes			I support the points outlined in the Policy, particularly locating new development where it reduces the need for travel, especially by car.	
SP11: Historic and natural environment	Yes						I support all the points outlined in this policy, especially conserving the landscape and scenic beauty and minimising the visual impact of any development. Protecting the conservation areas and buildings and heritage architecture of significance is very important, as is respecting the landscape surrounding these settlements.	
Policy LP12: Bristol Airport	Yes		Yes	Yes		Noise from the airport is a major cause of concern for those living in surrounding villages, particularly with the expansion of night time flights and proposals to introduce long-haul aircraft in future. Although probably not under NSCs remit, aircraft should be directed away from villages during take-off particularly, and undertake noise-abatement manoeuvres. Currently many (most) aircraft produce considerable noise annoyance. at take-off. The airport owners appear to be taking a very aggressive approach to it's future expansion, and it should be made clear to them that it is a regional airport, not an international hub airport, and NSC's planning policy will need to reflect this.		
Schedule 3: Local Green Space						The recreation space and tennis courts in Wrington (in Silver St/Cox's Green) does not appear to be listed. This is a major community facility for sports events, as well as a children's play area.		

Name: Paul Sperring **I.D:** 58558273

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	The proposed Tower Farm allocation is unsound and should not proceed because it places around 400 homes directly beside Weston Big Wood — an ancient, irreplaceable woodland at the heart of the Gordano Valley ecological network. Ecological damage would be irreversible, harming protected habitats, and fragmenting a nationally important landscape. No robust alternatives assessment has been published, the site involves the loss of high-grade farmland, and the proposal conflicts with the National Planning Policy Framework, which requires refusal of developments that threaten ancient woodland unless wholly exceptional circumstances exist. Claims of an 'ecological buffer' are vague and inadequate, with no enforceable protections against hydrological change or wildlife disturbance. The allocation also fails key planning tests - it is not positively prepared, given existing pressures on Portishead's schools, healthcare and transport; not effective, as delivery depends on unresolved and unfunded infrastructure and environmental measures; and not aligned with sustainable travel objectives, as this peripheral location would increase private-car dependency. Additionally, the cumulative impact alongside other local allocations would further undermine nature recovery and overstretch already burdened infrastructure. No modification short of removing the allocation entirely would make this site appropriate. Given its direct adjacency to ancient woodland, its loss would be irreversible and cannot be mitigated sufficiently. The land should instead be retained as undeveloped green space, managed to enhance biodiversity and provide sustainable public access, in line with the Avon Wildlife Trust's 2030 Strategy and national '30 by 30' nature recovery goals			

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					I don't support the the North Somerset Local Plan 2041 for the Tower Hill Farm location.			

Name: Paul Taylor **I.D:** 58347425

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP5: Housing, employment and mixed use allocations	Unsure		Unsure	Unsure	In accordance with the Vision, Strategic Priorities & Sustainability Objectives statement above, I have submitted an attractive flood free site for inclusion within the local plan to provide for beautiful, low density, high quality housing with green spaces / landscaping together with access to rural / scenic footpaths for the benefit and wellbeing of all inhabitants and local residents. My intention is to align perfectly with the vision statement above. Prior to my submission in March 25, I had met with several team members at WsM Town hall and explained that I wanted to work with the local authority in order to maximise the needs of the local plan, residents and area. I pointed out that as half of the site lay in the Mendip National Landscape, perhaps it could be used as part of green spaces or left out completely. I was advised to submit the full site for consideration as following application, a meeting would be called to discuss best use and options at that time. Following submission and unbeknown to me, the site HE2010123 was allocated an assessed capacity of 127 which in my opinion is way too high and intensive for this beautiful site. My initial thoughts on numbers were between 15 - 40 but guided by the local authority either up or down. In October however, the site was identified as having potential for further consideration. I have recently discovered that the site was unsurprisingly discounted as half the site lies within the Mendip National Landscape. I was disappointed that I was not called for a meeting following application as (a) the high number allocated post my application would not have occurred and (b) It would have been made clear to all that the half in Mendip National Landscape would not be used for development. I would like to still offer my site for inclusion within the local plan either in part or in its entirety. By doing so serves to both reduce the high density required on other sites and future proof the integrity and beauty of this site for future generations.			Reg19AddSites-1253462.pdf View from South.pdf Page 34 SHLAA Main Report 2025.png
Policy LP5: Housing, employment and mixed use allocations	Unsure		Unsure	Unsure				View from South.pdf Page 34 SHLAA Main Report 2025.png
Land north of Banwell Road, Locking /Elborough	Unsure		Unsure	Unsure				

Name: Paul Tindall **I.D:** 51055009

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Flooding The land targeted for housing development east of Backwell floods. Water originating on Backwell Hill flows and seeps down into the fields adjacent to Backwell Common. Dig a hole in the land in or around Woolleys Farm and it fills with water. Lift the main water supply stop cock lid in my gateway and you can see it is filled with water to 15cm below road level, even in non-flooding conditions. North Somerset Council has conveniently ignored or chosen to dismiss the flooding problems in Backwell Common in order to target the surrounding fields for development despite local knowledge, repeatedly being made aware of it over the last 30 years as well as recent hydrology reports and hydraulic modelling. Indeed, the document “North Somerset - 2012 Flood Investigations” does not even show this location as having flooded. The reality is that Backwell Common seriously flooded 6 times in 2012 between September and the end of December. This document is clearly inaccurate and missing critical information. Building a massive housing development in the fields east of Backwell will simply exacerbate the problem in Backwell Common in the vicinity of Woolleys Farm and the railway bridge. Unfortunately the mitigation approach so glibly positioned by planners and developers to address the problem is just an attempt at defying the laws of physics. Digging a pond in a water-logged floodplain simply creates a low-point container that fills with water, with no exit path or means of drainage without building a pumping station and drainage channels traversing the railway embankment. Overdevelopment The currently planned housing developments already increase the population of people and cars to a level that breaks local services and infrastructure. Adding a further 1000 houses and at least another 2000 cars is clearly an overdevelopment incompatible with local services. Backwell centre already suffers gridlock at several times of day with people competing for the meagre parking spaces and this is even before the currently planned or work-in-progress developments are completed and occupied. Development at the scale proposed will quickly render existing local services woefully inadequate, forever playing catch-up and desperate for hard-to-get infrastructure funding. On top of existing Backwell development, an additional 1000 houses is unsustainable, unjustified and unbalanced compared to other villages. It is delivering a soft target and gift into the hands of developers. Destruction of Agricultural Land and Green Belt The land east of Backwell is prime agricultural land and should absolutely not be used for housing development, especially at a time when shortage of such land has been highlighted nationally as an ever more serious food security problem for this country. New housing should be prioritised on non-greenfield sites. Recategorising this area from green belt to grey belt is not justified but is being used by North Somerset Council as a convenient route to downgrade its greenfield value and facilitate allocation for housing development. It is also inappropriate that the council is the body interpreting and applying the criteria for recategorisation of green belt to grey belt while at the same time the very body that is targeting the green belt areas for development. Infrastructure and Transport Backwell has minimal local employment and new housing developments will largely accommodate commuters to Bristol area workplaces. The recent level of return to site-based work has largely nullified the post-Covid benefits of working from home to transport capacity at peak times. While there is still some benefit to easing commuter load it is far from clear what the future of home working will be, its ability to drive development and sustainable use of local services and reduce the trajectory of traffic growth. However, what is clear is that adding hundreds more commuter car journeys daily to the A370 will exacerbate traffic congestion between Backwell and Bristol. The proposed Backwell cross rail link road is an unfunded yet highly expensive and difficult to construct proposal that will without doubt extend to 10’s of millions of pounds for a 1.5 mile stretch of road and will largely move traffic bottlenecks rather than eradicate them. Unless Station Road is closed to traffic to/from the A370, adding another route between the A370 and Nailsea will result in two traffic streams merging north of the station as well as introducing an additional intersection/delay between Backwell and Bristol. With the majority of traffic heading along the A370 in one direction at peak times, adding a new traffic route between Nailsea and the A370 does not reduce the traffic; it simply redistributes it between the existing and new routes but with the same volume of traffic ultimately joining the A370. And unfortunately, it gets even worse. If Nailsea - Bristol traffic that would currently use the Wraxall B3130 route migrates to the proposed new			

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					route it further adds to A370 congestion in Backwell. It should also be recognised that the proposed link road will cross a floodplain and if routed under the railway line, will be at risk of flooding with the requirement for pumping infrastructure. The alternative proposal of a bridge will result in a visual monstrosity reaching 13m (plus double-decker bus height vehicles) above existing ground level That is equivalent to the height of a 4 storey building. According to the transport strategy document (Appendix E) the approach ramps at each side would extend 250m to achieve the necessary gradient. The proposed link road passes within close proximity to three ancient/listed farmhouses of historic interest that are fundamental to Backwell Common's rural setting, character and heritage. Targeting the land east of Backwell for development of this magnitude entirely undermines the basis for protecting the character, setting and curtilage of listed buildings of historic interest. It is clearly in violation of Strategic Policy 11in the Local Plan as well as the stated Site Requirements to preserve key views from heritage assets.			

Name: Paul Tregedeon **I.D:** 58368129

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Land at Tower Farm	No	• Justified	Unsure	Unsure	NSC has not properly considered: Alternative brownfield or greenfield sites with far lower ecological impact, both in Portishead and across North Somerset.Opportunities to increase housing density on proposed brownfield sites, which could remove the need to develop Tower Farm and Black Rock.The strategic ecological importance of these sites in protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor. The fact that both areas were added to the Green Belt in the late 1980s due to their high ecological value.National planning policy allows Green Belt changes only in exceptional circumstances — and these have not been demonstrated. In addition: Neither site can provide safe or suitable access.Development would create unacceptable transport impacts, failing national soundness tests. For these reasons, Tower Farm and Black Rock should be removed from the Local Plan.			
Black Rock, north of Clevedon Road	No	• Justified	Unsure	Unsure	NSC has not properly considered: Alternative brownfield or greenfield sites with far lower ecological impact, both in Portishead and across North Somerset. Opportunities to increase housing density on proposed brownfield sites, which could remove the need to develop Tower Farm and Black Rock. The strategic ecological importance of these sites in protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor. The fact that both areas were added to the Green Belt in the late 1980s due to their high ecological value. National planning policy allows Green Belt changes only in exceptional circumstances — and these have not been demonstrated. In addition: Neither site can provide safe or suitable access.Development would create unacceptable transport impacts, failing national soundness tests. For these reasons, Tower Farm and Black Rock should be removed from the Local Plan.			

Name: Paul Turner **I.D:** 62769313

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Land north of Banwell Road, Locking /Elborough						I can't believe that the council would even consider this proposal. Not only will it increase the volume of cars but there is no new roads to accommodate them. The journey just to the M5.is horrendous already without adding at least 800 extra cars. Then there is the green space plus the issue of flooding which will be exacerbated. Also when you consider the amount of road works already being done, (ie Banwell bypass, Winterstoke Bridge.) All these cars trying to find alternative routes will not just be a inconvenience. As it is I live in Locking village, attending hospital appointments I have to go through Hutton because of all the roadworks which has got busier as other road users find alternative routes around the disruption. This purposed development is very short slighted. Please consider your deliberations carefully. Thank you		

Name: Paul Watkins **I.D:** 14339745

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Strategic Priorities	No	‣ Justified	Unsure	Unsure	How can you believe that this plan 'promotes sustainable development and addresses the climate emergency' more hubris... NSC hides behind this so called climate emergency and yet merely panders to any developer and sanctions completely unsustainable development...what absolute hypocrisy.			
SP2: Climate Change	No	‣ Justified	No	No	How can NSC write Reduce the risk of flooding both now and in the future, taking account of predicted sea level rises and the impact on areas vulnerable to coastal change; When it currently is unable to ensure that drains in highways, which it is responsible for, remain patent...and failure to do so by NSC contributes to local flooding...agian a further example of NSC hypocrisy			
SP6: Villages and rural areas	No	‣ Justified ‣ Effective	No	No	More weasel words...what exactly is meant by There is a clear justification for the need for the proposed location; your words... and may be justified by the developer but not by those who live in the village..and as always we know whose 'justification' NSC will support What exactly is defined by It results in a form, design and scale of development which is high quality, respects and enhances the local character, contributes to placemaking and the reinforcement of local distinctiveness, and can be readily assimilated into the village; What is 'placemaking' and how would you notice a 'reinforcement of local distinctiveness' ?? More weasel words which are undefined and show a further contempt by NSC and lack of probity			
SP10: Transport	No	‣ Justified ‣ Effective	No	No	you write New development must be located and designed to minimise the carbon impact of transport through limiting the need to travel and prioritising walking, wheeling (this includes wheelchairs, mobility scooters and other wheel-based mobility aids) and cycling and the use of public transport opportunities. How does NSC measure the carbon impact of transport, and where does it publish this data? Surely 'wheeling', ie using wheels for transport, includes cars and motorbikes...?? so why have they been excluded			

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					from your defintion?			
Policy LP10: Strategic gaps	No	• Justified • Effective	No	No	These are more examples of weasel words from NSC.. exactly how will you ensure that the strategic gaps are protected.?? you state Identification and protection of strategic gaps will help to prevent their erosion by incremental development which would be detrimental to the settlements' separate identities, character and/or landscape setting. But nowhere do you state how you will protect them.... I expect if challenged by a developer you will, as always, roll over and surrender.			
Policy LP23: Monaghan Mushrooms, Stock Lane Langford Broad Location	No	• Justified • Effective	No	No	You write 'however more comprehensive improvements will be required to support the full redevelopment of the site, including provision of improved pedestrian connectivity between the site and surrounding areas and highway safety measures. Any future design of the wider site must also incorporate the provision of bus travel into, out of and through the site as well as a substantial financial contribution to local bus services to offer genuine alternatives to travelling by car.' And exactly how would you ensure these took place? As usual NSC will grant planning, and then wonder why the developers are unable/unwilling to fund these critical improvements... we have seen this so many times with NSC, should we be surprised that it will happen again??...and lead to gridlock on Stock Lane.... all courtesy of NSC.. well done to you all!			
Wolvershill (north of Banwell)	No	• Positively prepared	No		So, NSC sells a by pass to Banwell on the grounds of easing traffice... and fails to engage with neighbouring villages, and now plans to add 3000 plus homes...and just what effect will this have on transport infrastructure locally? Of course it will be disastrous, and by highlighting this area for development NSC will merely encourage developers..and will not scrutinise their plans...since the NSC document already states that the development will take place.... a true case of transparency (or not)			
Land at Mead Farm	No	• Justified • Effective	No		How can you justify this development, in light of access via Mead Lane.... has anyone who wrote this litany of errors ever visited the site? I expect not; this is a totally unsustainable development Block this development asap			
Land south of Greenhill Road	No	• Justified • Effective	No	No	Unsustainable development..has anyone from NSC actually visited the site? I thought not			
Woodborough Farm	No	• Justified • Effective	No	No	a furthe example of unsustainable development proposed by NSC...exactly what is NSC criteria for sustainability.....except of course keeping themselves in very well paid jobs			
Broadleaze Farm	No	• Justified • Effective	No	No	Again, NSC identifies unsustainable sites...allowing developers to act like leaches and attach themselves to the NSC lead. Is NSC the regulator... or, as it seems, the gubernaculum of development?			
West of Hill Road	No	• Justified • Effective	No	No	Again, NSC , the gubernaculum...identify unsustainable sites and allow developers to follow... just like lemmings. This is yet another example of NSC's inability to demonstrate an ounce of impartiality...just how much do they receive a s 'cuts' from developers??Surely she should be told			
Land at Coombe Farm and Shipham Lane	No	• Justified	No	No	How can you state that there is resolution to grant consent when ground works have already started..as of date of these comments? Another case of NSC in 'bed' with developers			

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Banwell Bypass	No	• Justified • Effective	No		What will NSC do if the increase in actual traffic passing through neighbouring villages as a result of this vanity project exceed the levels that they predicted in their initial diatribe with local parishes? If it greater than they predicted what mitigation will they undertake??			

Name: Paula John Amor **I.D:** 62832353

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	1 Backwell already has 800 new houses approved, a 40% increase for the village. These additional numbers would lead to complete overdevelopment. 2 The proposed road would not effectively serve Nailsea's traffic or relieve congestion on Station Road, Backwell Common, or Chapel Hill. Engineering the road under or over the railway would be highly expensive and possibly unfeasible. There is already too much traffic as it is. 3 There are insufficient school places and no investment in health services or leisure facilities. The lack of existing infrastructure and services and absence of confirmed investment cannot support another 1,000 houses. 4 Backwell is allocated a higher number of houses than any other village in North Somerset, and even a higher growth percentage than towns. Backwell is expected to take 7% of the district's housing allocation, compared to Clevedon's 2%. 5 There has been no viability analysis for an extra 1,000 houses hugely changing Backwell. 6 Backwell is not an employment hub, most residents commute which will lead to unsustainable increase in traffic in the A370 7 No social cohesion impact assessment has been provided. 8 Grade 1 Agricultural Land currently used for food crops and grazing. There is only 7% of this high quality land left in the whole of North Somerset and there is no justification for the overdevelopment of the village 9 Government policy states that "we must protect our best and most versatile land" to safeguard food security. The proposals contradict this policy and undermine food security. 10 Development would destroy valuable wildlife habitats and further harm biodiversity in one of the world's most nature-depleted countries. 11 The proposals threaten the Brockley Maternity Roost and SSSI, with rare Lesser and Greater Horseshoe Bats relying on the land for food. 12 The Infrastructure Delivery Plan lacks analysis and costings, and there are no funding guarantees for the new road or services. 13 Backwell Common and surrounding areas are prone to flooding, which would be aggravated by more housing. 14 Concerns regarding the strategic growth location designation include the impact on the area's character, the loss of Greenbelt and high-quality agricultural land, the risk of flooding, and uncertainty over whether the road can be funded and delivered on time to support the proposed housing. 15 Backwell Lake (Reservoir) and adjacent fields, where the new roads and housing is planned and are on a floodplain, which floods regularly. 16 Government policy requires 50% affordable housing on Greenbelt Land, but this reduces the funds developers contribute towards infrastructure. 17 The sheer volume of growth with the required investment infrastructure and services over such a short period is destabilising, unsustainable and undeliverable. 18 The railway station is not fit for purpose as a transport hub; it remains inaccessible for people with mobility issues and presents serious challenges when travelling with young children.	The development already approved for Backwell is the maximum which should be permitted. None of the additional proposed development should be permitted	I absolutely do not support the soundness of the plan	

Name: Pauline Robertson **I.D:** 62819713

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Black Rock, north of Clevedon Road	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	NSC has not properly considered: Alternative brown and green field sites with much less ecological impact both in Portishead and across North Somerset. The opportunity to increase housing density on proposed brown field sites across North Somerset which would mean Black Rock is not needed to meet NSC housing targets. The need to protect Weston Big Wood (SSSI) and the Gordano Valley strategic green corridor. We have lived here all our lives. When the Council houses were built in the 1970's the field behind us going up to Weston Big Wood were left alone to protect nature. We have lived alongside nature in harmony since then. Please don't ruin the woods so that for people , animals and all the wonderful plant life can still live together. The fact that these sites were specifically added to the Green Belt in the late 1980's because of their high ecological value. For the above reasons, the Local Plan is unsound because National Planning Policy states that sites can only be removed from Green Belt for development under exceptional circumstances and these exceptional circumstances are definitely not proven.	No modifications short of removing the allocation completely is appropriate for this site. The land should be retained as undeveloped green space and potentially used for biodiversity net gain purposes. North Somerset Council should instead increase housing density on already known and new brown field sites in Portishead and North Somerset and look to develop on other green field sites in Portishead and the rest of the district which will have much less ecological impact.		

Name: Penelope Plas **I.D:** 62856929

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Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	The proposed additional 40% extra development of 800 more houses would overwhelm this already over developed community. Before this proposed further expansion, the past and current increase in population finds Backwell's services stretched with no plan to increase funding, daily traffic congestion along out roads. The local schools do not have the premises, space, staff or funding to educate the threatened demand for places. There are very few employment opportunities in Backwell causing new residents to commute on already overstretched roads. Developing the proposed site on Grade 1 Agricultural Land, currently in use for grazing and crops, makes no sense as there is less that 8% of good quality land left in all of North Somerset. Building on this site is counter to the Government's assertion that this country needs to protect productive agricultural land for the sake of food security. Not only does the plan threaten the survival of 2 species of bats, protected by the Brockley Maternity Roost, but, as with all such developments it will inevitably damage other endangered fauna and flora. Part of this area, such as Backwell Common and the land in the Backwell Lake, both included in plans for the further changes to roadways in the area, is prone to flooding, and is land no one should consider using in this way. The increase of a further 1,000 houses, along with the big increase in population, causing more road congestion, increasing pressure and competition for amenities, services and school places will drastically change the character of Backwell from what it is now; a cohesive, harmonious village.			

Name: Penelope Riley **I.D:** 30659873

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SP7: Green Belt	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	To be legally compliant the local plan must meet a number of procedural tests. Portishead Town Council (PTC) consider that policy SP7 has not been informed by full and effective cross border discussions regarding housing need and the sustainable location of new development. PTC has reviewed the duty to cooperate statement and considers that the relationship with Bristol and Bath to be unclear in terms of meeting housing needs. The statement explains that the plan area is strongly influenced by the adjacent larger urban areas and whilst it states that each authority agreed to meet their own housing need within their own boundaries, it is unclear how each strategy and approach to housing interacts. Soundness To be considered 'sound' the North Somerset Local Plan (NSLP) must be positively prepared, justified, effective and consistent with national policy. PTC consider that policy SP7 is not sound for the following reasons: Positively prepared To meet this requirement, the NSLP should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, consistent with achieving sustainable development. This assessment should also be informed by agreements with other authorities, so that unmet needs from neighbouring areas are accommodated where it is practical to do so and consistent with achieving sustainable development. Page 32 of the draft NSLP explains that the minimum number of new dwellings that the council is required to plan for over the plan period is 23,700, however the plan proposes 24,495. This is in excess of the level identified by the Government. PTC acknowledges that there is a requirement for significant levels of housing to be planned for. However, the strategy must be consistent with achieving sustainable development. It is stated within the draft NSLP that land must be released from the Green Belt in order to deliver development within sustainable locations. Furthermore, in response to policy SP8 it is explained that Portishead not a sustainable location for the level of growth proposed. It is clear, therefore that the housing requirement is not an objective assessment of development needs and therefore not positively prepared. Justified To meet this requirement, the NSLP should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate, robust and credible evidence. The NSLP should show how its policies and proposals help to ensure that the social, environmental, economic and resource objectives of sustainability will be achieved. In addition to their location within the Green Belt, the Tower Farm and Black Rock sites have a strategic ecological contribution in protecting the unique environment of Weston Big Wood (SSSI) and the Gordano Valley strategic green corridor. PTC consider the approach to Green Belt deletion is not fully justified as it has not fully considered all reasonable	Examples of the consideration of alternative sites also relates to the Wyndham Way site. This contains a 1.1 hectare "green field" which is effectively wasteland and has been earmarked for commercial development for many years, but no plans have ever been brought forward because of lack of viability. The vision of the Wyndham Way area is for a mixed housing and commercial development which would bring more jobs to Portishead and prevent it becoming purely a commuter town. This particular site is near to the new railway station which is due to open in 2028. Reclassifying it as a mixed residential and commercial site on this wasteland will increase the probability of the site being developed as the first phase of the Wyndham Way area vision/Town Centre regeneration. Land South of Clevedon Road was included as a site reference HE20488 in the 2023 NSC Local Plan draft but has been removed from the latest version, PTC understands that this is because the Environment Agency has reclassified the land is being in the flood plain. It is considered that further investigation is required in respect of this as the site is on a small ridge overlooking the Somerset Levels and is in fact on higher ground than most of the land developed in Portishead over the last 25 years. The 2023 proposal was for 80 homes on this 2.67 Hectare Green Belt site, mostly larger Executive style homes. It should be noted that the proposal for executive homes was in conflict with the Portishead Housing Needs Assessment carried out by AECOM for the Portishead Neighbourhood Plan - which highlighted the need for affordable and smaller dwelling units. This site is in a sustainable location, very close to the local Secondary school and a short flat walk to Portishead High Street. It is submitted that it should be included within the NSLP and classified as a suburban or urban site and using national housing density guidelines the 2.67 acre site could accommodate 250 to 500 dwellings which would help to reduce any potential need for Green Belt deletions. The NSLP should also include two further sites in Portishead: • Planning permission was granted in 2017 for 33 homes at a site in Portishead between Wyndham Way and Cheviot Meadow (17/P/1229/FUL). These were not built, and permission was later granted for a care home there, but that has also not been built and the site is for sale again. • Land is also for sale next to The Poacher public house, with an indicative 8 homes.		

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					alternatives particularly with regard to which are less environmentally sensitive as well as proposed density levels of other sites.			
SP8: Housing	No	‣ Positively prepared ‣ Justified ‣ Effective	No	No	Legal compliance and Duty to Cooperate As explained in response to policies SP7 and SP8 Portishead Town Council (PTC) consider that the draft local plan has not been informed by full and effective cross border discussions regarding housing need and the sustainable location of new development. PTC has reviewed the duty to cooperate statement and considers that the relationship with Bristol and Bath to be unclear in terms of meeting housing needs. The statement explains that the plan area is strongly influenced by the adjacent larger urban areas and whilst it states that each authority agreed to meet their own housing need within their own boundaries, it is unclear how each strategy and approach to housing interacts. Soundness To be considered ‘sound’ the North Somerset Local Plan (NSLP) must be positively prepared, justified, effective and consistent with national policy. PTC consider that policy LP5 is not sound for the following reasons: Positively prepared To meet this requirement, the NSLP should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, consistent with achieving sustainable development. This assessment should also be informed by agreements with other authorities, so that unmet needs from neighbouring areas are accommodated where it is practical to do so and consistent with achieving sustainable development. Page 32 of the draft NSLP explains that the minimum number of new dwellings that the council is required to plan for over the plan period is 23,700, however the plan proposes 24,495. This is in excess of the level identified by the Government. PTC acknowledges that there is a requirement for significant levels of housing to be planned for. However, the strategy must be consistent with achieving sustainable development. It is considered that the proposed approach, to distribute 7% of the housing supply within Portishead would not deliver sustainable development. Justified To meet this requirement, the NSLP should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate, robust and credible evidence. Given the above, Portishead Town Council contends that two specific sites in Portishead “Tower Farm” and “Black Rock, north of Clevedon Road” do not conform to an approach that is the most appropriate strategy. PTC consider that these sites are not justified as the most appropriate locations for housing development. The key concerns relate to the environmental impact of the site on the adjacent Weston Big Wood Site of Special Scientific Interest and Gordano Valley Strategic Green Corridor, landscape impacts, sustainability of the site, access, and highway safety	There are other sites available in Portishead such as Wyndham Way (brown field) and HE20488 Land South of Clevedon Road which are within Portishead that have much better access to the full set of retail and community services in and around Portishead High Street, and where development would do far less damage to the environment. These alternative sites are much more sustainable being substantially closer to the new Portishead Railway station and an easy walking distance over flat terrain to bus services . There are at least 23 brownfield sites across North Somerset that could accommodate higher densities and are more sustainable locations with less environmental constraints.		

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Black Rock, north of Clevedon Road	No	‣ Positively prepared ‣ Justified ‣ Effective	No	No	Legal compliance and Duty to Cooperate As explained in response to policies SP7 and SP8 Portishead Town Council (PTC) consider that the draft local plan has not been informed by full and effective cross border discussions regarding housing need and the sustainable location of new development. PTC has reviewed the duty to cooperate statement and considers that the relationship with Bristol and Bath to be unclear in terms of meeting housing needs. The statement explains that the plan area is strongly influenced by the adjacent larger urban areas and whilst it states that each authority agreed to meet their own housing need within their own boundaries, it is unclear how each strategy and approach to housing interacts. Soundness To be considered ‘sound’ the North Somerset Local Plan (NSLP) must be positively prepared, justified, effective and consistent with national policy. PTC consider that policy LP5 is not sound for the following reasons: Positively prepared To meet this requirement, the NSLP should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, consistent with achieving sustainable development. This assessment should also be informed by agreements with other authorities, so that unmet needs from neighbouring areas are accommodated where it is practical to do so and consistent with achieving sustainable development. Page 32 of the draft NSLP explains that the minimum number of new dwellings that the council is required to plan			

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					for over the plan period is 23,700, however the plan proposes 24,495. This is in excess of the level identified by the Government. PTC acknowledges that there is a requirement for significant levels of housing to be planned for. However, the strategy must be consistent with achieving sustainable development. It is considered that the proposed approach, to distribute 7% of the housing supply within Portishead would not deliver sustainable development. Justified To meet this requirement, the NSLP should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate, robust and credible evidence. Given the above, Portishead Town Council contends that two specific sites in Portishead “Tower Farm” and “Black Rock, north of Clevedon Road” do not conform to an approach that is the most appropriate strategy. PTC consider that these sites are not justified as the most appropriate locations for housing development. The key concerns relate to the environmental impact of the site on the adjacent Weston Big Wood Site of Special Scientific Interest and Gordano Valley Strategic Green Corridor, landscape impacts, sustainability of the site, access, and highway safety There are other sites available in Portishead such as Wyndham Way (brown field) and HE20488 Land South of Clevedon Road which are within Portishead that have much better access to the full set of retail and community services in and around Portishead High Street, and where development would do far less damage to the environment. These alternative sites are much more sustainable being substantially closer to the new Portishead Railway station and an easy walking distance over flat terrain to bus services . There are at least 23 brownfield sites across North Somerset that could accommodate higher densities and are more sustainable locations with less environmental constraints.			

Name: Penny Town **I.D:** 41044641

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Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with	Unsure	Unsure	These comments specinfically relate to PolicyLP4 COMMUNITY INVOLVEMENT AND CONSULTATION METHODS I do not believe that North Somerset Council have met their duty to properly engage with the local community regarding this plan. NSC's own Statement of Community Involvement says that they must target consultations to include the people most affected, in this case the villagers. I was one of many who were unaware of the consultation which resulted in Pill and Easton in Gordano being categorised as a "strategic location", nor, importantly, the repercussions of such a decision. NSC did not hold any sort of public event	1. A public meeting with the local community 2. The removal of HE206 and HE20491 from		

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		national policy			in Pill and Easton in Gordano to show the extent of the development areas being approved, meaning the villagers had no easy way of understanding the proposal or of raising questions and concerns. There was very little publicity unless you actively looked for it. Considering the sheer size of the development areas and the impact on the village, NSC did very little to ensure the villagers voices could be heard, and gave little consideration to the needs of those with protected characteristics or those with no computer literacy. RELEASE OF LAND FROM GREEN BELT NSC has not justified their decision to decimate the green belt surrounding Pill and Easton in Gordano, or explained why these sites are the most appropriate given reasonable alternatives. As an example, one alternative site was excluded by NSC because it reduced the gap between the village and proposed commercial development. Two of the green belt areas earmarked in Pill and Easton in Gordano for proposed developments (HE206 and HE20491) are the only green spaces between the village and the motorway. Another was excluded because of flooding risk, something that also applies to Pill and Easton in Gordano. FLOODING RISK The local plan does not sufficiently evaluate the area for flooding risk on any of the earmarked development sites or demonstrate how the concreting over of so much green belt will not increase the flood risk to existing property or expose any of the new properties to flood risk. Some of our village is within the Envoronment Agency's Flood Zone 3. As said previously, an alternative green belt area has already been excluded because of flood risk. There is no evidence provided by NSC to show they have considered alternative lower flood risk areas. NATURAL ENVIRONMENT HE 20491 (Lodway Farm) comprises old established damp meadow fields. The ponds there support a significant number of newts and toads. The development of HE206 and HE20491 will remove the green corridor between the village and the motorway and will have an adverse affect on adjacent SSSI, SAC and other wildlife areas NSC has not shown in any meaningful detail how these areas will be protected and the affect on the environment mitigated in accordance with national policy. TRAFFIC AND TRANSPORT ISSUES There nothing to indicate in the local plan that NSC has accepted in full the advice of the National Highways agency regarding the likely impact of these developments on J19 of the M5. The A369 and M5 Junction 19 are already frequently gridlocked, preventing villagers accessing Portishead and the motorway network . The local plan does not show that NSC has given sufficient consideration to the large increase in traffic on local roads. The roads in Easton in Gordano are, for the most part, narrow and often without pavements. There is only room for one way traffic on much of Church Road and Court Hay. The main roads of St George's Hill, Priory Road and Lodway , used for access to the A369 and M5, have limited pavements, dangerous bends and have pinch points without room for two vehicles to pass (especially if one is a large vehicle). Any development that adds to the volume of traffic on these roads will make them even more dangerous for pedestrians, cyclists and vehicles. LOCAL AMENITIES The village currently has 1 doctor's practice, 1 primary school and 1 secondary school, all of which i understand are close to full capacity. Although the plan allows for an additional primary school, other amenities will be severely stretched. These developments will increase the population by well over 40% which is simply not practical with this infrastructure. .	the plan and maintaining the green belt status of these sites. 3. A reduction in the volume of housing in HE2615		

Name: Pete Butt **I.D:** 18203777

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Land east					LAND EAST OF BACKWELL - GRADE 1 GREENBELT			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
of Backwell					I strongly object to the planning proposal to build 1000 new homes on Grade 1 Agricultural land currently used for food crops ang grazing I therefore summarise some of the main reasons why I am not happy with the planning application:-You can't continue to build houses on good agricultural land. We need our farm land to produce food for the people of this country. Two of the largest wheat exporters Russia and Ukraine are at war. China the largest exporter of wheat in the world is not on good terms with the west. We still have the crisis in the red sea, European farmers are increasing their prices, and we have a massive increase in population meaning more people to feed. The price of food is at an all time high. Prime agricultural land must be protected at all costs to continue to feed the people of this country, once the farmland is built upon it is gone forever. There is only 7% of this high quality Grade 1 Agricultural land left in the whole of North Somerset Government Policy states that "we must protect our best and most versatile land" to safeguard food security, therefore this policy must be upheld or it will be in direct breach and in contradiction of the importance as to why the Government felt it necessary to have this in place. We are all aware Councils across the UK are under a lot of pressure by the Government to build X houses by the year X but in the opinion of many residents a more sensible option would be to build nearer Bristol which will alleviate any further traffic congestion on the A370 and not destroy precious countryside.			

Name: Peter Baker **I.D:** 62852801

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The lack of infrastructure cannot support another 582 houses. This has been evident where lanes to the West of Nailsea are clogged up since the construction of houses at Parish Brook, Netherton Grange and the Uplands. All these additional houses will put more pressure on the roads which will continue to deteriorate. The developers / house builders have no interest in the local community. As an example, they have not contributed to upgrading roads in the West of Nailsea, Engine Lane is sinking since all the construction traffic used it and all the additional cars that use to get to the new houses. The roads leading out across to Tickenham and Netherton Wood Lane are literally crumbling. The addition of an additional 582 houses with no additional roads will lead to the quiet country lanes becoming even more dangerous and gridlocked. Furthermore, there appears to be a total disregard for the local community with litter levels evidently higher, presumably from residents new to the area who have no regard for the community and feel it is ok to disregard waste out of their car windows. Nailsea generally is not an employment hub, most residents commute. This will add more cars to already busy roads, leading to further gridlock at main access points to the M5 which is already not fit for purpose. Many people do not use public transport for work as its not viable, hundreds more cars will lead to further traffic issues across the wider area. This will increase traffic along Netherton Wood Lane towards the M5 at Clevedon. This road is totally unsuitable for this significant increase in traffic. This is also an area of natural beauty used by the local community and the proposals would take away this beauty removing an area where people can walk and cycle in peace, which ultimately could contribute to people having to exercise further afield and adding more cars to the roads or sadly and more likely people stopping exercising and leading to an increase in physical and mental health issue and more pressure on the NHS. This proposal is ill thought through with no regard for the local communities in Backwell and Nailsea. Development would destroy valuable wildlife habitats and further harm biodiversity in one of the world's most nature-depleted countries. The beautiful quiet valley where families can walk and cycle in relative safety would be lost and replaced with another soulless housing development.			
Land east of	No	• Positively	Unsure	Unsure	The lack of infrastructure and services cannot support another 1,000 houses. This has been evident in Nailsea where lanes to the West of Nailsea are clogged up since the construction of houses at Parish Brook and Netherton Grange. All these	Remove it in totality.		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Backwell		prepared • Justified • Effective • Consistent with national policy			additional houses will put more pressure on the roads which will continue to deteriorate. The developers / house builders have no interest in the local community. As an example, they have not contributed to upgrading roads in the West of Nailsea, Engine Lane is sinking since all the construction traffic used it and all of the additional cars that use to get to the new houses. The roads leading out across to Tickenham and Netherton Wood Lane are literally crumbling. I have no doubt this will be repeated in Backwell but on a larger scale with local roads used a cut throughs and rat runs with no investment from greedy developers and house builders who have little regard for the communities where they are building. Despite this increase, there is a deficit in school places and no investment in health services or leisure facilities. The lack of infrastructure and services cannot support another 1,000 houses. Backwell is not an employment hub, most residents commute. This will add more cars to already busy roads, leading to further gridlock at main access points to the M5 which is already not fit for purpose. Many people do not use public transport for work as its not viable, hundreds more cars will lead to further traffic issues across the wider area. Regardless of the new road proposed there will continue to be heavy traffic along Station Road through Backwell and along Station Road into Nailsea as commuters make their way to the M5 making the route even more hazardous and dangerous for school children walking and cycling to Nailsea and Backwell schools. Backwell Lake (Reservoir) and the adjacent fields, where the new roads and housing is planned and are on a floodplain, which floods regularly. This is also an area of natural beauty used by the local community and the proposals would take away this beauty with a noisy and busy road junction removing an area where people can relax and exercise, which ultimately could contribute to people having to exercise further afield and adding more cars to the roads or sadly and more likely people stopping exercising and leading to an increase in physical and mental health issue and more pressure on the NHS. This proposal is ill thought through with no regard for the local communities in Backwell and Nailsea. Development would destroy valuable wildlife habitats and further harm biodiversity in one of the world's most nature-depleted countries. The beautiful quiet valley where families can walk and cycle in relative safety would be lost and replaced with another soulless housing development.			

Name: Peter Barker **I.D:** 31078049

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Festival Way Strategic cycle route extention	No	• Effective	Unsure	Unsure	Limited cycle developments ignore Failand village. Possible developments include: - Traffic light development at junction of beggar bush lane and clevedon road to be sensitive to bike lights - currently if there are no cars then cyclists have to go through reds as the lights do not recognise cyclists - consideration of cycle lanes over the actively used beggar bush lane so as to better connect Failand to Bristol West and Central. Existing cycle routes through sandy lane are not suitable for commuters. Beggar bush lane is a dangerous road for cyclists who use it at a volume of around 1 cyclist every 2-3 minutes during commuting hours. Requirement to consider given limited public transportation links with failand and Bristol.	Fix Traffic lights as above. Consider studies to unlock potential of beggar bush lane.		

Name: Peter Brooks **I.D:** 62675201

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land to the west of Elborough	Unsure	• Justified	Unsure	Unsure	Please refer to the attached files	Please refer to the attached files		Peter Brooks (1)_Redacted (1).pdf Christine Brooks (1)_Redacted.pdf
Land to the west of Elborough	Unsure	• Justified	Unsure	Unsure	Please refer to the attached files	Please see the attached files		Peter Brooks (1)_Redacted (1).pdf Christine Brooks (1)_Redacted.pdf

Name: Peter Connelly **I.D:** 62773601

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No		No	No	Development of the Tower Farm site is in breach of Green Belt policy as introduced in 1988. It's proximity to Weston Big Wood (SSSI) will be ecologically damaging as this is an important site for wildlife and the environment - trees, plants, birds, insects, animals need access to- and -from all the fields surrounding it creating the Gordano Valley green corridor. Life is sustained by things eating other things. National planning policy allows changes to the Green Belt only in exceptional circumstances and these have not been demonstrated. The site cannot provide safe or suitable access, with unacceptable transport impact. It is unrealistic to state that the town centre and proposed railway station is within walking distance as the route entails a very steep gradient, cars will certainly be used. Development at Tower Farm should be prohibited. Other brownfield sites with far lower ecological and transport impacts are available and should be considered for development. If they have already been considered then density should be increased e.g. high-rise at Wyndham Way around the new station, and Castlewood. There is also Petersfield, an abandoned site in need of renewal.			
Black Rock, north of Clevedon Road	No	‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	Development of the Black Rock site is in breach of Green Belt policy as introduced in 1988. It's proximity to Weston Big Wood (SSSI) will be ecologically damaging as this is an important site for wildlife and the environment - trees, plants, birds, insects, animals need access to- and -from all the fields surrounding it creating the Gordano Valley green corridor. Life is sustained by things eating other things. National planning policy allows changes to the Green Belt only in exceptional circumstances and these have not been demonstrated. The site cannot provide safe or suitable access to amenities, with unacceptable transport impact. The Clevedon Road is a very busy "B" road especially at rush hour times, exacerbated when issues on the motorway means all traffic uses it as an alternative route north and south, failing national soundness tests.	Development at Black Rock should be prohibited. Other brownfield sites with far lower ecological and transport impacts are available and should be considered for development. At those already considered then density should be increased e.g. high-rise at Wyndham Way around the new station, and Castlewood. There is also Petersfield, an abandoned site in need of renewal.		

Name: Peter Cooper **I.D:** 62495809

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Poplar Farm, Nailsea	No	‣ Justified	No	Unsure				

Name: Peter Jennings **I.D:** 62863361

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Youngwood Lane	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with	Unsure	Unsure	I would like to appeal against the implementation of the NSC REG 19 Local Plan 2041 on the grounds detailed below: - The proposed development of 1,817 new homes in Nailsea would lead to a total over development of our town. - New primary schools would be required, and with no locations and firm funding provisions in place, this would not facilitate the proposed population increases to the town.			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
		national policy			- The new link road, under the rail crossing is likely to be very expensive with problematic engineering given the proximity to the River Kenn. - The plans will lead to the permanent loss of Grade 2 Agricultural land which is of good quality and high yielding, as a result of the housing development to the south of Nailsea. - The town's existing health and leisure provisions are already under considerable pressure and would become unacceptably pressured without firm investment committed to developing these facilities further. - Proposed sites for development in Nailsea are recognised foraging sites for Greater and Lesser Horseshoe bats. - The proposed development to the west and south of Backwell Lake (reservoir) mean that new roads and housing will be in the floodplain which does flood regularly. - Plans are not currently in place for accident blackspots at Wraxall Hill, Stone Edge Batch and Portbury Lane, which will see a marked increase in vehicle movements. - The railway station is already not fit for purpose as a transport hub, since it remains inaccessible for people with mobility issues and presents considerable challenges for adults travelling with small children. - The proposed new road would not serve Nailsea's traffic or relieve congestion on Station Road, nor would it help traffic moving from Backwell to the M5.			
Land north of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I would like to appeal against the implementation of the NSC REG 19 Local Plan 2041 on the grounds detailed below: - The proposed development of 1,817 new homes in Nailsea would lead to a total over development of our town. - New primary schools would be required, and with no locations and firm funding provisions in place, this would not facilitate the proposed population increases to the town. - The new link road, under the rail crossing is likely to be very expensive with problematic engineering given the proximity to the River Kenn. The plans will lead to the permanent loss of Grade 2 Agricultural land which is of good quality and high yielding, as a result of the housing development to the south of Nailsea. The town's existing health and leisure provisions are already under considerable pressure and would become unacceptably pressured without firm investment committed to developing these facilities further. - Proposed sites for development in Nailsea are recognised foraging sites for Greater and Lesser Horseshoe bats. - Proposed homes adjacent to the Moor End Spout Nature Reserve, would destroy wild life habitats and biodiversity in our town, since the site hosts many protected species. - The proposed development to the west and south of Backwell Lake (reservoir) mean that new roads and housing will be in the floodplain which does flood regularly. - Plans are not currently in place for accident blackspots at Wraxall Hill, Stone Edge Batch and Portbury Lane, which will see a marked increase in vehicle movements. - The railway station is already not fit for purpose as a transport hub, since it remains inaccessible for people with mobility issues and presents considerable challenges for adults travelling with small children. - Greenfield Cresent playing field is not protected under Local Green Space Policy LP15. - The proposed new road would not serve Nailsea's traffic or relieve congestion on Station Road, nor would it help traffic moving from Backwell to the M5.			
Land off Pound Lane, Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I would like to appeal against the implementation of the NSC REG 19 Local Plan 2041 on the grounds detailed below: - The proposed development of 1,817 new homes in Nailsea would lead to a total over development of our town. - New primary schools would be required, and with no locations and firm funding provisions in place, this would not facilitate the proposed population increases to the town. - The new link road, under the rail crossing is likely to be very expensive with problematic engineering given the proximity to the River Kenn. - The plans will lead to the permanent loss of Grade 2 Agricultural land which is of good quality and high yielding, as a result of the housing development to the south of Nailsea. - The town's existing health and leisure provisions are already under considerable pressure and would become unacceptably pressured without firm investment committed to developing these facilities further. - Proposed sites for development in Nailsea are recognised foraging sites for Greater and Lesser Horseshoe bats.			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					- Proposed homes adjacent to the Moor End Spout Nature Reserve, would destroy wild life habitats and biodiversity in our town, since the site hosts many protected species. - The proposed development to the west and south of Backwell Lake (reservoir) mean that new roads and housing will be in the floodplain which does flood regularly. - Plans are not currently in place for accident blackspots at Wraxhall Hill, Stone Edge Batch and Portbury Lane, which will see a marked increase in vehicle movements. - The railway station is already not fit for purpose as a transport hub, since it remains inaccessible for people with mobility issues and presents considerable challenges for adults travelling with small children. - The proposed new road would not serve Nailsea's traffic or relieve congestion on Station Road, nor would it help traffic moving from Backwell to the M5.			
Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I would like to appeal against the implementation of the NSC REG 19 Local Plan 2041 on the grounds detailed below: - The proposed development of 1,817 new homes in Nailsea would lead to a total over development of our town. - New primary schools would be required, and with no locations and firm funding provisions in place, this would not facilitate the proposed population increases to the town. - The new link road, under the rail crossing is likely to be very expensive with problematic engineering given the proximity to the River Kenn. - The plans will lead to the permanent loss of Grade 2 Agricultural land which is of good quality and high yielding, as a result of the housing development to the south of Nailsea. - The town's existing health and leisure provisions are already under considerable pressure and would become unacceptably pressured without firm investment committed to developing these facilities further. - Proposed sites for development in Nailsea are recognised foraging sites for Greater and Lesser Horseshoe bats. - The proposed development to the west and south of Backwell Lake (reservoir) mean that new roads and housing will be in the floodplain which does flood regularly. - The railway station is already not fit for purpose as a transport hub, since it remains inaccessible for people with mobility issues and presents considerable challenges for adults travelling with small children. - The proposed new road would not serve Nailsea's traffic or relieve congestion on Station Road, nor would it help traffic moving from Backwell to the M5.			

Name: Peter King **I.D:** 30933985

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	• Effective	Unsure	Unsure	This policy makes mention of connections between Nailsea and the A370 but does not, so far as I can see, mention the connections to the M5. Nearly 4000 extra dwellings plus additional light industrial space will put thousands of extra cars on the roads and also extra lorries, many of which will wish to commute through the village of Tickenham to the motorway via the B3130. There is a pinch point at Stone Edge Batch which already results in standing traffic on occasion, as commercial vehicles attempt to pass each other, and this will get worse. There are three particular concerns: (1) this is the route to the motorway for ambulances, fire engines and police from their Nailsea stations. (2) there is no pavement or other pedestrian provision in several places, but especially at Stone Edge Batch and the stretch of the B3130 on the Nailsea side of Jacklands Bridge, alongside Jacklands Fish Farm. (3) air quality for houses in Jacklands will deteriorate.	These issues need to be specifically addressed in the plan. One possible mitigation would be greatly improved access to the motorway via Nailsea Wall.		

Name: Peter Kirsen **I.D:** 62854369

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP7: Green Belt	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	No deliverability plan for A369, M5 J19, Schools, GP Access or Drainage by 2041	Whilst I accept the need for additional housing in the area, the concept of building 600 new houses on the Pill Green site is incredibly shortsighted, in the absence of a new arterial road connecting M5 Junction 19 to Bristol. The three major bottlenecks are : 1. The sharp bend at Martcombe Bottom 2. The narrowing of the road at Abbots Leigh (The George pub) 3. Rownham Hill		

Name: Peter Milner **I.D:** 32612257

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano					We have lived in Pill for over 30 years, long enough to appreciate this village(s) both in terms of community and environment, we are therefore dismayed by NSC proposes to double the size of this village while replacing open green space with housing. Not Grey Belt. The initial consultation to these development proposals in February - March this year was so poorly publicised few people were aware of them. Only 30 or so responses were forthcoming, some obviously from vested interests insisting this (Pill Road & Pill Green) was poor quality land and obviously Grey Belt. How does this fit with the statement from SP4 Placemaking: “A Community Engagement Statement must be submitted for major planning applications (10 or more dwellings or 1,000 square metres of floorspace) which sets out the local engagement that has been undertaken and any amendments to the scheme which have been made in response to it." It would have been far better to begin this process in the same spirit. You will see now a proper consultation organised by the local community has taken place with leaflets going to every house and that there are now over 2000 responses to these proposals, the vast majority objecting to these plans. This might be because no proper consultation has been attempted by NSC and trust has been lost. Section 13 Para 142 of the National Planning Policy Framework states that: “The government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.” The document does then go on to give situations where exceptions might be made but nothing in the document allows for NSC or anyone else to label this land as Grey Belt. This is for the most part high quality agricultural land, grades 1&2. Its openness and lack of ‘urban sprawl’ is appreciated not just by local people but also travelers on the A369 which represent the wider community. This is high quality landscape with sweeping views to Wales, rolling hills with wooded slopes and margins. This is Green Belt and should be kept as such. Travel This road (A369) is the main conduit for traffic in the area. We already know flow is constricted at Junction 19 with the M5, and at Abbots Leigh and Rownham Hill where the road descends toward South Bristol. The road is unsuitable for widening. It is already beyond its carrying capacity during high usage periods. Constriction at Junction 19 is due to the nature of the interchange which causes blockage on the M5. Although the junction has recently been upgraded there is little discernible effect, it cannot be made to carry more traffic without enormous investment. The A369 or Junction 19 simply cannot handle the many hundreds of extra car journeys these developments will generate daily. The argument that this will be relieved by the train passenger service being restored is at best dubious. This service will be constrained both by length of train and frequency which maybe as low as once an hour and no more than three coaches			

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					potentially removing about 350 car journeys from the roads at peak traffic times. But if you're adding over a 1000 commutes in and out of the new developments everyday, this cannot compensate. The bus service also relies on the A369 and will be caught in the same congestion. Has there been any modelling of the likely traffic flows with these new potential commuters added in? If so, then it should be made public. If not, then it is unsafe to allow these developments to go ahead. Buffer zones, run-off and biodiversity offsetting There are five development sites surrounding the village. Two (Land at Lodway Farm, Pill and Easton-in-Gordano, and land east of Gordano Services, Pill and Easton-in-Gordano)were clearly intended as green buffer zones between the settlement and the noise and pollution of the motorway. How these are now considered suitable for development ought to be explained. The most northerly of these sites is known to be wildlife rich and is part of an enormous toad migration each spring. Both during development and on completion both these sites will create runoff which with the attendant pollutants will find their way via the rhynes and natural drainage system toward the Avon and the SSSI saltgrass areas bordering the river. These are internationally important Ramsar conservation sites and must be protected; has a Habitats Regulations Assessment been made of the potential impact of the developments on the Severn Estuary Ramsar site? Appropriate assessment - GOV.UK So called Pill Green, and the site on Pill Road opposite St Katherine's school are high-quality farmland but also habitats for skylarks and linnets as well as other species of wild birds and mammals. These sites abut species-rich ancient woodland around the course of the Markham Brook. The Pill Road site appears to stretch to the middle of the stream bed. We would hope and expect NSC to follow Natural England's guidelines of buffer zones on either side of the watercourse which must also be protected from runoff during construction and after completion of the development because of potential pollutants. Any loss of biodiversity must be compensated for locally: from the Houses of Parliament Office of Science and Technology postnote no. 309 2011 "It is vital that offsets are appropriately determined based on predicted losses of biodiversity, requiring rigorous methodology to determine what trade-offs are appropriate or allowable. Furthermore, there must be a strong assurance about delivery, likely requiring an accountability mechanism and funds set aside in every offset transaction to support monitoring and auditing." We have learnt that developers are actually asking whether an environmental impact assessment is necessary for these sites. The answer is unequivocally 'Yes' and any biodiversity loss must be compensated for locally. A report published a few days ago (8th December 2025) by the Bristol Avon Rivers Trust, Pollution from Construction Sites is Smothering Our Streams highlights the serious problems of pollution from construction sites: "Developers are required to produce Construction Environmental Management Plans (CEMPs) and Site Environmental Management Plans (SEMPs). However, local authorities are not carrying out routine compliance checks, meaning that developers are effectively left to "mark their own homework." This can lead to corners being cut and leaves communities and rivers paying the price. We don't want to see this happening here. Local services "Development of the four large housing allocations at Pill and Easton-in-Gordano (Land at Lodway Farm, Land east of Gordano Services, Pill Green and Land at Pill Road) will require a strategic and co-ordinated approach to ensure the growth of the village provides tangible benefits for existing and future communities. This will be achieved through a co-ordinated approach to the delivery of infrastructure to ensure the provision of necessary services, facilities..." from Policy LP4: Strategic location: Pill and Easton-in-Gordano Although a new primary school has been proposed (where?) has there been a thorough assessment of the impact that the large increase of the population will have on the existing doctor's surgery? If so, where can detailed information on this topic be found? Conclusion			

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					New housing is clearly needed, especially affordable dwellings for local people, but NOT at the expense of losing substantial green belt land (much valued by locals), that currently provides separation from the docks and the main road and a differentiation between our village and neighbouring Abbots Leigh, preventing urban sprawl encroaching on rural landscape. The large increase in population that would come with the density of housing proposed would completely change the identity of the village and would inevitably increase existing traffic problems and put pressure on local services. This scale of development would also have a detrimental effect on the environment, with potential increase of flood risk, and local wildlife would undoubtedly be affected. The plan needs to be rigorously reconsidered and major amendments made.			

Name: Peter Shaw **I.D:** 62742657

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I wish to object in the strongest terms about the proposed housing developments being put forward for Backwell Backwell already has 800 new houses approved, a 40% increase for the village. These additional proposed houses would lead to complete overdevelopment. There is a deficit in school places and no investment in health services and other village services. The village infrastructure is creaking now! Can the council please explain were all the children in these new houses will be schooled? The lack of infrastructure and services cannot support another 1,000 houses. Backwell is allocated a higher number of houses than any other village in North Somerset, and even a higher growth percentage than towns. Backwell is expected to take 7% of the district's housing allocation, compared to Clevedon's 2%. It seems Backwell is seen as an easy target for development. There is no needs or viability analysis for an extra 1,000 houses. Backwell is not an employment hub, most residents commute. The A 370 is already chaotic during commuting and school times, these developments will only serve to compound the problems. No social cohesion impact assessment has been provided. Government policy states that "we must protect our best and most versatile land" to safeguard food security. The proposals contradict this policy. The Infrastructure Delivery Plan lacks analysis and costings, and there are no funding guarantees for any new road or services.			

Name: Peter Sims **I.D:** 31022913

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Strategic Priorities	No	• Positively prepared • Justified • Effective	Unsure	Unsure	Sustainable development objectives Ensure a range of job opportunities are easily accessible without having to use a car. Promote development which requires a deliverable level of high quality and sustainable infrastructure. Boost delivery and meet the housing need identified within the plan period. Reduce the need to travel by car to minimise environmental impacts of unsustainable forms of travel, including transport related carbon emissions and air pollution.			

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		‣ Consistent with national policy			Protect and where possible enhance biodiversity, geodiversity and green infrastructure and allow its adaptation to climate change, particularly with respect to protected habitats Restricting comments to the above points for the Strategic Location of Nailsea and Backwell. The amount of jobs that can possibly be created locally for the proposed number of people in the new developments means either of the following;- Dramatically reducing the new developments to match the number of jobs which may be available on the new 6.1 hectare site and existing employment places in the local active travel area. Accepting that the new residents will have to seek employment outside the active travel boundaries, but due to the woeful public transport opportunities available to the residents most travel would be by car. Promoting sustainable infrastructure means attending to the road structure all around Nailsea, bearing in mind that Nailsea not serviced by a single A road. It does not appear that any specified housing needs have actually been identified in the Plan. Who would want to live in a location were houses were expensive and there is little local work? Reducing the need to travel by car can only happen by reducing the housing developments minimising the number of new residents. The emissions can be reduced by switching to electric cars but this means every new house in the developments must be fitted with a home charger and no flats can be built As the Plan does not even meeting the basic aims of the Plan for a Strategic Location, listed above, it is clear the Local Plan 2041 is unsound.			
SP2: Climate Change	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Policy SP2 Climate Change This policy states that the new houses should minimise energy use and deliver a net zero energy standard in new building. Planning permission on some of the developments covered by the Plan has already been granted and houses are being built. These houses do not appear to being built to the high standard required for net zero energy. The policy also states the need to reduce the risk of flooding both now and in the future, taking account of predicted sea level rises and the impact on areas vulnerable to coastal change. There are 6 sites allocated for development which have a possible flood risk Land at north west Nailsea, land north of Nailsea, land off Pound Lane, Nailsea, Poplar Farm, Nailsea, Land south of Nailsea and Grove Farm, Backwell. All the statements in the Plan are to avoid increasing the risk of flooding and not reducing the risk especially in the developments directly in the flood plain like the Nailsea end of the proposed new cross rail link road,			
SP5: Towns	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	The policy states “ “Proposals for new development within the settlement boundaries of the four towns of Weston-super-Mare, Clevedon, Nailsea and Portishead as defined on the Policies Map will be supported provided that they meet 4 main criteria. The fourth criteria is as follows Can be successfully served by infrastructure such as transport, education and health facilities. As far as Nailsea & Backwell are concerned this criterion in the NS Local plan 2041 has not been met for the following reasons • There is no transport mitigation in the north of Nailsea for all the extra traffic caused by the vastly increased population (41%) traveling through the town and moving and from the town to Tickenham. Clevedon the M5 and Bristol • Station Rd/Nailsea Park Rd is the only road that leads through Nailsea from the station and it is not designed or suitable to take all the extra buses, goods vehicles and motor vehicles outlined in the Plan. • In addition, there are 2 infant/junior schools in Station Rd Nailsea which is a major health and safety concern with all the extra traffic. • Station Rd/Nailsea Park Rd are not suitable for active travel as there are no cycle paths and the footpaths are only on part of the road. Cross rail link road The railway (built on a high embankment) runs through Backwell and Nailsea is the main line which links London (Paddington) via Exeter to the West Country down as far as Penzance. The HSE state that the minimum vertical distance under a bridge is 16 feet 6 inches (5.03 metres). This height will allow double decker buses, 44ton articulated trucks etc to travel under the rail line. A new rail bridge will have to be constructed, the embankment removed and the ground level lowered to achieve the required clearance. This will cause major disruption and cost to Network Rail, the Train Companies and to all the passengers it will affect In addition, the proposed link road is to be built on flood plains that regularly flood. The proposed link road goes through one of the planned housing developments and joins A370 immediately opposite a school adding to more congestion and danger to school children. Also who would want to live in anew estate that had a commuter route running through it? The proposed link road goes across the flood plain north of the railway and joins Station Rd immediately by the			

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					existing single lane railway bridge and transport hub. The proximity of these things will mean more congestion, delay and health and safety issues. This is an immensely expensive project with all sorts of technical, logistic and regulatory problems to overcome. Developer contributions will not be anywhere enough to pay for this scheme. There is no budget to cover the building of this project. A proper cost/benefit analysis would most likely decide that it was not cost effective. The Local Plan 2041 is unsound			
SP9: Employment	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	The amount of additional employment area being allocated in Nailsea is only 6.1 hectares. The increase in the population that require to find work is likely to be well over 4500 from the 3728 new homes that are proposed for Nailsea and Backwell in the Plan. It is most likely that most of the new residents will have to 1) Seek employment away from Nailsea and Backwell. The most likely places being the airport, Weston-Super-Mare, Bristol and Avonmouth. 2) Already have jobs away from Nailsea and Backwell. Most of these journeys will probably be by car unless public transport methods happen to allow people to get to their job on time. Therefore, the whole premise of active travel to employment locally will not work in Nailsea and Backwell as the number of people needing/having work far exceeds local supply. The Plan does absolutely nothing to cater for these facts The Local Plan 2041 is unsound			
Policy LP3: Strategic location: Nailsea and Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	The building of 3728 new houses in Nailsea and Backwell and increasing the population by 41% is a gross over development and will totally overload all the roads, medical and leisure facilities and everthing else that make Nailsea and Backwell nice places to live in. The only transport infrastructure mitigation in the Plan is a cross rail link road in the south of Nailsea. This road will only have a minor impact on the transport problems that will be caused by all the new house development proposed in the Plan. The houses planned in the north of Nailsea will use the B3130 which in places is a very narrow road where buses, lorries and other large vehicles cannot even pass each other. This is a serious health and safety concern that also will cause massive delays to bus time tables. There is no mitigation in the Plan for this. The houses to the west of Nailsea will, out of necessity, use the Quiet Lanes which are mostly single track designed only to take a minimal amount of traffic. There are no means of safe active travel for business or leisure on these lanes with all the proposed increase in traffic. There is no mitigation in the Plan for this either. In addition, there are several accident black spots on the B3130, B3128/ Wraxall hill junction Stone Edge Batch and Portbury Lane which will have greatly increased traffic through them increasing the chance of serious accidents. There is no mitigation in the Plan for resolving these problems.			
Policy DP17: Public transport accessibility	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	The policy states that the appropriate bus service frequency should comply with the following principles of frequency based on population size: The inter urban services (for example A370 corridor) should have a minimum frequency of 15 minutes. Minimum frequencies will apply between 7am-7pm Monday to Saturday, with 50% of minimum frequencies outside these times and 30% between 9am- 7pm on Sundays The buses serving Nailsea will never meet the above criteria for two reasons 1 It will be uneconomic for bus companies to supply and man the number of buses required. 2 There is no demand for this number of bus services in Nailsea and Backwell. All the buses will mostly be running empty The Nailsea Transport Hub is shown on the map as being directly situated by the Nailsea and Backwell rail station in the flood plain. The end of the proposed cross rail link road is also in the immediate area. There is no flood mitigation in the plan to protect this hub and road. The Nailsea and Backwell rail station is not suitable for inclusion as a safe and viable active travel route as access to the platforms is extremely poor especially for the less mobile people.’’ The Local Plan 2041 is unsound			
Policy DP17: Public transport accessibility	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	The policy states that the appropriate bus service frequency should comply with the following principles of frequency based on population size: The inter urban services (for example A370 corridor) should have a minimum frequency of 15 minutes. Minimum frequencies will apply between 7am-7pm Monday to Saturday, with 50% of minimum frequencies outside these times and 30% between 9am- 7pm on Sundays The buses serving Nailsea will never meet the above criteria for two reasons 1 It will be uneconomic for bus companies to supply and man the number of buses required. 2 There is no demand for this number of bus services in Nailsea and Backwell. All the buses will mostly be running empty The Nailsea Transport Hub is shown on the map as being directly situated by the Nailsea and Backwell rail station in the flood plain. The end of the proposed cross rail link road is also in the immediate area. There is no flood mitigation in the plan to protect this hub and road.			

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					The Nailsea and Backwell rail station is not suitable for inclusion as a safe and viable active travel route as access to the platforms is extremely poor especially for the less mobile people.'' The Local Plan 2041 is unsound			
Policy DP35: Nature conservation	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	There is also the fact that the developments west of Nailsea will seriously affect the population of Lesser and greater horse bats which are a protected species and the natural corridors that they need to use in order to find food. The Plan does not explain how it will ensure the bats will be protected and allowed to thrive. The wild life habitats on the Moor End Spout Nature Reserve are also under threat from the 100 houses proposed near the reserve. There is no mitigation in the Plan to ensure the survival of the wild life			
Policy DP35: Nature conservation	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	There is also the fact that the developments west of Nailsea will seriously affect the population of Lesser and greater horse bats which are a protected species and the natural corridors that they need to use in order to find food. The Plan does not explain how it will ensure the bats will be protected and allowed to thrive. The wild life habitats on the Moor End Spout Nature Reserve are also under threat from the 100 houses proposed near the reserve. There is no mitigation in the Plan to ensure the survival of the wild life			
Policy DP63: Infrastructure delivery and development contributions	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	The infrastructure delivery and development contribution policy document states that the Infrastructure will be provided in step with new development and co-ordinated through the Infrastructure Delivery Plan. The Local Plan 2041 does not contain a Infrastructure Delivery Plan. The planning and delivery of such a comprehensive and complex plan as the Plan to ensure that the infrastructure is in step with the new development is an absolutely mammoth undertaking. Its easy to write the words in the Plan but it deserves much more consideration and information in the Plan to provide information on how it will be achieved, and not just a statement. The policy also states that the costs involved in the provision of the required infrastructure will in large part met by the developers. However, the amounts provided by the developers will in no way cover the cost of the required infrastructure. These costs will be substantial. The Plan does not mention how this infrastructure will be financed in step with the developments Therefore, as in the past the money will not be forthcoming and the infrastructure will not be delivered on time. The result of which will be that the residents both existing and new and will have houses without the required infrastructure. The Local Plan 2041 is unsound			

Name: Peter Tottle **I.D:** 51291329

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Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy			I am compelled to express my profound objection to the proposed development of 1000 residential units on precious Grade 1 Agricultural Greenbelt land in Backwell. This plan poses a significant threat to our community and environment for several reasons: Overdevelopment Concerns Currently, 800 houses have already been approved, which would increase Backwell's population by 40%. The additional 1000 houses would result in an over 80% increase in our population without any accompanying infrastructure. This is a clear case of overdevelopment. Whereas Weston Super Mare is having a 22% increase in population and is adjacent to a motorway and has a train station with direct routes to London and a disabled access to the station. Loss of Agricultural Land			

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					Only 7% of Grade 1 Agricultural land remains in the whole of North Somerset. While governments urge us to combat climate change, North Somerset's plan to develop housing on agricultural land contradicts this by necessitating increased food imports and transportation. By taking away valuable land for crops and grazing, we are undermining food security and sustainability. Government policy clearly states that ‘we must protect our best and most versatile land.’ Yet, this proposal seeks to give it away to housing, which is unnecessary in Backwell given the existing housing developments. Lack of Infrastructure The plans show inadequate infrastructure to support the influx of new families. While a new road is proposed, funding is expected to come from North Somerset Council, which has already stated it lacks the necessary funds. Schools: Our existing schools are already nearing capacity, and there are no plans for new educational facilities to accommodate the additional children. Healthcare: The Tyntesfield Medical Centre has indicated it cannot service the anticipated increase in residents, further straining our already limited healthcare resources. Flooding Backwell common and Backwell Lake’s surrounding fields, where new roads and housing are planned are proven to flood regularly. Why would it be sensible to build houses or roads in this area? Nobody will buy them. Transportation Issues Backwell is not an employment hub, and most residents commute. The primary road, the A370, is already congested, especially during busy summer months or when the M5 experiences closures. Public transport, including buses and trains, is often full during peak commuting times, making it difficult for residents to travel. Additionally, there is no access for disabled individuals at the train station, despite numerous reports highlighting this issue, leaving many without viable travel options. Character of Backwell The proposed development is out of character with the existing community. Backwell is already allocated a higher percentage of housing than any other village in North Somerset (7% compared to Clevedon’s 2%). This disproportionate allocation undermines the village's character and community integrity. Conclusion In conclusion, I urge you to reconsider the implications of this development on our community and the environment. We cannot sacrifice our agricultural land and community resources for unchecked housing growth. Thank you for considering my objection.			

Name: Peter Willis **I.D:** 62700673

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Land at Tower Farm	No	‣ Effective ‣ Consistent	No	No	I am objecting to the current draft of the North Somerset Local Plan on the grounds that it is not sound and not consistent with national policy, for the following reasons:	1. Remove or significantly amend allocations that threaten Weston Big Wood SSSI and its buffer zones Delete or relocate the proposed 500-home allocation that encroaches into the established protective buffer zones of		

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		with national policy			1. Conflict with the National Planning Policy Framework (NPPF) The draft plan allocates over a quarter of its total housing capacity to Green Belt land, contrary to NPPF requirements that Green Belt release must be a last resort and only justified in exceptional circumstances. No such justification has been demonstrated. 2. Harm to a designated SSSI and its legally required buffer zones The proposed 500-home development adjacent to Weston Big Wood (SSSI) encroaches into protective buffer zones and will increase footfall, disturbance and fragmentation. The SSSI is already in “unfavourable declining” condition; further recreational pressure would cause irreversible damage. 3. Failure to maintain ecological networks as required by law Under Section 40 of the Natural Environment and Rural Communities Act (2006), the Council has a statutory duty to maintain the coherence and resilience of ecological networks. The current allocations undermine key wildlife corridors across the Gordano Valley, reducing connectivity between internationally, nationally and locally important sites. 4. Inconsistency with the Local Nature Recovery Strategy (LNRS) The proposals directly undermine the principles and mapped priorities of the LNRS, as required under the Environment Act 2021. The plan neither protects nor enhances the identified strategic ecological network. 5. Lack of cumulative impact assessment The draft plan does not demonstrate that cumulative ecological effects of multiple developments have been properly assessed. This is a core component of justified and effective spatial planning. 6. Absence of reasonable alternative options The plan appears to rely heavily on Green Belt release without transparent assessment of brownfield capacity, redevelopment opportunities, or alternative spatial strategies. This fails the “justified” test of soundness.	Weston Big Wood. Ensure any remaining development is supported by a legally robust Habitats Regulations Assessment. Reason: The Council has a statutory duty under the NERC Act (2006) to maintain ecological networks, and must protect designated sites from increased recreational pressure. The current allocation conflicts with these duties and with NPPF requirements to safeguard SSSIs. 2. Reinstate protection of strategic ecological corridors across the Gordano Valley Redesign the spatial strategy to avoid fragmentation of the Gordano Valley ecological network, which connects the Severn Estuary, Portbury Wharf, Weston Big Wood, and the Somerset Levels. Introduce policy wording requiring habitat buffers, wildlife corridors, and net-gain designs aligned with the Local Nature Recovery Strategy (LNRS). Reason: The Plan currently undermines the LNRS and the NERC Act duty to secure resilient ecological networks. 3. Reduce reliance on Green Belt land and demonstrate genuine exceptional circumstances where release is proposed Reassess housing distribution to reduce the amount allocated to Green Belt. Prioritise brownfield land, urban intensification, and sustainable settlement extensions. Where Green Belt release is still proposed, provide a transparent, evidence-based justification establishing “exceptional circumstances” in line with national policy. Reason: The current Green Belt strategy is not justified or consistent with the NPPF. 4. Produce a comprehensive cumulative ecological impact assessment Update the Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) to consider the combined impact of all allocations on designated sites and ecological networks. Include modelling of visitor pressure, recreational impacts, hydrology changes, and species disturbance. Reason: The absence of cumulative assessment means the plan is not legally compliant, not justified, and not effective. 5. Demonstrate meaningful cross-boundary cooperation on strategic environmental issues Provide evidence of Duty to Cooperate agreements with Bristol, South Gloucestershire, Somerset, Natural England, and Avon Wildlife Trust regarding Green Belt strategy and nature recovery networks. Incorporate any jointly agreed ecological priorities into the plan.		

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						Reason: The Duty to Cooperate has not been demonstrated in relation to nature recovery and Green Belt strategy. 6. Align all ecological and spatial policies with the Local Nature Recovery Strategy (LNRS) Amend policies to explicitly protect LNRS priority areas and map these within the plan. Require all major developments to demonstrate how they contribute to LNRS delivery. Reason: The Environment Act 2021 requires Local Plans to support nature recovery priorities, which the draft plan currently contradicts. 7. Strengthen biodiversity, landscape, and recreation policies to avoid harm to sensitive sites Introduce a requirement for visitor management plans, green infrastructure networks, and off-site mitigation where development borders sensitive habitats. Ensure biodiversity net gain is meaningful and locally relevant (e.g., supporting woodland, wetlands, and species corridors). Reason: This ensures the plan is effective, deliverable, and compliant with environmental duties. These modifications are essential for the Plan to: -Comply with statutory duties (NERC Act, LNRS obligations, SEA/HRA requirements), - Meet NPPF tests for Green Belt protection and environmental safeguarding, satisfy the Duty to Cooperate, and - Become sound (positively prepared, justified, effective, and consistent with national policy).		
Black Rock, north of Clevedon Road	No	‣ Effective ‣ Consistent with national policy	No	No	I am objecting to the current draft of the North Somerset Local Plan on the grounds that it is not sound and not consistent with national policy, for the following reasons: 1. Conflict with the National Planning Policy Framework (NPPF) The draft plan allocates over a quarter of its total housing capacity to Green Belt land, contrary to NPPF requirements that Green Belt release must be a last resort and only justified in exceptional circumstances. No such justification has been demonstrated. 2. Harm to a designated SSSI and its legally required buffer zones The proposed 500-home development adjacent to Weston Big Wood (SSSI) encroaches into protective buffer zones and will increase footfall, disturbance and fragmentation. The SSSI is already in “unfavourable declining” condition; further recreational pressure would cause irreversible damage. 3. Failure to maintain ecological networks as required by law Under Section 40 of the Natural Environment and Rural Communities Act (2006), the Council has a statutory duty to maintain the coherence and resilience of ecological networks.	1. Remove or significantly amend allocations that threaten Weston Big Wood SSSI and its buffer zones Delete or relocate the proposed 500-home allocation that encroaches into the established protective buffer zones of Weston Big Wood. Ensure any remaining development is supported by a legally robust Habitats Regulations Assessment. Reason: The Council has a statutory duty under the NERC Act (2006) to maintain ecological networks, and must protect designated sites from increased recreational pressure. The current allocation conflicts with these duties and with NPPF requirements to safeguard SSSIs. 2. Reinstate protection of strategic ecological corridors across the Gordano Valley Redesign the spatial strategy to avoid fragmentation of the Gordano Valley ecological network, which connects the Severn Estuary, Portbury Wharf, Weston Big Wood, and the Somerset Levels.		

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					The current allocations undermine key wildlife corridors across the Gordano Valley, reducing connectivity between internationally, nationally and locally important sites. 4. Inconsistency with the Local Nature Recovery Strategy (LNRS) The proposals directly undermine the principles and mapped priorities of the LNRS, as required under the Environment Act 2021. The plan neither protects nor enhances the identified strategic ecological network. 5. Lack of cumulative impact assessment The draft plan does not demonstrate that cumulative ecological effects of multiple developments have been properly assessed. This is a core component of justified and effective spatial planning. 6. Absence of reasonable alternative options The plan appears to rely heavily on Green Belt release without transparent assessment of brownfield capacity, redevelopment opportunities, or alternative spatial strategies. This fails the “justified” test of soundness.	Introduce policy wording requiring habitat buffers, wildlife corridors, and net-gain designs aligned with the Local Nature Recovery Strategy (LNRS). Reason: The Plan currently undermines the LNRS and the NERC Act duty to secure resilient ecological networks. 3. Reduce reliance on Green Belt land and demonstrate genuine exceptional circumstances where release is proposed Reassess housing distribution to reduce the amount allocated to Green Belt. Prioritise brownfield land, urban intensification, and sustainable settlement extensions. Where Green Belt release is still proposed, provide a transparent, evidence-based justification establishing “exceptional circumstances” in line with national policy. Reason: The current Green Belt strategy is not justified or consistent with the NPPF. 4. Produce a comprehensive cumulative ecological impact assessment Update the Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) to consider the combined impact of all allocations on designated sites and ecological networks. Include modelling of visitor pressure, recreational impacts, hydrology changes, and species disturbance. Reason: The absence of cumulative assessment means the plan is not legally compliant, not justified, and not effective. 5. Demonstrate meaningful cross-boundary cooperation on strategic environmental issues Provide evidence of Duty to Cooperate agreements with Bristol, South Gloucestershire, Somerset, Natural England, and Avon Wildlife Trust regarding Green Belt strategy and nature recovery networks. Incorporate any jointly agreed ecological priorities into the plan. Reason: The Duty to Cooperate has not been demonstrated in relation to nature recovery and Green Belt strategy. 6. Align all ecological and spatial policies with the Local Nature Recovery Strategy (LNRS) Amend policies to explicitly protect LNRS priority areas and map these within the plan. Require all major developments to demonstrate how they contribute to LNRS delivery. Reason: The Environment Act 2021 requires Local Plans to support nature recovery priorities, which the draft plan currently contradicts.		

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						7. Strengthen biodiversity, landscape, and recreation policies to avoid harm to sensitive sites Introduce a requirement for visitor management plans, green infrastructure networks, and off-site mitigation where development borders sensitive habitats. Ensure biodiversity net gain is meaningful and locally relevant (e.g., supporting woodland, wetlands, and species corridors). Reason: This ensures the plan is effective, deliverable, and compliant with environmental duties. These modifications are essential for the Plan to: -Comply with statutory duties (NERC Act, LNRS obligations, SEA/HRA requirements), - Meet NPPF tests for Green Belt protection and environmental safeguarding, satisfy the Duty to Cooperate, and - Become sound (positively prepared, justified, effective, and consistent with national policy).		

Name: Peter and Susan Gearing **I.D:** 58544865

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP8: Housing							We write in support of North Somerset Council’s draft local plan: specifically, what appears to be the recognition that some areas are unsuitable and ill equipped for large scale housing development. Wrington is one such area. • Access is via narrow country lanes whether for local inhabitants or emergency services. • Employment opportunities are few and far between, necessitating more coming and going along the already difficult lanes. • There is no public transport worthy of the name. • The very popular school defies the odds, functioning out of an old building and temporary classrooms. • The nearest GP surgery is in a neighbouring village, necessitating more car journeys • Despite the relatively recent successful flood relief scheme, based on Webbs Brook, flooding remains an issue for some of the village • Wrington’s heritage is important particularly the grade 1 listed All Saints Church and views of its historic and imposing presence, from the surrounding area, are much valued • Wrington’s character is framed by surrounding fields and beautiful landscape. • Many of those fields are of agricultural value, particularly important in a country striving for more domestic food production. • All around, there are important wildlife habitats. Implicit in North Somerset Council’s Local Plan 2041 is a recognition of much of the above and we are very grateful	North Somerset Council.docx

Name: Phil Collinson **I.D:** 62765473

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The Local Plan proposes an additional 1,000 more houses in Backwell. The village already has 800 new houses approved, a 40% increase for the village. The additional 1,000 would be a further 36% increase for the village. Despite this increase, there is a lack of supporting infrastructure to support a further 1,000 houses. Backwell Common & the surrounding areas are prone to flooding, which would be aggravated by more housing. The proposed Link Road, either under or over the railway, will be highly expensive & possibly unfeasible. Backwell has been allocated a higher number of houses than any other village in North Somerset. For these reasons, I object to these proposals in their present form.			

Name: Phil Hockett **I.D:** 29308449

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell already has 800 new houses approved, a 40% increase for the village. These additional numbers would lead to complete overdevelopment. The proposed road would not effectively serve Nailsea's traffic or relieve congestion on Station Road, Backwell Common, or Chapel Hill. Engineering the road under or over the railway would be highly expensive. Despite the proposed increase, there is a deficit in school places and no investment in health services or leisure facilities. The lack of infrastructure and services cannot support another 1,000 houses. Backwell is allocated a higher number of houses than any other village in North Somerset, and even a higher growth percentage than towns. Backwell is expected to take 7% of the district's housing allocation, compared to Clevedon's 2%. There is no needs or viability analysis for an extra 1,000 houses. Backwell is not an employment hub, most residents commute No social cohesion impact assessment has been provided. The loss of Grade 1 Agricultural Land currently used for food crops and grazing is unacceptable. There is only 7% of this high-quality land left in the whole of North Somerset. Government policy states that "we must protect our best and most versatile land" to safeguard food security. The proposals contradict this policy and undermine food security. The Development would destroy valuable wildlife habitats and further harm biodiversity in one of the world's most nature-depleted countries. The proposals threaten the Brockley Maternity Roost and SSSI, with rare Lesser and Greater Horseshoe Bats relying on the land for food. The Infrastructure Delivery Plan lacks analysis and costings, and there are no funding guarantees for the new road or services. Backwell Common and surrounding areas are prone to flooding, which would be aggravated by more housing. Concerns regarding the strategic growth location designation include the impact on the area's character, the loss of Greenbelt and high-quality agricultural land, the risk of flooding, and uncertainty over whether the road can be funded and delivered on time to support the proposed housing. Backwell Lake (Reservoir) and adjacent fields, where the new roads and housing is planned and are on a floodplain, which floods regularly. The sheer volume of growth with the required investment infrastructure and services over such a short period is destabilising, unsustainable and undeliverable. The railway station is not fit for purpose as a transport hub; it remains inaccessible for people with mobility issues and presents serious challenges when travelling with young children.			

Name: Phil Oakes **I.D:** 28755393

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at	No		Unsure		The existing public infrastructure utilities in the Tower Farm estate (water, sewage, water run off, electricity, broadband) is not capable of supporting the proposed expansion without significant infrastructure upgrade with the associated significant			

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Tower Farm					disruption to the existing area and residents. The wider Portishead local amenities such as schools, dental, pharmacy and doctor h have not been considered and therefore require to be considered in more detail prior to acceptance of this plan. The previous local plan clearly has not been taken into account and in light of this latest consultation has not provided value for money for the taxpayer. The National Audit Office (NAO) and National Infrastructure and Service Transformation Authority (NISTA) should provide a review of the assurance and scrutiny that was conducted and feasibility of the delivery of the previous plan prior to a revision or replacement plan is approved or considered. The proposal would place unsustainable traffic pressure on the local road network, based upon N.Somerset average car ownership of 1.38 vehicles per household, 400 dwellings would create at least 1200 vehicle movements per day during daylight hours (notwithstanding any school expansion, which would likely increase this figure). The assumption that most commutes would be via foot or e-bike to the proposed rail-link are derisory given; a)the stated notion that the journey can be walked in 20-30 minutes (one would struggle to achieve that going down the hill, let alone the 300ft elevation on the return) is totally unrealistic. b) the lack of capacity on the proposed rail-link due to the lack of proper signaling, which will prevent a useful service frequency. Given the shortcomings in the proposal, it's lack of appreciation of the environmental, ecological and logistical disbenefits, it should be rejected as fundamentally unsound. An expansion of the existing school site could be considered (without the additional housing) which could make more sense by delivering a benefit for the wider community without impinging significantly on the local ecology, and road infrastructure.			

Name: Phil Watkin **I.D:** 18470785

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	List of Key Points against the additional 889 houses proposed to the north east of Backwell In principal adding further to the new housing already approved is unsustainable without very dramatic infrastucture improvements which are not even considered in the local plan. The proposed road is unlikely to change the problems on Station Road and building another bridge under the railway is probably not feasible There is no obvious requirement for a further 889 homes, where will the people come from? Certainly not from Backwell or Nailsea. There is very little employment in Backwell and only a moderate amount in Nailsea so the people are likely to commute, mostly by car, as the railway and other public transport only really serve central Bristol. The village of Backwell has been allocated a much larger proportion of the housing target than Clevedon but that is unexplained. Backwell Common and the lake are on flood plain land so even a road development would require special construction techniques. Run off from the site of the proposed 889 houses would inevitably increase the risk and frequency of flooding. The proposal appears to ignore the Governments policy of protecting the best agricultural land for food production. Existing schools are unlikely to be able to absorb the additional children needing education, and this will also place a further burden on the NHS facilities in the area. I also understand that the development threatens various endangered species in contravention of current protection legislation.			

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					In summary apart from being an unfair allocation of the housing target, which it clearly is, it is also ignoring so many other issues that the proposal should be thrown out with no further money spent on following it up			

Name: PhilCook **I.D:** 62766689

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	NSC has not properly considered: Alternative brownfield or greenfield sites with far lower ecological impact, both in Portishead and across North Somerset. Opportunities to increase housing density on proposed brownfield sites, which could remove the need to develop Tower Farm and Black Rock. The strategic ecological importance of these sites in protecting Weston Big Wood and the Gordano Valley green corridor. The fact that both areas were added to the Green Belt in the late 1980's due to their high ecological value. It seems strange that this has now been removed. National Planning Policy allows Green Belt changes only in exceptional circumstances and these have not been demonstrated. Neither site can provide safe or suitable access - development would create unacceptable transport impacts, failing national soundness tests. FOR THESE REASONS, BOTH TOWER FARM & BLACK ROCK SHOULD BE REMOVED FROM THE LOCAL PLAN. I do NOT support the North Somerset Local Plan 2041 for the Tower Farm lication.			
Black Rock, north of Clevedon Road	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	Unsound. The land lies immediately beside Weston Big Wood, an ancient woodland site of nature conservation, managed by Woodland Trust & Avon Wildlife Trust. The woodland forms part of the Gordano Valley ecological network and is a nationally important habitat for open grassland, wetland & woodland. Not justified. There is no robust published alternative assessment demonstrating that this sensitive site is the only or most appropriate option for growth. The loss of best and most versatile farmland and the risk of irreversible damage to the ancient woodland make this allocation unsuitable. Not consistent with national policy. The plan conflicts with National Planning Policy framework paragraphs 180-182 which require that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland) should be refused unless wholly exceptional reasons exist. The council's reference to an ecological buffer is vague, unenforceable and insufficient to address indirect impacts such as root-zone damage, hydrological change or wildlife disturbance. The Woodland Trust & Avon Wildlife Trust state that ancient woodland is irrecoverable once damaged. Moreover, the Framework requires delivering biodiversity gain but the allocation offers no clear mechanism to ensure the outcome. I do NOT support this plan. No modifications would make the plan sound.			

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					The site is environmentally and logistically unsuitable for housing due to multiple infrastructure dependency requirements. The allocation should be removed entirely. Instead the land should remain open countryside in line with Avon Wildlife Trust's 2030 strategy, Woodland Trust guidance and national biodiversity objectives.			

Name: Philip Heath **I.D:** 62777089

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP12: Bristol Airport	No	• Effective	Unsure	Unsure	It is well know that Bristol Airport are extremely aggressive in their pursuit of growth, to the detriment of the local community and to the detriment of the environment. They have currently drafted a masterplan proposing to grow the airport to 15m passengers. It is understood that North Somerset wish to present some sensible constraints on that growth. Unfortunately, as drafted, the language in the plan is very equivocal. This give Bristol Airport a huge amount of "wriggle-room" in which it can aggressively shoe-horn its aspirations, claiming it is compliant with the local plan and yet continuing its ongoing campaign to trample on local communities and the environment. If there is any doubt that Bristol Airport are likely to take this approach in the future, simply consider what they have done for many years in the past. The language in the plan needs to be much clearer about what NSC consider to be acceptable and what they consider to be unacceptable.	Pg 82 - first bullet - what does "appropriately justified" mean? Second bullet - what mitigation is deemed to be "adequate?" Why is "improved" qualified with "wherever possible?" A significant percentage of biodiversity net gain should be specified as a bare minimum. Third bullet - "appropriate" surface access requirements is too weak. Specify that all future growth must be handled using public transport - local roads are already clogged with airport traffic. Fourth bullet - "where necessary" - rephrase to say "improvements made to mitigate all adverse impact to airport operations" Fifth bullet - who is to judge whether benefits are "maximised?" And what about "net benefits" - ie benefits as reduced by harms? What about saying benefits must outweight harms by 10:1? Sixth bullet - again, who judges whether renewable energy generation is "maximised?" Much tighter targets are required. What about carbon neutral travel to and from the airport? How is the airports "net zero" commitment measured? Does it include offsetting (which is typical just green-wash)? Similar points apply throughout the "justification" section, where weak language provides ample opportunity for Bristol Airport's advisors to pay lip-service to the local plan, while destroying local communities and the local environment.		

Name: Philip John Taylor **I.D:** 62582625

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I am totally opposed to the inclusion in the proposed new Local Plan 2041 of the additional sites east of Backwell, providing for almost 1000 new houses, which will lead to an unacceptable overdevelopment of the village. Backwell is already subject to approved developments of approximately 800 houses and these additional proposed sites will “be the straw that breaks the camel’s back” for Backwell. Such development raises questions that are currently unanswered, namely:- what provision will be made for the provision and finance of increased services such as school places, local medical centre, etc that will inevitably be required. Also how will the proposed new road be financed and constructed and by whom? Enough is enough, I say NO to these proposals.			

Name: Philip STEPHEN Palmer **I.D:** 58406881

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	I have lived in Portishead for many years, and I am writing to object to the proposed allocation of Tower Farm (HE2068). My concerns come not only from reading the Local Plan documents but also from living right next to the area affected. I care deeply about the Downs, the woods, the wildlife, and the community here. This response explains why I believe the allocation is not legally compliant and why it fails the four soundness tests required by the NPPF. But more importantly, it explains why this development would harm the place that many of us call home. 1. Soundness: Positively Prepared The Plan is not positively prepared, in my opinion: So much brownfield capacity is sitting unused, including Castlefield in Clevedon, which could take hundreds of homes and has much better transport options. Tower Farm is being chosen even though it is one of the least suitable places for development. It feels like the Council is avoiding harder decisions about regenerating brownfield land and instead taking the easier option of open fields. 2. Soundness: Justified I do not believe Tower Farm is justified as a development site: The fields, valley and woodland form a natural space that supports countless birds, insects, and other wildlife. It is a peaceful buffer that makes this part of Portishead what it is. A previous Planning Inspector recognised how important these woods and this buffer were — I don’t understand why this view seems to have been abandoned. Compared with the alternatives, Tower Farm simply doesn’t stack up when it comes to sustainability or environmental value. 3. Soundness: Effective			

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					On a practical level, the allocation does not feel deliverable: Access is already a problem here. The Downs is narrow, heavily parked, and extremely busy at school times. Adding hundreds of homes feeding onto this road just seems unsafe. The emergency access from Tower Road wouldn't function as a true second access. If the main route is blocked, people would still be stuck. The Council's documents suggest people will walk or cycle to key services, but anyone who knows the area understands how steep Avon Way is. It's difficult enough going down it — coming back up is something many residents simply couldn't do. The run-off from the fields is already noticeable in heavy rain. Building over them will only push more water downhill towards existing houses. Traffic across Portishead is already a serious issue. This development would add significantly more pressure onto a network that is barely coping as it is. The housing mix doesn't make sense for local people. Portishead needs more smaller homes, not another set of large four-bedroom properties. 4. Soundness: Consistent with National Policy To me, the allocation goes directly against national policy: The woodland and valley are part of what makes this area special. Damaging them would contradict the environmental protections set out in the NPPF. The Downs are a lifeline for many people — a place for exercise, fresh air, and a break from the pressures of daily life. National policy emphasises the importance of public health and wellbeing, and this site plays a huge role in that for thousands of residents. National planning guidance is clear about prioritising brownfield land. But this Plan has not done so. The proposed transport strategy feels detached from real local conditions. Sustainable transport isn't achieved by assuming large numbers of people will cycle up steep hills or walk long distances from isolated housing. 4. Personal Concerns About Tower Farm I am strongly opposed to this allocation for personal and community reasons: The woods and the valley behind the Downs are part of Portishead's identity. They are more than just land — they are part of our wellbeing. The wildlife here is extraordinary. The birdsong that fills the air in the mornings comes directly from those fields and woods. Losing that would be a loss to the whole town. Development here would change the character of the Downs permanently. The strain on roads, schools, and community services would be felt everywhere, not just by those of us living nearby. Portishead has grown quickly, and many of us feel the town is struggling to keep up. Building at Tower Farm would make that worse. Tower Farm is not a sustainable or suitable site for development. It fails the legal tests, the soundness tests, and the simple common-sense test of whether it would benefit the community.			

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					For all these reasons, I respectfully request that the allocation be removed from the North Somerset Local Plan. I am asking the Council to remove HE2068 (Tower Farm) from the Local Plan. I believe future growth should: Focus on brownfield regeneration, Make use of sites like Castlefield, and Protect the natural areas that residents depend on for their wellbeing.			

Name: Philippa Morris **I.D:** 62770049

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Consistent with national policy	No		The plan does not take into consideration the ecological importance of Weston Big Wood. The plan is not in line with EIP interim targets- for instance; 'halt the decline of species abundance by 2030'. Building so close to the wood and demolishing hedgerows in the process will have a detrimental effect on local habitats and species. This is a greenfield site and has been since the 1980s. The plan shows no exceptional circumstances for building on thos greenbelt site. The infrastructure of Portishead is not fit for more houses. We currently have one pharmacy, Gordano school has a huge amount of pupils - one could argue more than they can facilitate and support effectively, and trying to see a doctor is extremely challenging. The town facilities are at capacity. The access road is not suitable. Observe this road during school opening and leaving times and ypu will see how hazardous it is. The town has one main road in and out Portishead. Which frequently has high traffic volume and traffic jams. Adding more vehicles to this is enhancing the probelm further.	Whilst I appreciate that there is a demand for local councils to provide affordable houses - destroying greenbelt sites cannot be the answer. If more housing is needed - a brownsite should be used. A better road system in place. Although the long awaited railway is meant to be happening, this has been spoken about for years. This addition of a railway was partly why the Marina development and Vale development happened all those years ago - but the railway never did. Even if this does happen now, the additonal houses built back then, on the premise of a railway being established, should be taken into consideration. An additional secondary school should also be built before more housing. Our local MP is working hard to establish more pharmacies however, these should be in place and working effectively before more housing is built and added pressure to an already oversubscribed health system.		20251124_100544.jpg

Name: Phoebe Gooch **I.D:** 58549313

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Justified	No	No	The fields in question are regarded as “brownfield” which is completely untrue. There are many brownfield sites in North Somerset and this is not one of them! The fields play a critical role in the community, with large numbers of the population appreciating the green space they provide, hence they are part of the Green Belt and therefore cannot be called brownfields. Furthermore the access to the proposed housing estate is NOT SUITABLE. During school drop off and pick up hours, The Downs is an extremely busy road. It takes locals up to half an hour to leave	Due to the ecological value of the fields and their importance in supporting the wildlife and green corridor, I believe Tower		

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					the road they live on during these times - imagine how chaotic it would be with another couple hundred cars. The proposed plans are clearly unsound, they appear to be the work of someone who has never visited Portishead or spoken to any of the residents and are therefore barbaric.	Farm will never be a suitable place to build houses, hence the plans will never be sound.		

Name: Phoenix Life Ltd (Fraser Green) **I.D:** 29307745

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP3: Spatial strategy	Yes		Yes	Yes			Support SP3	
SP5: Towns	Yes		Yes	Yes			Support Policy SP5	
SP8: Housing	Yes		Yes	Yes			Policy SP8 Housing provides for Land will be identified to secure the delivery of a minimum of 23,700 dwellings within North Somerset 2026-2041, equivalent to 1,580 dwellings per annum with 1,601 identified in Portishead. At Portishead allocations have been identified for 562 homes and the Wyndham Way Broad Location can accommodate up to 785 new dwellings. The Councils published SHLAA October 2025 refers to Wyndham Way, Portishead as a broad location for growth rather than a traditional site allocation. The justification of the capacity of 785 dwellings is based on the July 2024 Delivery Testing Report which assessed the potential yield across the main sites based on high level site options and viability modelling, recognising that this housing may be delivered later in the plan period – or potentially beyond. Reference is made to key sites such as Old Mill Road with capacity of up to 567 units in the Plan period, which has been shown by the evidence base to be viable in principle. Support Policy SP8	
SP9: Employment	Yes		Yes	Yes			Support Policy SP9	
Policy LP5: Housing, employment and mixed use allocations	Yes		Yes	Yes			Policy LP5 identifies the proposed housing and employment allocations which are set out in Schedules 1 and 2. Development must take account of the site-specific requirements set out in the schedules. Schedule 1 includes Wyndham Way Broad Location with an indicative capacity of 785 dwellings. It is noted as a new allocation – and urban intensification opportunity. The key site requirements of the allocation are: • Mixed use urban renewal to include new homes, town centre uses and net increase in jobs.	

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							• Development to conform to the principles of the Wyndham Way Development Area Framework and Policy LP20. Support LP5 and Schedule 1 allocation for Wyndham Way Broad Location	
Policy LP8: Town centre hierarchy	Yes		Yes	Yes			Support Policy LP8	
Policy LP20: Wyndham Way	No	◦ Positively prepared ◦ Justified ◦ Effective	Yes	Yes	Support LP20 on the basis that it provides the policy base for bringing forward regeneration proposals for the Wyndham Way Broad Location in a phased manner. The Plan needs to be consistent in its references to Policy LP20 (remove references to LP17 elsewhere in the Reg 19 Local Plan). In terms of the name for the area itself, LP20 should be amended to refer to the Wyndham Way Broad Location rather than the Wyndham Way Development Area. Support the capacity figures in Policy LP20 which are justified via the evidence base. However, the evidence base has not been published in full with the Reg 19 Plan which requires clarification. The evidence base includes the report entitled "Wyndham Way, Portishead Opportunity Area Delivery Testing" which looks at the deliverability of the sites in the Wyndham Way Opportunity Area Framework. This report should be read together with the Allies and Morrison Site Studies Report April 2024, yet this latter report is not included in the evidence base included on the Councils website. Phoenix Life, in earlier informal consultation on the Site Studies Report, did express some concerns regarding practical delivery of some very specific land use and locational proposals, assumptions regarding decanting of existing uses and the provision of common infrastructure, given different ownerships and tenancies across the area. Assuming these studies and reports are to be included in full in the Councils evidence base, it should be clearly stated in Policy LP20 or its supporting text that they include options for practical delivery of Policy LP20 objectives and do not represent definitive proposals. Further the evidence base on the Councils website also includes a further Delivery Testing Report (not the Wyndham Way Area Development Framework as noted on the website) This report notes that it contains commercially sensitive information on site viability and notes of landowner and Member	Phoenix Life does not support the references in the draft Policy LP20 to the Neighbourhood Plan. There is no policy basis in the adopted Core Strategy to identify the Phoenix Life site at Old Mill Road (which includes the Wyndham Way Retail Park) as a “Valued Employment Site”. Phoenix Life has consistently maintained its view that the Neighbourhood Plan’s approach to the Wyndham Way Development Area is inconsistent with the adopted Core Strategy, and the Neighbourhood Plan provisions in this regard run counter to the positive regeneration approach set out in Policy LP20 in respect of the allocated Wyndham Way Broad Location. If the references to the Neighbourhood Plan approach remain unchanged in draft Local Plan Phoenix Life considers that this would render Policy LP20 in the Local Plan unsound as in this respect it is not positively prepared or justified (founded on a robust and credible evidence base and not the most appropriate strategy when considered against the reasonable alternatives) or effective (deliverable, flexible and able to be monitored).		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					discussions which are for NSCs internal use. Thus, the evidence base on the website does not actually include the Wyndham Way Area Development Framework, which provides the basis for the policy provisions included in Policy LP20. This should be rectified. Policy LP20 refers to the Neighbourhood Plan for Portishead that was made in September 2023. The policy text suggests that it is aligned to the North Somerset Core Strategy strategic policies which will be superseded by the Local Plan, but also contains policies to support the town centre and existing valued employment sites, some of which lie within the Wyndham Way Development Area. Phoenix Life does not support the references in the draft Policy LP20 to the Neighbourhood Plan. There is no policy basis in the adopted Core Strategy to identify the Phoenix Life site at Old Mill Road (which includes the Wyndham Way Retail Park) as a “Valued Employment Site”. Phoenix Life has consistently maintained its view that the Neighbourhood Plan’s approach to the Wyndham Way Development Area is inconsistent with the adopted Core Strategy, and the Neighbourhood Plan provisions in this regard run counter to the positive regeneration approach set out in Policy LP20 in respect of the allocated Wyndham Way Broad Location. If the references to the Neighbourhood Plan approach remain unchanged in draft Local Plan Phoenix Life considers that this would render Policy LP20 in the Local Plan unsound as in this respect it is not positively prepared or justified (founded on a robust and credible evidence base and not the most appropriate strategy when considered against the reasonable alternatives) or effective (deliverable, flexible and able to be monitored).			
Policy DP21: Safeguarding employment sites	No	Effective	Yes	Yes	Draft Policy DP21 seeks to safeguard employment sites other than those allocated for other purposes. On this basis and by definition this policy should not apply to the Wyndham Way Broad Location which is allocated for mixed use in the Reg 19 Plan at Policy LP20. Clarification is required in order to make the Local Plan sound as in this respect it is not effective (deliverable, flexible and able to be monitored).	Draft Policy DP21 seeks to safeguard employment sites other than those allocated for other purposes. On this basis and by definition this policy should not apply to the Wyndham Way Broad Location which is allocated for mixed use in the Reg 19 Plan at Policy LP20. Clarification is required in order to make the Local Plan sound as in this respect it is not effective (deliverable, flexible and able to be monitored).		
Policy DP24: Town Centres	Yes		Yes	Yes			Support Policy DP24	

Name: Pill & Easton-in-Gordano Parish Council **I.D:** 62802913

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SP3: Spatial strategy	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	Pill & Easton-in-Gordano Parish Council objects to Policy SP3. Policy SP3 is unsound because it jumps Pill (a Category A village) to full strategic-location status without any prior consultation. The February–March 2025 consultation paper framed the sites only as non-strategic “other potential” village-scale allocations (Table 7.1). No question was ever asked about elevating the parish to a fourth strategic location. Yet the Cabinet report of 18 June 2025 (paras 3.20–3.21) cited “general support for the principle of development” to justify the change, misrepresenting responses that were never sought on strategic status. This arbitrary breach of the spatial hierarchy (NPPF para 36b) overrides our made Neighbourhood Plan without evidence and renders the policy unjustified. Not Positively Prepared (NPPF para 36a): SP3 fails to proactively meet needs through collaboration, sidelining village-scale alternatives and imposing disproportionate growth (55% stock increase) without addressing unmitigable harms like flood exacerbation. Not Justified (NPPF para 36b): Evidence lacks robustness; Sustainability Appraisal overlooks Defra MAGIC constraints (e.g., floodplain woodland in Zones 2/3 at Pill Green). No proportionate alternatives assessment justifies bypassing the hierarchy for Green Belt release over brownfield/urban options (NPPF para 148). Not Effective (NPPF para 36c): Undeliverable: Draft IDP (Feb 2025, §8.3) flags high-risk, unfunded infrastructure (J19 upgrades). Cumulative ~700 peak trips from Pill, plus Portishead/dock growth, lack modelling (NPPF para 116 and 118), breaching SP3's own flood minimisation. Inconsistent with National Policy (NPPF para 36d): Violates spatial principles (NPPF para 74: Neighbourhood Plan conformity) and Green Belt protections. Legally non-compliant with Localism Act 2011 (developer-led over community needs). Duty to Cooperate unmet: No updated Statements of Common Ground on cross-boundary J19/ecology impacts (e.g., with Bristol/National Highways). This flawed strategy risks Plan-wide unsoundness, reverting to outdated policies and developer speculation.	To make SP3 sound and compliant, we request: Revise SP3 Hierarchy: Explicitly limit strategic growth to the three main towns; revert Pill to Category A village status, aligning with "local needs" only (NPPF para 74). Remove cross-references to LP4. Strengthen Evidence Base: Commission independent hierarchy review: Assess non-Green Belt alternatives via MAGIC-integrated SA; include 10-year J19 modelling (cumulative impacts) and NE/EA responses on flood/habitats. Pause and Extend Consultation: Halt until Statements of Common Ground (NPPF para 28) evidence Duty to Cooperate (e.g., Bristol transport). Enhance Safeguards: Revise SP3 to require infrastructure delivery before growth (e.g., J19 upgrades pre-occupation). These modifications ensure SP3 is positively prepared (community-aligned), justified (evidenced alternatives), effective (deliverable), and NPPF-consistent thus avoiding Examination rejection.		ALC Defra MAGIC Pill Sites Grades 1 and 2 Dec2025.png Markham Brook Ancient Woodland and Priority Habitat Inventory.pdf
SP7: Green Belt	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	Pill & Easton-in-Gordano Parish Council objects to Policy SP7 (Green Belt). This policy is unsound because it allows the release of five high-quality Green Belt sites around our village (total ~1,100 homes) without meeting any of the strict national tests in the NPPF (December 2024). It has not shown that all non-Green Belt options (brownfield sites, higher density in towns) have been used up first. It has not demonstrated that these five sites are low-value “grey belt” – in fact they include ancient woodland edges, priority habitats, floodplain and woodland. There is no published Green Belt review or exceptional-circumstances report that justifies taking this land out of the Green Belt. Policy SP7 is unsound and inconsistent with NPPF para 145, as it fails to demonstrate "exceptional circumstances" for Green Belt release in Pill & Easton-in-Gordano. Two LP4 sites (HE206 and HE20491) constitute the remaining narrow Green Belt corridor between the parish and Royal Portbury Dock, vital for preventing coalescence and urban sprawl. Yet when assessing Portbury Dock, NSC stated: "The remaining Green Belt land located between the port estate and Portishead is considered extremely sensitive in preventing coalescence and checking unrestricted urban sprawl" (This consultation within section "4 Locational Policies" - "Policy LP14: Royal Portbury Dock"). Allocating these sites now contradicts this, prioritising development over high-value Green Belt without grey belt proof or alternatives assessment. This developer-led approach breaches Localism Act 2011; Duty to Cooperate unmet with no joint work on landscape gaps (e.g., with Bristol on port impacts). It fails para 148 by releasing Pill's sensitive corridor (HE206/HE20491) without proving alternatives, misusing Feb responses that objected to Green Belt loss. Cabinet's 'well supported' claim (3.21) ignores this, no strategic consult occurred, making boundary changes unjustified and inconsistent with Portishead's	Delete the proposed Green Belt deletions around Pill & Easton-in-Gordano (the five sites in Policy LP4). Amend SP7 to explicitly protect Pill-Dock Green Belt corridors as strategic gaps to prevent merger/coalescence (per NPPF para 143(b)), deleting LP4 sites HE206/HE20491. Require full alternatives appraisal before any release (para 148). Keep the Green Belt boundary exactly as it is now, or at the very least only allow removal if a proper, published Green Belt review proves exceptional circumstances and shows the land is genuine low-value “grey belt”. Add wording to SP7 that says: “Green Belt release will only happen after all reasonable non-Green Belt alternatives have been exhausted and a full exceptional-circumstances report has been published and consulted on.” These changes would bring the policy back into line with national rules and stop our high-quality countryside being lost without proper justification.		ALC Defra MAGIC Pill Sites Grades 1 and 2 Dec2025.png Markham Brook Ancient Woodland and Priority Habitat Inventory.pdf

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					'extremely sensitive' protection (LP14) This sudden change only appeared in June 2025 – it was not in the July 2024 draft. It looks rushed and reactive rather than properly planned. Releasing this Green Belt without the proper evidence breaks national policy and makes the whole plan unsound.			
SP10: Transport	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Policy SP10 is unsound, ineffective and inconsistent with national policy (NPPF para 109) because the transport evidence for the 1,100-home Pill allocation (LP4) is extraordinarily sparse and demonstrably inadequate (see also para 118 on required assessments). The council's own Infrastructure Delivery Plan (October 2025, section 8.3) classifies M5 Junction 19 upgrades as "high risk" with no funding or delivery plan. No cumulative 10-year traffic modelling has been carried out for the combined impact of Pill (≈ 700 peak-hour car trips), Portishead growth, and expanding Royal Portbury Dock traffic. The active travel routes shown on the Policies Map – notably the Markham Brook overbridge and connections across private land – appear to have been drawn freehand without site visits, surveys or landowner agreements. They cut directly through ancient woodland, floodplain woodland and private property, ignoring the mandatory 15-metre buffer (Natural England Standing Advice) and basic topography. These routes are undeliverable and give every impression of a rushed, last-minute insertion to justify a housing numbers gap rather than a properly prepared, evidence-led strategy. SP10's requirement to "minimise adverse effects" on the highway network and the environment is therefore meaningless for Pill. The policy fails on the council's own evidence.	To make SP10 sound and deliverable it must be amended to state: "No development at the Pill & Easton-in-Gordano Strategic Location (Policy LP4) shall commence until M5 Junction 19 capacity improvements are completed, funded and open to traffic." And "The safeguarded active travel route across Markham Brook (Schedule 7) shall be deleted or re-routed to avoid all ancient woodland and its 15-metre buffer zone." Without these changes SP10 is ineffective and the Plan risks being found unsound.		Markham Brook Ancient Woodland and Priority Habitat Inventory.pdf
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Pill & Easton-in-Gordano Parish Council objects to Policy LP4. Designating our parish as a fourth Strategic Development Location for ~1,100 dwellings on five Green Belt sites is unsound, unlawful and undeliverable. This allocation only appeared in June 2025 – it was absent from the July 2024 draft – and has not been properly evidenced or consulted on. This abrupt June 2025 elevation misrepresents the February–March 2025 consultation, which sought views only on individual sites as 'potential allocations' in sustainable villages, not as a strategic location (Consultation Paper Section 5.43). Cabinet's 18 June claim of 'general support' (para 3.21) ignores localised objections and the fact no strategic question was asked, breaching Localism Act 2011 engagement duties. Not Positively Prepared – Forces a Category A village (1.9 % of North Somerset's electorate) to take 4.6 % of all new housing, overriding our made Neighbourhood Plan (81 % referendum support, 2021) which caps growth at 150–200 homes to 2038. Policy LP4 is also procedurally flawed and unjustified because it was introduced as a complete surprise in June 2025 – absent from all previous consultations. The supporting evidence is extraordinarily sparse: no updated Sustainability Appraisal, no transport modelling, no habitat surveys, and no landowner agreements for the proposed active travel routes. Several of these routes (notably the Markham Brook overbridge and connections across private land) appear to have been drawn freehand on a map with no regard to topography, ancient woodland, floodplain, or existing rights of way. This gives the clear impression of a rushed, last-minute insertion to plug a perceived housing numbers gap, rather than a properly prepared, evidence-led allocation. Such an approach renders the policy neither justified nor effective and risks the entire Plan being found unsound. Not Justified – The Sustainability Appraisal fails to use Defra MAGIC maps, missing floodplain woodland (Flood Zones 2/3), ancient woodland and priority habitats. No objective assessment of non-Green Belt or brownfield alternatives has been carried out (NPPF para 157). The proposed Markham Brook active travel route cuts through irreplaceable ancient woodland with no 15 m buffer or	Delete Policy LP4 in its entirety and remove all five Pill & Easton-in-Gordano sites from the proposals map. Revert to the July 2024 spatial strategy under which our parish was not a Strategic Location and growth was limited to local needs only, in line with Policy SP3 and our Neighbourhood Plan. Furthermore, the Plan's failure to examine the government's new Environmental Improvement Plan 2025 (EIP 2025, published 1 December 2025) renders LP4 unsound and non-compliant. EIP sets binding national targets under the Environment Act 2021, including 30% land protection by 2030 (30by30), mandatory 10% Biodiversity Net Gain (BNG) for all developments by mid-2026, and £10.5bn for nature-based flood defences (protecting floodplain woodlands like those on Pill Green HE2015). It requires Local Nature Recovery Strategies (LNRS) by end-2025, which local plans must integrate for habitat mapping, no-net-loss of ancient woodland (via updated inventories by 2027), and riparian buffers along Markham Brook. NSC's June 2025 allocation predates EIP and lacks any assessment of these requirements—no BNG strategy for irreplaceable habitats (NPPF para 193c alignment), no LNRS-informed alternatives to Green Belt release, and no evidence of flood-resilient designs (e.g., SuDS to avoid downstream risks in Pill village). This breaches NPPF para 36 (not justified/effective)		Markham Brook Ancient Woodland and Priority Habitat Inventory.pdf ALC Defra MAGIC Pill Sites Grades 1 and 2 Dec2025.png

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					compensation strategy (NPPF para 193c; Natural England Standing Advice 2024). The Sustainability Appraisal and evidence base contain no assessment of the loss of best and most versatile agricultural land. Four of the five LP4 sites (HE2015 Pill Green, HE20491 Lodway Farm, HE206 Gordano Services, and HE20492 Pill Road) are predominantly Grade 1 and Grade 2 according to Defra's Provisional Agricultural Land Classification (see attached screenshot from magic.defra.gov.uk). This is prime farmland that the NPPF (para 119 and Planning Practice Guidance) says should only be developed as a last resort after all reasonable lower-grade alternatives have been exhausted. No such alternatives assessment has been carried out, rendering Policy LP4 not justified (NPPF para 36(b)). Not Effective – The council's own Infrastructure Delivery Plan (Oct 2025, §8.3) labels M5 Junction 19 upgrades and Pill flood-risk management as high-risk and unfunded. The five LP4 sites together would add approximately 1,540 peak-hour car trips (1.4 cars/home × 1,100 dwellings) – on top of Portishead's remaining growth and the continuing expansion of Royal Portbury Dock HGV traffic – with no evidenced mitigation and no funded solution. National Highways has raised unresolved objections to the cumulative impact on Junction 19 capacity and safety. In the absence of any robust assessment or deliverable mitigation, Policy LP4 fails the effectiveness test (NPPF para 36(c)) and would cause severe residual cumulative impacts on the strategic road network (NPPF para 116). Flood mitigation fails the sequential test (NPPF para 174). Inconsistent with National Policy & Legally Non-Compliant – Directly breaches NPPF paragraph 148: the council has published no evidence that brownfield opportunities and urban density increases have been maximised before releasing high-value Green Belt in Pill. Residents and the parish council are aware of potential brownfield sites that have not been fully explored. Releasing these five Green Belt sites therefore fails the sequential test, the "grey belt" priority, and the requirement for exceptional circumstances. This, combined with tiny consultation responses (often <30 per site) and a developer-led process, also breaches the Localism Act 2011. Duty to Cooperate failed – No updated Statements of Common Ground with National Highways, Natural England or the Environment Agency on J19, habitats or SuDS. This policy risks the whole plan being found unsound (as happened with the Joint Spatial Plan in 2020).	and the Biodiversity Duty for public bodies. **To comply, pause submission until: (i) Full EIP/ LNRS integration via revised Sustainability Appraisal; (ii) Independent audit of sites against EIP targets (e.g., 250,000 ha habitat creation by 2030); and (iii) 6-week extended consultation. Additionally, fund a Parish-led audit of small/ micro-sites (2–5 homes each) on underused/ brownfield land within the parish, as reasonable alternatives prioritised under NPPF paras 36(b), 69, 119 and 148. Residents have identified potential infills fitting local needs without Green Belt harm—exploring these first would demonstrate proportionate evidence and effective rural land use. These fixes would enable evidence-led, nature-positive growth without judicial review risks. These changes would make the plan properly thought-through, backed by real evidence, deliverable, and fair. If the council does them now, the plan can still be saved and we avoid the nightmare of it being thrown out and developers building whatever they like.		
Policy LP9: Extent of the Green Belt	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	Pill & Easton-in-Gordano Parish Council objects to Policy LP9 because it removes five large areas of Green Belt around our parish to enable Policy LP4 (1,100 homes). This deletion is unsound for the following reasons: Not justified & inconsistent with national policy (NPPF paragraphs 142–148): The council has not demonstrated the "exceptional circumstances" required to alter Green Belt boundaries, nor has it shown that all non-Green Belt alternatives have been fully explored and exhausted. No evidence has been published to prove these sites are "grey belt" (lower-value Green Belt). In fact, the sites contain high-value features: ancient woodland edges, priority habitats, floodplain woodland, and land identified on Defra MAGIC maps as irreplaceable. Not positively prepared: The sudden decision in June 2025 to treat Pill as a fourth "strategic location" (the same status as the three main towns) was never part of the July 2024 draft. This late change has not been tested through proper alternatives assessment. Not effective: The supporting Infrastructure Delivery Plan (Oct 2025, section 8) labels essential road and flood defences as "high risk" and unfunded. Green Belt removal is	Delete the proposed Green Belt deletions around Pill & Easton-in-Gordano from the LP9 Policies Map and retain the existing Green Belt boundary. Alternatively, if any change is to be considered, the council must first publish a full Green Belt Review proving exceptional circumstances and that these sites are genuinely low-value "grey belt" after all brownfield and non-Green Belt options have been used up. Retain current Green Belt boundaries for HE206/HE20491; revert LP9 amendments to July 2024 draft. Mandate strategic gap designation for Pill-Dock corridor, per LP14 principles.		

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					therefore premature. Legal compliance & Duty to Cooperate: No updated Statement of Common Ground with neighbouring authorities (e.g., Bristol City or National Highways) shows how the cumulative impact on Junction 19 has been resolved. LP9's proposed Green Belt boundary amendments for Pill LP4 sites are unjustified and inconsistent with NPPF para 147, lacking evidence of maximised brownfield/ urban options first. Sites HE206 (Land East of Gordano Services) and HE20491 (Lodway Farm) form the critical remaining Green Belt corridor between Pill parish and Royal Portbury Dock, essential to prevent coalescence and sprawl. NSC's own Portishead assessment confirms: "The remaining Green Belt land located between the port estate and Portishead is considered extremely sensitive in preventing coalescence and checking unrestricted urban sprawl." Deleting this gap now (while protecting similar ones elsewhere) is arbitrary, with no grey belt assessment (para 148) or habitat compensation (para 193a/c). This rushed June 2025 change breaches Localism Act 2011; Duty unmet without cross-boundary input from National Highways on dock-adjacent sprawl.			
Policy LP11: Transport infrastructure, allocations and safeguarding	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	Policy LP11 is unsound (not justified, not effective, and not consistent with national policy) because: The proposed “active travel route” across Markham Brook (shown on the Policies Map and listed in Schedule 7) would cut straight through irreplaceable ancient woodland and priority habitat deciduous woodland in the Gordano Valley. → Natural England’s Standing Advice (2024) and NPPF paragraph 193c require a minimum 15-metre untouched buffer on each side of ancient woodland. The government's Environmental Improvement Plan 2025 (published 1 December 2025) reinforces this by committing to maintain protections for ancient woodland as irreplaceable habitats and evolve Biodiversity Net Gain to ensure infrastructure like active travel routes delivers net environmental benefits without harm. No layout has ever been produced that can meet this requirement. The route is therefore physically undeliverable without destroying habitat that national policy says must not be lost unless there are “wholly exceptional reasons” and full compensation – neither of which exist here. The Sustainability Appraisal and the rest of the evidence base contain no assessment whatsoever of this route’s impact on ancient woodland, priority habitats, protected species (e.g. bats), or the legal need for buffers. This makes the policy not justified (NPPF para 36b). No alternative alignments appear to have been examined. The council has not demonstrated that a deliverable route is possible at all – making the policy not effective. The proposed Markham Brook active travel bridge and path would destroy irreplaceable ancient woodland and priority habitat with no 15 m buffer and no compensation strategy. This directly breaches NPPF paragraphs 193c and 192 and renders the policy unsound. This same route is being relied on to “mitigate” the traffic impact of the 1,100 homes proposed under Policy LP4. If the route cannot be built, the mitigation fails and the housing allocation becomes even less deliverable.	Delete the Markham Brook active travel route from Policy LP11, Schedule 7, and the Policies Map, or redraw it so that it demonstrably avoids all ancient woodland and priority habitat with the required 15 m buffers (Natural England Standing Advice 2024). Align with Environmental Improvement Plan 2025 commitments by requiring a Biodiversity Net Gain assessment (at least 10%) and integration with Local Nature Recovery Strategies to prove no net habitat loss. If no deliverable alternative exists, the council must remove the reliance on this route as mitigation for the Pill & Easton-in-Gordano strategic location (Policy LP4) and reassess the housing numbers accordingly. Reroute the Markham Brook link to avoid private land and existing bridleway PE2/1, or delete it entirely pending full landowner consultation.		
Policy LP14: Royal Portbury Dock	No	‣ Positively prepared ‣ Justified ‣ Effective	No	No	Policy LP14 is unsound and inconsistent with national policy because it directly contradicts its own wording and objectives when applied to the proposed Strategic Location at Pill & Easton-in-Gordano (Policy LP4 – 1,100 new homes). LP14 states that new development must not cause unacceptable harm to the operation, access or expansion of Royal Portbury Dock.	Delete or heavily amend Policy LP4 so that no housing growth that relies on Junction 19 is permitted until the necessary upgrades are fully funded and built. Alternatively, remove Pill & Easton-in-Gordano as a Strategic Location entirely, reverting to the July		

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		‣ Consistent with national policy			It also requires improvements to M5 Junction 19 and local roads to be delivered in advance of development that would otherwise harm the port. The 1,100 homes in Pill would add approximately 700 extra peak-hour car trips straight onto the A369 and Junction 19 – the only realistic route for dock traffic, including hundreds of HGVs and abnormal-load vehicles that must use the slow lane on the Avonmouth Bridge. The council's own Infrastructure Delivery Plan (Oct 2025, section 8.3) classifies Junction 19 upgrades as high risk and unfunded, with no committed scheme or funding before 2030. No cumulative traffic modelling of the combined impact of Pill homes, Portishead growth and ongoing port expansion (Bristol Port Master Plan 2023) has been carried out, contrary to the requirement for a robust transport evidence base (NPPF paragraph 118). This means Policy LP4 would cause exactly the unacceptable harm that LP14 is supposed to prevent, and the required road improvements are not in place and cannot be guaranteed. The two policies therefore directly contradict each other, making the plan ineffective, unjustified and inconsistent with national policy.	2024 strategy, so that LP14 can be properly applied without contradiction. Amend Policy LP14: Portbury dock with the addition of "The remaining Green Belt land located between the port estate and Pill and Easton-in-Gordano is considered extremely sensitive in preventing coalescence and checking unrestricted urban sprawl		
Land at Lodway Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	The Parish Council objects to allocating Land at Lodway Farm (HE20491) for 160 dwellings under LP4. Residents at our 9 Dec drop-in (45 attendees) recognise the need for some new homes but oppose huge estates—most would accept 20–30 here if fitting the awkward access (The Breaches/Beechwood Rd) and preserving the Green Belt buffer to the estuary, aligning with our Neighbourhood Plan's local-scale growth. This allocation is undeliverable and harms rural character without "very special circumstances". Not Positively Prepared – The 160-home scale overrides our 150–200 cap (81% support 2021), ignoring modest alternatives. Not Justified – No noise modelling for M5 or heritage assessment (Grade II* Church of St George views). Green Belt not "grey" (NPPF para 148).The Sustainability Appraisal contains no assessment of the loss of best and most versatile agricultural land. The site is predominantly Grade 1 (excellent quality) with the remainder Grade 2 according to Defra's Provisional Agricultural Land Classification (see attached screenshot from magic.defra.gov.uk). This is the highest-quality farmland that the NPPF (para 119 and Planning Practice Guidance) says should only be developed as an absolute last resort after all reasonable lower-grade alternatives have been exhausted. No such alternatives assessment has been carried out, rendering the allocation not justified (NPPF para 36(b)). Not Effective – IDP Oct 2025 (§8.3) flags unfunded J19; ~224 vehicles overload Marsh Lane without modelling (NPPF para 115d). Active travel (River Avon Trail) unfeasible on third-party land. Inconsistent/Legally Non-Compliant – Breaches NPPF para 148 and paras 106-108; Duty unmet with Historic England.	Delete from Schedule 1; revert to July 2024 non-strategic status, capping at local needs (20–30 homes max, with buffer).		ALC Defra MAGIC Pill Sites Grades 1 and 2 Dec2025.png
Land east of Gordano Services	No	‣ Positively prepared ‣ Justified ‣ Effective	No	No	The Parish Council objects to Land East of Gordano Services (HE206) for 200 dwellings under LP4. Residents wouldn't mind a few homes here but see ~186 (original proposal) as creating a standalone "village" disconnected from Pill, with insurmountable traffic safety on Marsh Lane (no access allowed). Undeliverable due to consultee objections on flooding/highways, and undeliverable in this number due to severe infrastructure constraints	Delete Land East of Gordano Services from Schedule 1 and the proposals map. Revert to non-strategic status under July 2024, allowing small-scale (e.g., 10–20 homes) if traffic resolved. If retained, require pre-allocation: Resolve EA/ National Highways objections via funded flood/J19		ALC Defra MAGIC Pill Sites Grades 1 and 2 Dec2025.png

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		• Consistent with national policy			Not Positively Prepared – Disproportionate scale ignores community preference for small infill, overriding Neighbourhood Plan cap. No parish collaboration on alternatives, ignoring cumulative dock expansion impacts (Bristol Port Master Plan 2023). Not Justified – Evidence base flawed. No noise modelling (M5) or archaeological evaluation; high flood risk in Zones 2/3 per Defra MAGIC maps, with Environment Agency holding objection pending sequential tests (NPPF para 174); not "grey belt" (para 148). The Sustainability Appraisal contains no assessment of the loss of best and most versatile agricultural land. The entire site is classified as Grade 1 (excellent quality) according to Defra's Provisional Agricultural Land Classification (see attached screenshot from magic.defra.gov.uk). This is prime farmland that the NPPF (para 119 and Planning Practice Guidance) says should only be developed as a last resort after all reasonable lower-grade alternatives have been exhausted. No such alternatives assessment has been carried out, rendering the allocation not justified (NPPF para 36(b)). Not Effective – The council's own Infrastructure Delivery Plan (Oct 2025, §8.3) labels M5 Junction 19 upgrades as high-risk and unfunded. This site alone would generate approximately 280 peak-hour vehicle trips (1.4 cars per home × 200 dwellings) that must exit directly onto the Junction 19 / Marsh Lane / dock access network. When added to the remaining Portishead allocations and the ongoing expansion of Royal Portbury Dock HGV traffic, the cumulative impact has no evidenced or funded mitigation. National Highways has raised unresolved objections to the capacity and safety of Junction 19. In the absence of any robust assessment or deliverable mitigation, the allocation fails the effectiveness test (NPPF para 36(c)) and would cause severe residual cumulative impacts on the strategic road network (NPPF para 116). PRoW upgrade to services unfeasible without dock operator consent; active travel links (River Avon Trail, Marsh Lane) cross sensitive habitat without mitigation. Inconsistent/Legally Non-Compliant – Breaches NPPF para 148 (Green Belt without alternatives), para 193c (habitat harm), and Policy LP14 (no harm to dock operations). Duty to Cooperate failed: No joint Statements of Common Ground with Environment Agency (flooding) or National Highways (J19); ignores prior consultee holding objections from March 2025. This allocation risks Plan-wide unsoundness, exacerbating gridlock and flood risks.	mitigations, full noise/heritage assessments, and dock compatibility study.		
Pill Green	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The Parish Council objects to Pill Green (HE2015) for 600 dwellings under LP4. Universal drop-in opposition—no one spoke in favour; all cited unsustainable traffic (~30% parish increase), no viable road access, "fictional" active travel routes, and irreparable Markham Brook damage (contradicting EIP 2025's ancient woodland protections and NFM via buffers). This is the largest and most damaging of the five LP4 sites, lying entirely in the Green Belt and containing floodplain woodland, ancient woodland and priority habitat. Not Positively Prepared – 600 homes would increase the parish housing stock by around 30% in one go, completely overriding our Neighbourhood Plan (81 % referendum support 2021) which caps growth at 150–200 homes to 2038. Not Justified – The Sustainability Appraisal ignores Defra MAGIC maps showing over 55 % of the site is floodplain woodland in Flood Zones 2/3 and ancient woodland at Markham Bottom. The proposed active travel overbridge and continuation of Bridleway LA8/33/40 would destroy irreplaceable habitat with no 15 m buffer and no compensation strategy (NPPF para 193c; Natural England Standing Advice 2024). No evidence proves this is "grey belt" or that exceptional circumstances exist (NPPF para 148). The Sustainability Appraisal contains no assessment of the loss of best and most versatile agricultural land. The vast majority of the site is classified as Grade 2 (very good quality) with significant pockets of Grade 1 (excellent quality) according to Defra's Provisional Agricultural Land Classification (see attached screenshot from magic.defra.gov.uk). This is prime farmland that the NPPF (para 119 and Planning	Delete Pill Green (HE2015) in its entirety from Schedule 1 and the proposals map. Revert to the July 2024 spatial strategy under which this land remained protected Green Belt with no strategic allocation.		ALC Defra MAGIC Pill Sites Grades 1 and 2 Dec2025.png Markham Brook Ancient Woodland and Priority Habitat Inventory.pdf

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					Practice Guidance) says should only be developed as a last resort after all reasonable lower-grade alternatives have been exhausted. No such alternatives assessment has been carried out, rendering the allocation not justified (NPPF para 36(b)). Not Effective – The council's own Infrastructure Delivery Plan (Oct 2025, §8.3) labels M5 Junction 19 upgrades and Pill flood-risk management as high-risk and unfunded. Adding ~840 peak-hour car trips (1.4 cars/home) from this site alone – on top of Portishead growth and expanding dock HGV traffic – has no evidenced mitigation and no funded solution**. National Highways has raised unresolved objections to the cumulative impact on Junction 19 capacity and safety. In the absence of any robust assessment or deliverable mitigation, the allocation fails the effectiveness test (NPPF para 36(c)) and would cause severe residual impacts on the strategic road network (NPPF para 116). The site-specific requirements admit no increased surface water run-off is permitted and flood mitigation is needed downstream, yet no viable scheme is shown. The primary school and Markham Brook overbridge are unfunded and cross third-party land with no delivery mechanism. Inconsistent with National Policy & Legally Non-Compliant – Direct loss of irreplaceable habitat (para 193c), failure of sequential flood test (para 174), breach of Green Belt policy (para 148), and Localism Act 2011 (developer-led, ignoring 2,000-signature petition). Duty to Cooperate failed: no joint work with Environment Agency or Natural England on flood/habitat solutions. The Feb consultation listed HE2015 as a standalone village site (600 homes indicative), not strategic—yet June Cabinet aggregated it into LP4 without re-consulting on cumulative harms, misrepresenting objections as 'localised' support (para 3.21) This site alone risks the entire Local Plan being found unsound.			
Land at Pill Road	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The Parish Council objects to Land at Pill Road (HE20492) for 100 dwellings under LP4. Every resident we've spoken with strongly opposed this site, no support voiced, only fact-based concerns on flood risks, habitat loss and undeliverable connections. This Green Belt site south of Markham Brook is undeliverable due to severe flood risk, habitat destruction and lack of infrastructure. Not Positively Prepared – Further erodes our Neighbourhood Plan (81 % referendum support 2021) which caps total growth at 150–200 homes to 2038. Not Justified – The Sustainability Appraisal and site requirements ignore Defra MAGIC evidence that the site lies in Flood Zones 2/3 and directly abuts Markham Brook floodplain woodland and ancient woodland. The required active travel connection and overbridge would destroy irreplaceable habitat with no 15 m buffer and no compensation strategy (NPPF para 193c; Natural England Standing Advice 2024). No proof this is "grey belt" or that exceptional circumstances exist (NPPF para 148). The Sustainability Appraisal contains no assessment of the loss of best and most versatile agricultural land. The entire site is classified as Grade 2 (very good quality) according to Defra's Provisional Agricultural Land Classification (see attached screenshot from magic.defra.gov.uk). This is prime farmland that the NPPF (para 119 and Planning Practice Guidance) says should only be developed as a last resort after all reasonable lower-grade alternatives have been exhausted. No such alternatives assessment has been carried out, rendering the allocation not justified (NPPF para 36(b)). Not Effective – Undeliverable. The site-specific wording admits "no increased surface water run-off will be permitted" and "flood risk mitigations will be needed downstream", yet no viable scheme is evidenced. The Markham Brook overbridge is unfunded, crosses third-party land, and relies on the equally undeliverable Pill Green allocation (600 homes). IDP Oct 2025 (§8.3) confirms flood-risk management and J19 upgrades are high-risk and unfunded.	Delete Land at Pill Road (HE20492) from Schedule 1 and the proposals map. Revert to the July 2024 spatial strategy under which this land remained protected Green Belt with no strategic allocation.		ALC Defra MAGIC Pill Sites Grades 1 and 2 Dec2025.png Markham Brook Ancient Woodland and Priority Habitat Inventory.pdf

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					Inconsistent with National Policy & Legally Non-Compliant – Direct loss of irreplaceable habitat (para 193c), failure of sequential flood test (para 172-175), and breach of Green Belt policy (para 148). Duty to Cooperate failed: no joint work with Environment Agency on flood mitigation or Natural England on habitat protection.			
Land at Ham Green	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	The Parish Council objects to Land at Ham Green (HE20493) for 40 dwellings under LP4. Drop-in feedback was positive on location for parish needs (especially affordable homes), but unanimous concern over traffic buildup on narrow Perrett Way—residents fear it becoming a rat-run. Still undeliverable overall. Not Positively Prepared – Adds to LP4 overload, overriding Neighbourhood Plan cap despite local support for sensible siting. Not Justified – No evidence that this Green Belt site is “grey belt” or that exceptional circumstances exist (NPPF para 148). The requirement to compulsorily upgrade and extend the private Perrett Way as public highway has no landowner agreement, no costed scheme, and no viability assessment. Not Effective – Undeliverable. Perrett Way is a narrow private road serving existing homes; turning it into a through-route for 40+ new houses will create traffic, safety and privacy issues for current residents. No funding or delivery mechanism is identified for the upgrade or the 'proportionate contribution' to wider active travel routes. Cumulative impact with the other four LP4 sites remains unmodelled (NPPF para 116). Inconsistent with National Policy & Legally Non-Compliant – Breaches Green Belt policy (para 148) and risks infringing private property rights without due process.	Delete Land at Ham Green (HE20493) from Schedule 1 and the proposals map, if retained post-LP4 withdrawal, cap at 20–30 affordable homes with Perrett Way safeguards (no through-traffic)		

Name: Portishead **I.D:** 58360225

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Land at Tower Farm	No		No		Weston Big Wood is home to many. The ecological features will be impacted. BADGERS - The rural landscape which provides suitable foraging, self-building and commuting resources, badgers are likely to be present locally and could use this site for foraging and commuting, therefore could be impacted by development. BATS - The trees provide home for bats, grassland surrounding the woods provide valuable foraging resource. Light pollution from the housing development will eliminate the valuable foraging. BIRDS - The trees and adjacent habitats provide suitable bird nesting habitat. HEDGEHOG Due to the rural landscape, tree lines, woodland and grassland which will provide suitable foraging, commuting and sheltering resource, therefore hedgehogs will be impacted by this development. DOORMICE - The mature trees in this wood will link to the wider landscape through the ancient woodland and network of hedgehogs. Additional footfall and activity will affect vegetation and a potential for them to be affected by the development. REPTILES & AMPHIBIANS - The surrounding habitat could provide habitat for widespread reptiles and amphibian species, therefore there the housing development will have a negative impact. The proposed buffer zone to the woods will have high footfall and dog activity. Therefore, as a result of the housing development there would be a loss of good grassland for foraging animals.			

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					UK law has been significantly updated in England and Wales through the new Dogs (Protection of Livestock)(Amendment) bill to tackle attacks on livestock, the development on Tower Farm would destroy valuable Green Belt and reduce dog walking areas further. The road to accomodate the new development is showing as The Downs, this road is highly congested at peak times, the new development traffic would raise safety concerns for the school children attending Highdown School which will also increase in numbers. The roads in this area are not suitable for the volume of traffic the new development will create and cause misery to the residents in The Deans and The Downs. No building should take place on the Green Belt when suitable Brown sites are available within Portishead and have been identified. NSC should be looking to protect our Green Belt and Green spaces for all to enjoy especially our ancient wood. Do not believe this is a sensible option to build on Tower Farm, can not see how the houses would be affordable for 1st time buyers due to the area. Brown sites at the bottom of Portishead can accomodate affordable housing with scope for high rise buildings as built on the Marina. High Rise on Tower Farm would impact on Weston Big Wood.			

Name: Portishead Town Council **I.D:** 4113729

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SP7: Green Belt	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Legal compliance and Duty to Cooperate To be legally compliant the local plan must meet a number of procedural tests. Portishead Town Council (PTC) consider that policy SP7 has not been informed by full and effective cross border discussions regarding housing need and the sustainable location of new development. PTC has reviewed the duty to cooperate statement and considers that the relationship with Bristol and Bath to be unclear in terms of meeting housing needs. The statement explains that the plan area is strongly influenced by the adjacent larger urban areas and whilst it states that each authority agreed to meet their own housing need within their own boundaries, it is unclear how each strategy and approach to housing interacts. Soundness To be considered ‘sound’ the North Somerset Local Plan (NSLP) must be positively prepared, justified, effective and consistent with national policy. PTC consider that policy SP7 is not sound for the following reasons: Positively prepared To meet this requirement, the NSLP should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, consistent with achieving sustainable development. This assessment should also be informed by agreements with other authorities, so that unmet needs from neighbouring areas are accommodated where it is practical to do so and consistent with achieving sustainable development. Page 32 of the draft NSLP explains that the minimum number of new dwellings that the council is required to plan for over the plan period is 23,700, however the plan proposes 24,495. This is in excess of the level identified by the Government. PTC acknowledges that there is a requirement for significant levels of housing to be planned for. However, the strategy must be consistent with achieving sustainable development. It is stated within the draft NSLP that land must be released from the Green Belt in order to deliver development within sustainable locations, however no consideration appears to have been given to the implications of planning for a higher level of housing development and the resulting need for more Green Belt deletions. Furthermore, as detailed within the PTC response to policy SP8 it is explained that	Amend policy SP7 to remove reference to Tower Farm, Portishead and Black Rock, Portishead – therefore retaining these two sites within the Green Belt.		Response for policy LP5 - why policy is not sound DRAFT 251210.docx

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					Portishead not a sustainable location for the level of growth proposed. It is clear, therefore that the housing requirement is not an objective assessment of development needs and therefore not positively prepared. Justified To meet this requirement, the NSLP should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate, robust and credible evidence. The NSLP should show how its policies and proposals help to ensure that the social, environmental, economic and resource objectives of sustainability will be achieved. In addition to their location within the Green Belt, the Tower Farm and Black Rock sites have a strategic ecological role in protecting the unique environment of Weston Big Wood (SSSI) and the Gordano Valley strategic green corridor. PTC submits that the approach to the proposed removal of the sites from the Green Belt is not fully justified as it has not fully considered all reasonable alternatives particularly with regard to sites which are less environmentally sensitive, neither has the approach considered the impact of increasing density levels on other more sustainable sites, furthermore, consideration does not appear to have been given to the reasons for the designation of the current Green Belt. These matters are explained in more detail below. Alternative sites: Wyndham Way is an example of the consideration of an alternative sites . This contains a 1.1 hectare “green field” which is effectively wasteland and has been earmarked for commercial development for many years, but no plans have ever been brought forward because of lack of viability. The vision of the Wyndham Way area is for a mixed housing and commercial development which would bring more jobs to Portishead and therefore prevent it becoming purely a commuter town. The site is near to the new railway station which is due to open in 2028. The allocation of the site for mixed residential and commercial development will increase the probability of the site being developed as the first phase of the Wyndham Way area vision/Town Centre regeneration. Another site which should be allocated is Land South of Clevedon Road. This was included as a site reference HE20488 in the 2023 NSC Local Plan draft but is not within the current draft plan, PTC understands that this is because the Environment Agency has reclassified the land is being in the flood plain. It is considered that further investigation is required regarding flood risk on this site - it is on a small ridge overlooking the Somerset Levels and is in fact on higher ground than most of the land developed in Portishead over the last 25 years. The 2023 proposal was for 80 homes on this 2.67 Hectare Green Belt site, mostly larger Executive style homes. It should be noted that the proposal for executive homes was in conflict with the Portishead Housing Needs Assessment carried out by AECOM for the Portishead Neighbourhood Plan - which highlighted the need for affordable and smaller dwelling units. This site is in a sustainable location, very close to the local Secondary school and a short flat walk to Portishead High Street. It is submitted that it should be included within the NSLP and classified as a suburban or urban site and using national housing density guidelines the 2.67 acre site could accommodate 250 to 500 dwellings which would help to reduce any potential need for Green Belt deletions in unsustainable locations. PTC considers that the NSLP should also include two further sites in Portishead: • Planning permission was granted in 2017 for 33 homes at a site in Portishead between Wyndham Way and Cheviot Meadow (17/P/1229/FUL). These were not built, and permission was later granted for a care home there, but that has also not been built and the site is for sale again. • Land is also for sale next to The Poacher public house, with an indicative 8 homes. Density PTC consider that a number of sites should have the proposed density reassessed. In the			

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					previous iteration of the draft NSLP the Wyndham Way site in Portishead was increased from 485 to 785 homes, something that was suggested by PTC as this approach would deliver sustainable development particularly as it is a brownfield and is within, rather than on the edge of the town. Only one other significant proposed site in North Somerset saw an increase in its allocation between the previous and current draft. The Castlewood site in Clevedon is owned by North Somerset Council and has an allocation of only 120 homes. It is a sustainable site with an area of 3.37 hectares with a flat walk to the High Street, served by several bus services (X5, X6, X7/X7a, X10 and X11 – both local and Bristol services). PTC consider that as a result of the location and characteristics the density should be increased – accommodating between 300 to 600 homes rather than the 120 currently proposed. Several other proposed allocations across North Somerset (at least 23) are clearly, from their descriptions within the draft plan are brownfield sites. If 300 homes can be added to Wyndham Way by increasing the density, it is submitted that this approach could be taken elsewhere, removing the need to develop land within the Green Belt. Previous Green Belt Designation The Green Belt designation of Portishead Down, which included the Tower Farm and Black Rock sites was tested in 1988 as part of the South West Avon Green Belt Local Plan which resulted in a planning enquiry (See Report by County of Avon Planning, Highways and Transport Committee 20th June 1988) The Planning inspector recommend an increase in the area of Green Belt to include two areas on the Northern boundary of the Tower Farm site resulting in all parts of both the Tower Farm and Black Rock sites being designated as Green Belt. Regarding Portishead Down, the report states “The inclusion of this land in the Green Belt conforms with the Structure Plan. It is an area of open land on Portishead Down which should remain open. The boundary would form an acceptable Green belt boundary protecting not only the character of this part of Portishead Down but also the setting of both the Gordano Valley and the town of Portishead. The remainder of Portishead Down to the South West is in the designated Green Belt as an area of the land which should remain open in the long-term” The report goes on to say that “The deposited Local Plan contains this Policy which states WITHIN THOSE AREAS DESIGNATED ON THE PROPOSALS MAP, DEVELOPMENT WILL NOT NORMALLY BE PERMITTED EXCEPT IN VERY SPECIAL CIRCUMSTANCES FOR PURPOSES OTHER THAN AGRICULTURE, FORESTRY AND OUTDOOR RECREATION. These matters remain fully relevant today. The sites protect the character of Portishead Down and the setting of both the Gordano Valley and the town. PTC contends that the special and relatively late designation of some of this land has not been properly considered by the NSC Green Belt assessment and therefore Policy SP7. It is submitted that the proposed removal of the Tower Farm and Black Rock sites from the Green Belt is not justified. Consistent with national policy To meet this requirement, the local plan should enable the delivery of sustainable development in accordance with the NPPF. Section 145 of the NPPF is clear that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Section 146 explains that exceptional circumstances include where an authority cannot meet its identified need for homes, commercial or other development through other means. Section 147 states that before concluding that exceptional circumstances exist to justify			

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					changes to Green Belt boundaries, the strategic policy making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. Reference is made to the need for the strategy to: a) make as much use as possible of suitable brownfield sites and underutilised land; b) optimise the density of development - including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and c) have been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development. PTC submit that the NSLP and its associated evidence base does not demonstrate exceptional circumstances, in particular that: • an alternative spatial distribution would reduce the need for Green Belt deletions in Portishead, delivering more sustainable development; • a reduction in the overall housing number, to accord with those identified by the government's standard method for calculating housing need; • alternative, more sustainable sites are available in the town; • density could be increased on other more sustainable proposed housing sites; and • lack of clarity regarding the duty to cooperate. The proposed Green Belt deletions within policy SP7 are therefore not consistent with national policy.			
SP8: Housing	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Legal compliance and Duty to Cooperate To be legally compliant the local plan must meet a number of procedural tests. Portishead Town Council (PTC) consider that policy SP8 has not been informed by full and effective cross border discussions regarding housing need and the sustainable location of new development. PTC has reviewed the duty to cooperate statement and considers that the relationship with Bristol and Bath to be unclear in terms of meeting housing needs. The statement explains that the plan area is strongly influenced by the adjacent larger urban areas and whilst it states that each authority agreed to meet their own housing need within their own boundaries, it is unclear how each strategy and approach to housing interacts. Soundness To be considered 'sound' the North Somerset Local Plan (NSLP) must be positively prepared, justified, effective and consistent with national policy. PTC consider that policy SP8 is not sound for the following reasons: Positively prepared To meet this requirement, the NSLP should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, consistent with achieving sustainable development. This assessment should also be informed by agreements with other authorities, so that unmet needs from neighbouring areas are accommodated where it is practical to do so and consistent with achieving sustainable development. Page 32 of the draft NSLP explains that the minimum number of new dwellings that the council is required to plan for over the plan period is 23,700, however the plan proposes 24,495. This is in excess of the level identified by the Government. PTC acknowledges that there is a requirement for significant levels of housing to be planned for. However, the strategy must be consistent with achieving sustainable development. It is considered that the proposed approach, to distribute 7% of the housing supply within Portishead would not deliver sustainable development. New housing development should be located within towns where occupants of the new housing would have greater access to services and facilities, thereby delivering sustainable development. Justified To meet this requirement, the NSLP should be the most appropriate strategy, when	Amend policy SP8 to reduce the proportion of housing supply proposed for Portishead to better reflect the level of services and infrastructure capacity		Response for policy SP8 - why policy is not sound DRAFT 251210.docx

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					considered against the reasonable alternatives, based on proportionate, robust and credible evidence. The draft NSLP is clear that the impact of distributing 7% of the housing supply within Portishead would result in the need for Green Belt deletions. As explained within the submission for policy SP7, this is disputed by PTC. Furthermore, the level of development and proposed Tower Farm and Black Rock sites would have a significant effect on the natural environment and are not sustainable locations for future development, as detailed within the submission for policy LP5. Given these significant constraints, the approach to the spatial distribution is not justified. There are at least 23 brownfield sites across North Somerset that could accommodate higher densities and are more sustainable locations with less environmental constraints. PTC consider the approach to the distribution of housing is not fully justified as it has not fully considered all reasonable alternatives particularly with regard to settlements which are less environmentally constrained. Consistent with national policy To meet this requirement, the local plan should enable the delivery of sustainable development in accordance with the NPPF. Section 11 of the NPPF requires development plans to apply a presumption in favour of sustainable development. It explains that for plan making: a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects; b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. As detailed above, PTC submit that locating 7% of the housing supply within Portishead would not promote a sustainable pattern of development and the impact of the proposed development on the rich natural environment. The proposed distribution of housing development for Portishead within policy SP8 is therefore not consistent with national policy.			
Policy LP5: Housing, employment and mixed use allocations	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	(Full formatted response attached including charts and images) Policy LP5 – Housing and employment allocations Legal compliance and Duty to Cooperate As explained in response to policies SP7 and SP8 Portishead Town Council (PTC) consider that the draft local plan has not been informed by full and effective cross border discussions regarding housing need and the sustainable location of new development. PTC has reviewed the duty to cooperate statement and considers that the relationship with Bristol and Bath to be unclear in terms of meeting housing needs. The statement explains that the plan area is strongly influenced by the adjacent larger urban areas and whilst it states that each authority agreed to meet their own housing need within their own boundaries, it is unclear how each strategy and approach to housing interacts. Soundness	Removal of Land at Tower Farm and Black Rock, north of Clevedon Road as housing allocations and retention of these sites within the Green Belt PTC support a reasonable alternative to the proposed Local Plan whereby each North Somerset town or village conducts a community-led improvement plan of key sites, including underused, vacant, dilapidated and locally preferred brownfield and greenfield sites. The target allocation of homes for each area will remain, however the type, location and arrangement can be designed to benefit the local		Response for policy LP5 - why policy is not sound DRAFT 251210.docx Gordano Valley The future of Wildlife.pdf gordano-valley-ecological-development-strategy-report.pdf

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					To be considered ‘sound’ the North Somerset Local Plan (NSLP) must be positively prepared, justified, effective and consistent with national policy. PTC consider that policy LP5 is not sound for the following reasons: Positively prepared To meet this requirement, the NSLP should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, consistent with achieving sustainable development. This approach should also be informed by agreements with other authorities, so that unmet needs from neighbouring areas are accommodated where it is practical to do so and consistent with achieving sustainable development. Page 32 of the draft NSLP explains that the minimum number of new dwellings that the council is required to plan for over the plan period is 23,700, however the plan proposes 24,495. This is in excess of the level identified by the Government. PTC acknowledges that there is a requirement for significant levels of housing to be planned for. However, the strategy must be consistent with achieving sustainable development. It is considered that the proposed approach, to distribute 7% of the housing supply within Portishead would not deliver sustainable development. New housing development should be located within towns where occupants of the new housing would have greater access to services and facilities, thereby delivering sustainable development. Justified To meet this requirement, the NSLP should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate, robust and credible evidence. Given the above, PTC contends that two specific sites in Portishead “Tower Farm” and “Black Rock, north of Clevedon Road” do not conform to an approach that is the most appropriate strategy. PTC consider that these sites are not justified as the most appropriate locations for housing development and should not be released from the Green Belt. The key concerns relate to the environmental impact of the site on the adjacent Weston Big Wood Site of Special Scientific Interest and Gordano Valley Strategic Green Corridor, the role of the sites as part of the Green Belt, landscape impacts, sustainability of the site, access, and highway safety. Land at Tower Farm The site has been within the Green Belt since 1988. The ecological importance of the Gordano Valley is well established. The Strategic Green corridor runs all the way from the Severn Estuary through Portbury Wharf Nature Reserve, along the Gordano valley and through to the Somerset Levels and the Mendips. Much of it lies at or near sea level and is shaped by historic drainage channels (“rhynes”), creating a rich mosaic of habitats. Its limestone escarpments and Mendip outcrops support a diversity increasingly threatened by expanding development. The Green Belt designation of Portishead Down including the Tower Farm and Black Rock sites was tested in 1988 as part of the South West Avon Green Belt Local Plan which resulted in a planning enquiry (See Report by County of Avon Planning, Highways and Transport Committee 20th June 1988) The Planning inspector recommend an increase in the area of Green Belt to include two areas on the Northern boundary of the Tower Farm site resulting in all parts of both the Tower Farm and Black Rock sites being designated as Green Belt. Regarding Portishead Down, the report states “The inclusion of this land in the Green Belt conforms with the Structure Plan. It is an area of open land on Portishead Down which should remain open. The boundary would form an acceptable Green belt boundary protecting not only the character of this part of Portishead Down but also the setting of both the Gordano	population. The construction methods are to be low impact, local and energy efficient. The benefits of this approach would be improvements in community health, local jobs, reduced loneliness, economic prosperity, sustainable travel routes, better living conditions, older residents remain in their community, kids have safe places to play, nature recovery and reduced anti-social behaviour.		

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					Valley and the town of Portishead. The remainder of Portishead Down to the South West is in the designated Green Belt as an area of the land which should remain open in the long-term” The report goes on to say that “The deposited Local Plan contains this Policy which states WITHIN THOSE AREAS DESIGNATED ON THE PROPOSALS MAP, DEVELOPMENT WILL NOT NORMALLY BE PERMITTED EXCEPT IN VERY SPECIAL CIRCUMSTANCES FOR PURPOSES OTHER THAN AGRICULTURE, FORESTRY AND OUTDOOR RECREATION. These matters remain fully relevant today. The sites protect the character of Portishead Down and the setting of both the Gordano Valley and the town. Weston Big Wood SSSI is owned and managed by Avon Wildlife Trust. It is considered one of the most valued landscapes and most important biodiversity sites in North Somerset. Its unimproved grassland, hedgerows, shelterbelts and trees provide essential wildlife corridors linking the wood with the wider valley. The SSSI is dominated by oak, hazel, ash and elm, it holds uncommon species such as small-leaved lime, wild service tree, rock whitebeam, herb paris, birds nest orchid, common toothwort and purple gromwell. Spring ground flora is exceptionally rich and includes bluebells, violets, wild garlic, wood anemone and lesser celandine. The wood also supports notable fungi, numerous birds of prey (buzzards, red kites, peregrine falcons) owls, roosting bats, deer and badgers. Natural succession has expanded the woodland fringe beyond its official boundary, providing vital habitat for red-listed endangered birds such as linnet. All surrounding land is Green Belt, and its role is reinforced by North Somerset’s Green Infrastructure Strategy (2021). PTC consider that even minor development on the edge of the SSSI would erode biodiversity and damage key views and the setting and character of the town. Nearby development would also increase footfall in the woods, as well as affect wildlife via noise and light pollution. There have been two major studies on the area. The first was a major World Wildlife Fund/ Avon Wildlife Trust commissioned PhD study in the 1980s (“Gordano Valley: The Future for Wildlife”) https://www.portishead.gov.uk/uploads/gordano-valley-ecological-study.pdf?v=1763999384. This set a biodiversity baseline and warned even then of species loss. Its core message: the entire valley is an interconnected ecological unit whose habitats are mutually dependent and cannot be protected piecemeal. Development anywhere in this system disrupts the whole. A 2023 updated study of the area commissioned by Portishead Town Council https://www.portishead.gov.uk/uploads/gordano-valley-ecological-development-strategy-report.pdf?v=1741102465 found further decline, including severe recreational damage to Weston Big Wood during the Covid period. This provided an indicator of how intensified human pressure from developments like Tower Farm or Black Rock would be ecologically devastating. It identified the Gordano Valley as the region’s most important wet meadow and wetland bird site and stressed the need to reconnect fragmented habitats using Biodiversity Net Gain metrics. Mapping shows Black Rock and Tower Farm sites lying squarely within the “Strategic Development Avoidance Polygon,” with high bat activity north and south of the wood. The map below shows the proposed development (in red) and all nearby SSSIs (in blue: Weston Big Wood, Nightingale Valley, Weston in Gordano, Gordano Valley, Walton Common and Court Hill), demonstrating how they act to protect a vital nature corridor, of which Tower Farm is currently a part. PTC consider that development at Tower Farm would damage not only the ancient woodland but the entire valley system it anchors. The long-standing scientific consensus is clear: this landscape’s interconnected habitats make it uniquely valuable—and uniquely vulnerable. Given the weight of evidence of the high ecological benefit of the area around Weston Big Wood, Nightingale Valley and the Gordano Valley proven over more than half a century PTC			

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					submit that the Tower Farm site is not suitable for development. Local naturalist expert, Chris Sperring MBE, states “Footfall pressure on Weston Big Wood is happening now and is already fragmenting the wood. The Wood will simply be unable to function without the current buffer of surrounding fields. Where will human beings go to feel good if there is nowhere green to go, to immerse themselves in trees and bird song?” Development at Tower Farm along with that at Black Rock will stop the wood functioning and accelerate the loss of species in the wider Gordano Valley strategic green corridor. These losses have been witnessed and recorded by Chris and many others over the past half century. PTC considers that the evidence illustrates that the Tower Farm site plays a crucial role in providing a wildlife corridor linking Weston Big Wood, the Gordano Valley, Walton Common and other habitats. Given the sensitivity of the site, it is submitted that development would irrevocably damage valuable habitats over time, fragment the Gordano Valley ecological network and undermine nature recovery ambitions. In addition to Weston Big Wood, Tower Farm is also in close proximity to Nightingale Valley SSSI. In all likelihood the location shares the geological features that Nightingale Valley’s citation protects, and PTC submit it should be protected for the same reasons. Alongside the substantial ecological impacts, PTC has concerns regarding landscape impacts. The 2018 NSC Landscape Character Assessment noted that: “Visual impact of unsympathetic urban edges of Portishead and Clevedon and urban fringe influences within the immediately adjacent landscapes” as a threat to the Portishead Ridges and Combes, an area that includes the Tower Farm site. It also stated that “The landscape strategy for Portishead Ridges and Combes is to conserve the elements of strong character, the woodland, open grassland and pasture, the ancient hilltop sites and stone built settlement while enhancing area of declining condition and weaker character such as the urban edges and the gappy hedgerows”. It provided Landscape Guidelines including “Conserve the peaceful and secluded nature of the wooded landscape” and “Minimise the impact of the urban edge and the encroachment of visually intrusive land uses…”. This emphasises the landscape significance of the site. With regard to the sustainability of the site, PTC submits that it is not and cannot be made a sustainable location. Future residents would not be able to walk or cycle comfortably to and from the amenities at the centre of town/High Street due to the distance involved and the topography. This is as a result of the Tower Farm site being at the top of a long, steep hill. Many would not be able to walk or cycle there all. The table below illustrates the distances and the climb required to reach Tower Farm from various locations in the town: Miles Climb (ft) Folk Hall Town Council 1.2 335 Post Office 1.3 335 Somerset Hall 1.3 335 Aldi 1.3 338 Library 1.4 328 Lake Grounds (Wheels & Skate Park) 1.4 335 Gordano Secondary School 1.4 335 Nearest GP practice: Portishead Medical Group 1.4 338 Sainsburys 1.6 351 Lidl 1.6 331 Parish Wharf Leisure Centre 1.6 331 Waitrose Portishead Football Club 1.7 344 Portishead Station (when built) 1.9 338 There is very little in terms of shops, bars, restaurants, services or employment within walking distance of the Tower Farm site. Bus access would only be the X4 and occasionally			

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					the X10 that can be caught from Down Road – a fair, hilly walk from a lot of the proposed dwellings. As a result, almost everyone living at the site would need to drive - increasing congestion and emissions, and worsening air quality and public health. The Tower Farm development would be in breach of NSC's draft Local Plan Policy DP17, which states that "All residential development should be within reasonable distance of a direct and frequent bus service providing access to a good range of facilities, services and jobs via a direct, safe and attractive pedestrian route," and that "In terms of locating development within a 'reasonable distance' this means a maximum of approximately 400 metre walking radius of a bus stop with a service frequency as identified below (every 30 minutes)." The middle of the development would however be about 650 metres walk (uphill) to the nearest bus stop on Down Road. Some homes would be even further away than that, approximately 800 metres away. It should also be noted that this development would be in breach of NSC draft Local Plan Policy DP14, which states that "Development likely to have a severe residual cumulative impact on transport routes, traffic congestion or on the character and function of the surrounding area, will only be permitted where acceptable mitigation measures are delivered", as such mitigation cannot be delivered. This section also states that "the effect of additional traffic on the surrounding road system must be taken into account such as where development introduces traffic of excessive volume, size or weight into... residential areas. Where there is a detrimental impact and no acceptable countermeasures are possible, planning permission will be refused." PTC submits that just because the Tower Farm site is on the edge of Portishead, it should not be assumed it is a sustainable development site. Other locations in the town would be much more sustainable and better placed to take advantage of public transport, both new and existing, such as Old Mill Road/Wyndham Way. With regards access to the site, PTC consider that a suitable access could not be provided. Access would be via The Downs. This is a cul-de-sac with further cul-de-sacs leading off it. It is also right next to High Down School, the whole area around which is already extremely congested and chaotic at drop-off/pick-up times despite numerous campaigns to reduce car use. The map below shows the typical extent of parking at these times (marked in red). Based on the average in the South West of 1.37 cars per household that would be an extra 548 cars, and a great many additional vehicle movements. It would become extremely dangerous for the primary school children to cross the roads to get to school, as it will for the many toddlers and children in pushchairs accompanying them and their parents. It would be an accident waiting to happen. It is therefore considered that safe and suitable access to the site cannot be achieved. Tower Road, The Downs and Down Road all regularly become gridlocked at times already. Increased traffic, both during construction and afterwards, will make this significantly worse. There will also be increased traffic elsewhere in and around the town, for example Avon Way, Combe Road, High Street, Cabstand, and the Gordano roundabout as a result of people having to drive to and from Tower Farm, for example for work. The Local Plan Transport Assessment document suggests that there would be an improvement to the current levels of congestion, even with development, if mitigation is put in place, but it is unclear what mitigation, other than the railway, is proposed. Also, the document uses a figure of 485 homes at Wyndham in one section and 785 in another, so its accuracy should be called into question. PTC submits that the impacts on the transport network cannot be mitigated, and a more sustainable site for development should be found.			

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					There are no provisions in the latest version of the Plan to improve transport around Down Road, The Downs, The Deans and Tower Road. “Active travel connections to The Downs, St Mary’s Road/Wetlands Lane” are mentioned but will achieve nothing – they don’t help anyone get to anywhere other than potentially Gordano School. Any enhancement of the existing footpaths would also require the further destruction of green space and involve work on land owned by others. Furthermore, consideration must be given to the transport impacts of the creation of an additional school/or extending the existing High Down School. Expanding school places at the top end of Portishead when most of the children needing places will be at the bottom (i.e. 785 homes at Wyndham Way) is rehashing exactly the same arguments as the last time this was proposed, when NSC accepted that it was not a viable idea. Car journeys would rise exponentially, creating traffic jams all over the town. We would not see the impact “cost effectively mitigated to an acceptable degree” – this is actually making things worse. PTC questions the deliverability of this site. It is clear that PTC strongly object to the proposed allocation. Should the site remain within the local plan PTC submit that given its significant ecological constraints and the other issues identified as part of this representation, PTC would expect the draft local plan to include a detailed policy for the site setting out the key requirements to be met before development could take place. It is PTC view that the only way to create reasonable access to the site would be to construct a new road around or through the Weston Big Wood (SSSI) effectively fragmenting and destroying it. Housing density would need to be low in order to protect the local environment. Given the ecological sensitivity of the site, PTC believe it is impossible to quantify the amount of Biodiversity Net Gain Credits that would be needed to “mitigate” the short- and long-term damage to Weston Big Wood, its surrounding ecosystem and the reduced wellbeing of the people that enjoy the area. Instead, PTC recommends that instead of development, the Tower Farm Site should be allocated as an area to receive BNG credits to help repair the ecological damage created by humans over the last 50 years or more. It is impossible to mitigate the loss of an ancient woodland. Once it is gone it is gone. Black Rock, north of Clevedon Road The Black Rock site lies on the northern flanks of the Gordano Valley on the edges of Portishead, within the Green Belt. As previously explained, the Gordano Valley plays a significant geographical feature in the landscape of Somerset, stretching as it does from the Severn Estuary through to the Mendips and Somerset Levels. Its Green Belt designation was re-confirmed in 1988 as part of the South West Avon Green Belt Local Plan which resulted in a planning enquiry (See Report by County of Avon Planning, Highways and Transport Committee 20th June 1988) The site forms a natural buffer to Weston Big Wood SSSI and comprises unimproved and improved grassland, hedgerows, shelterbelts (which act as windbreaks) and trees. These serve as vital wildlife links with the surrounding Gordano Valley. PTC submits that even small amounts of development around the fringes of the woodland would significantly impact on the biodiversity of the area as well as the visual appearance of the wood from the valley. The fields are in pasture predominately year in year out used for grazing. Black Rock together with Tower Farm plays a crucial role in providing a wildlife corridor linking Weston Big Wood, the Gordano Valley, Walton Common and other habitats. PTC submit that the development of the site would irrevocably damage valuable habitats over time, fragment the Gordano Valley ecological network and undermine nature recovery ambitions. Development of the site would fail to promote the conservation, restoration and enhancement of priority habitats, ecological networks and protection of priority species.			

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					Many of the ecological arguments for protecting the Black Rock site are the same as for Tower Farm so these are not repeated below. However, in addition to Weston Big Wood, Black Rock is also in close proximity to Weston in Gordano SSSI. In all likelihood the location shares the geological features that Weston in Gordano's citation protects and perhaps should be protected itself for the same reasons. The map below shows the proposed allocated site (in red) and all nearby SSSIs (Weston Big Wood, Weston in Gordano, Nightingale Valley, Gordano Valley, Walton Common and Court Hill), demonstrating how they act to protect a vital nature corridor, of which Black Rock is currently a part. With regard to landscape impact, the council's Landscape sensitivity Assessment states "Land to the south-west of the town, is gently sloping and Valley Road forms a strong, vegetated edge. In some locations, there is a distinctive change in character from an urban to a rural landscape on either side of this road and the visual prominence of land beyond is generally high. In addition, the Nightingale Valley SSSI and Middle Hill Common LNR are located to the south of this road. Owing to the above, this land is of high sensitivity." The 2018 NSC Landscape Character Assessment noted that "Visual impact of unsympathetic urban edges of Portishead and Clevedon and urban fringe influences within the immediately adjacent landscapes" as a threat to the Portishead Ridges and Combes, an area that includes the Black Rock site. It also stated that "The landscape strategy for Portishead Ridges and Combes is to conserve the elements of strong character, the woodland, open grassland and pasture, the ancient hilltop sites and stone built settlement while enhancing area of declining condition and weaker character such as the urban edges and the gappy hedgerows". It provided Landscape Guidelines including "Conserve the peaceful and secluded nature of the wooded landscape" and "Minimise the impact of the urban edge and the encroachment of visually intrusive land uses…". This emphasises the landscape value of the site. With regards the accessibility of the site, Black Rock is not in the centre of Portishead, there is very little in terms of shops, bars, restaurants, services or employment within comfortable walking distance. Future residents would not be able to walk or cycle comfortably to and from the amenities at the centre of town/High Street due to the distance involved. For example, it would be a 28-minute walk to The Precinct, 29 minutes to the nearest supermarket, 35 minutes to Parish Wharf leisure centre, or a 38 minutes to the station (when built).(According to Google Maps.) There are only bus stops for the X5 (Portishead to Weston) route nearby, not for the X4 or X10. The nearest X4 stop for residents wanting to travel to Bristol is a 27 minute walk away. Alternatively, future residents could catch 2 buses, but this would mean 2 fares, and therefore the majority of residents would no doubt drive instead. In addition, the last bus towards Portishead on weekdays is at approximately 7.35pm and from Portishead at about 8.10pm. On Saturdays this becomes 7.10 and 7.40, and the service does not run at all on Sundays or bank holidays (despite the Local Plan Transport Assessment document claiming that there is a Sunday X5 service). As a result, there would be a great many additional car journeys made, increasing congestion and emissions, and worsening air quality and public health. As noted above, the NSC Plan would require a contribution from the developer towards bus stop upgrades, but there is no mention of contributions for improvements to the bus service itself. The North Somerset Model Development Report mentions an increase in the frequency of the X5 service, but the Local Plan Transport Assessment proposes extending the service "to serve Parklands at West Wick Roundabout, Weston-Super-Mare". Making routes longer in this way will compromise reliability and make the service worse for residents, and the X5 route has only just been made more direct to provide a better service, following pressure from passengers. Also, the X5 route is currently subsidised, and with Government BSIP funding due to end next year, what is the future for this service			

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					The NSC Plan states “Connections required through the site to adjacent wider footway and cycle network, along with contribution to or delivery of section of Gordano Greenway.” The intention of the Gordano Greenway is to provide a cycle path between Portishead and Clevedon. However, there are many issues regarding land ownership and funding (in addition to a “contribution” from this developer) that would need to be resolved, throwing into doubt whether this is actually deliverable. The developer plan is to provide about 50 metres of cycleway, but this will lead straight onto a busy road which is not suitable for cycling. The additional 2 plus miles to build a safe cycle path to Clevedon would need substantial funding and the agreement of multiple landowners The developer also states, “This cycle/footway/bridleway must also connect to the new Metro West rail link to Bristol.” This is never going to be achievable however, given the location of the station on the opposite side of the town from the development and the existing roads, houses, shops, schools, public amenities and other buildings in place. There does not appear to be a Transport Sustainability and Access Strategy to measure the effects of this potential development on traffic in the vicinity and within the town. The reopening of the station in Portishead will do little in terms of “offering a genuine choice of transport modes” for the Black Rock area. As noted above, it will be a 38-minute walk, nearly two miles away, so residents would have to either drive or catch the X5 bus and change / pay a second fare to catch the train into Bristol. PTC submit that just because Black Rock would be on the edge of Portishead does not mean that it is sustainable as a development site. Other locations in the town would be much more sustainable and better placed to take advantage of public transport, both new and existing, such as Old Mill Road/Wyndham Way. PTC questions the deliverability of this site. It is clear that PTC strongly object to the proposed allocation. Should the site remain within the local plan, PTC submit that given its significant ecological constraints and other issues identified within this representation, PTC would expect the draft local plan to include a detailed policy for the site setting hout the key requirements to be met before development could take place. PTC consider Housing density would need to be low in order to protect the local environment. It is impossible to quantify the amount of Biodiversity Net Gain Credits that would be needed to “mitigate” the short- and long-term damage to Weston Big Wood, its surrounding ecosystem and the reduced wellbeing of the people that enjoy the area. Instead, PTC recommends that instead of development, the Black Rock site should be allocated as an area to receive BNG credits to help repair the ecological damage created by humans over the last 50 years or more. The Black Rock proposal causes unavoidable and significant ecological, landscape and policy harm. It conflicts with national and local planning policy, fails statutory biodiversity protections, threatens irreplaceable habitats and undermines decades of environmental stewardship across the Gordano Valley. It will reduce the quality of life for human beings living in the area. It is impossible to mitigate the loss of an ancient woodland. Once it is gone it is gone The Black Rock site should be removed from the Local Plan. Consistent with national policy To meet this requirement, the local plan should enable the delivery of sustainable development in accordance with the NPPF. As detailed in response to the strategic approach, the council has not provided evidence to justify the approach to the distribution of housing development and the need for Green Belt deletions. Robust justification is a requirement of national guidance. Section 15 of the NPPF requires planning policies to contribute to and enhance the natural environment. This includes protecting and enhancing valued landscapes and sites of			

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					biological value in a manner commensurate with their statutory status. Development plans are required to identify, map and safeguard components of local wildlife rich habitats and wider ecological networks. Given the ecological and landscape value of the two sites, it is considered there is a clear conflict with section 15 of the NPPF. Although the proposed allocations lie adjacent to the existing settlement boundary, it is submitted that the locations are not sustainable. Section 9 of the NPPF states that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This includes seeking to facilitate access to high quality public transport. Whist it is acknowledged that Portishead does have services and facilities, it is submitted that given the distance from the proposed sites, future residents would have little option other than to travel by car. The proposed allocations therefore fail to meet the requirements of section 9 of the NPPF.			
Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	(Full formatted response including charts and images attached) Tower Farm NPPF S147 states that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph and whether the strategy: a) makes as much use as possible of suitable brownfield sites and underutilised land; b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport... Formal List of Objections in relation to NPPF S147 1. Failure to Optimise Density on Brownfield Sites Across North Somerset 1.1 The increase in density at Wyndham Way (from 485 to 785 homes) between the previous draft of the NSC Local Plan and this one, as suggested by Portishead Town Council, demonstrates that substantial additional capacity exists on brownfield land when properly assessed. 1.2 No comparable density uplift has been applied to other major sites in the NSC area. NSC provides no credible evidence that densities have been systematically reviewed, contrary to NPPF 147 and its own Green Belt Review claims. 1.3 At least 23 other brownfield sites in North Somerset could accommodate higher densities, reducing the need to release Green Belt land. 2. Under-Utilisation of Key Brownfield Sites 2.1 Castlewood, Clevedon (4.5 ha and NSC Council-owned) is allocated only 120 homes, despite being a highly sustainable site with excellent public transport. National density guidelines indicate potential for 400–800 homes. 2.2 Optimising Castlewood alone would reduce pressure on ecologically sensitive locations such as Tower Farm and help correct the severe imbalance in housing numbers across settlements (e.g., Clevedon: 258 vs Weston: 6,084 vs. Portishead: 1,347 vs. Backwell 1,683. 2.3 NSC also has a duty to maximise the value of sites it owns—something it has failed to do at Castlewood. 3. Omission of Viable Brownfield Sites in Portishead 3.1 At least two deliverable brownfield sites are missing from the Plan: • Land between Wyndham Way and Cheviot Meadow (previous permissions for 33 homes; currently for sale) (17/P/1229/FUL) • Land adjacent to The Poacher (c. 8 homes) 3.2 NSC must identify all such sites before proposing Green Belt release. 4. Misclassification and Missed Opportunity at Wyndham Way 4.1 The so-called “1.1 ha green field” within Wyndham Way is in reality derelict land long earmarked for commercial use but never viable if used solely for that purpose.. 4.2 Reclassifying it for mixed residential and commercial development would support the	Remove Land at Tower Farm as housing allocation from the NS Local Plan site allocations.		PTC Tower Farm reformatted 20251209.docx Gordano Valley The future of Wildlife.pdf gordano-valley-ecological-development-strategy-report.pdf

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					Town Centre/Wyndham Way regeneration vision, deliver jobs, 100 plus dwellings, and make full use of its proximity to the 2028 railway station. 4.3 Doing so would reduce pressure to build adjacent to the SSSI from development at Tower Farm. 5. Removal of a Sustainable Greenfield Site in Portishead Without Clear Justification 5.1 Land South of Clevedon Road (HE20488) was dropped following an Environment Agency flood plain reclassification, despite being on higher ground than much of modern Portishead. 5.2 The 2023 proposal for this site focused on executive homes, contradicting the AECOM's Housing Needs Assessment commissioned by the Portishead Neighbourhood Plan, which identifies need primarily for 2–3 bedroom affordable homes and no need at all for any more 4 bedroom houses. 5.3 Using national density guidance, this 2.67 ha site could accommodate 250–500 dwellings, avoiding the need for more damaging options such as Tower Farm. 6. Incorrect Assessment of Tower Farm and Green Belt Harm 6.1 Tower Farm lies within Green Belt designated in 1988 specifically to protect the ecological integrity of the Strategic Gordano Valley Green Corridor. 6.2 NSC's Green Belt assessment fails to reflect these unique circumstances, treating Tower Farm as ordinary Green Belt when it is exceptional in ecological and strategic significance. 7. NSC Has Not Met the NPPF Requirement to Exhaust All Reasonable Alternatives 7.1 NSC has not demonstrated that all brownfield and sustainable urban/suburban opportunities have been fully explored. 7.2 CPRE analysis confirms there is sufficient brownfield capacity nationally to meet housing targets—reinforcing that Green Belt release is not inevitable. 7.3 NSC therefore fails the test set out in NPPF 147, which requires exhausting all reasonable non–Green Belt options before altering Green Belt boundaries. --- NPPF S156 states that where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review, or on sites in the Green Belt subject to a planning application, the following contributions ('Golden Rules') should be made: ... b) necessary improvements to local or national infrastructure; and the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces Formal list of objections in relation to NPPFS156 1.0 There is nothing in the Draft Infrastructure Delivery Plan Schedule document in Portishead other than: a cycle lane to Clevedon; the railway line that has been used to justify every development in the town for the past 30 years so can't be described as "necessary improvements to local or national infrastructure" in response to the proposed loss of Green Belt land; and something vague about possibly building a new school. 2.0 There is also no "provision of new, or improvements to existing, green spaces" in the NSC Plan. 3.0 The developer's Vision Document includes plans to provide a small amount of additional land to and changes to Merlin Park (which is public land not owned by them), but shows a complete lack of understanding of the current area. Their plans would be out of keeping with the current use, and also assumes that the current/future owners of the existing land would want to make those changes. 4.0 This version of the Local Plan is developer led rather than community led and this has led to too much focus on "easy to develop" green belt sites at the expense of a full and proper consideration of "more difficult to develop" brown field and lower environment impact and more sustainable green field sites. It can therefore not be demonstrated that the Golden Rule for releasing land from the Green Belt for the provision of housing of "necessary improvements to local or national infrastructure; and the provision of new, or improvements to existing, green spaces that are			

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					accessible to the public" will be met, contrary to NPPF S156. --- NPPF S187 1. Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; c) … …minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs; … Background: Tower Farm lies immediately beside Weston Big Wood, an ancient woodland SSSI recognised as one of North Somerset's richest biodiversity sites, and close to the geological and ecological interest of Nightingale Valley SSSI. The surrounding unimproved grassland, hedgerows and shelterbelts form vital wildlife corridors linking the wood to the wider Gordano Valley. Weston Big Wood itself is a rare remnant of Ice-Age woodland, dominated by oak, hazel, ash and elm and supporting uncommon tree species such as small-leaved lime, wild service tree and rock whitebeam. Its exceptionally rich ground flora includes bluebells, wild garlic, violets, wood anemone and herb paris, alongside notable fungi. The woodland provides habitat for birds of prey including buzzards, red kites and peregrine falcons, as well as owls, roosting bats, deer and badgers, while its expanding woodland fringe supports red-listed species such as linnet. The wider Gordano Valley contains a mosaic of habitats—rhynes, saltmarsh, woodland, unimproved grassland, orchards, hedgerows, quarries and limestone outcrops—that together sustain butterflies, dragonflies, bats, wetland birds and diverse flora. Decades of ecological studies by WWF, Avon Wildlife Trust and Portishead Town Council emphasise that this is an interconnected ecological system whose species and habitats depend on maintaining uninterrupted wildlife corridors. Recent assessments show Weston Big Wood to be in unfavourable and declining condition, with increasing pressure from recreation and habitat fragmentation, and note high bat activity around Tower Farm and Black Rock. Geological features similar to those that underpin Nightingale Valley's SSSI designation are also likely to be present at Tower Farm, further underscoring the area's ecological and conservation importance. In addition to Weston Big Wood, Tower Farm is also in close proximity to Nightingale Valley SSSI. In all likelihood the location shares the geological features that Nightingale Valley's citation protects, and perhaps should be protected itself for the same reasons. Sources: World Wildlife Fund and Avon Wildlife Trust Biodiversity study PhD https://www.portishead.gov.uk/uploads/gordano-valley-ecological-study.pdf?v=1763999384; (1988) ; Portishead Town Council Commissioned update report: https://www.portishead.gov.uk/uploads/gordano-valley-ecological-development-strategy-report.pdf?v=1741102465 (2023) The map below shows the proposed development (in red) and all nearby SSSIs (in blue: Weston Big Wood, Nightingale Valley, Weston in Gordano, Gordano Valley, Walton Common and Court Hill), demonstrating how they act to protect a vital nature corridor, of which Tower Farm is currently a part. Formal list of objections in relation to NPPF S187			

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					1. Harm to SSSIs and Irreplaceable Habitats 1.1 Tower Farm directly adjoins Weston Big Wood SSSI and lies close to Nightingale Valley SSSI, both highly sensitive and legally protected sites. 1.2 Development would cause significant harm to these irreplaceable habitats through noise, light pollution, increased footfall and domestic predation. 1.3 Natural England, Avon Wildlife Trust and long-standing ecological studies confirm that ancient woodland ecosystems cannot be recreated or compensated for once damaged. Please see this link. avon-wildlife-trust-draft-response-to-north-somerset-local-plan-2041.pdf In their response to this consultation, AWT highlights that “Under DP35 of this draft Plan (Nature Conservation), it is clearly stated that “development within or in proximity to a Site of Special Scientific Interest (SSSI) or National Nature Reserve that is likely to have a direct or indirect adverse effect on its biodiversity or geological interest will not normally be permitted” 1.4 the most recent report (2023) on Weston Big Wood found severe recreational damage during the Covid period—an indicator of how intensified human pressure from developments like Tower Farm or Black Rock would be ecologically devastating. 2. Loss and Fragmentation of Ecological Networks 2.1 Tower Farm forms a critical wildlife corridor linking Weston Big Wood, the Gordano Valley, Walton Common and surrounding habitats. 2.2 Development would fragment the Gordano Valley ecological network, contrary to NPPF paragraphs 179, 187, 192 and 193. 2.3 Reliance on off-site mitigation or a narrow ecological buffer represents a reactive and wholly inadequate approach that fails to prevent ecological harm. 3. Conflict with Biodiversity Policy and Biodiversity Net Gain Requirements 3.1 The developer provides no credible method for achieving the required 10% Biodiversity Net Gain. 3.2 Evidence shows the proposal would result in a net loss of biodiversity over time due to its proximity to the ancient woodland boundary. 3.3 Ancient woodland and associated ecosystems cannot be offset through BNG credits or mitigation planting, as confirmed by the Woodland Trust and Avon Wildlife Trust. 3.4 The proposal fails to comply with Portishead Neighbourhood Plan Policy PEN4, which requires protection, sufficient buffering to protect wild-life corridors and enhancement of ecological networks. 4. Green Belt Harm 4.1 The site forms part of the long-established South West Avon Green Belt and the Gordano Valley Strategic Green Corridor. 4.2 All land surrounding Weston is Green Belt, reinforced by North Somerset’s Green Infrastructure Strategy (2021) and development would erode the Green Belt buffer between Portishead and Weston Big Wood, contrary to the purposes of 4.3 This location is among the least appropriate in North Somerset for any potential Green Belt release, given its proximity to two SSSIs and its high ecological sensitivity. 5. Landscape and Visual Harm 5.1 North Somerset’s Landscape Sensitivity Assessment identifies this area as “high sensitivity”, with a strong rural character that would be irreversibly damaged. 5.2 The wooded, secluded landscape of the Gordano Valley escarpment would be visually degraded by new urban edges. 5.3 Development conflicts with landscape guidelines requiring the conservation of woodland, open grassland, peaceful character and avoidance of intrusive urban encroachment. 6. Established Scientific Evidence Demonstrating Ecological Importance 6.1 Decades of research—including the WWF/Avon Wildlife Trust PhD study (1988) and the 2023 Portishead-commissioned ecological update—confirm the Gordano Valley is an interconnected ecological system that cannot be protected piecemeal. 6.2 Geological features linked to Nightingale Valley SSSI are likely present at Tower Farm, further raising its conservation importance. 7. Non-Compliance with National Planning Policy Framework (NPPF) 7.1 NPPF 187 – The proposal fails to protect or enhance valued landscapes, biodiversity, ecological networks or priority species. 7.2 NPPF 192 – The development does not safeguard wildlife-rich habitats or contribute to			

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					conservation, restoration or measurable biodiversity gain. 7.3 NPPF 193(a–c) – The development fails all three statutory biodiversity protection tests: • Significant biodiversity harm cannot be avoided or adequately mitigated. • Development likely to adversely affect an SSSI “should not normally be permitted”. • Irreplaceable habitats (ancient woodland) would be put at risk, with no exceptional justification. 8. Failure of Proposed Mitigation 8.1 The suggested £15m “No-Dig” and 50m “No Build” buffer is insufficient to protect ancient woodland from indirect impacts such as noise, light, recreation, hydrological change and predation. 8.2 On-site mitigation proposals cannot compensate for loss of semi-natural grassland and wildlife corridors that form part of the woodland ecosystem. 8.3 Local naturalist expert, Chris Sperring MBE, states “Footfall pressure on Weston Big Wood is happening now and is already fragmenting the wood. The Wood will simply be unable to function without the current buffer of surrounding fields. Where will human beings go to feel good if there is nowhere green to go, to immerse themselves in trees and bird song?” The developer proposals will stop the wood functioning and accelerate the loss of species in the wider Gordano Valley strategic green corridor. These losses have been witnessed and recorded by Chris and many others over the past half century. 9. Impact on the Wider SSSI Network 9.1 Tower Farm lies within a cluster of connected SSSIs (Weston Big Wood, Nightingale Valley, Gordano Valley, Walton Common, Court Hill). 9.2 The integrity of this network would be compromised, contrary to national policy requiring protection of the wider SSSI network, not just individual site boundaries. 10. Unsustainable Location 10.1 The site is not sustainably located and brings no benefits that outweigh the significant ecological and environmental harms. 10.2 Development pressure here would exacerbate recreational and ecological stress already documented in Weston Big Wood during recent years. A recent report https://www.theguardian.com/environment/2025/jul/10/britain-ancient-woodlands-failing-regenerate-forests-climate-drought-heat-disease-deer-hope-aoe has found that British ancient woodland is struggling to regenerate and is under threat. We should therefore not be allowing any development that threatens the health of Weston Big Wood, which this proposal does, and it “should be refused”. There are also not “wholly exceptional reasons” not to refuse development here. _____ Conclusion PTC questions the deliverability of this site. We would expect to have seen detailed Policy requirement on how to mitigate such an ecologically sensitive and unsustainable site but these are not evident in the NS Plan. In our view, the only way to create reasonable access to the site would be to construct a new road around or through the Weston Big Wood (SSSI) effectively fragmenting and destroying it. Housing density would need to be low in order to protect the local environment. It is impossible to quantify the amount of Biodiversity Net Gain Credits that would be needed to “mitigate” the short and long term damage to Weston Big Wood, its surrounding ecosystem and the reduced wellbeing of the people that enjoy the area. Instead, PTC recommends that instead of development, the Tower Farm Site should be allocated as an area to receive BNG credits to help repair the ecological damage created by humans over the last 50 years or more. The Tower Farm proposal causes unavoidable and significant ecological, landscape and policy harm. It conflicts with national and local planning policy, fails statutory biodiversity protections, threatens irreplaceable habitats and undermines decades of environmental			

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					stewardship across the Gordano Valley. It will reduce the quality of life for human beings living in the area. It is impossible to mitigate the loss of an ancient woodland. Once it is gone it is gone. The Tower Farm site should be removed from the Local Plan. --- NPPF S110 ... Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health... Tower Farm is not a sustainable location for residential development due to its distance from essential services and the steep topography that prevents most residents from comfortably walking or cycling to key destinations. The site sits at the top of a long, steep hill, making active travel impractical for many—particularly older people, families with children, and those with mobility issues. Although the developer claims that local facilities are within “reasonable walking distance” and that active travel is viable, the actual distances and climbs involved show the opposite. In practice, the site is significantly disconnected from Portishead’s main amenities, employment areas and transport links. Public transport provision is also inadequate. No bus service can enter the site itself, leaving residents reliant on the X4 and occasional X10 services, both reached only after a hilly walk and operating indirect routes to the High Street. The developer’s Transport Sustainability and Access Strategy significantly underestimates walking times and ignores both topography and existing congestion, especially around High Down School. As a result, nearly all residents would drive for daily activities, increasing traffic, emissions and air quality impacts. The distance to the proposed Portishead rail station—almost two miles—further undermines claims of sustainable travel and does not provide a realistic alternative to car use. Formal List of Objections 1. Failure to Meet Sustainability Requirements (NPPF S110) 1.1 Tower Farm cannot be made a sustainable location due to steep gradients and long walking distances to essential services, contrary to NPPF S110’s requirement that significant development be focused on locations that limit the need to travel. 1.2 Active travel options are unrealistic for most residents, undermining claims of walkability and sustainable access. 2. Inadequate Access to Local Amenities 2.1 Contrary to the developers’ claims, key facilities—including schools, shops, GP services, leisure centres and the High Street—are over a mile (see table below) away and require climbs of 300–350 ft, making walking or cycling impractical for large sections of the population. 2.2 The developer’s assertion that amenities are within a “reasonable walking distance” is demonstrably inaccurate. 2.3 Labelling a small retail cluster at Down Road as a “local centre” exaggerates its scale and importance. _____ Distances and Elevation Table Miles Climb (ft) Folk Hall Town Council 1.2 335 Post Office 1.3 335 Somerset Hall 1.3 335 Aldi 1.3 338 Library 1.4 328 Lake Grounds (Wheels & Skate Park) 1.4 335 Gordano Secondary School 1.4 335 Nearest GP practice: Portishead Medical Group 1.4 338 Sainsbury’s 1.6 351 Lidl 1.6 331			

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					Parish Wharf Leisure Centre 1.6 331 Waitrose Portishead Football Club 1.7 344 Portishead Station (when built) 1.9 338 _____ 3. Misrepresentation of Transport Accessibility 3.1 The developer's Transport Sustainability and Access Strategy significantly underestimates walking times and ignores the steep topography of Portishead. 3.2 Claims regarding cycling access to the future rail station are misleading; the station will be nearly two miles away and inaccessible for many users. 3.3 Suggestions that residents should mitigate access problems by purchasing e-bikes are unrealistic and discriminatory toward less affluent, older or mobility-impaired residents. 4. Insufficient Public Transport Provision 4.1 No bus route will directly serve the development; residents must walk uphill to reach the X4 or X10. 4.2 The X4 route through High Down and Bruton Avenue operates only one-way, taking 17 minutes to reach the High Street—far longer than by car. 4.3 This limited public transport offer will result in high car dependency. 5. Increased Traffic and Congestion 5.1 Daily car use will rise significantly, worsening congestion on already overburdened roads, particularly around High Down School during peak times. 5.2 The transport assessment fails to account for future pressures from planned expansions at High Down School or additional housing elsewhere in Portishead. 5.3 The Transport Sustainability and Access Strategy omits known local congestion issues and misrepresents the true accessibility of the site. 6. Excessive Dependence on Private Cars 6.1 Nearly all residents will have to drive for shopping, school, work, healthcare and leisure. 6.2 This conflicts with local and national policy objectives to reduce emissions, improve air quality and promote healthier lifestyles. _____ Conclusion The Tower Farm site demonstrably fails the sustainability tests required under NPPF S110. Its steep topography, long distances to amenities, inadequate public transport provision and misleading transport claims mean that development here would create a car-dependent community, worsen congestion and undermine local and national transport, health and environmental objectives. Planning permission should therefore be refused on sustainability and transport grounds. ---------- NPPF S115 In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: a) sustainable transport modes are prioritised…; b) safe and suitable access to the site can be achieved for all users; … and c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach. Background: Regarding b), access to a development at Tower Farm is proposed via The Downs. This is a cul-de-sac with further cul-de-sacs leading off it. It is also right next to High Down infants and Junior Schools, the whole area around which is already extremely congested and chaotic at drop-off/pick-up times despite numerous campaigns to reduce car use. The map below shows the typical extent of parking at these times (marked in red). Portishead Town Council regularly receive requests from residents for schemes to improve traffic safety and flow in			

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					this area (see Agenda item 8.2.2, Planning and Placemaking Cttee, August 2025 https://www.portishead.gov.uk/council-meetings?month=08&year=2025&submit=Go#item-2005053) Formal List of Objections – Transport, Access and Highway Safety 1. Non-Compliance with NPPF S110 (Unsustainable Location) 1.1 All sustainability concerns previously identified under NPPF S110 apply equally here. 1.2 Tower Farm's steep topography and long distances to services make sustainable travel impossible for most residents. 1.3 The development would create a car-dependent community, contrary to national policy requiring significant development to limit the need to travel. _____ 2. Unsafe and Unsuitable Access via The Downs 2.1 Access is proposed through The Downs, a cul-de-sac feeding multiple smaller cul-de-sacs, creating an inherently constrained network. 2.2 This road sits directly beside High Down School, an area already dangerously congested at school drop-off and pick-up times. 2.3 Introducing construction vehicles and traffic from 400 new homes (approx. 548 additional cars) would greatly increase risks to children, parents and pedestrians. 2.4 Safe and suitable access for all users cannot be achieved, contrary to NPPF requirements. _____ 3. Severe Worsening of Local Congestion 3.1 Tower Road, The Downs and Down Road already experience regular gridlock; development traffic would significantly worsen this. 3.2 Town-wide congestion—Avon Way, Combe Road, High Street, Cabstand, Gordano Roundabout—would also increase as residents must drive for all essential trips. 3.3 Increased traffic from future school expansions or a new school on-site has not been adequately assessed. _____ 4. Inaccurate and Misleading Transport Assessment 4.1 The Local Plan Transport Assessment is inconsistent, using both 485 and 785 dwellings for Wyndham Way, undermining its credibility. 4.2 It claims congestion will improve with mitigation, but no meaningful mitigation is identified apart from the railway almost 2 miles away. 4.3 The developer's Transport Sustainability and Access Strategy incorrectly states that 400 dwellings will not create severe residual impacts at Down Road/The Downs. _____ 5. Lack of Deliverable Mitigation Measures 5.1 The impacts on the transport network cannot be mitigated to an acceptable degree. 5.2 Proposed "active travel connections" offer no practical benefit; upgraded footpaths would destroy green space and require work on third-party land. 5.3 A "contribution to bus services" is meaningless, as the road network cannot physically accommodate bus access once the development is built. _____ 6. Railway Reopening Does Not Provide Sustainable Access 6.1 The developer repeatedly cites the railway as justification for development, despite the station being nearly two miles away. 6.2 Walking or cycling to the station is unrealistic for many residents due to steep gradients. 6.3 No credible plan exists for a shuttle bus; any such promise is vague and likely temporary based on the experience of bus services in Portishead which in recent years, have been regularly cut back, trialled and changed and are unable to survive without large public subsidyies. 6.4 The railway has already been used for decades to justify thousands of new homes elsewhere in Portishead, and can no longer be relied upon to support further car-dependent development at Tower Farm. _____ 7. Professional Industry Concern About Site Unsuitability			

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					7.1 Persimmon Homes Severn Valley has formally stated that Tower Farm is not suitable for development due to its impact on the local transport network. 7.2 They highlight that the site forces unnecessary traffic through the centre of Portishead and up steep access roads, and is far less sustainable than locations closer to main routes and the station. _____ 8. Non-Compliance with NPPF S115 8.1 Sustainable transport modes are not prioritised. 8.2 Safe and suitable access cannot be achieved for all users. 8.3 Significant impacts on capacity, congestion and highway safety cannot be mitigated cost-effectively. 8.4 Therefore, the proposal fails to meet the requirements of NPPF S115. _____ Conclusion The Tower Farm proposals would create unmanageable congestion, unsafe school-side access, and a car-dependent settlement fundamentally at odds with national transport policy. Key assessments rely on misleading or inaccurate information, and no viable mitigation exists. Planning permission should therefore be refused on transport, access and highway safety grounds. --- NPPF S110-112 The developer's own technical evidence (Vision Document and Transport Sustainability & Access Strategy) confirms several access constraints that cannot be overcome without significant adverse impact on the local highway network. Inadequate Access Strategy — Single Access Point The developer proposes one main vehicular access via The Downs and a second access limited to emergency, pedestrian and cycle use only via Tower Road (typically bollarded). This means the entire development of at least 400–500 homes would rely on a single functioning access point. The single access point proposed is contrary to best practice, introduces unnecessary risk for emergency response resilience, and does not provide "safe and suitable access for all users" as required by NPPF 110–112. The only alternative access routes are also not suitable: 1 - Via Tower Road - This has a narrower junction with Down Road than The Downs does. It could not have double-yellow lines added, as is proposed for The Downs, as there are houses on both sides all the way along. 2 - Via Valley Road - Valley Road already experiences road traffic accidents on a fairly regular basis and an additional access road onto Valley Road would be dangerous and further harm / restrict wildlife movement in the area of green belt surrounding the SSSI.			
Black Rock, north of Clevedon Road	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Black Rock NPPF S147 states that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph and whether the strategy: a) makes as much use as possible of suitable brownfield sites and underutilised land; b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density	Removal of Land at Black Rock, north of Clevedon Road as housing allocations from the NS Local Plan 2026-2041		Black Rock reformatted 20251209.docx Gordano Valley The future of Wildlife.pdf gordano-valley-ecological-development-strategy-report.pdf

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					standards in town and city centres and other locations well served by public transport... Formal List of Objections in relation to NPPF S147 1. Failure to Optimise Density on Brownfield Sites Across North Somerset 1.1 The increase in density at Wyndham Way (from 485 to 785 homes) between the initial draft and this one, as suggested by Portishead Town Council, demonstrates that substantial additional capacity exists on brownfield land when properly assessed. 1.2 No comparable density uplift has been applied to other major sites. NSC provides no credible evidence that densities have been systematically reviewed, contrary to NPPF 147 and its own Green Belt Review claims. 1.3 At least 23 other brownfield sites in North Somerset could accommodate higher densities, reducing the need to release Green Belt land. 2. Under-Utilisation of Key Brownfield Sites 2.1 Castlewood, Clevedon (4.5 ha and Council-owned) is allocated only 120 homes, despite being a highly sustainable site with excellent public transport. National density guidelines indicate potential for 400–800 homes. 2.2 Optimising Castlewood alone would reduce pressure on ecologically sensitive locations such as Black Rock and help correct the severe imbalance in housing numbers across settlements (e.g., Clevedon: 258 vs Weston: 6,084 vs. Portishead: 1,347 vs. Backwell 1,683. 2.3 NSC also has a duty to maximise the value of sites it owns—something it has failed to do at Castlewood. 3. Omission of Viable Brownfield Sites in Portishead 3.1 At least two deliverable brownfield sites are missing from the Plan: • Land between Wyndham Way and Cheviot Meadow (previous permissions for 33 homes; currently for sale) (17/P/1229/FUL) • Land adjacent to The Poacher (c. 8 homes) 3.2 NSC must identify all such sites before proposing Green Belt release. 4. Misclassification and Missed Opportunity at Wyndham Way 4.1 The so-called “1.1 ha green field” within Wyndham Way is in reality derelict land long earmarked for commercial use but never viable. 4.2 Reclassifying it for mixed residential and commercial development would support the Town Centre/Wyndham Way regeneration vision, deliver jobs, and make full use of its proximity to the 2028 railway station. 4.3 Doing so would reduce pressure to build adjacent to the SSSI from development at Black Rock. 5. Removal of a Sustainable Greenfield Site in Portishead Without Clear Justification 5.1 Land South of Clevedon Road (HE20488) was dropped following an Environment Agency flood plain reclassification, despite being on higher ground than much of modern Portishead. 5.2 The 2023 proposal for this site focused on executive homes, contradicting the AECOM’s Housing Needs Assessment commissioned by the Portishead Neighbourhood Plan, which identifies need primarily for 2–3 bedroom affordable homes and no need at all for any more 4			

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					bedroom houses. 5.3 Using national density guidance, this 2.67 ha site could accommodate 250–500 dwellings, avoiding the need for more damaging options such as Black Rock. 6. Incorrect Assessment of Black Rock and Green Belt Harm 6.1 Black Rock lies within Green Belt designated in 1988 specifically to protect the ecological integrity of the Strategic Gordano Valley Green Corridor. 6.2 NSC's Green Belt assessment fails to reflect these unique circumstances, treating Black Rock as ordinary Green Belt when it is exceptional in ecological and strategic significance. 7. NSC Has Not Met the NPPF Requirement to Exhaust All Reasonable Alternatives 7.1 NSC has not demonstrated that all brownfield and sustainable urban/suburban opportunities have been fully explored. 7.2 CPRE analysis confirms there is sufficient brownfield capacity nationally to meet housing targets—reinforcing that Green Belt release is not inevitable. 7.3 NSC therefore fails the test set out in NPPF 147, which requires exhausting all reasonable non–Green Belt options before altering Green Belt boundaries. NPPF S156 states that where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review, or on sites in the Green Belt subject to a planning application, the following contributions ('Golden Rules') should be made: b) necessary improvements to local or national infrastructure; and the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces Formal list of objections in relation to NPPFS156 1.0 There is nothing in the Draft Infrastructure Delivery Plan Schedule document in Portishead other than: a cycle lane to Clevedon; the railway line that has been used to justify every development in the town for the past 30 years so can't be described as "necessary improvements to local or national infrastructure" in response to the proposed loss of Green Belt land; and something vague about possibly building a new school. 2.0 There is also no "provision of new, or improvements to existing, green spaces" in the NSC Plan. 3.0 This version of the Local Plan is developer led rather than community led and this has led to too much focus on "easy to develop" green belt sites at the expense of a full and proper consideration of "more difficult to develop" brown field and lower environment impact and more sustainable green field sites. It can therefore not be demonstrated that the Golden Rule for releasing land from the Green Belt for the provision of housing of "necessary improvements to local or national infrastructure; and the provision of new, or improvements to existing, green spaces that are accessible to the public" will be met, contrary to NPPF S156. NPPF S187 1. Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and			

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					soils (in a manner commensurate with their statutory status or identified quality in the development plan); b)recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; c) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs; … Background: The site for the proposed Black Rock development lies immediately beside Weston Big Wood, an ancient woodland SSSI recognised as one of North Somerset's richest biodiversity sites, and close to the geological and ecological interest of Nightingale Valley SSSI. Open fields used for grazing or maize cultivation run directly to the boundary of Weston Big Wood (SSSI). The surrounding unimproved grassland, hedgerows and shelterbelts form vital wildlife corridors linking the wood to the wider Gordano Valley. Weston Big Wood itself is a rare remnant of Ice-Age woodland, dominated by oak, hazel, ash and elm and supporting uncommon tree species such as small-leaved lime, wild service tree and rock whitebeam. Its exceptionally rich ground flora includes bluebells, wild garlic, violets, wood anemone and herb paris, alongside notable fungi. The woodland provides habitat for birds of prey including buzzards, red kites and peregrine falcons, as well as owls, roosting bats, deer and badgers, while its expanding woodland fringe supports red-listed species such as linnet. The wider Gordano Valley contains a mosaic of habitats—rhynes, saltmarsh, woodland, unimproved grassland, orchards, hedgerows, quarries and limestone outcrops—that together sustain butterflies, dragonflies, bats, wetland birds and diverse flora. Decades of ecological studies by WWF, Avon Wildlife Trust and Portishead Town Council emphasise that this is an interconnected ecological system whose species and habitats depend on maintaining uninterrupted wildlife corridors. Recent assessments show Weston Big Wood to be in unfavourable and declining condition, with increasing pressure from recreation and habitat fragmentation, and note high bat activity around Tower Farm and Black Rock. Geological features similar to those that underpin Nightingale Valley's SSSI designation are also likely to be present at Black Rock, further underscoring the area's ecological and conservation importance. In addition to Weston Big Wood, Black Rock is also in close proximity to Nightingale Valley SSSI. In all likelihood the location shares the geological features that Nightingale Valley's citation protects, and perhaps should be protected itself for the same reasons. Sources: World Wildlife Fund and Avon Wildlife Trust Biodiversity study PhD https://www.portishead.gov.uk/uploads/gordano-valley-ecological-study.pdf?v=1763999384; (1988) ; Portishead Town Council Commissioned update report: https://www.portishead.gov.uk/uploads/gordano-valley-ecological-development-strategy-report.pdf?v=1741102465 (2023) Formal list of objections in relation to NPPF S187 1. Proposals conflict with national planning policy (NPPF) and failure to protect designated sites 1.1 Conflict with NPPF requirement to avoid harm to SSSIs and irreplaceable habitats o Development would cause adverse impacts to Weston Big Wood (SSSI and ancient woodland), which the NPPF states should not normally be permitted unless wholly exceptional reasons exist (none do). o Building up to the woodland boundary with only a small buffer fails to safeguard the site and its ecosystem. 1.2 Failure to avoid, mitigate or compensate for biodiversity harm (NPPF)			

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					1.3 The Biodiversity Net Gain (BNG) report's proposed habitats (new woodland, species-rich grassland, orchards, swales, pond, etc.) are located on existing semi-natural land and do not mitigate damage to the ancient woodland ecosystem and nature corridors. 1.4 Significant long-term biodiversity loss is inevitable 1.5 No mitigation or BNG credits can replace an ancient woodland and SSSI, which are irreplaceable. 1.6 Ancient woodland once damaged "is gone forever" (Woodland Trust; Avon Wildlife Trust). Please see this link: avon-wildlife-trust-draft-response-to-north-somerset-local-plan-2041.pdf In their response to this consultation, AWT highlights that "Under DP35 of this draft Plan (Nature Conservation), it is clearly stated that "development within or in proximity to a Site of Special Scientific Interest (SSSI) or National Nature Reserve that is likely to have a direct or indirect adverse effect on its biodiversity or geological interest will not normally be permitted" 1.7 Failure to protect wider ecological networks (NPPF para 179, S187, S192) 1.8 Black Rock forms part of a wildlife corridor linking Weston Big Wood, Gordano Valley, Walton Common and other SSSIs. 1.9 Development would fragment this network and undermine nature recovery goals. 2. Concerns about agricultural land quality 2.1 Incorrect or misleading agricultural land classification o NSC's background paper labels the site as Grade 3, but Natural England / DEFRA maps show part of the site is Grade 1 (Best and Most Versatile land). (see below) o NPPF footnote 65 requires development to avoid high-quality (Grades 1, 2, 3a) agricultural land where possible. Source: https://naturalengland-defra.opendata.arcgis.com/datasets/provisional-agricultural-land-classification-alc-england/explore?location=51.470936%2C-2.780582%2C16.00 3. Landscape sensitivity and character 3.1 The plans for Black Rock conflict with NSC Landscape Sensitivity Assessment (https://n-somerset.gov.uk/sites/default/files/2023-06/Landscape%20Sensitivity%20Assessment%20%28March%202018%29-acc.pdf which notes: "Visual impact of unsympathetic urban edges of Portishead and Clevedon and urban fringe influences within the immediately adjacent landscapes" as a threat to the Portishead Ridges and Combes, an area that includes the Black Rock site. It also stated that "The landscape strategy for Portishead Ridges and Combes is to conserve the elements of strong character, the woodland, open grassland and pasture, the ancient hilltop sites and stone built settlement while enhancing area of declining condition and weaker character such as the urban edges and the gappy hedgerows". It provided Landscape Guidelines including "Conserve the peaceful and secluded nature of the wooded landscape" and "Minimise the impact of the urban edge and the encroachment of visually intrusive land uses…". o Land south-west of Portishead is identified as high sensitivity due to rural character, visibility, and proximity to Nightingale Valley SSSI and Middle Hill Common LNR. Development would damage this sensitive landscape. o The Assessment identifies threats from urban edge encroachment and calls for conservation of woodland, pasture, and peaceful landscape character. In contrast the proposed development would intensify intrusive urban edges and degrade woodland character.			

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					4. Conflict with Portishead Neighbourhood Plan (PEN4) 4.1 Non-compliance with Policy PEN4 (biodiversity and ecological networks) o The scheme does not: ◈ Provide genuine BNG (biodiversity net gain) ◈ Protect or enhance ecological corridors ◈ Provide adequate buffers ◈ Address indirect impacts such as noise, light pollution, and disturbance to habitats o It fragments the Gordano Valley ecological network. 5. Objections relating to NPPF S192 (biodiversity and geodiversity) 5.1 Failure to safeguard mapped wildlife-rich habitats and ecological networks o Black Rock is identified as key connective habitat between several SSSIs. o Development undermines land identified for habitat protection, restoration, and enhancement. 5.2 Failure to promote conservation and recovery of priority habitats and species o Reliance on off-site mitigation and a narrow buffer is reactive, not preventative. o Conflicts with the Avon Wildlife Trust 2030 Strategy: restoring 30% of land for nature and strengthening Gordano Valley landscape connectivity. 6. Objections relating to NPPF S193 (decision-making principles) 6.1 Significant harm cannot be avoided, mitigated or compensated (S193a) o Alternative locations exist with far less ecological harm. o Light, noise and pet disturbance (especially predation by cats) are unavoidable. 6.2 Adverse effects on an SSSI should not be permitted (S193b) 6.3 The development’s claimed benefits do not outweigh impacts on Weston Big Wood SSSI. 6.4 The site is not a sustainable location. 6.5 Loss or deterioration of irreplaceable habitats (S193c) 6.6 Development threatens ancient woodland already struggling to regenerate. • No wholly exceptional reasons justify this. 7. The presence of multiple SSSIs and geological conservation 7.1 Black Rock lies adjacent to a cluster of SSSIs forming a critical nature corridor (see map). The area includes: Weston Big Wood, Weston in Gordano, Nightingale Valley, Gordano Valley, Walton Common, Court Hill. Development would fragment this high-value corridor 7.2 The site likely shares geological features with Weston in Gordano SSSI and may warrant protection itself. 8. Ecological expert opinion 8.1 Avon Wildlife Trust’s explicit objection o They state no development should occur at or near Weston Big Wood. o Ancient woodland here is among the “most fragile and rare” and irrecoverable once damaged. avon-wildlife-trust-draft-response-to-north-somerset-local-plan-2041.pdf			

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					8.2 Local independent naturalist expert, Chris Sperring MBE disputes the developer's claims and states " Footfall pressure on Weston Big Wood is happening now and is already fragmenting the wood. The Wood will simply be unable to function without the current buffer of surrounding fields. Where will human beings go to feel good if there is nowhere green to go, to immerse themselves in trees and bird song?" The developer proposals will stop the wood functioning and accelerate the loss of species in the wider Gordano Valley strategic green corridor. These losses have been witnessed and recorded by Chris and many others over the past half century 9. Objections regarding Green Belt considerations 9.1 Green Belt removal here is inappropriate o This is one of the most ecologically sensitive locations in North Somerset. o The Green Belt Assessment undervalues its landscape and ecological significance. 10. Deficiencies in the developer's Biodiversity Net Gain report 10.1 BNG claims are misleading and do not reflect actual ecosystem damage o Proposed habitat creation is on existing semi-natural land and does not offset the loss of irreplaceable habitats. o Construction close to the ancient woodland boundary undermines the validity of claimed net gains. o Building 100 homes cannot logically "enhance nature corridors." 11. Objection proposing an alternative use 11.1 Black Rock is more appropriate as a designated BNG site rather than a development site. This would allow ecological restoration of degradation accumulated over the past 50 years. 12. Objection in relation to the site being an Unsustainable Location 10.1 The site is not sustainably located and brings no benefits that outweigh the significant ecological and environmental harms. 10.2 Development pressure here would exacerbate recreational and ecological stress already documented in Weston Big Wood during recent years. A recent report https://www.theguardian.com/environment/2025/jul/10/britain-ancient-woodlands-failing-regenerate-forests-climate-drought-heat-disease-deer-hope-aoe has found that British ancient woodland is struggling to regenerate and is under threat. We should therefore not be allowing any development that threatens the health of Weston Big Wood, which this proposal does, and it "should be refused". There are also not "wholly exceptional reasons" not to refuse development here. Conclusion The Black Rock proposal causes unavoidable and significant ecological, landscape and policy harm. It conflicts with national and local planning policy, fails statutory biodiversity protections, threatens irreplaceable habitats and undermines decades of environmental stewardship across the Gordano Valley. It will reduce the quality of life for human beings living in the area. The Black Rock site should be removed from the Local Plan. NPPF S110 ... Significant development should be focused on locations which are or can be made			

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					sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health... List of Objections 1. Location is isolated and unsustainable o Black Rock lies on the extreme southern edge of Portishead with no shops, services, or employment within comfortable walking distance. o Many residents would be unable to walk or cycle to the town centre due to the long distances involved (e.g., 28–38 minutes to key amenities). 2. Inadequate access to essential facilities o Long walking times to the High Street, supermarkets, leisure centre, and future station indicate the site does not support active travel for daily needs. 3. Poor access to Bristol-bound public transport o Nearby bus stops only serve the X5 route, not the X4 or X10 which are the only buses to Bristol. The nearest Bristol-bound X4 stop is a 27-minute walk away. o Taking two buses would mean two fares, discouraging public transport use and encouraging driving. 4. Limited and unreliable bus service o The X5 timetable is very limited: last weekday buses around 7.35 pm (towards Portishead) and 8.10 pm (from Portishead), worse on Saturdays, and no service at all on Sundays or bank holidays. o This would lead to a significant increase in car journeys, congestion, emissions, and poorer air quality. 5. Developer contributions do not address the real issue o Contributions are required for bus stop upgrades, but no improvements to the bus service itself are proposed. o With Government BSIP funding ending next year and the X5 already subsidised, the future viability of the service is uncertain. 6. Gordano Greenway delivery is uncertain o The cycle link relies on resolving complex land ownership and funding issues, making deliverability doubtful. o The developer’s proposed 50 m cycleway would feed directly onto a busy, unsafe road. o A further 2+ miles of high-quality cycle infrastructure would be needed for a safe connection to Clevedon. 7. Cycle/footway link to the new station is unrealistic o A direct link to the new rail station is not achievable due to the station's location on the opposite side of town and existing built-up areas. 8. Far better sites exist elsewhere in Portishead o More sustainable and better-connected locations (e.g., Old Mill Road / Wyndham Way) are available and much closer to existing and new public transport links. 9. Lack of a Transport Sustainability and Access Strategy o There is no evidence of an assessment of the development’s likely impact on local or town-wide traffic. 10. Rail reopening offers no meaningful benefit for this site o The new station is nearly two miles away (38-minute walk), so residents would have to drive or pay for two separate bus and train fares, undermining any sustainable transport benefits. 11. The site does not meet NPPF sustainability requirements			

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					o Despite lying within the Portishead boundary, Black Rock cannot be considered a sustainable development location. o It does not support limiting the need to travel nor provide a genuine choice of transport modes, contrary to NPPF S110. NPPF S115 In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: a) sustainable transport modes are prioritised…; b) … and any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach. List of Objections 1. NPPF S110 concerns still apply o The development fails to meet the sustainability and transport criteria already identified under NPPF S110, and these issues remain unresolved. 2. Railway reopening cannot justify further development o The reopening of the Portishead rail line has been repeatedly used for decades to justify thousands of new homes (Vale, Village Quarter, Marina developments), despite the station still not being operational. o Using it again as a justification is not credible or sustainable. 3. Black Rock residents would not have practical access to the station o The distance makes walking or cycling to the station impractical for many residents, undermining the claim that rail access supports sustainable transport for this site. 4. Cumulative housing numbers will overload local road infrastructure o The Local Plan proposes 100 dwellings at Black Rock, plus 1274 in Portishead and 1100 in Pill, creating a large cumulative traffic impact. o This would place significant additional strain on M5 Junction 19, which is already congested and hazardous at peak times. 5. No planned mitigation for M5 Junction 19 o Despite acknowledging the scale of planned development, no mitigation measures are proposed to address worsening congestion or safety risks at Junction 19. 6. Fails to meet NPPF S115 requirements o Sustainable transport modes are not prioritised. o Safe and suitable access for all users cannot be achieved. o Significant impacts on the transport network cannot be mitigated cost-effectively. o Therefore, the proposal is contrary to NPPF S115.			

Name: Priscille Lesne **I.D:** 39231681

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Policy LP3: Strategic location:	No	• Positively prepared	Unsure	Unsure	I object to the allocation of 889 homes on Land East of Backwell (Policy LP3) on Green Belt and Grade 1 agricultural land. This proposal is fundamentally at odds with the climate and nature emergency we face, with the growing national and global food-security crisis, and it is unsound as it is neither sustainable nor deliverable/effective.			

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Nailsea and Backwell		• Justified • Effective • Consistent with national policy			A. Environmental and Food Security Failure (Unsound & Unsustainable) The proposed plan will do irreparable harm to the environment, directly opposing the Council's own strategic goals: * Climate Emergency and Carbon Sequestration Grade 1 agricultural soils and permanent grassland act as major carbon sinks. Paving over this land will release centuries of stored soil carbon and remove its ongoing ability to sequester CO_2 at a time when North Somerset Council has declared a climate emergency and committed to net-zero by 2030. This directly undermines the Council's own Climate Emergency Strategy and national net-zero targets. * Food-Security Crisis The UK is already only 60% self-sufficient in food, and we have lost over 20% of our Best and Most Versatile (BMV) agricultural land since WWII. Grade 1 land is nationally scarce and irreplaceable. Building on it now, when we face harvest failures, supply-chain disruption, and geopolitical risks to food imports, is reckless and short-sighted. The Government's own Food Security Report (2024) stresses the urgent need to protect high-quality farmland – this allocation does the exact opposite. * Irreplaceable Wildlife Habitat and Biodiversity Crisis The site lies in a critical wildlife corridor for protected Greater and Lesser Horseshoe bats and supports priority habitats and species. Permanent fragmentation and light/noise pollution from 889 homes cannot be adequately mitigated. Sacrificing functioning farmland and hedgerows for housing is unacceptable. 10% biodiversity net gain on paper does not compensate for the outright destruction of established ecosystems. * Green Belt Encroachment and Sustainable Location The land fulfils one of the primary purposes of the Green Belt: to safeguard the countryside from encroachment. Its release is a significant breach of established planning policy. Furthermore, developing a car-dependent, greenfield site far from jobs and services will lock in high transport emissions for decades, while removing land that naturally absorbs rainfall increases downstream flood risk. B. Infrastructure and Viability Failure (Unsound & Not Deliverable) * This plan fails to provide necessary infrastructure and its reliance on uncertain financial mechanisms: Unmanageable Increase in Village Size and Lack of Infrastructure: The proposed 889 houses represents an approximate 80% increase in the size of Backwell village. The existing community and social infrastructure is wholly inadequate to accommodate this unprecedented level of growth. Capacity Failure: The Plan fails to demonstrate how essential services will be upgraded prior to occupation. Local GP/ medical surgery provision, Primary and Secondary school capacity, and the sewerage/drainage systems are already at capacity and cannot absorb an estimated 2,000+ new residents. Unsustainable Community: This rapid and disproportionate growth, without guaranteed supporting infrastructure, is inherently unsustainable and will severely degrade the quality of life for all residents. * Viability and Funding of Essential Road Infrastructure The success of this allocation relies entirely on the construction of a new road, the deliverability and funding mechanism of which remain entirely unclear, making the policy not effective. However, the funding remains uncertain: A clear statement is required on who will fund the new road. If funding is dependent solely on developer contributions (CIL/S106), this is subject to viability changes and provides no certainty. If the road is not delivered, the existing road network will suffer catastrophic, unmanageable congestion. National planning policy (NPPF para 174-175) requires protection of best and most versatile agricultural land unless need overwhelmingly outweighs harm. No such justification has been demonstrated when brownfield sites and lower-grade land exist elsewhere in the district. The harm to Green Belt, food security, biodiversity, and the fundamental lack of assured infrastructure render this allocation Unsound. I urge the Council to remove this allocation (Policy LP3) and redirect growth to genuinely sustainable locations that do not sacrifice irreplaceable food-producing land, carbon sinks, and wildlife habitats at the exact moment the planet needs them most.			

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Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I object to the allocation of 582 homes on the Land South of Nailsea / Backwell Lake on the grounds that it is unsound, not effective, and fundamentally conflicts with local and national planning policy concerning Green Belt protection, environmental conservation, and deliverability. 1. Green Belt Encroachment and Separation The site falls within the Green Belt and its development would constitute an unacceptable encroachment into the countryside and a failure to maintain the separation between the settlements of Nailsea and Backwell. Breach of Green Belt Purpose: The land is currently open, undeveloped countryside, fulfilling the Green Belt's primary function to prevent urban sprawl and safeguard the countryside from encroachment. This allocation significantly weakens the existing separation, leading to the coalescence of the two villages. Irreplaceable Landscape Character: The site forms a key part of the landscape character near Backwell Lake. Developing it will result in the permanent loss of this open space, negatively impacting the local visual amenity enjoyed by both residents and visitors. 2. Environmental Impact and Habitat Destruction The site's proximity to Backwell Lake makes it highly sensitive ecologically and unsuitable for large-scale development. The proposal poses a significant threat to protected species and critical habitats. Proximity to Backwell Lake: The lake and surrounding land are important ecological assets, forming a key wildlife corridor and habitat for numerous species, including bats, amphibians, and wildfowl. The development of 582 homes will introduce intolerable levels of light pollution, noise pollution, and run-off, permanently damaging the functionality of this vital area. Surface Water Management and Flood Risk: The site is explicitly identified as having flood risk issues, requiring a sequential test for access and significant surface water attenuation. The allocation is therefore inherently high-risk. Paving a large area for 582 houses will exacerbate downstream flood risk, contrary to the Plan’s sustainability goals, regardless of the attenuation measures proposed. The Council must ensure that flood risk will not be worsened elsewhere as a result, a commitment that is difficult to guarantee with a development of this size near sensitive water bodies. The allocation of 582 dwellings on land south of Nailsea/Backwell Lake is unsustainable due to the irreparable environmental harm to an ecologically sensitive area, and the unacceptable breach of the Green Belt. The proposal is therefore Unsound. I urge the Council to remove this allocation and redirect future growth to genuinely sustainable locations that do not sacrifice the environment, green belt integrity, or compromise the long-term viability of the communities.			

Name: Professor Christopher McMahon **I.D:** 62807585

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure		The Plan is unjustified because the Sustainability Appraisal failed to properly weight the economic and food-security value of the Grade 1 land at East Backwell against lower-quality alternatives elsewhere in the district. The allocation is unsound and inconsistent with national policy as it violates the fundamental Green Belt purpose of 'preventing neighbouring towns from merging into one another.' The proposed mitigation is insufficient to maintain the physical and visual separation of Backwell and Nailsea. The Plan is not effective because the transport modelling relies on unproven mitigation measures for the A370 and other local roads. Without committed funding for a major capacity upgrade before occupation, the cumulative impact on the road network is 'severe' and renders the site undeliverable. The railway station is not fit for purpose as a transport hub, in particular as it only has step access on the 'down' platform and it has inadequate bus connections.			

Name: Professor Colin Fudge **I.D:** 38530913

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Policy LP2: Strategic location: Woodspring (south west of Bristol)	No	• Effective	Unsure	Yes				Response to NSC Local plan 25 11 25.pdf Appendix A environmental information final issue.pdf Woodspring Sketch SPD_Graphics ISSUE 25 08 12-2.pdf

Name: Quin-Jones **I.D:** 62854817

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Justified	No	No	NSC has not properly considered: Alternative brownfield or greenfield sites with far lower ecological impact, both in Portishead and across North Somerset.Opportunities to increase housing density on proposed brownfield sites, which could remove the need to develop Tower Farm and Black Rock.The strategic ecological importance of these sites in protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor.The fact that both areas were added to the Green Belt in the late 1980s due to their high ecological value.National planning policy allows Green Belt changes only in exceptional circumstances — and these have not been demonstrated. In addition: Neither site can provide safe or suitable access.Development would create unacceptable transport impacts, failing national soundness tests. For these reasons, Tower Farm and Black Rock should be removed from the Local Plan.			
Black Rock, north of Clevedon Road	No	• Justified	No	No	NSC has not properly considered: Alternative brownfield or greenfield sites with far lower ecological impact, both in Portishead and across North Somerset.Opportunities to increase housing density on proposed brownfield sites, which could remove the need to develop Tower Farm and Black Rock.The strategic ecological importance of these sites in protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor.The fact that both areas were added to the Green Belt in the late 1980s due to their high ecological value.National planning policy allows Green Belt changes only in exceptional circumstances — and these have not been demonstrated. In addition: Neither site can provide safe or suitable access.Development would create unacceptable transport impacts, failing national soundness tests. For these reasons, Tower Farm and Black Rock should be removed from the Local Plan.			

Name: R Axford **I.D:** 51454721

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Consistent	Unsure	Unsure	The proposed development in Backwell is on Grade 1 agricultural land. The UK food security is in crisis and the UK needs to respond by making sure that all good quality agricultural land is used to produce food. Using grade 1 land to build houses will have a massive impact on the country’s food security. There is only 7% of this high quality land left in North Somerset. Backwell already has 800 new houses approved which means the village will already grow by 40%. These additional			

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		with national policy			numbers will lead to overdevelopment. Backwell doesn't have many shops or services and there is no funding to provide additional shops or services with this development. Residents have to travel to Nailsea for most things. The only safe way of doing so with the lack of safe cycle routes and extremely limited bus service is by car. Station Road is extremely narrow and already very congested and can't cope with current volume of traffic. With this scale of development, we either need to make sure there are adequate facilities in Backwell for all new housing (shops, library, community hub, restaurants) or to make a safe, traffic free cycle route linking Nailsea and Backwell AND regular buses, at least every 30 minutes, between the two towns.			

Name: R Beckingsale **I.D:** 29258657

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	There are many reasons why this development should not be considered to be a sound proposal: - There does not appear to be a need for a further 900 houses in Backwell on top of the 800 new homes already approved for the village. - The current infrastucture would not cope with this huge increase in homes and it is likely that most new residents would be commuting to work placing even greater strain on the existing road network and public transport services. Backwell is not an employment hub and there are also limited employment opportunities in nearby Nailsea. Why should Backwell be required to take 7% of North Somerset's housing allocation when the much larger town of Clevedon has only been allocated 2%? - New schools would inevitably be required but I see no mention of land set aside for these in the proposal. - The proposed new road connecting the new development with Nailsea and the station is likely to be unviable due to cost restraints and the almost inevitable risk of flooding. - The Grade 1 farmland on which this proposal is based should be protected for future generations. How do we expect to continue to feed the ever growing population if we continue to build all over our most high quality agricultural land? - Nailsea & Backwell station is not fit for purpose as a transport hub due to its location and inaccessability.			

Name: R Bettison **I.D:** 51275905

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	• Justified	No	No	Housing Growth Backwell already has approval for 800 new homes, representing a 40% expansion. Any further allocation risks overwhelming the village with unsustainable development. Road Proposal The proposed road fails to address Nailsea's traffic issues or ease congestion on Station Road, Backwell Common, and Chapel Hill. Constructing it under or over the railway would be prohibitively costly and potentially unworkable. Infrastructure Deficit Despite significant housing growth, there is a shortage of school places and no investment in health or leisure facilities. Existing infrastructure cannot sustain an additional 1,000 homes. Housing Allocation Backwell has been allocated more housing than any other village in North Somerset, with growth rates exceeding those of towns. It is expected to absorb 7% of the district's housing, compared to Clevedon's 2%. Lack of Analysis	As above		

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					No needs or viability assessment has been undertaken to justify the addition of 1,000 homes. Employment Backwell is not an employment centre; the majority of residents commute elsewhere for work. Social Cohesion No assessment has been provided regarding the impact of development on social cohesion. Agricultural Land The site comprises Grade 1 agricultural land used for crops and grazing. Only 7% of such high-quality land remains in North Somerset. Food Security Policy Government policy requires protection of the best and most versatile land to safeguard food security. These proposals directly contradict that principle. Wildlife and Biodiversity Development would destroy vital habitats and further damage biodiversity in one of the world’s most nature-depleted nations. Bat Roosts The proposals threaten the Brockley Maternity Roost and SSSI, where rare Lesser and Greater Horseshoe Bats depend on the land for feeding. Infrastructure Delivery Plan The Infrastructure Delivery Plan lacks detailed analysis and costings, with no funding guarantees for the road or associated services. Flood Risk Backwell Common and nearby areas are already prone to flooding, which would be exacerbated by further housing. Strategic Growth Concerns Designation as a strategic growth location raises concerns about loss of character, Greenbelt and agricultural land, increased flood risk, and uncertainty over road funding and delivery. Backwell Lake Floodplain Backwell Lake and adjacent fields, earmarked for roads and housing, lie on a floodplain that floods regularly. Affordable Housing Policy Government policy requires 50% affordable housing on Greenbelt land, but this reduces developer contributions towards infrastructure. Unsustainable Growth The scale and pace of growth, combined with the infrastructure demands, render the proposals destabilising, unsustainable, and undeliverable.			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					Railway Station Backwell’s railway station is inadequate as a transport hub, remaining inaccessible for those with mobility issues and difficult for families with young children.			

Name: R Bowden **I.D:** 21206817

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at North West Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Green Belt: the area to the north of nailsea is a significant contributor to the prevention of urban sprawl. The proposed plan ignores this and simply seeks to perform a swap of one area for another with no consideration to the current contribution to the greenbelt. The greenbelt is supposed to be protected by the necessity of using other land first and justification of change through exceptional circumstances, yet neither is demonstrated in the plan - in particular the council has not demonstrated that all other alternatives have been exhausted, nor demonstrated that they have challenged the government's policy with respect to the particular challenges that north somerset faces in terms of the availability of viable land for development. Traffic: there are significant traffic challenges at and near the junction with tickenham hill (3128) and clevedon road (3130) - both a pinch point and traffic backing up everyday from the junction. Designating the land north of nailsea as a strategic development area for housing and the resulting additional traffic will greatly exacerbate an existing problem and no remedies are proposed for this. National strategic assets: A little research indicates the presence of a strategic aviation fuel line running through the area proposed north of nailsea. No mention is made of this in the plan let alone how it should be dealt with - not how, nor who pays for it. Existing plans: The Wraxall & Failand Neighbourhood Plan (2022–2038) has already been adopted and the proposed north somerset plan conflicts with that plan.			

Name: R Burgess **I.D:** 62811873

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	The plan to build the additional 1193 homes across 4 locations around Nailsea is unsound in my opinion for the following reasons: 1. The proposed 1817 new homes in Nailsea would be a total over development of the town. This will place immense pressure on health and leisure facilities. There are no obvious investment plans to meet the health/leisure/educational needs of this major increase in population. 2. The proposed new link road across Backwell Common and under the railway bridge would be prohibitively expensive and a major engineering feat It would not alleviate traffic congestion on Station Road nor adequately serve Nailsea traffic. The new road will be in a flood plain which regularly floods. There is no indication of how this project would be funded. 3. Land to the north of Nailsea is greenbelt and should be preserved as such. 4. Land to the south of Nailsea is grade 2 agricultural land which is good quality, high yielding land which will be permanently lost due to this development. 5. Protected species of bat will lose their foraging ground if all proposed sites are developed. Valuable wildlife habitats of the Moorend Spout Nature Reserve will be destroyed if the land adjacent to it is developed. 6. Development on the proposed scale would result in a vast increase in vehicular movement causing congestion in the rural lanes making it unsafe for pedestrians, cyclists & horses riders. 7. The railway station would not accommodate the substantial increase in passengers numbers expected with the development of 1817 homes not to mention the 1762 new homes proposed in Backwell. The platforms are short and narrow and there is no access for mobility vehicles or pushchairs south bound.			

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Land off Pound Lane, Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The plan to build the additional 1193 homes across 4 locations around Nailsea is unsound in my opinion for the following reasons: 1. The proposed 1817 new homes in Nailsea would be a total over development of the town. This will place immense pressure on health and leisure facilities. There are no obvious investment plans to meet the health/leisure/educational needs of this major increase in population. 2. The proposed new link road across Backwell Common and under the railway bridge would be prohibitively expensive and a major engineering feat It would not alleviate traffic congestion on Station Road nor adequately serve Nailsea traffic. The new road will be in a flood plain which regularly floods. There is no indication of how this project would be funded. 3. Land to the north of Nailsea is greenbelt and should be preserved as such. 4. Land to the south of Nailsea is grade 2 agricultural land which is good quality, high yielding land which will be permanently lost due to this development. 5. Protected species of bat will lose their foraging ground if all proposed sites are developed. Valuable wildlife habitats of the Moorend Spout Nature Reserve will be destroyed if the land adjacent to it is developed. 6. Development on the proposed scale would result in a vast increase in vehicular movement causing congestion in the rural lanes making it unsafe for pedestrians, cyclists & horses riders. 7. The railway station would not accommodate the substantial increase in passengers numbers expected with the development of 1817 homes not to mention the 1762 new homes proposed in Backwell. The platforms are short and narrow and there is no access for mobility vehicles or pushchairs south bound.			
Poplar Farm, Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The plan to build the additional 1193 homes across 4 locations around Nailsea is unsound in my opinion for the following reasons: 1. The proposed 1817 new homes in Nailsea would be a total over development of the town. This will place immense pressure on health and leisure facilities. There are no obvious investment plans to meet the health/leisure/educational needs of this major increase in population. 2. The proposed new link road across Backwell Common and under the railway bridge would be prohibitively expensive and a major engineering feat It would not alleviate traffic congestion on Station Road nor adequately serve Nailsea traffic. The new road will be in a flood plain which regularly floods. There is no indication of how this project would be funded. 3. Land to the north of Nailsea is greenbelt and should be preserved as such. 4. Land to the south of Nailsea is grade 2 agricultural land which is good quality, high yielding land which will be permanently lost due to this development. 5. Protected species of bat will lose their foraging ground if all proposed sites are developed. Valuable wildlife habitats of the Moorend Spout Nature Reserve will be destroyed if the land adjacent to it is developed. 6. Development on the proposed scale would result in a vast increase in vehicular movement causing congestion in the rural lanes making it unsafe for pedestrians, cyclists & horses riders. 7. The railway station would not accommodate the substantial increase in passengers numbers expected with the development of 1817 homes not to mention the 1762 new homes proposed in Backwell. The platforms are short and narrow and there is no access for mobility vehicles or pushchairs south bound.			
Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The plan to build the additional 1193 homes across 4 locations around Nailsea is unsound in my opinion for the following reasons: 1. The proposed 1817 new homes in Nailsea would be a total over development of the town. This will place immense pressure on health and leisure facilities. There are no obvious investment plans to meet the health/leisure/educational needs of this major increase in population. 2. The proposed new link road across Backwell Common and under the railway bridge would be prohibitively expensive and a major engineering feat It would not elevate traffic congestion on Station Road nor adequately serve Nailsea traffic. The new road will be in a flood plain which regularly floods. There is no indication of how this project would be funded. 3. Land to the north of Nailsea is greenbelt and should be preserved as such. 4. Land to the south of Nailsea is grade 2 agricultural land which is good quality, high yielding land which will be permanently lost due to this development. 5. Protected species of bat will lose their foraging ground if all proposed sites are developed. Valuable wildlife habitats of the Moorend Spout Nature Reserve will be destroyed if the land adjacent to it is developed. 6. Development on the proposed scale would result in a vast increase in vehicular movement causing congestion in the rural lanes making it unsafe for pedestrians, cyclists & horses riders. 7. The railway station would not accommodate the substantial increase in passengers numbers expected with the development of 1817 homes not to mention the 1762 new homes proposed in Backwell. The platforms are short and narrow and there is no access for mobility vehicles or pushchairs south bound.			
Land east of Backwell	No	• Positively	Unsure	Unsure	The plan to build circa 1000 homes on LAND EAST OF BACKWELL is unsound in my opinion for the following reasons: NSC have already approved applications for approximately 800 new homes at Grove Farm, Farleigh Fields and Moor Lane			

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		• prepared • Justified • Effective • Consistent with national policy			which will increase housing in the village by 40%, already altering the nature and rural feel of the village. To build a further 1000 homes would result in an increase in housing of 80% which is wholly unacceptable given the distinct lack of investment in infrastructure and services (ie schools, doctors, dentists, roads, leisure etc), with no indication of any proposals of future investment. The scale and rate of growth proposed is unsustainable and undeliverable and will have a detrimental effect on the existing community. The allocation of housing for Backwell is disproportionate for the size of the village and a complete over development of a community. The land east of Backwell is GRADE 1 agricultural greenbelt land. To build on this land would be a threat to our food security in the future given that there is only 7% grade 1 agricultural land in North Somerset. The land is currently used for crop production, grazing and leisure. To build on this land would contradict the Governments stated policy of protecting our best and most versatile land. Backwell and surrounding areas are prone to flooding, the proposed development of this land is likely to aggravate the situation causing problems for existing property owners. Under the railway bridge at Chapel Hill the road regularly floods to a height of 3 to 4 feet and cars are often stranded in deep water there. The proposed new road which cuts across Backwell Common and will pass under the railway line would be a highly expensive engineering project and possibly unfeasible! There are no costings or indication of who would fund such a project. It is unlikely to ease traffic on Station Road or at the traffic lights on the cross roads at A 370. If it is the intention for a new road to serve the Nailsea community, it would be sensible to direct it south to join A370 through the new Grove Farm Development in Backwell, recently approved by NSC. The land at Backwell Lake/reservoir, adjacent fields and across the common is a flood plain which floods frequently thus making it unsuitable for road construction. Backwell is not an employment hub and most residents commute. The railway station would not accommodate the substantial increase in passengers numbers expected with the development of a further 1000 homes, yet alone the 800 homes already granted planning permission ! The platforms are short and narrow and there is no access for mobility vehicles or pushchairs south bound. A considerable investment would be required to upgrade the station to increase its capacity to accommodate housing on the scale proposed. If investment was forth coming in the future to upgrade the station, then it would be sensible to widen the bridge at the station to accommodate 2 way traffic on Station Road to ease the flow of traffic and avoid congestion. To increase Backwells housing population by 80% is disproportionate and will affect the communities social cohesion. No needs or viability study has been conducted for an additional 1000 new homes. There will be a loss of habitat for flora and fauna and a threat to our protected bat colonies if this land is developed.			

Name: R Burrows **I.D:** 939361

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP1: Sustainable Development	No	• Positively prepared • Justified • Effective	Unsure	Unsure	There are several inherent conflicts and specific policies that are argued to constrain development, particularly housing delivery. When coupled with other documents outside of the local plan, such SPDs as the proposed enlarged Bat SAC. It is questioned how NSC will deliver windfall sites & small sites at all. The financial burden is already onerous and this will add too much financial burden on small developers & self builders who should be exempt. Coupled with flood risk and the absurdity of designing to an undefended flood situation (rather than breach modelling) an almost impossible scenario where the flood defences are completely removed. To design to the absolute worse case (doomsday) scenario is unrealistic and far from pragmatic. Development Management Policies (DP), particularly those related to climate change, sustainability standards, and flood risk, make the delivery of growth procedurally and economically harder. This is highlighted by the fact that the LPA was found not to have delivered a five-year supply of housing for at least	Policy SP1: Suggested Rewording (Limiting Applicability): "To be sustainable, new development for 10 or more dwellings in North Somerset should [... follow the policy's bullet points]"		

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					13 years, suggesting the existing constraints are already impacting deliverability. This will exacerbate the situation & the financial burden of compliance with policies that duplicate existing primary legislation uneccessary.			
SP2: Climate Change	No	‣ Positively prepared ‣ Justified ‣ Effective	Unsure	Unsure	There are several inherent conflicts and specific policies that are argued to constrain development, particularly housing delivery. When coupled with other documents outside of the local plan, such SPDs as the proposed enlarged Bat SAC. It is questioned how NSC will deliver windfall sites & small sites at all. The financial burden is already onerous and this will add too much financial burden on small developers & self builders who should be exempt. Coupled with flood risk and the absurdity of designing to an undefended flood situation (rather than breach modelling) an almost impossible scenario where the flood defences are completely removed. To design to the absolute worse case (doomsday) scenario is unrealistic and far from pragmatic. Development Management Policies (DP), particularly those related to climate change, sustainability standards, and flood risk, make the delivery of growth procedurally and economically harder. This is highlighted by the fact that the LPA was found not to have delivered a five-year supply of housing for at least 13 years, suggesting the existing constraints are already impacting deliverability. This will exacerbate the situation & the financial burden of compliance with policies that duplicate existing primary legislation uneccessary.	Policy SP2: Suggested Rewording (Simplifying/Deferring to Regulations): "Development proposals, once approved must be constructed to building regulation standards relevant at the time of commencement"		
Policy LP7: Settlement boundaries	No	‣ Positively prepared ‣ Justified ‣ Effective	Unsure	Unsure	There are several inherent conflicts and specific policies that are argued to constrain development, particularly housing delivery. When coupled with other documents outside of the local plan, such SPDs as the proposed enlarged Bat SAC. It is questioned how NSC will deliver windfall sites & small sites at all. The financial burden is already onerous and this will add too much financial burden on small developers & self builders who should be exempt. Coupled with flood risk and the absurdity of designing to an undefended flood situation (rather than breach modelling) an almost impossible scenario where the flood defences are completely removed. To design to the absolute worse case (doomsday) scenario is unrealistic and far from pragmatic. Development Management Policies (DP), particularly those related to climate change, sustainability standards, and flood risk, make the delivery of growth procedurally and economically harder. This is highlighted by the fact that the LPA was found not to have delivered a five-year supply of housing for at least 13 years, suggesting the existing constraints are already impacting deliverability. This will exacerbate the situation & the financial burden of compliance with policies that duplicate existing primary legislation uneccessary.	Policy LP7: NSC has a consistent under delivery of housing with ill defined settlement boundaries drawn purposely to restrict development. The former policy of allowing sites adjacent to settlement boundaries therefore must be retained in order to meet targets.		
Policy DP5: Climate change adaptation and resilience	No	‣ Positively prepared ‣ Justified ‣ Effective	Unsure	Unsure	There are several inherent conflicts and specific policies that are argued to constrain development, particularly housing delivery. When coupled with other documents outside of the local plan, such SPDs as the proposed enlarged Bat SAC. It is questioned how NSC will deliver windfall sites & small sites at all. The financial burden is already onerous and this will add too much financial burden on small developers & self builders who should be exempt. Coupled with flood risk and the absurdity of designing to an undefended flood situation (rather than breach modelling) an almost impossible scenario where the flood defences are completely removed. To design to the absolute worse case (doomsday) scenario is unrealistic and far from pragmatic. Development Management Policies (DP), particularly those related to climate change, sustainability standards, and flood risk, make the delivery of growth procedurally and economically harder. This is highlighted by the fact that the	Policy DP5: Suggested Rewording (Limiting Applicability): The requirement for a climate change adaptation statement should apply only to: "All development for 10 or more dwellings". The cost is onerous on small scale developers, self builders etc.		

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					LPA was found not to have delivered a five-year supply of housing for at least 13 years, suggesting the existing constraints are already impacting deliverability. This will exacerbate the situation & the financial burden of compliance with policies that duplicate existing primary legislation uneccessary.			
Policy DP6: Net zero construction	No	• Positively prepared • Justified • Effective	Unsure	Unsure	There are several inherent conflicts and specific policies that are argued to constrain development, particularly housing delivery. When coupled with other documents outside of the local plan, such SPDs as the proposed enlarged Bat SAC. It is questioned how NSC will deliver windfall sites & small sites at all. The financial burden is already onerous and this will add too much financial burden on small developers & self builders who should be exempt. Coupled with flood risk and the absurdity of designing to an undefended flood situation (rather than breach modelling) an almost impossible scenario where the flood defences are completely removed. To design to the absolute worse case (doomsday) scenario is unrealistic and far from pragmatic. Development Management Policies (DP), particularly those related to climate change, sustainability standards, and flood risk, make the delivery of growth procedurally and economically harder. This is highlighted by the fact that the LPA was found not to have delivered a five-year supply of housing for at least 13 years, suggesting the existing constraints are already impacting deliverability. This will exacerbate the situation & the financial burden of compliance with policies that duplicate existing primary legislation uneccessary.	Policy DP6: As per SP2 to allow building regulations to control this. The local plan is littered with duplicating primary legislation and should enable development rather than hold it up or render it economically unviable.		
Policy DP9: Flood risk	No	• Positively prepared • Justified • Effective	Unsure	Unsure	There are several inherent conflicts and specific policies that are argued to constrain development, particularly housing delivery. When coupled with other documents outside of the local plan, such SPDs as the proposed enlarged Bat SAC. It is questioned how NSC will deliver windfall sites & small sites at all. The financial burden is already onerous and this will add too much financial burden on small developers & self builders who should be exempt. Coupled with flood risk and the absurdity of designing to an undefended flood situation (rather than breach modelling) an almost impossible scenario where the flood defences are completely removed. To design to the absolute worse case (doomsday) scenario is unrealistic and far from pragmatic. Development Management Policies (DP), particularly those related to climate change, sustainability standards, and flood risk, make the delivery of growth procedurally and economically harder. This is highlighted by the fact that the LPA was found not to have delivered a five-year supply of housing for at least 13 years, suggesting the existing constraints are already impacting deliverability. This will exacerbate the situation & the financial burden of compliance with policies that duplicate existing primary legislation uneccessary.	Policy DP9: Suggested Rewording (Relaxing Tests for Minor Development): "For potential development sites in flood zone the following should be applied in relation to the Sequential and Exceptions test. In the 4 main towns of WsM, Portishead, Clevedon and Nailsea, sites of 9 or fewer dwellings are not required to pass the sequential test or the exceptions test". Smaller windfall sites could be exempt as deliver has stalled significantly, they are counted as part of the delivery targets but are likely to struggle. Regarding redundant ground floor premises (like those in W-s-M), the policy should be re-worded, or the accompanying Strategic Flood Risk Assessment (SFRA) guidance should be amended to allow the conversion and re-use of redundant ground floor premises with mandatory flood resistant and flood resilient measures. This is based on the argument that future governments and the LPA will provide funding to improve sea defences before flooding reaches a critical point. Deferring to the SFRA will allow that to change more flexibly than the LP.		
Policy DP21: Safeguarding employment sites	No	• Positively prepared • Justified • Effective	Unsure	Unsure	There are several inherent conflicts and specific policies that are argued to constrain development, particularly housing delivery. When coupled with other documents outside of the local plan, such SPDs as the proposed enlarged Bat SAC. It is questioned how NSC will deliver windfall sites & small sites at all. The financial burden is already onerous and this will add too much financial burden on small developers & self builders who should be exempt. Coupled with flood risk and the absurdity of designing to an undefended flood situation (rather than breach modelling) an almost impossible scenario where the flood defences are completely removed. To design to the absolute worse case (doomsday) scenario is unrealistic and far from pragmatic.	Policy DP21: Suggested Rewording (Exempting Small Sites): "For smaller sites with 2/3 or less B2/B8 units, marketing is not required. For all other sites... marketing is required". (The reason provided is that smaller sites are often remote and deemed unsustainable, making the marketing onerous.) This policy in particular should relate only to allocated employment sites.		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					Development Management Policies (DP), particularly those related to climate change, sustainability standards, and flood risk, make the delivery of growth procedurally and economically harder. This is highlighted by the fact that the LPA was found not to have delivered a five-year supply of housing for at least 13 years, suggesting the existing constraints are already impacting deliverability. This will exacerbate the situation & the financial burden of compliance with policies that duplicate existing primary legislation uneccessary.			
Land north of Banwell Road, Locking /Elborough	No	‣ Justified	Unsure	Unsure				

Name: R Chubb **I.D:** 62859969

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Backwell has already approved 800 new houses on top of the existing c.2,000 houses. This is a 40% increase before any additional sites are added in the proposed Local Plan. Full implementation of the plan would increase Backwell's population by 80% - this is disproportionate. Where is the needs and viability analysis for the extra houses proposed in the Local Plan? The additional proposed 1,000 houses at East Backwell would lead to complete overdevelopment on the village with existing roads and infrastructure unable to cope. Backwell is being asked to take 7% of the entire district's housing allocation despite being a village. Clevedon is taking 2% despite better amenities and infrastructure. The proposed road would be at a considerable expense and not affordable by NSC or the developers. It is therefore possibly unfeasible as there are no guarantees that funding would ever be available. The land is also grade 1 agricultural land and there is only 7% left in the county. Government policy states we must protect the best and most versatile land. This is in contradiction to the Local Plan.			

Name: R Collinson **I.D:** 39195041

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Land east of Backwell	No	‣ Justified ‣ Effective	Unsure	Unsure	I am objecting to this Local Plan 2041 proposal on the basis that ; It is over development with a lack of additional resources to infrastructure, services to support either the existing or new residents. Backwell has already had approved the development of an additional 800 homes, some of which have started. The proposed additional numbers on top of this represents over development without the sufficient resources to support and manage such a population increase. There is no indication of additional resources for the services here that are already at capacity. Facilities such as schools, doctors, dentists, and pharmacy are already under stress to cope with the existing population, even before the approved			

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					800 homes are occupied. Additions beyond this will be unsustainable. In a similar manner the HWRC in Church Town (a conservation area) currently creates traffic issues in limited capacity roadways. There does not appear to be any proposals for managing the existing system let alone resiting the recycling facilities. The same problems will occur for the leisure centre where limited parking is available. Backwell is not a significant employment area. It must be predicted that most new homes will be for commuters into Bristol. Already the main road passing through the village (A370) is at full capacity mornings and evenings from commuters living in the surrounding area where huge development has occurred. Whilst there is a railway station for Backwell / Nailsea, it is of insufficient size and capacity to take predictable additional commuters even before these additional homes are proposed. There is no accessible access to the railway platform which today is unacceptable to be sustainable. The proposed additional homes of about 900 in number are indicated to be on Grade 1 agricultural land. Given the Government policy is to protect such land, and given all the lack of infrastructure to go with such residential developments none of there proposals should be considered.			

Name: R Crabtree **I.D:** 62796097

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at North West Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	1. Development of 582 houses and road next to Backwell lake. 1.1 Developing farmland to provide housing so close to a nature preservation area is unacceptable, due to the disruption this will cause from the noise development and access to the site proposed. 1.2 Cattle graze on these fields and they are often flood from excess water flowing from the stream. 2. Birds - Nesting. 2.1 The lake provides a sanctuary for the swans, ducks, other bird species and fish. Moving residents into this space will disrupt and effect the wild life living at the lake. 3. Road Building. 3.1 Building a road across acres of farmland to ease congestion in the village will also effect the wildlife living in the farmland. Habitats will be destroyed and harm the biodiversity in the area. 3.2 The railway bridge will also cause tremendous disruption to the railway network which is a major connection to London and the South Coastline for business. 4. Amenities. 4.1 Pressure on our Schools, Doctors, Dentist and Social Care facilities will be undoubtable stretched due to the huge increase in the residents in the area. Nailsea is already stretched at capacity to provide high standards of care which we have all been used to receiving. The proposal, as it stands, is unsound, unsustainable, and inconsistent with the long-term interests of the community. I respectfully request that the planning authority reject this development proposal.			
Land south of Nailsea	No	• Positively prepared • Justified	Unsure	Unsure	Excessive Cumulative Housing Growth — 582 Houses - Land South of Nailsea 1. Disproportionate Housing Allocation Compared with other North Somerset Settlements. 1.1. Any additional allocation materially exceeds what could be considered proportionate or sustainable for Nailsea town			

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		• Effective • Consistent with national policy			and Backwell village. In my opinion they should NOT be lumped together. 1.2. Emphasis planning for large-scale housing growth needs to be properly supported by infrastructure which will be inadequate, should these proposed developments go ahead. 1.3. Local Plans to deliver sustainable growth. A disproportionate concentration of development in Backwell compared with nearby service centres, does not meet the requirement for a justified spatial strategy. 2. Transport, Highway Safety & Connectivity Commuter Pressures & Unsustainable Travel Patterns. 2.1. Station Road and surrounding road networks are already operating at capacity especially at peak times (school runs and with increased summer traffic). 2.2. It requires developments to ensure safe and suitable access for all users; this is demonstrably unachievable without extensive planning. 2.3. The proposed allocation is unsound etc. and should be removed from the draft local plan. More importantly the land suggested to build a road system is totally unsuitable. This area regularly floods and the streams in the hedges are overflowing. If a road system is built on this land where is the excess water be displaced to? Houses in the area are going to suffer as a result. 2.4 Alternatives, such as widening the existing railway bridge, which are constrained by regular flooding. This is unpassable at times which prohibits allocating land at high flood risk areas when safer alternatives exist. 2.5. The planned road access will also cause untold disruption to the engineering conflicts with the railway corridor (a major arterial route) which needs to be available for commuters travelling to London and Southern England. The area also needs to be protected, as it is of value to the wildlife and landscape. 2.6. The proposed development area supports species reliant on open fields and hedgerows. This development would result in a substantial impact on the wildlife. The overall loss of peace and tranquillity for the habitat at the Backwell lake. 2.7. Backwell/Nailsea is heavily reliant on commuting by rail and car. Travel to Bristol is already congested at peak times and in the summer months. 3. Biodiversity Impact. Significant Flood Risk. 3.1. Climate-conscious policy direction supports retention of agricultural land and minimisation of carbon-intensive development. 3.2 Backwell Common and Backwell Lake are known flood plains. Past rainfall events already cause closures and property damage. 3.3. Development on flood plains is strongly discouraged. 3.4. Increased hard surfacing will worsen downstream flooding.			
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Formal objection to the proposed further housing development in Backwell I write to register my formal objection to the proposed additional housing developments in Backwell. The grounds for objection are set out below. 1. Excessive cumulative development. 1.1. Planning approval has already been granted for approximately 800 new dwellings, representing an estimated 40% increase in the village's housing stock. 1.2. Any further expansion would constitute over-development, placing disproportionate pressure on existing services and fundamentally altering the character of Backwell as a rural village. 2. Road safety, traffic capacity, and transport infrastructure. 2.1. The local road network is already operating beyond safe and reasonable capacity. Station Road, where I reside, experiences constant congestion and high volumes of heavy vehicles. 2.2. The narrow pavement from the railway station to Westleigh Infants' School and Backwell Comprehensive School presents a significant risk to students and pedestrians, particularly when buses and lorries pass in close proximity. 2.3. Proposals to construct a road over the railway line at Backwell Common (near the George public house) would result in substantial visual intrusion, landscape harm, and engineering risk. 2.4. The alternative option—widening the existing railway bridge—is compromised by frequent flooding, which already leads to road closures. 2.5. Any works affecting the main railway line serving London, Exeter, Plymouth, and Cornwall would generate major disruption for rail operators and passengers. 3. Insufficient public services and healthcare provision. 3.1. Existing GP surgeries, dental practices, and schools in Backwell are already			

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					under strain. 3.2. It is unclear what assurances, if any, exist that additional medical, dental, educational, and social-care staff will be funded to meet the needs of thousands of new residents. 3.3. Current government capacity does not indicate that such staffing increases will be provided, resulting in unacceptable service delays and unmet community needs. 4. Inequitable housing allocation compared to other areas. 4.1. Backwell has been allocated a significantly higher proportional housing increase (approximately 7%) than nearby settlements such as Clevedon (approximately 2%). 4.2. Backwell's limited retail and service infrastructure—consisting of small shops, cafés, and minimal commercial facilities—cannot reasonably support such disproportionate development, especially when compared with Clevedon's and Nailsea's far more extensive amenities. 5. Commuter pressures and lack of transport capacity. 5.1. Backwell functions predominantly as a commuter village, with heavy reliance on rail and road connections to London, Bristol, and the South West. 5.2. Existing train services are already at full capacity, often with standing-room only. No evidence has been provided that developers or rail operators plan to increase service levels to accommodate additional demand. 5.3. Road congestion into Bristol is already severe; an increase in population will cause further delays, impacting on school schedules, employment, and daily travel. 6. Insufficient community facilities. 6.1. Village halls, sports clubs, and recreational facilities are already heavily utilised. 6.2. Additional population growth without corresponding infrastructure expansion will result in significant shortfalls in community provision. 7. Loss of Grade 1 agricultural land. 7.1. The proposed development threatens remaining areas of Grade 1 agricultural land, of which only approximately 7% remains in North Somerset. 7.2. These high-quality soils are essential for domestic food production and grazing; their loss would be contrary to national sustainability and food-security objectives. 8. Environmental and climate-related concerns. 8.1. National and global policy increasingly supports plant-based agriculture and reduced environmental impact. 8.2. Building on agricultural land undermines food resilience, contributes to climate stress, and conflicts with objectives to protect carbon-absorbing landscapes. 9. Biodiversity and wildlife impact. 9.1. The fields surrounding Backwell support wildlife habitats essential to already vulnerable species. 9.2. Development in these areas would further diminish biodiversity in one of the world's most nature-depleted countries and contravene ecological protection principles. 10. Flood risk and development on flood plains. 10.1. Backwell Common is designated as a flood plain and is known to flood during periods of high rainfall. 10.2. Extensive hard surfacing and road infrastructure will exacerbate surface-water flooding, with water redirected into residential areas. 10.3. Past experience—both locally and in wider Somerset—demonstrates that building on flood plains results in repeated property damage, unsafe living conditions, and costly remediation. 10.4. Building on a flood plain is widely recognised as unsafe and unsustainable. Lessons from previous developments must be taken seriously. 11. Additional flood-risk concerns: Backwell Lake. 11.1. The Backwell Lake (reservoir) area and adjacent fields also flood regularly. 11.2. Additional development will increase downstream flood risk to existing homes, infrastructure, and ecosystems.			

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					12. Lack of accessible railway facilities. 12.1. Backwell and Nailsea railway station is not compliant with accessibility requirements. 12.2. The Bristol-bound platform has ramp access, but return access requires navigating stairs, which is unsuitable for wheelchair users, pushchairs, and passengers with limited mobility. 12.3. No proposals have been provided to address these deficiencies, despite increased demand. 13. Funding constraints due to affordable housing requirements. 13.1. Government policy requiring 50% affordable housing which restricts developers' ability to finance essential infrastructure such as schools, medical facilities, transport upgrades, and flood-mitigation works. 13.2. No comprehensive infrastructure costing or impact analysis has been provided to demonstrate how Backwell will absorb such rapid population growth. 14. Housing affordability and economic feasibility. 14.1. With rising living costs, many households already struggle to afford food, heating, and essential needs. 14.2. It is questionable whether the proposed housing will genuinely be affordable to local people, especially when factoring in increasing commuting and transport costs. 14.3. Significant risk exists that new homes will not meet local demand, undermining the development's stated purpose. Conclusion For the reasons detailed above—including transport constraints, environmental harm, flood risk, infrastructure inadequacy, loss of agricultural land, and disproportionate development—I strongly object to the proposed further housing development in Backwell. The proposal, as it stands, is unsound, unsustainable, and inconsistent with the long-term interests of the community. I respectfully request that the planning authority reject this development proposal.			
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Formal objection to the proposed further housing development in Backwell. I write to register my formal objection to the proposed additional housing developments in Backwell. The grounds for objection are set out below. 1. Excessive cumulative development. 1.1. Planning approval has already been granted for approximately 800 new dwellings, representing an estimated 40% increase in the village's housing stock. 1.2. Any further expansion would constitute over-development, placing disproportionate pressure on existing services and fundamentally altering the character of Backwell as a rural village. 2. Road safety, traffic capacity, and transport infrastructure. 2.1. The local road network is already operating beyond safe and reasonable capacity. Station Road, where I reside, experiences constant congestion and high volumes of heavy vehicles. 2.2. The narrow pavement from the railway station to Westleigh Infants' School and Backwell Comprehensive School presents a significant risk to students and pedestrians, particularly when buses and lorries pass in close proximity. 2.3. Proposals to construct a road over the railway line at Backwell Common (near the George public house) would result in substantial visual intrusion, landscape harm, and engineering risk. 2.4. The alternative option—widening the existing railway bridge—is compromised by frequent flooding, which already leads to road closures. 2.5. Any works affecting the main railway line serving London, Exeter, Plymouth, and Cornwall would generate major disruption for rail operators and passengers. 3. Insufficient public services and healthcare provision. 3.1. Existing GP surgeries, dental practices, and schools in Backwell are already under strain. 3.2. It is unclear what assurances, if any, exist that additional medical, dental, educational, and social-care staff will be funded to meet the needs of thousands of new residents. 3.3. Current government capacity does not indicate that such staffing increases will be provided, resulting in unacceptable service delays and unmet community needs.			

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					4. Inequitable housing allocation compared to other areas. 4.1. Backwell has been allocated a significantly higher proportional housing increase (approximately 7%) than nearby settlements such as Clevedon (approximately 2%). 4.2. Backwell's limited retail and service infrastructure—consisting of small shops, cafés, and minimal commercial facilities—cannot reasonably support such disproportionate development, especially when compared with Clevedon's and Nailsea's far more extensive amenities. 5. Commuter pressures and lack of transport capacity. 5.1. Backwell functions predominantly as a commuter village, with heavy reliance on rail and road connections to London, Bristol, and the South West. 5.2. Existing train services are already at full capacity, often with standing-room only. No evidence has been provided that developers or rail operators plan to increase service levels to accommodate additional demand. 5.3. Road congestion into Bristol is already severe; an increase in population will cause further delay, impacting school schedules, employment, and daily travel. 6. Insufficient community facilities. 6.1. Village halls, sports clubs, and recreational facilities are already heavily utilised. 6.2. Additional population growth without corresponding infrastructure expansion will result in significant shortfalls in community provision. 7. Loss of Grade 1 agricultural land. 7.1. The proposed development threatens remaining areas of Grade 1 agricultural land, of which only approximately 7% remains in North Somerset. 7.2. These high-quality soils are essential for domestic food production and grazing; their loss would be contrary to national sustainability and food-security objectives. 8. Environmental and climate-related concerns. 8.1. National and global policy increasingly supports plant-based agriculture and reduced environmental impact. 8.2. Building on agricultural land undermines food resilience, contributes to climate stress, and conflicts with objectives to protect carbon-absorbing landscapes. 9. Biodiversity and wildlife impact. 9.1. The fields surrounding Backwell support wildlife habitats essential to already vulnerable species. 9.2. Development in these areas would further diminish biodiversity in one of the world's most nature-depleted countries and contravene ecological protection principles. 10. Flood risk and development on flood plains. 10.1. Backwell Common is designated as a flood plain and is known to flood during periods of high rainfall. 10.2. Extensive hard surfacing and road infrastructure will exacerbate surface-water flooding, with water redirected into residential areas. 10.3. Past experience—both locally and in wider Somerset—demonstrates that building on flood plains results in repeated property damage, unsafe living conditions, and costly remediation. 10.4. Building on a flood plain is widely recognised as unsafe and unsustainable. Lessons from previous developments must be taken seriously. 11. Additional flood-risk concerns: Backwell Lake. 11.1. The Backwell Lake (reservoir) area and adjacent fields also flood regularly. 11.2. Additional development will increase downstream flood risk to existing homes, infrastructure, and ecosystems. 12. Lack of accessible railway facilities. 12.1. Backwell & Nailsea railway station is not compliant with accessibility requirements. 12.2. The Bristol-bound platform has ramp access, but return access requires navigating stairs, which is unsuitable for wheelchair users, prams, and passengers with limited mobility. 12.3. No proposals have been provided to address these deficiencies, despite increased demand. 13. Funding constraints due to affordable housing requirements. 13.1. Government policy requiring 50% affordable housing restricts developers' ability to finance essential infrastructure such as schools, medical facilities, transport upgrades, and flood-mitigation works.			

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					13.2. No comprehensive infrastructure costing or impact analysis has been provided to demonstrate how Backwell will absorb such rapid population growth. 14. Housing affordability and economic feasibility. 14.1. With rising living costs, many households already struggle to afford food, heating, and essential needs. 14.2. It is questionable whether the proposed housing will genuinely be affordable to local people, especially when factoring in increasing commuting and transport costs. 14.3. Significant risk exists that new homes will not meet local demand, undermining the development's stated purpose. Conclusion For the reasons detailed above—including transport constraints, environmental harm, flood risk, infrastructure inadequacy, loss of agricultural land, and disproportionate development. The proposed allocation is unsound, unsustainable, and inconsistent with the long-term interests of the community and it should be removed from the draft local plan.			

Name: R Dawson **I.D:** 21230881

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	We moved to Backwell 10 years ago from Bristol, pregnant with twins and excited what village life would bring for our new little family. We wanted green spaces, fresh air and a vibrant community for our children. All of this is being decimated before our very eyes, and the future of our children here and for village life is looking bleak. Traffic is already horrendous, school places are challenging and doctor and dentist appointments are non-existent. Our village already has an additional 800 new houses with planning permission now, which is a 40% increase, much more than other areas in North Somerset including towns. It seems the village is targeted because it has a train station and yet the trains are already at capacity. For many years people have asked for the Station to be fully accessible on both sides for those with mobility issues and we have been told it is impossible to achieve this because of the banks, which are unable to support any form of ramps. It is also impossible to extend the trains because of the length of the platform, so with another 800 houses and families moving in, I fail to see how the Station will cope with this further number, without yet ANOTHER 1,000 houses – an 80% population increase!! It is utter unsustainable madness, when a town like Clevedon is looking at a 6% population growth. The land that has been farmed for over 1,000 years and still is! Has been put forward for this extra 1,000 houses. I am told it is Grade 1, the highest quality land you can get and North Somerset only has 7% left, on top of that it is Greenbelt and I can vouch for the fact that it has crops growing and cows grazing all year round. It is utterly appalling that this land is being put forward. I notice our North Somerset MP Sadik Al-Hassan put out a social media post recently saying how a new Government Policy called the "Environmental Improvement Plan" had just been published and that "Food Security" was one of the top issues. It makes no sense to launch this and say the environment must be improved and food security must be prioritized and then allow this land to be built on. Particularly when Backwell has more than done it's bit to provide housing. There are so many reasons to object to this proposal – it really is the worst of the worst – wildlife, nature, biodiversity, overdevelopment, infrastructure, services, social cohesion, loss of high-quality land, no needs analysis, food security, flooding, mental health and wellbeing of people living in the village. The list is so long I find it completely overwhelming. I very much hope that these appalling plans are taken out and some sense and balance is incorporated into North Somerset Councils Local Plan going forward.			

Name: R Eade **I.D:** 39272545

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Land south of Nailsea	No	• Positively prepared	Unsure	Unsure	1. The existing highway network has no improvements shown. Hot spots that will become worse are the top of Wraxall Hill, Stone Edge Batch (where traffic will flow to the M5) and Portbury Lane. The proposed east Backwell New Road is (a) unfunded with developers only building roads for their developments, (b) Nailsea station is an unrealistic transport hub as double decker buses still cannot pass under the railway, (c) shuttle traffic working would be required where the new road			

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		• Justified • Effective • Consistent with national policy			hooks up with Backwell Common road for safety. With additional traffic being thrown on to station road a passenger refuge will be required at the popular crossing point at the Horwood Rd junction as people access the town centre. 2. The proposed developments are well away for walking distances to town centre, train station etc. 3. Proposed developments increase housing in the area by 41% with no corresponding increase in medical nor leisure facilities 4. No improvements planned for Nailsea & Backwell station 5. Developments south of Nailsea are on quality agricultural land helping the nations food security. 6. No real employment facilities which implies more commuting on an existing busy road network grappling with HGV's on narrow roads. In addition existing lanes within Nailsea are at risk of issues. 7. Why are we building on flood plane areas?			

Name: R Evans **I.D:** 28715585

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	• Justified	Unsure	Yes	There is no needs analysis which justifies the need for an additional 1000 houses for Backwell.			
Policy LP3: Strategic location: Nailsea and Backwell	No	• Justified	Unsure	Yes	The need to earmark the land to the East of Westleigh Primary School is not justified as housing targets can be met without this field. Its location means it is ideally suited for eating an additional green space for children's play, wellbeing. This field presents an ideal opportunity to enhance green space, not lose it forever.			
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	There is no needs or viability analysis for another 1000 houses. Utilising this land is a contradiction to Government policy to protect our best and most versatile land. The infrastructure delivery plan lacks analysis and costings, and there are no funding guarantees for the new road or services. There is no holistic view on where an appropriate community facility could be located with the danger that fragmented community facilities could be the outcome. Backwell Playing Fields charity has land which cold be utilised for this purpose.			

Name: R Flower **I.D:** 62856097

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Black Rock, north of Clevedon Road	No	• Justified	Unsure	Unsure	NSC has not considered alternative brownfield or green field sites with far lower ecological impact. NSC has not considered the ecological importance of Weston Big Wood and the Gordano Valley green corridor. Clevedon Road is not able to deal with the additional traffic caused by construction and the future residents of these properties. The road becomes gridlocked when the M5 is shut as it is and residents cannot get out of their drives let alone travel between Portishead and Clevedon.			

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					National planning allows Green Belt changes in exceptional circumstances which this does not meet. Tower Farm and Black Rock should be removed from the Local Plan			

Name: R Gaunt **I.D:** 10224737

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I write in connection with the proposal to build some 1,000 new houses on this green belt agricultural land. I object to the proposal and would make the following points:- 1. No consideration or study has been done as to what Backnell needs or requires in terms of new developments. 2. Backwell is a village of some 2,000 home. Already planning permission has been given for some 800 new homes which is a 40% increase and this proposal seeks a further 1,000 new homes. 3. There are not the jobs, schools, roads or infrastructure to support this growth. 4. A new road has been proposed, but this lacks any detail, plans , feasibility study or funding and would have serious implications on the whole of the Backwell Common area. 5. These developments, together with the proposal for 582 new homes next to Backwell Lake, all seriously impact Station Road and the Backwell conservation area. 6. All these developments and the proposed roads involve flood plains which flood regularly. 7. The sheer volume of growth with the required investment infrastructure and services over such a short period is destabilising, unsustainable and undeliverable. 8. The proposed developments would destroy valuable wildlife habitats and further harm biodiversity. It would also threaten our locl bat population of greater and lesser horseshoe bats. 9. Backwell does not have the jobs to support this level of new build so would necessitate residents commuting, adding to the significant traffic we already experience on Station Road and particularly around the crossroads. 10. The new road being propsed has not been thought through or costed. As it has to go over of under an existing railway line would be prohibitively expensive and possibly unfeasible. In summary, Backwell does not need this level of new homes, cannot support them in terms of jobs,infrastructure, or health and school services and the majority of the developments are on floodplains which are prone to flooding and the propsed new road is uncosted and possibly totally unfeasible.			

Name: R Gentilli **I.D:** 17894113

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Positively prepared • Effective • Consistent with national policy	No	No	Comment on Policy LP4: Strategic location – Pill and Easton-in-Gordano and related policies SP7 (Green Belt), SP10 (Transport) and SP11 (Historic and natural environment) Is the plan sound? No – the Pill and Easton-in-Gordano proposals are unsound for the following reasons. 1. Community involvement and legal compliance – The additional-sites consultation (February–March 2025) introduced five sites around Pill and Easton-in-Gordano for 1,100 dwellings, yet no exhibition or event was held in the village. Only 29 individuals responded, even though a petition with more than 1,800 signatures (about 40 per cent of the population) opposed the scale of development. This under-representation indicates that North Somerset Council failed to comply with its own Statement of Community Involvement and did not meet the Public Sector Equality Duty. 2. Release of Green Belt land is not justified – Policy SP7 proposes releasing 1,100 dwellings across five sites around Pill and Easton-in-Gordano◈188816892012036†L1303-L1319◈ as part of “exceptional circumstances” because the council says it cannot meet housing need elsewhere◈188816892012036†L1364-L1375◈. However, the plan does not demonstrate that reasonable alternatives have been exhausted; it does not show how	Given the significant concerns set out above, the following changes are necessary for soundness and legal compliance: - Remove the Pill and Easton-in-Gordano strategic allocation (Land at Lodway Farm, Land east of Gordano Services, Pill Green and Land at Pill Road). Retain the village as a service village within the Green Belt and only permit limited infill. - Reallocate housing need		

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					brownfield sites or higher-density developments have been maximised or that neighbouring authorities were asked to help meet need. The 'Golden Rules' of the National Planning Policy Framework require 50 per cent affordable housing on these Green Belt sites◈188816892012036†L1303-L1319◈, yet the council's own viability evidence suggests this is challenging. Without clear evidence that alternatives have been considered and that 50 per cent affordable housing is deliverable, the release of Green Belt land is unjustified and not sound. 3. Transport impacts and reliance on unproven infrastructure – Policy LP4 envisages a strategic approach that integrates green spaces, active travel routes and essential infrastructure◈188816892012036†L3070-L3091◈ and requires a new primary school, transport hub and several active travel connections◈188816892012036†L3099-L3132◈. Yet Pill's "sustainable" status is based on the proposed Portishead–Pill–Bristol railway (funding secured but not open until 2028) and access via the A369◈188816892012036†L3156-L3174◈. The plan lacks cumulative transport modelling to show the effect of 1,100 homes on Junction 19 of the M5 and existing congestion. National Highways has already raised concerns about development near the Gordano services. Without firm commitments to deliver new infrastructure before occupation and without evidence that Junction 19 can cope with extra traffic, the proposals risk increasing car dependence and congestion, contrary to SP10, and are therefore unsound. 4. Environmental and biodiversity impacts – All Pill and Easton-in-Gordano allocations involve Green Belt land◈188816892012036†L3099-L3103◈. The village lies within consultation zones for the North Somerset & Mendip Bats Special Area of Conservation and near the Severn Estuary Site of Special Scientific Interest. Policy LP4 requires green spaces and active travel routes◈188816892012036†L3099-L3132◈, but the plan offers no specific Habitat Regulations Assessment for these sites and no clear mitigation for bat roosts or habitat corridors. Without robust ecological assessments, secured biodiversity net gain funding and measures to protect best and most versatile agricultural land, the proposals conflict with SP11 and are not legally compliant. 5. Flood risk – Parts of Pill and Easton-in-Gordano, particularly around Markham Brook, lie in Environment Agency Flood Zone 3. Policy DP9 requires development to avoid areas at high risk of flooding and to apply the sequential test, but Policy LP4 still proposes housing on land adjacent to the brook. The plan gives no evidence of site-specific flood risk assessments or sequential testing to demonstrate that lower-risk areas were prioritised. This failure to address flood risk renders the proposals unsound. Conclusion – The Pill and Easton-in-Gordano proposals fail the tests of legal compliance and soundness. They do not demonstrate effective community engagement, justification for releasing Green Belt land, deliverable infrastructure, protection of biodiversity or robust management of flood risk. I therefore object to the allocation of 1,100 homes around Pill and Easton-in-Gordano and urge the council to withdraw. Given the significant concerns set out above, the following changes are necessary for soundness and legal compliance: - Remove the Pill and Easton-in-Gordano strategic allocation (Land at Lodway Farm, Land east of Gordano Services, Pill Green and Land at Pill Road). Retain the village as a service village within the Green Belt and only permit limited infill. - Reallocate housing need to brownfield sites and higher-density urban extensions elsewhere in the district or seek assistance from neighbouring authorities under the duty to co-operate. - Re-run public consultation for any new proposals with meaningful engagement in Pill and Easton-in-Gordano in line with the Statement of Community Involvement. - Undertake cumulative transport modelling for the M5 junction 19 and A369; ensure new rail, bus and active travel infrastructure is delivered before housing occupation. - Carry out site-specific Habitat Regulations Assessments, biodiversity net-gain plans and Flood Risk Assessments; avoid development on Flood Zone 3 land and protect habitat corridors.aw these sites, explore brownfield and higher-density options elsewhere and preserve the Green Belt and character of the village.	to brownfield sites and higher-density urban extensions elsewhere in the district or seek assistance from neighbouring authorities under the duty to co-operate. - Re-run public consultation for any new proposals with meaningful engagement in Pill and Easton-in-Gordano in line with the Statement of Community Involvement. - Undertake cumulative transport modelling for the M5 junction 19 and A369; ensure new rail, bus and active travel infrastructure is delivered before housing occupation. - Carry out site-specific Habitat Regulations Assessments, biodiversity net-gain plans and Flood Risk Assessments; avoid development on Flood Zone 3 land and protect habitat corridors.		

Name: R Griffiths **I.D:** 62796513

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Lodway Farm	No	• Positively	Unsure	Unsure	The proposal has not been subject to a meaningful community engagement by North Somerset Council in the local area. The proposal is likely to result in significant changes to the local community.	Removal of the proposal from the plan		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
		prepared • Justified • Effective			Is likely to result in significant traffic and transportation issues. M5 junction 19 is already subject to significant congestion. North Somerset council has progressed with the local plan before National Highways have completed their assessment of M5 J19. The benefits ascribed to potential future railway links (which do not as yet exist) are not justified with sufficient evidence. May result in removal of land from the Green Belt without adequate assessment of alternative Brownfield options Is likely to have a significant impact upon the natural environment and the protection of wildlife Could exacerbate potential flood risks			
Land east of Gordano Services	No	• Positively prepared • Justified • Effective	Unsure	Unsure	The proposal has not been subject to a meaningful community engagement by North Somerset Council in the local area. The proposal is likely to result in significant changes to the local community. Is likely to result in significant traffic and transportation issues. M5 junction 19 is already subject to significant congestion. North Somerset council has progressed with the local plan before National Highways have completed their assessment of M5 J19. The benefits ascribed to potential future railway links (which do not as yet exist) are not justified with sufficient evidence. May result in removal of land from the Green Belt without adequate assessment of alternative Brownfield options Is likely to have a significant impact upon the natural environment and the protection of wildlife Could exacerbate potential flood risks	Removal of proposal from the plan		
Pill Green	No	• Positively prepared • Justified • Effective	Unsure	Unsure	The proposal has not been subject to a meaningful community engagement by North Somerset Council in the local area. The proposal is likely to result in significant changes to the local community. Is likely to result in significant traffic and transportation issues. M5 junction 19 is already subject to significant congestion. North Somerset council has progressed with the local plan before National Highways have completed their assessment of M5 J19. The benefits ascribed to potential future railway links (which do not as yet exist) are not justified with sufficient evidence. May result in removal of land from the Green Belt without adequate assessment of alternative Brownfield options Is likely to have a significant impact upon the natural environment and the protection of wildlife Could exacerbate potential flood risks	Removal of this proposal from the plan		
Land at Pill Road	No	• Positively prepared • Justified • Effective	Unsure	Unsure	The proposal has not been subject to a meaningful community engagement by North Somerset Council in the local area. The proposal is likely to result in significant changes to the local community. Is likely to result in significant traffic and transportation issues. M5 junction 19 is already subject to significant congestion. North Somerset council has progressed with the local plan before National Highways have completed their assessment of M5 J19. The benefits ascribed to potential future railway links (which do not as yet exist) are not justified with sufficient evidence. May result in removal of land from the Green Belt without adequate assessment of alternative Brownfield options Is likely to have a significant impact upon the natural environment and the protection of wildlife Could exacerbate potential flood risks	Removal of proposal from plan		

Name: R Harris **I.D:** 58488865

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land to the west of Elborough	No	• Justified	Unsure	Unsure	1. TRAFFIC With the increase of traffic, cars, vans and lorries on these minor countryside roads, which have increased over the last few years, and with the amount of houses that are planned to build, it's unsustainable on these narrow country roads. Since l've lived here there have been numerous accidents - several serious accidents of cars speeding down Banwell Road and colliding at the junction with Cedern Ave, one resulting in crashing into the house at the junction of Cedern Ave, another where a horse was killed and rider injured, as we do live in the country we have many horses using Banwell Road, going to local stables. Plus there are no pavements or paths along this road			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					2. FLOOD PLAINS The intentions are to build houses on a flood plain, a runoff from the Mendip Hills, and plus with heavy rain, Banwell Road does flood, causing more problems with the traffic, and with the increase of houses you hope to build, the traffic will increase fivefold causing more congestion and danger. 3. WILDLIFE There are bats that feed in the valley, coming from roosts from the caves at Banwell Wood. Also there are deer, badgers, and foxes feeding in the valley, they also come from the woods. 4.INFRASTRUCTURE There is no infrastructure in this area, we have to drive to shops, doctors and other amenities. When Elborough was built, shops were included in the plan, this of course never happened. I note that on the plan it includes a shop or community building , I doubt very much that this will happen, like the proposed outlets in Locking Parklands, yet to see the light of day. Plus the strain on our roads,schools, doctors and general infrastructure. 5. GENERAL Why not finish building on Locking Parklands and Haywards Village before looking for new sites. I’m alongside Hutton parish council who oppose these developments.			
Land north of Banwell Road, Locking /Elborough	No	Justified	Unsure	Unsure	1. TRAFFIC With the increase of traffic, cars, vans and lorries on these minor countryside roads, which have increased over the last few years, and with the amount of houses that are planned to build, it's unsustainable on these narrow country roads. Since l've lived here there have been numerous accidents - several serious accidents of cars speeding down Banwell Road and colliding at the junction with Cedern Ave, one resulting in crashing into the house at the junction of Cedern Ave, another where a horse was killed and rider injured, as we do live in the country we have many horses using Banwell Road, going to local stables. Plus there are no pavements or paths along this road 2. FLOOD PLAINS The intentions are to build houses on a flood plain, a runoff from the Mendip Hills, and plus with heavy rain, Banwell Road does flood, causing more problems with the traffic, and with the increase of houses you hope to build, the traffic will increase fivefold causing more congestion and danger. 3. WILDLIFE There are bats that feed in the valley, coming from roosts from the caves at Banwell Wood. Also there are deer, badgers, and foxes feeding in the valley, they also come from the woods. 4.INFRASTRUCTURE There is no infrastructure in this area, we have to drive to shops, doctors and other amenities. When Elborough was built, shops were included in the plan, this of course never happened. I note that on the plan it includes a shop or community building , I doubt very much that this will happen, like the proposed outlets in Locking Parklands, yet to see the light of day. Plus the strain on our roads,schools, doctors and general infrastructure. 5. GENERAL Why not finish building on Locking Parklands and Haywards Village before looking for new sites. I’m alongside Hutton parish council who oppose these developments.			

Name: R Harvey **I.D:** 58408641

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No		Unsure	Yes	FLOODING The proposed 889 houses and new road adjacent to the London to Swansea railway line will contribute to major flooding issues. This land already floods. Backwell Common is very low lying land in the base of a valley. The water run off from the proposed additional housing developments will exacerbate the situation. Dibdens Farm has a very large pond which currently takes excess water from the reans (water courses)and already fills to capacity when there is	The building of any houses in the vicinity of Backwell Common will have a detrimental effect on the already significant flood risk. North Somerset council have duty to do everything in its power to prevent flooding. By allowing construction North Somerset Council will be neglecting this duty. The North Somerset local flood risk management strategy completed in 2012 highlights a number of issues which have not changed. Backwell Lake was built around 1978 as a balancing pond by	N/A	

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					heavy rain. Backwell Lake was created by the Environment Agency to prevent flooding in the valley. Any further development will intensify the situation to unmanageable levels.	Wessex Water to manage surface water from new housing developments in Nailsea and prevent flooding. The lake is at full capacity.		

Name: R J Jeffries **I.D:** 58633121

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell					I wish to register my Objection to this new building proposal in Nailsea, owing to the following reasons to be investigated. 1 - Marsh]and/ flood plain effecting drainage of storm and foul water on site, with reference to the existing water table. 2 - High additional costs of piling works for foundations to prevent subsidence, if necessary. 3 - New very high powered electrical cables and concrete pilons spanning the site, increasing magnetic fields. 4 - Inadequate infrastructure i.e. existing access and egress roads to the site. 5 - Unsuitable existing roads in the Nailsea area to accommodate additional traffic. 6 - Further erosion of wildlife habitat in this area. 7 - Additional Health and Wealth facilities will be required, I.e. Doctors Dentists. Opticians, Pharmacies, Schools! Youth Facilities etc. There are probably many other very important reasons, why this proposed site is unsuitable for new building construction, to he determined by others as appropriate. I hope the Planning Department will seriously consider and add my Objection to the above new project.			

Name: R James **I.D:** 58578145

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Black Rock, north of Clevedon Road					I am emailing to object to the proposed development of Tower Farm. We live on The Downs, and the single access route would cause chaos. It already takes us 15 mins to get out of our street at school times. We bought our house due to the open space and common land because there is nowhere to walk up at West Hill with children, there is no green space or outside space, unless we drive to the marina. These, I understand, are green belt areas and other sites haven’t been fully explored before this proposal. These sites also protect the Weston Big Wood, and changes to the green belt need to be in exceptional circumstances and this hasn’t been demonstrated. There are many vacant brownfield sites that could be redeveloped and actions to reduce	We would appreciate any support you can give to objecting this proposal, and any advice to us on what we can do to continue to object / fight this.		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					vacant housing in the area which would reduce the need to develop greenfield. I am sure that the other areas proposed were less impactful in terms of development. The single access via The Downs is just not viable or sustainable. We would appreciate any support you can give to objecting this proposal, and any advice to us on what we can do to continue to object / fight this.			

Name: R Mansfield **I.D:** 62740577

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	‣ Justified	Unsure	Unsure	There already is a lot of house building going on in and around the village of Backwell and I do not think we have the schools, shops, doctors or recreational facilities to accommodate the village of backwell growing anymore. In addition, you are proposing to build on green belt, prime agricultural land. In the uncertainty of food security for the future I really do not think the proposal to build on such is a good idea. I know we do need more housing but it is really important that the sites for such housing is looked at in the round with sustainability of our 'green and pleasant land' held in much higher regard than it is currently. There is also the question of the impact all this building would have on our roads and the safety of people living in our streets trying to get round on foot safely! There are far too many cars already and I hate to think of what our local roads will be like if all these building proposals go through. In particular Station Road does not lend itself to further foot fall as it is far too narrow In addition what about the increased, very real risk of further flooding (parts of Backwell are on a Flood Plain) if further large developments are allowed to be built. For example, the A370 through Backwell and Flax Bourton; Chapel Hill and Backwell Common - the flooding situation will only get worse. I have lived on Backwell Common for 45 years and have had the pleasure of enjoying all the wild life it has had to offer during the whole of that time - seeing deer, rabbits, badgers, hares, bats, voles, newts, frogs, stoats, field mice, toads, egrets, kingfishers, swans, canada geese, swallows, starlings, bees, dragon flies, magpies, sparrows, sparrow hawks, bussards, red kites, jenny wren, and sparrow hawkes. Not forgetting, the cows, sheep, goats and horses.	It should be motified to stop this.	I do not support it.	

Name: R North **I.D:** 62862433

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I am writing to voice my firm opposition to yet more destruction of grade 1 green belt land, this time off Station road, Backwell Common and behind Backwell Secondary School, to be permanently replaced with more environmentally damaging housing, of highly questionable need. The residents of Backwell have already been forced to accept 4 so called 'developments' comprising nearly 800 houses, all of course on green belt land. Until these houses are sold we will have no idea how their very sudden and excessive appearance will adversely affect the village. With virtually zero additional infrastructure, where exactly are the extra 1400 odd cars going to go? (oh yes, I remember now, all the new occupants will be travelling everywhere by train). Where indeed are the additional school places for maybe 1000 children, and where are all these kids going to play? Doctors appointments, parking places, loss of habitat for wildlife, the day to day running of the village is already about to come under severe pressure. So this is the situation now, this new proposal will undoubtedly make things 10 times worse. I understand the land earmarked for this proposal is subject to flooding, a serious problem becoming increasingly common thanks to climate change. Putting a massive housing estate on such land will clearly substantially exacerbate the problem, a ridiculous situation, the plan being to in the future just dump at the Environment Agency's door no doubt. Given the current deplorable state of the village roads, it is also quite clear that a relief road, whilst promised, will never ever be built to help deal with the traffic explosion, if there is apparently no money to repair simple pot holes. Station Road, which all this new traffic will inevitably have to use, is not suitable to deal with such increased volume, as the pinch point of the railway tunnel will always be a major problem. Proposals to 'possibly' go over or under the railway to improve this situation are, both practically and financially, risible.			

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					There are probably many other reasons why this extra building plan is wholly unsuitable of our lovely village, hopefully others have been forthcoming with them, and as we are already experiencing exponential growth and don't yet have any idea of its impact, further building would seem to be utter folly. I am both angry and disappointed that it is still necessary for the people of Backwell to endlessly point out the blindingly obvious problems of yet more housing on our nice and easy to build on green fields, that once dug over like the once lovely fields currently 'satisfying policy' 200yds from my house, they will be gone forever, lost most likely to a political box ticking exercise.			

Name: R Pike **I.D:** 62463649

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy DP14: Highway safety, traffic and provision of infrastructure associated with development	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The information relating to Public Transport is incorrect and out of date. The Stage 7 Transport Assessment paragraph 4.60 wrongly states that “At present, buses either travel along the A369 without diverting into Pill or divert through the centre of Pill via Priory Road, Lodway and Pill Road.” There hasn’t been a bus service along the A369 for several years, indicating that the late inclusion of Pill into the Plan was rushed and ill-prepared. For this reason, the proposed BSIP changes to the A369 multiple occupancy lane will worsen, not improve bus services. This specifically contravenes 4.64 which states it is a key aim that “congestion does not adversely affect road safety, active travel connectivity, and / or public transport journey times and reliability”. Furthermore, 4.66 states that “The cumulative impact of development at Junction 19 is being considered as part of the wider Local Plan Transport Assessment rather than specifically in relation to the Pill development allocation”, even though the 4.63 states “there will inevitably be an increase in vehicle movements associated with the level of development proposed for Pill. It is likely that the two junctions which connect Pill to the A369, namely the Pill Road / A369 junction, and St Georges Hill / A369 junction, will experience increased congestion.” Given the sites’ close proximity to Junction 19, it is flawed to not specifically consider the impact on the Pill public transport journey times and reliability.	Remove the Pill sites entirely from the plan or limit the number of houses to be in proportion with the size of the existing village and its infrastructure, in line with our Neighbourhood Plan 2020-2036.		

Name: R Ransome **I.D:** 62858113

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I do not consider this Plan to be sound because it fails to address a number of key issues which need to be take in to account when assessing the impact of adding such a large number of dwellings – and their residents – to the Nailsea and Backwell area. It may be true that we need to build more homes for people, but just erecting more and more dwellings without considering ALL the effects this will have on the surrounding area, as well as the resulting implications it will have for both existing and new residents in their day-to-day lives, is both socially and morally unacceptable. The proposed level of development planned for Nailsea will totally over-develop the town and seriously damage or destroy valuable wildlife habitats in the area. A large rise in the number of residents in the area will obviously place immense pressure on existing health and leisure provision in the town, but there will be no direct investment to cope with this pressure. What plans are there to address this? Equally, more residents will result in an increased demand for school places. The plan includes proposals for three new primary schools for Nailsea and Backwell, but these will be phased and no locations have yet been identified. Similarly,			

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					there will also be a resultant rise in the demand for secondary school places and this also needs to be planned for. Existing traffic congestion will only get worse, as the proposed new road will do nothing to help Nailsea residents, nor will it ease the route for traffic travelling from Backwell to the M5. Provision of the under rail crossing close to the River Kenn is likely to prove challenging and very costly – all for very little benefit to the majority of Nailsea residents. Traffic problems in the network of rural roads around Nailsea will only increase, with more vehicles using these narrow lanes, making them congested and unsafe for pedestrians, cyclists and horse riders. Increased levels of traffic using the known accident blackspots of Wraxall Hill, Portbury Lane and Stone Edge Batch will only make these routes more dangerous and add to the likelihood of accidents. There are no plans to improve these areas. The existing railway station is already not fit for purpose, as it remains inaccessible for people with mobility issues and challenging when travelling with young children. The proposed plans do not address these issues.			

Name: R Reynolds **I.D:** 62861217

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP3: Spatial strategy	No	• Positively prepared • Justified • Effective	Unsure	Unsure				Rsponse to local plan 12.12.25.docx

Name: R Rumble **I.D:** 62858017

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	This site should be removed from the local plan. Before building on greenfield sites all brownfield sites within Portishead should be fully developed at an increased density, and this is not the case. Some brownfield sites are not in the plan and others are not fully utilised. If they were in the plan, greenfield sites in Portishead would not be needed, so there inclusion cannot be justified. Having listened to the experts, the damage to the SSSI Weston Big Wood would be significant and irreversible. Avon Wildlife Trust are against the plans as are local wildlife groups. The sites were only added to greenbelt in the late 1980's due to their ecological value, this has not changed. National planning policy says that sites can only be removed from the greenbelt in exceptional circumstances, the fact there are still undeveloped brown field site means this is not the case and their inclusion is unjustified. The site is at the top of a long and steep hill (from all directions). I've lived in the upper part of Portishead for decades now and have never walked or cycled that hill, to suggest the people living in this new estate will do otherwise is fanciful. No sustainable transport is possible to this site and this is against planning policy. Adding a new buses will not mitigate this. Other sites in Portishead would allow walking and cycling, but not this one. The roads around this site are jammed every school day. This estate will only compound this problem. If the school increases in size, it will be further compounded. The roads cannot be changed, so increasing the number of cars using them will cause significant further issues. I use the site daily for dog walking. In Winter significant sections are at times underwater, with the ground unable to absorb more. I dont know what would happen if the site is unable to absorb any water. Parts of Portishead High Street already flood after heavy rain. Building here will not improve this. The site is inappropriate, no modifications will change this, it should be removed.			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					I do not support its inclusion			

Name: R Snook **I.D:** 62529793

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	1. The proposed figure of 1,817 new homes in Nailsea would lead to a total over development of the town. 2. The proposed new road would not serve Nailsea's traffic or relieve congestion on Station Road, nor would it help traffic travelling from Backwell to the M5 3. The new link road, under a rail crossing is likely to be extremely expensive and the engineering problematic due to the proximity to the river Kenn 4. Although 3 new primary schools are proposed for Nailsea and Backwell, they will be funded through developer contributions and will be phased with no locations identified as yet 5. Additional development will place immense pressure on the towns existing health and leisure provision. There will be no direct investment to combat this pressure 6. Greenfield Crescent playing field is not protected under Local Green Space Policy LP15 7. Grade 2 agricultural land which is high yielding and of very good quality will be lost permanently through housing development to the south of Nailsea 8. All proposed development sites in Nailsea have been assessed for foraging locations for the rare greater and lesser horseshoe bats which are protected species 9. One hundred homes are proposed adjacent to Moor End Spout nature reserve a site hosting many protected species. Development would destroy valuable wildlife habitats and further harm biodiversity in our area 10. Transport modelling shows there will be notable increases in vehicle movements on the network of rural lanes around Nailsea. There are no clear workable plans to mitigate this. The lanes will become congested and unsafe for pedestrians, cyclist and horse riders. 11. There are no plans to improve the accident blackspots at Stone Edge Batch, Wraxall Hill or Portbury Lane all of which will see a marked increase in vehicles 12. Development is proposed west and south of Backwell Lake. The new roads and housing will be in the floodplain which actually does flood regularly 13. The railway station is not fit for purpose as a transport hub, it remains unaccessible for people with mobility issues and presents serious challenges when travelling with young children			
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell already has 800 new homes approved, a 40% increase for the village. Additional numbers would be complete over development. The proposed road would not effectively serve Nailsea's traffic or reduce congestion on Station Road, Backwell Common or Chapel Hill. Engineering the road over or under the railway would be highly expensive and potentially unfeasible. Despite the proposed increase there will be no additional school, leisure facilities or health services. The lack of infrastructure services cannot support another 1000 homes. Backwell is allocated a higher percentage of housing increase than any other North Somerset village and an even higher number of percentage growth. 7% of the regions compared to only 2% for Clevedon. There is no needs or viability analysis for an extra 1000 homes. Backwell is not an employment hub, most residents commute. No social cohesion impact assessment has been provided. Grade 1 agricultural land used for crops and grazing. There is only 7% of this land left in the whole of North Somerset. Government policy states 'we must protect our best and most fertile land' to safeguard food security. This is a contradiction of this policy and haram food security.			

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					Development would destroy valuable wildlife habitats and further harm biodiversity in one of the worlds most nature depleted countries. The proposals threaten the Brockley maternity roost and SSSI with rare lesser and greater horseshoe bats relying on the land for food. The infrastructure delivery plan lacks analysis and costings, and there are no funding guarantees for the road or services. Backwell Common and surrounding areas are prone to regular flooding, new houses would exacerbate the problem. Concerns regarding the strategic growth location designation include the impact on the areas character risk of flooding, the loss of greenbelt and agricultural land, and uncertainty over the funding for the road. Backwell Lake where the new houses and road are planned is on a floodplain and regularly floods. Government policy requires 50% affordable housing on greenbelt land but this reduces the funds developers contribute towards infrastructure. The sheer volume of growth and requires infrastructure over a short period of time is unsustainable, destabilising and undeliverable. The railway station is not fit for purpose as a transport hub, it remains unaccessible for people with mobility issues and presents serious challenges for those travelling with children.			

Name: R Stevenson **I.D:** 29242497

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP12: Bristol Airport	No	• Positively prepared • Justified • Consistent with national policy	Unsure	No	your statement that biodiversity and climate change, are adequately mitigated against and improved wherever possible is a clearly blatant lie. No expansion can mitigate against worsening climate action. Disgraceful!			

Name: R Storrar **I.D:** 31062913

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Vision, Strategic Priorities and Sustainability Objectives	Yes		Yes	Yes			I do support this Local Plan, it is well thought through, reflecting the need to make all development sustainable, within short (preferably active or mass transit) distances of Bristol or other town centres, where work and facilities can be centred. This enables residents to enjoy a better quality of life, makes the best use of the available land and will minimise the effects of population growth on Climate Change.	
Strategic Policies	Yes		Yes	Yes			The Local Plan is correct in identifying where development should take place, keeping it within easy reach of established city/town centres. This ensures existing town areas are sustained by the extra trade the new residents will bring and prevent the fragmentation of disconnected housing estates, that have neither work nor facilities nearby. Examples of unsustainable isolated housing estates have been a feature across the country, where cheap green field sites have been built on, resulting in residents spending long hours travelling to work or facilities, overwhelming already scarce health facilities and removing precious	

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							agricultural land.	
SP1: Sustainable Development	Yes		Yes	Yes			All ten reasons listed for making developments sustainable are completely accurate and should be the over-riding guide to all future developments. There is no excuse for any developers to try and challenge these principles. To do so would show a lack of moral judgement, both for the planet (by ignoring the effects of climate change) and for the mental wellbeing of future residents, who would be stuck in isolated and barren housing estates, miles from any employment and amenities, reliant on their cars to get to even a small shop or a doctor appointment. It is time to realise building estates around isolated villages (an example being Wrington) is unsustainable for all the above reasons. The lack of suitable mass transport, narrow lanes that make driving difficult/dangerous and cycling impossible is why this policy for sustainable development needs to be adopted and not 'watered down' by self interest.	
SP2: Climate Change	Yes		Yes	Yes			This strategic policy is completely correct in identifying the measures we need to take to mitigate and, hopefully, roll back some of the damage already done to the planet. To continue without adopting this policy, and applying it to all the other listed policies, is simply unsustainable and would have a very negative effect on the lives of future residents. Unpredictable and extreme weather (whether very hot or very wet) is already happening. We cannot continue to ignore it and the Council are right to use the principles listed as their over-riding criteria for other policies.	
SP3: Spatial strategy	Yes		Yes	Yes			I fully agree with this Spatial Policy. It identifies the needs of future residents and protects the rural landscape away from the already urbanised areas. This is necessary to minimise/reverse the effects of climate change and makes sure that food production can be guaranteed on agricultural land. It is time to stop building disconnected housing estates on green field sites.	
SP4: Placemaking	Yes		Yes	Yes			I fully agree with the council about placemaking. For too long, unsuitable and overly large developments have been foisted on small villages, where the lack of employment and amenities (from shops to GP surgeries) have caused resentment. The developers are seen as greedy, opportunistic and uncaring about the effects there housing estates (50+ houses being the norm) have on existing and future residents. Collaboration with the local population is seen as a tick box exercise, with a handful of cheap leaflets circulated to a few neighbouring houses and an advert in an obscure local paper that no one is likely to buy in 2026. The opinions of local residents should have much more weight, following a proper period of consultation and engagement. Developers should have to hold in person meetings to properly gauge the feelings of local residents. Developments of all housing estates (30+ houses) should have at least one commercial building for use as a shop, GP surgery of Youth Centre. To simply build stand alone estates is not sustainable.	
SP5: Towns	Yes		Yes	Yes			This policy is correct in identifying the sizeable towns that can not only take further areas of development but then support the future residents. It will encourage further employment opportunities and regenerate some of the centres that are feeling the effects of out of town shopping. Developers still need to provide infrastructure of localised food shopping, schools and health care. However, this will be more effective and more easily managed through the amalgamation of CiLs (s.106 payments). This policy also protects the rural nature of the county, which in turn prevents urban sprawl around isolated villages, and leads to more tourism.	
SP6: Villages and rural areas	Yes		Yes	Yes	I fully support Strategic Policy 6. Without these strict guidelines, the very fabric of the rural countryside (for which Somerset is rightly famous) will be destroyed. Historic and beautiful small villages (such as Wrington with it's Grade			

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					1 church) will be surrounded by bland housing estates that obscure the original village boundaries, making it like a town full of bland suburban housing. It is fair to say, any mass of houses, even if very sympathetically modelled on the existing stone buildings, will overwhelm the original architecture and reduce tourism to the area, having a very negative impact on the local economy.			
SP7: Green Belt	Yes		Yes	Yes			The loss of some Green belt is an unavoidable consequence of the pressure to build sustainable housing and minimise the effects of climate change, whilst supporting the commercial viability of Bristol and surrounding areas, that are already heavily built up. The reasoning and logic of the policy is sound. It protects the rural agricultural areas of the county and helps encourage tourism, not only with passenger numbers at the airport, but also maintains the attractiveness of the rural landscape, keeping it free from developments.	
SP8: Housing	Yes		Yes	Yes			I support the logic of building upon the already identified sites. The number of houses to be built is a Government target that NSC have done well to accommodate within the areas identified, keeping them away from the more remote villages, which lack any sustainable transport links. The reliance on private vehicles to commute, shop, education or obtain healthcare is not sustainable, creating congested roads, pollution and increasing the rate of climate change. The mental wellbeing of future residents needs to be considered and being in a remote rural location is not a suitable social environment for any young person, who will have to rely on social media, precisely at the time the Government are recognising how unhealthy this is. The requirement to build small numbers of affordable housing for local employment is fine, providing it is for sustainable employment needs and only limited to the houses needed, not a justification for a mass of 'executive' housing with a handful of 'affordable' homes at the entrance to the estate.	
SP9: Employment	Yes		Yes	Yes			This allocation of land for commercial use is a sound policy. To simply build houses is not sustainable, there needs to be adequate provision for employment in the local area.	
SP10: Transport	Yes		Yes	Yes			The need to ensure non-carbon reliant transport is essential to ensure that the effects of climate change are minimised. Mass transport solutions are needed to reduce the reliance on private vehicles. This is all part of the housing and spatial policies. Where active travel opportunities are identified, they need to be realistically evaluated. The fact that it is possible to walk/cycle to a train station, does not mean it is very likely if the route to it is unlit, narrow or dangerous due to other traffic. Active travel is still mostly a leisure activity, not a viable alternative to the car!	
SP11: Historic and natural environment	Yes		Yes	Yes			I fully support this policy, as it is vital to protect the historic and natural environment. Without the historic buildings and their settings, for example a village and the surrounding landscape, being preserved them the county becomes a bland expanse of housing estates or industrial complexes. Many villages rely on tourism and North Somerset is a highly valued holiday destination. These holidaymakers want to experience the idyllic rural lifestyle, and this includes the chance to see a variety of wildlife and natural features, unblighted by housing estates. The protection of the rural habitats of the Greater and Lesser Horseshoe bats is essential. They rely on areas with no light pollution, so the establishment of Nature Parks to cover all their feeding zones should	

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							be a priority.	
SP12: Minerals	Yes		Yes	Yes			This policy makes sense, it is important to identify and protect possible mining sites. It is also important that existing sites are worked, as they provide much needed employment.	
SP13: Waste	Yes		Yes	Yes			The management of waste is a vital requirement, to ensure that recycling opportunities are maximised and landfill kept to a minimum.	
Policy LP1: Strategic location: Wolvershill (north of Banwell)	Yes		Yes	Yes			Given the huge number of houses that need to be built in order to meet the Government targets, it makes sense to concentrate the necessary housing where it is most sustainable. This follows the guidelines laid out already in the Local Plan.	
Policy LP2: Strategic location: Woodspring (south west of Bristol)	Yes		Yes	Yes			Houses built here are the most sustainable, given their proximity to Bristol. The safeguards put in place by NSC should protect the historic landscape and features being affected.	
Policy LP3: Strategic location: Nailsea and Backwell	Yes		Yes	Yes			This area of development will be backed up with better transport links. It is unavoidable that these smaller villages will be overwhelmed by the development, but this has to be seen within the greater context of keeping the developments sustainable and contained to make the best use of the space, rather than haphazard development across the better agricultural land and pushing more traffic into the narrow lanes that surrond the more remote viallages.	
Policy LP4: Strategic location: Pill and Easton-in-Gordano	Yes		Yes	Yes			By concentrating these four developments close together will enable better transport links to be provided to a location that is already close to the M5. This makes it much more sustainable and minimises the effects of climate change.	
Policy LP5: Housing, employment and mixed use allocations	Yes		Yes	Yes			It makes sense to have mixed use sites, as these are more sustainable, reducing the need for long commutes to work.	
Policy LP6: Educational, sporting, leisure and community use allocations	Yes		Yes	Yes			By containing the areas for development, NSC will be able to ensure that developers contributions (CiLs) can be properly used to construct the necessary infrastructure to support the new residents. This will minimise single vehicle travel times and make a more vibrant community.	
Policy LP7: Settlement boundaries	Yes		Yes	Yes			The maintaining of the village and town boundaries, other than those already selected for development, is crucial to prevent the random spread of housing estates, creating isolated pockets of people that are not part able to properly integrate into a village, but exist on the fringes. This is caused by the estates having no mass transport systems and no realistic prospect of active travel in to the village. They are forced to use their own vehicles which clogs up the lanes and village centre, creates pollution and lowers the standard of life for the establish community and new residents alike. These isolated estates also put a strain on already stretched GP surgeries, schools and recreational facilities (if they exist at all).	
Policy LP11: Transport infrastructure, allocations and	Yes		Yes	Yes			The safeguarding of land for mass transport systems is very sound and links together the areas that have been selected for development. Any other developments, scattered across the more remote areas of the county, will not be able to take advantage of this excellent policy, which is just one more reason to prevent opportunistic developers/ landowners putting forward housing plans outside those proposed.	

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safeguarding								
Policy DP1: High quality design	Yes		Yes	Yes			It is essential that all developers provide housing that is built to the highest possible specifications, both externally and internally. Visually they need to match the existing housing stock in both style and scale. For too long developers have built houses to a formula, based on the their balance sheets, not what is best for the communities.	
Policy DP2: Residential development within settlement boundaries	Yes		Yes	Yes			For too long developers have promised to build houses that meet local needs, then over time, alter the layout and composition of the housing estate, either by reducing the number of affordable homes, removing solar panels, car charging ports, reneging on CiL amounts, or reducing off-setting climate change measures. This policy, if properly enforced, will ensure that what is promised is delivered!	
Policy DP4: Houses in Multiple Occupation and residential subdivision	Yes		Yes	Yes			It is necessary to uphold this strategy and thereby prevent the cramped infill that comes from garden developments.	
Policy DP5: Climate change adaptation and resilience	Yes		Yes	Yes			A major concern through this region is flooding. All development needs to show it can withstand substantial periods of rainfall and not within areas of flood risk. What were once one in one hundred year events are rapidly becoming one in 10 year events. This particularly applies to isolated housing estates on agricultural land that border flood risk areas, The developer needs to show that not only will the area not flood or cause extra run off, but that the area itself will not be cut off and prevent emergency services from reaching stranded vulnerable people.	
Policy DP6: Net zero construction	Yes		Yes	Yes			The desire to go to net zero is essential and a very sensible policy	
Policy DP8: Efficient use of land	Yes		Yes	Yes			This policy is reflected in the Strategic Policies and is essential to prevent urban sprawl.	
Policy DP9: Flood risk	Yes		Yes	Yes			All developments need to be stringently tested for the risk of flooding. By allowing housing estates to be built on flood prone land, you are subjecting future residents to potentially catastrophic events, where they might lose their lives, or their homes are so damaged they are not repairable. By the time this happens, the developer responsible has long gone and not held to account.	

Name: R Whitesmith **I.D:** 62832801

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective	Unsure	Unsure	I go to school in Backwell and I am very worried about the scale of the development in the plans my parents have shown me. The impact on the wildlife and the use of land that should be used to grow crops and graze animals is what makes me scared about the future of my village. I don't want to live in a large town or city, I want to live in a village where I can see	Look at other places to build the houses, not this land which I am told is Grade 1 Agricultural Green Belt. It does not make any sense to build houses on this land.		

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		• Consistent with national policy			wildlife and where the farmers can use their precious land to help us eat locally sourced food.			

Name: R Wood **I.D:** 62852961

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Churchill Avenue	No	• Justified	Unsure	No	The Land North of Churchill Avenue aka The Penny Field is one of Clevedons last Green Spaces its is well used by children and dog walkers and loved by the residents as it is and should be protected as such for its diverse nature. Churchill Avenue already struggles with the level of car congestion and parking on a daily basis adding a further 44 cars potentially will just make things worse and add further pollution to the area. The Millcross/Former KwikSave site has been boarded up for 16 years with promises of being first a hospital and then housing and yet still nothing has been done. That site should be developed for housing as promised and the Penny Fields left for a Green Space for the Residents as it was intended when purchased	Modification to make it sound would be to develop Mill Cross as promised and leave the Fields alone		

Name: Rachael Morris **I.D:** 58579201

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy		Unsure	Overdevelopment given the 800 houses already approved Proposed road will not ease congestion on station road, backwell common or chapel hill. Engineering the road over or under the railway line will be expensive and unfeasible. Lack of investment to support such a large increase in housing - school places are oversubscribed, health services will struggle to cope with such a large influx, limited leisure facilities locally. Backwell is allocated a proportion of houses which is out of synch with its size and location. ie 7% as opposed to Clevedon's 2% Backwell has little by by way of employment opportunities which gives rise to more commuting No social cohesion impact assessment has been provided. Development is over grade 1 agricultural land which is scarce (7% in N Somerset) and currently used for crops and grazing. This undermines Govt policy to protect our best and most versatile land undermining food security. Destruction of nature rich resource. Wildlife habitats and roosts supporting lesser and greater horseshoe bats. Infrastructure delivery plan lacks any analysis and costings. No funding guarantees for the new road or services. The area is prone to flooding. The 50% requirement for affordable housing on greenbelt land is likely to reduce the capability of developers to meet infrastructure costs. The railway station is not fit for purpose as a transport hub and there is little chance of change. it is inaccessible on one side to all with mobility issues (accessible only up/down steep steps) and children in pushchairs.			

Name: Rachel Cox **I.D:** 62848897

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The proposed development is not viable due to flood risk, nonviable access arrangements, and significant infrastructure deficiencies. The proposed access road and bridge cross the River Kenn floodplain, which floods regularly, directly contradicting national planning policy. The developer's flood modelling remains unapproved by the Environment Agency after three revisions. In addition it is uncalibrated, omits known flood events and uses outdated hydrological data. SuDS features proposed in the Drainage Strategy would be submerged during storm conditions and therefore cannot function. Thus planning permission cannot currently be granted. It is our understanding, having sought expert advice, that in order for the access road and bridge not to increase flood risk elsewhere the engineering requirements would be cost prohibitive. Critical access alternatives have not been reliably assessed, and The Perrings route, proposed by Persimmon, appears too narrow with visibility constraints. The development would significantly increase car dependency being too far from the town centre, while the railway station is not fit for commuter or disabled access demands. Nailsea and Backwell lack infrastructure capacity for this scale of development (schools, health facilities), and no confirmed funding exists. The proposed A370 link road and underbridge are unlikely to be delivered before 2040, and likely to be not only unaffordable but also may be technically unfeasible, and would alter flood pathways on Backwell Common, worsening downstream flood risk which is not permitted in the NPPF. The site is valuable agricultural land and an important feeding ground for the Brockley Bat maternity roost. Otters use the local river and rhyne network to travel to and from Backwell Reservoir. Any increase in the height of flooding to the Backwell Reservoir would endanger birds which overwinter there and other wildlife.			

Name: Rachel Glass **I.D:** 51427457

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell has been inundated with new housing developments. We are already feeling the effects of destructive heavy traffic, construction noise, unsafe roads and pavements. Backwell is not an employment hub. Most residents commute. The A370 is not suitable for the increase of daily traffic to and from Bristol. Our natural habitats are being lost forever. We will never get these back. Surface water flooding is already bad. As more green areas are lost, more residential flooding is inevitable. Where is the investment in education, leisure, access to doctors and dentists? I am stunned that our green belt and grade 1 agricultural land is even open to discussion. We should be protecting our environment, not rushing to build at any cost. The amount of development already given permission is too much, yet still more and more gets proposed. Leave Backwell alone!			

Name: Rachel Harvey **I.D:** 62622241

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Positively prepared • Justified • Effective • Consistent with national	No	No	During the initial public consultation into the Local Plan that ran from 7 February 2025 for 6 weeks to 21 March 2025, North Somerset Council (NSC) did not comply with its Statement of Community involvement with regards to the potential sites around Pill and Easton-in-Gordano (PEIG). All 5 sites in the initial consultation, amounting to an additional 1,100 potential dwellings around the village of Pill have been recommended for development. This would result in increasing the number of homes around the village by over 40%. Ref: https://n-somerset.gov.uk/sites/default/files/2020-03/Statement%20of%20community%20involvement%202019.pdf There were 5 sites being consulted on around PEIG but unlike Long Ashton, Weston-Super-Mare, Nailsea, and	North Somerset Council needs to do further consultation with the residents of Pill, Ham Green and Easton-in-Gordano with regards to		

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		policy			Backwell (Section 2.7, pp14-15 of the NSC Regulation 19 Additional Sites Consultation: Consultation Statement (May 2025)), no public exhibition or Q&A session was held in Pill to inform the inhabitants of the possibility of Pill becoming a strategic site within the Local Plan. Ref: https://n-somerset.gov.uk/sites/default/files/2025-07/Additional%20Sites%20Consultation%20-%20Consultation%20Statement%20%28May%202025%29%20Accessible.pdf This contravenes several of the principles for planning consultations in NSCs Statement of Community Involvement namely: 1. We will target consultation to include people whom we consider would be most affected by any proposals or plans and where possible any known interest groups. 2. We will seek views as early as possible. 3. We will always aim to provide sufficient information to enable people to comment effectively. 4. Involvement will be open to all. Firstly, the local population was given no indication that PEIG would be designated a strategic location at any time during the initial public consultation with all sites being listed separately within the consultation and only linked together later in the NSC Regulation 19 Additional Sites Consultation: Consultation Statement (May 2025) . This contravenes principles 2 and 3. Lack of a public exhibition meant that most residents were unaware that the consultation was even happening; this contravenes principle 1. Evidence of low public awareness in PEIGN can been seen in the extremely low numbers of residents from PEIG who completed the initial consultation. This is in contrast with the 2,209, as of 2.30pm on Friday 12 December 2025, plus 115 pen and ink signatures, who have signed the petition objecting to excessive house building in the area around Pill. This is out of an adult population of around 3,877 (2021 census). Where were their voices in the initial public consultation? Ref: https://c.org/n65SRK5Y6M Misleadingly in the NSC Regulation 19 Additional Sites Consultation: Consultation Statement (May 2025) , p8, states that there were 125 responses over the 5 sites giving the impression that 125 people or organisations responded to the public consultation. However, this does not take into account multiple responses. An analysis of the number of responses made by each discrete person or organisation responding to the sites shows that the vast majority responded to more than one site, with the maximum number responding to an individual site was 29. Only around 18 residents from Pill responded at all (these numbers are estimates but an accurate number could be found if time were taken to make a full and detailed analysis of the responses to the 5 sites in detail given here - I am one individual with very limited free time so could not analyse all the responses in full detail). Most respondents gave responses to 3 or 4 sites around PEIG but not any other sites across North Somerset. Ref: https://n-somerset-pp.inconsult.uk/Reg19AddSites/viewCompoundDoc?docid=15643252&sessionid=&voteid=&partId=15644756 However, there are several people or organisations from outside the village who have made comments in favour of development across multiple sites e.g. of the eight respondents that said ‘Yes’ to the HE2015 (Pill Green/Markham Fields) site, 6 of them were obviously from outside of the village and had responded ‘No’ to development in their area but ‘Yes’ to other places in North Somerset e.g RisC (Residents of Station Close) in Backwell who responded ‘Yes’ to development across 4 sites around PEIG and several other areas across North Somerset but ‘No’ to sites in Backwell. Likewise Backwell Parish Council who targeted all 5 sites in PEIG to respond ‘Yes’ to, while defending the sites across Nailsea and Backwell. The PEIG PC, by contrast, only commented on sites around PEIG. Backwell PC, of course, and the residents of Nailsea and Backwell were much more aware of the threat to their towns from the Local Plan because of the two public exhibitions and Q&A sessions held there on 7 March (Nailsea) and 10 March (Backwell) see p.14 of the Public Consultation Statement (link in paragraph 1). There was nothing within the Public Consultation Process to stop this kind of strategic response to the Public Consultation. Equally worryingly there is no acknowledgement of this manipulation of the results within the Public Consultation Statement. This has led to the conclusions within the Public Consultation Statement being skewed: 'Strategic Growth Locations: There was strong objection to Nailsea and Backwell being identified as a strategic growth location…There was a significant level of response for Long Ashton with 591 comments received for the ten sites identified…	designating the village as a strategic location. A public exhibition and Q&A session needs to be held in Pill and a new public consultation, like the one in Spring 2025, must be reopened where residents are able to put forward their views and to give time to properly consider the implications of making Pill a strategic location. There needs to be proper consultation and discussion around implications relating to infrastructure, road safety from the substantial increase in the number of cars such a huge amount of development will generate, particularly in relation to the A369, the J19 motorway roundabout and the M5. Issues relating to noise pollution, particulates and increased risk of flooding also need to be properly explored before rushing through this plan. During the initial public consultation process nobody was aware that Pill was going to be designated as a strategic location so there was no proper investigation into or debate around		

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					For Pill and Easton-in-Gordano there was a fairly even split of support and objection to the sites identified in this location. Pill and Easton-in-Gordano was felt to be a sustainable location in terms of proximity to Bristol, access to the motorway, connections to Bristol along the new railway line…' p.7 If NSC had properly scrutinised the responses to the five sites around PEIG, they would not have drawn the conclusion that 'there was a fairly even split of support and objection' or that 'Pill and Easton-in-Gordano was felt to be a sustainable location in terms of proximity to Bristol, access to the motorway, connections to Bristol along the new railway line.' The Public Consultation fed directly into the development of the Pre-submission (Regulation 18) Local Plan and indicates that the plan is not Sound because it was not positively prepared and there was a lack of proportionate engagement. Even after the Regulation 18 pre-submission plan had been published in early Summer 2025 and PEIG was identified as a strategic location, NSC failed to properly consult with residents of PEIG. According to the minutes of from the North Somerset Council - Report to the Placemaking, Economy and Sustainable Communities Policy and Scrutiny Committee, on 17 July 2025: 'LP4: Strategic Location: Pill and Easton-in-Gordano 3.24 A workshop session with the parish council and local residents has been offered in July, and the outcomes of that workshop will feed into the emerging policy and site- specific requirements set out in Schedule 1 of the plan. Further engagement will continue over the coming months.' This workshop did not take place and local residents were actively discouraged by the PEIG PC from trying to actively engage in the process of feeding into the Local Plan before the Public Consultation in the Autumn of 2025, by which time the scope of the consultation was much more limited. This was pointed out Natalie Richards, NSC Planning Policy Manager, Jason Beale, Head of NSC Planning, Jenna Ho Maris, NSC Councillor and PEIG PC in an email dated 22 August 2025 but no action was taken to rectify this. Some representatives of Sustainable Pill and District (SPAD), a local community group that has prepared a group response to this public consultation, did have some limited contacted with NSC Planning Officer Natalie Richards. They met online twice and were invited to comment on the LP4 document but without access to the Schedule 1 document. However, any suggestions made were ignored by NSC planning department. To summarise, I do not believe that the NSC Local Plan is legally compliant with respect to its duty to adequately consult with residents regarding the designation of PEIG as a strategic location. It failed to hold a public exhibition or Q&A session in Pill unlike other strategic locations across North Somerset and it came to misleading and inaccurate conclusions in the subsequent Regulation 19 Additional Sites Consultation: Consultation Statement (May 2025). After PEIG had been formally designated a strategic location in the Pre-submission Regulation 18 Local Plan, no further public consultation was sought with the residents of PEIG and a public workshop proposed for July 2025 did not go ahead. Limited consultation was sought by NSC planning office with one local community group over the Summer of 2025 but their concerns and suggestions were disregarded. As a consequence the current version of the NSC Local Plan was not positively prepared adn cannot be deemed to be Sound.	any of these issues. The results of the public consultation need to be properly analysed and interpreted so they fairly represent the views of the public and are not open to manipulation by organisations and individuals outside of PEIG who are seeking to deflect development in their area. Members of the public who do not have online access should be given support to give their comments. West Pill is identified as among the most 25% of deprived areas in England (NSC Indices of multiple deprivation, 2015) but no extra support has been put in place to enable residents to fully contribute to the public consultations.		

Name: Rachel Lane **I.D:** 62860193

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective	No	No	No social cohesion impact assessment had been provided. Likewise the complexity of responding to the plan is incredibly complicated and will put off a significant proportion of the elderly population of Backwell.			

Name: Rachel Skipper **I.D:** 62563137

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Im writing to express my strong opposition to the proposed housing development in North Farleigh Road, Backwell by Mac Mic Strategic. While I understand the need for affordable housing, I believe that this project would have been far better placed on brown field sites of which there are many and not on grade 1 agricultural land in the Green belt. There is only 7% of this high quality land left in the whole of the North Somerset, once this land is gone, that's it, it's gone! It's absolutely appalling that this land is even being discussed and that you are considering tearing this up and discarding it with no empathy to its value. The government state "we must protect our best and most versatile land" yet this proposal abolishes there statement. The proposed development is simply too large for our area. The increase in population density would put a strain on our already overburdened infrastructure, leading to increased traffic congestion, noise pollution, flood plains and strain on our public services. Backwell is allocated a higher number of houses than any other village in North Somerset, this simply is not fair. Backwell is a village and not an employment hub, residents commute for work. Additionally, the construction of this project would result in significant environmental damage, destroying natural habitats and putting wildlife at risk. This site sits directly next to a conservation area and is linked up with Tynsfield National Trust and Belmont estate. The government state how important it is to protect our wildlife yet you are considering destroying their habitats. In conclusion we the villagers, Backwell Residents Association, Backwell Parish Council and Belmont estate are standing together to protect our wildlife, green space and village.			
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I am writing to register my strong objection to the proposed MMSL housing development north of Farleigh Road, East Backwell. The scheme is fundamentally unsound, environmentally damaging, and incompatible with Backwell's infrastructure and character. 1. Reliance on an Undeliverable Link Road The proposal depends on a link road that has been judged not deliverable, removed from strategic plans, and has no funding. The development's viability is built on infrastructure that has no realistic prospect of ever being built. Proceeding on this basis would be irresponsible and contrary to good planning practice. 2. Severe Traffic Impacts Backwell already experiences heavy congestion on the A370 and surrounding routes. Without a deliverable transport solution, the development would add hundreds of daily car movements, worsening congestion, air pollution, and safety risks, and forcing spill-over traffic through unsuitable village lanes. 3. Loss of High-Quality Countryside and Agricultural Land The site forms an important green buffer between Backwell and Nailsea and includes Grade-1 agricultural land. Once developed, this rural landscape and its agricultural value would be permanently lost. 4. Environmental and Biodiversity Harm The fields, hedgerows, and wildlife corridors support a range of species and contribute to local biodiversity. Large-scale housing here would cause habitat loss and fragmentation that cannot be meaningfully mitigated. 5. Pressure on Already Stretched Local Services Backwell's schools, GP services, public transport, and utilities are near capacity. No firm or funded commitments have been provided to expand these services, making the proposal unsustainable. 6. Out of Scale with the Village The development would represent a major urban extension and effectively double the size of East Backwell. This scale of growth is wholly at odds with the village's character and the intentions of the Neighbourhood Plan. 7. Clear Local Opposition Backwell residents have repeatedly opposed large-scale development on this site. Approving it would disregard the community's democratically expressed wishes. Conclusion This proposal is unjustified, unsustainable, and environmentally damaging. It relies on undeliverable infrastructure and would harm Backwell's character, services, and landscape. I strongly urge the Council to reject the application.			

Name: Rachel Tadman **I.D:** 62715521

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy DP12: Development in the Green Belt	No	• Consistent with national policy	No	Unsure	See attached letter	Policy DP12 and its justification should be amended to accurately reflect current national policy and case law in full.		North Somerset Local Plan Rep 2025.pdf

Name: Rachel Upton **I.D:** 62501665

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell already had 800 new houses approved, a 40% increase for the village. These additional numbers would lead to complete overdevelopment. The proposed road would not effectively serve Nailsea's traffic or relieve congestion on Station Road, Backwell Common or Chapel Hill. Engineering the road under or over the railway would be highly expensive and possibly unfeasible. Despite the huge increase in housing, there is a defect in school places and no investment in health or leisure services. The lack of infrastructure cannot support the planned 1000 houses. Backwell is getting more than it's fair share - higher than any other village and even higher than some towns, including Clevedon. There is no needs of viability analysis for an extra 1000 houses. No social cohesion impact assesment has been provided. Government policy states we must protect our best and most versatile land to safeguard food security. Backwell Common and surrounding areas are prone to flooding, which would be aggravated by more housing. It would harm habitat and biodiversity. The infrastructure delivery plan lacks analysis and costing, and there are no funding guarantees for new roads or services. Backwell lake and adjacent fields where the new roads and housing are proposed are on a floorplan, which floods regularly. The sheer volume of growth with the required investment infrastructure and services over such a short period of time is destabilising, unsustainable and undeliverable. The railway station is not fit for purpose as a transport hub - it is not accessible.			

Name: Ralph Wood **I.D:** 51430017

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared • Justified • Effective • Consistent with	Unsure	Unsure	Protect the green field east of West Leigh Primary School: I request the removal of the field to the east of West Leigh Primary School from the Grove Farm / Rodney Road housing allocation. Because: The land functions as an important environmental buffer between the school and surrounding housing, helping reduce noise, air pollution, overheating and loss of biodiversity affecting children. Once built	I request the removal of the field to the east of West Leigh Primary School from the Grove Farm / Rodney Road housing allocation.		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
		national policy			on, this green space will be irreversibly lost. Protection now is the only opportunity to secure long-term community value. The site has strong potential for designation as Local Green Space, as it is: demonstrably special to the local community, local in character, and offers clear recreational, educational, health and ecological benefits. Development here would represent avoidable harm to children's outdoor provision, at a time when national policy strongly emphasises active travel, outdoor learning, physical activity and mental wellbeing.			
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell is already committed to substantial growth, with around 800 homes approved—representing a 40% expansion of the village. Adding the proposed further development would amount to excessive intensification. The proposed relief road would not adequately address traffic problems in Nailsea or Backwell, and constructing a crossing over or under the railway would be prohibitively costly and may not be technically achievable. Existing roads are already under significant strain. Despite the major increase in housing, there is no corresponding investment in schools, healthcare or leisure provision. Current services are already stretched and are not capable of supporting another 1,000 homes. Backwell has been assigned a disproportionately large share of new housing—more than any other village in North Somerset and even higher proportional growth than some towns. The village would be expected to absorb 7% of the district's total allocation, far exceeding places such as Clevedon at 2%. No evidence has been provided to justify the need or feasibility of an additional 1,000 dwellings. The village is not a local employment centre, meaning most new residents would need to commute elsewhere. There is also no assessment of the effect such rapid expansion would have on community cohesion. Much of the land identified for development is Grade 1 agricultural land—some of the best in the country—of which only a small fraction remains in North Somerset. National policy clearly requires the protection of high-quality farmland to maintain food security; the proposals run counter to this. The plans would also destroy important wildlife habitats and further erode biodiversity in an already nature-poor region. The area supports the Brockley maternity bat roost and an SSSI, with rare Lesser and Greater Horseshoe bats dependent on this landscape for foraging. The Infrastructure Delivery Plan is incomplete, lacking robust evidence, costings and guaranteed funding for the new road or associated services. Flooding is already a known issue on Backwell Common and the surrounding floodplain, including around Backwell Lake and the fields earmarked for development. Additional hard surfacing and housing would worsen this risk. Designation of the area as a strategic growth location raises serious issues: damage to local character, loss of Green Belt and high-quality farmland, increased flood vulnerability, and major uncertainty over whether essential transport infrastructure can be delivered on time. Government policy requires that 50% of homes built on Green Belt land are affordable, yet such a proportion significantly reduces developers' financial contributions to necessary infrastructure. Overall, the scale and pace of the proposed expansion—combined with inadequate infrastructure, insufficient services, and lack of clear funding—make the plans unstable, environmentally harmful and undeliverable. The railway station, intended as a key transport hub, remains inaccessible and poorly equipped to support increased use, particularly for people with limited mobility or families with young children.			

Name: Rebecca Hall **I.D:** 58602401

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared	No	No	Green Belt & exceptional circumstances: Allocating Tower Farm (and similar sites) takes land out of the Green Belt without showing exceptional circumstances. There are alternative brownfield or lower-impact sites that could meet housing needs without damaging protected areas. Environmental protection: Tower Farm sits next to Weston Big Wood, Nightingale Valley, and the Gordano Valley corridor. The ecological assessments are incomplete, proposed buffers are too small, and there is no clear long-term plan to protect wildlife or maintain habitats. Transport & safety: The Downs already suffers heavy congestion at school pick-up, with cars often mounting pavements. Additional housing would make this worse. Proposed active travel and bus improvements are insufficient to make the area safe. Flood risk: The land slopes toward lower parts of Portishead. The Plan does not show how surface water runoff and flood risks will be safely managed. Deliverability: Safe access for vehicles, walking, and cycling has not been proven. Duty to Cooperate: The Council has not demonstrated sufficient engagement with neighbouring authorities or statutory bodies regarding the environmental, transport, and flood impacts of this site.	Remove Tower Farm (and similar Green Belt allocations) from the Plan. Focus on brownfield and lower-impact sites to meet housing needs. Require full ecological, transport, and flood risk assessments before any allocation. Ensure enforceable long-term management of ecological buffers and mitigation measures. Demonstrate safe and deliverable access that addresses current and future traffic pressures. Engage fully with statutory bodies and neighbouring authorities to meet the Duty to Cooperate	I support the Plan’s general aims to create sustainable, liveable neighbourhoods, improve access to facilities, support regeneration, and address climate change — but only where these objectives do not compromise Green Belt protection, environmental safety, or public safety.	

Name: Rebecca J Cox **I.D:** 51424225

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell already has over 800 new houses approved which is a 40% increase for the village. If approved our village would no longer a village become a town without the infrastructure needed to support the extra population. The schools and doctors are already full. Backwell does not have local employment for extra population so all these new residents will be commuting on the A370. The new road proposed by the developers only goes as far as Backwell common building over or under the railway would cost millions who will fund this. North Somerset have already said they have no money. The area around the common and railway is subject to frequent flooding. The local wildlife has already been pushed off local fields their habitat is shrinking. This sheer volume of growth with the required investment, damage to green belt agricultural land I feel is destabilising and unsustainable.	Proper consideration of road infrastructure. Backwell is a village. All roads off the main A370 are narrow often not two way throughout and have parked cars from existing houses. The railway station is not fit for a main commuter hub as it doesn’t have disabled access. The trains currently running at peak times are often overloaded who has consulted the rail companies to address this. Proper funding for schools, doctors, green space and upkeep of play areas long term needs to be thought through thoroughly.		

Name: Rebecca Matthews **I.D:** 62865313

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell already has approval for 800 new homes which is a 40% increase in the size of the village. Adding another 1,000 on top of that would amount to serious overdevelopment. The proposed new road wouldn't actually solve Nailsea's traffic problems or ease congestion on Station Road, Backwell Common, or Chapel Hill. And creating a route that goes under or over the railway would be extremely costly and might not even be technically possible. Even with the approved growth, local schools are already short of places, and there's been no investment in health or leisure facilities. The existing infrastructure simply can't cope with another 1,000 homes. Backwell has been asked to take more new housing than any other village in North Somerset — even more, proportionately, than many towns. Backwell is expected to take 7% of the district's housing allocation, compared with Clevedon's 2%. No assessment has been carried out to show whether there is a real need for these extra 1,000 homes or whether the development is viable. Backwell isn't an employment centre, so most people living here have to commute elsewhere for work. The plans don't include any assessment of how this level of development would affect community cohesion. The site includes Grade 1 Agricultural Land currently used to grow food and for grazing. Only 7% of North Somerset's land is this high quality, and we can't afford to lose more of it. Government policy is clear: we must protect our "best and most versatile" farmland to safeguard food security. This proposal goes against that policy. Building on this land would destroy important wildlife habitats and further damage biodiversity in a country that is already one of the most nature-depleted in the world. The development threatens the Brockley Maternity Roost and the nearby SSSI. Rare Lesser and Greater Horseshoe Bats rely on this land for feeding, and their survival could be put at risk. The Infrastructure Delivery Plan doesn't include proper analysis or costings, and there's no guarantee that the road or other essential services can actually be funded. Backwell Common and the surrounding area already flood, and adding more housing would make the situation worse. The designation of this area as a strategic growth location raises major concerns: it risks damaging the area's character, would mean losing Green Belt and top-quality farmland, increases flood risk, and still doesn't guarantee that the new road could be funded or built in time. Backwell Lake (the Reservoir) and the nearby fields (where the new road and housing are proposed) lie on a floodplain that regularly floods. Trying to force this scale of growth, along with all the investment in infrastructure and services it requires, into such a short period is destabilising, unsustainable, and unrealistic. Backwell railway station simply isn't suitable as a transport hub. It's not accessible for people with serious mobility difficulties, and it's very challenging for families with young children to use.			

Name: Rebecca Smith **I.D:** 39209857

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Justified	Unsure	Unsure	While there is a legal requirement to build more houses and North Somerset are required to have an allocation of these, Portishead has seen more than its fair share of development over the last few decades. The infrastructure has not matched the development, with doctor's surgeries being at capacity and roads becoming ever more congested. Therefore I do not feel it justified to build any more houses in Portishead as there simply isn't room. With reference specifically to Tower Farm and 400 houses being built there, I strongly object to this. This green space is a vital resource for local people to access recreationally and provides much benefit for mental wellbeing. Removing this would be a huge loss and deny locals of a space in nature to walk and enjoy the outside. Additionally, removing any green space will always affect wildlife as it would be removing a natural habitat for many creatures, upsetting the existing balance. The proximity to Weston Big Woods is also a concern. 400 houses means 800 new cars in this space. We are already way too congested with vehicles in Portishead. Therefore I strongly object to this development.			
Black Rock, north of Clevedon Road	No	• Justified	Unsure	Unsure	While there is a legal requirement to build more houses and North Somerset are required to have an allocation of these, Portishead has seen more than its fair share of development over the last few decades. The infrastructure has not matched the development, with doctor's surgeries being at capacity and roads becoming ever more congested. Therefore I do not feel it justified to build any more houses in Portishead as there simply isn't room. With reference specifically to Black Rock and 100 houses being built there, I strongly object to this. This green space is a vital resource and provides much benefit for mental wellbeing. Removing this would be a huge loss. Additionally, removing any green space will always affect wildlife as it would be removing a natural habitat for many creatures, upsetting the existing balance. The proximity to Weston Big Woods is also a concern. 100 houses means 200 new cars in this space. We are already way too congested with vehicles in Portishead. We do not need more concrete in Portishead, rather we should be preserving our lovely green spaces and protecting them for wildlife and recreation. Therefore I strongly object to this development.			

Name: Reis Braganza **I.D:** 14666145

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Morgan’s Hill, Nailsea	No	• Positively prepared • Justified	Unsure	Unsure	This is related to the junction between Morgans Hill local green space and the development of Youngwood lane which is already under construction. The land south of the Nailsea football ground is designated both as the local green space and part of the Youngwood lane development site. This piece of land should be entirely in Morgans Hill local green space and should not be built on. It sits on the junction of three footpaths, along the top, bottom and middle of Morgans hill. If this land was taken away it would destroy the footpath / trails structure. These footpaths get waterlogged at various times of the year, but not necessarily at the same times, so it is currently possible to structure a walk circuit at most times. Nailsea residents have lost a lot of green space with the construction of the development just south of the Uplands and this would further restrict the recreation space available to residents.	Adjust the boundaries of Morgans hill, so that the footpaths are within the Morgans Hill local open space.		

Name: Rhiannon Mark **I.D:** 62850977

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national	Unsure	Unsure	As a resident with a child at in year 1 at the local infant school I find the 10 minute walk to school extremely unsafe due to the volume of traffic on local roads. A development of the size proposed will invariably make this journey even more hazardous. It won't be long before a child is seriously injured in Backwell due to the lack of road safety measures. We need better pavements, more cycle routes, better flow of traffic on the major routes to avoid cut through traffic. School places are limited, there is a difficulty getting doctors appointments, there is no local NHS dentist and and our community does not have the infrastructure to support a bigger community. Our community volunteers are already running baby and toddler groups, warm hubs and activities for the elderly but	stop the plan	As above	

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		policy			volunteers are dwindling and there is no public infrastructure to support the very needed community groups that already exist. People that move into an area need to be welcomed to an area to ensure community cohesion and they can only do that when there is the correct infrastructure to welcome them. No social cohesion assessment has been provided. There is significant, standstill, traffic as soon as there are any issues with the motorway. I live in a side road and couldn't get out of my road when the M5 was recently shut due to the motorway traffic flowing through the village. If this is what it's like before the houses it can be underplayed how significant the difficulties would be after further housing. There is regular flooding in the area and this again discourages people from walking and cycling round the village which pushes more people into cars. Backwell seems to have been allocated a huge percentage of houses and this doesn't feel fair.			

Name: Rhona **I.D:** 30920417

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I am concerned about the huge number of prospective houses that have been allocated to Backwell. This is totally out of proportion to the size of the village and is more than would be expected for the allocation when compared to nearby larger towns such as Clevedon. The suitability for extra housing in Backwell is limited by its lack of infrastructure and suitable roads. Not only this but I think it is short sighted to use up grade 1 agricultural land when there are other options more suitable and available. The choice of an area of land already prone to flooding is a bad idea. Although we have a railway station between Nailsea and Backwell, the transport links around it are poor and there are no obvious way of improving these. Even a proposed new road is not thought through properly. Most new residents will be commuting out of Backwell as there is little employment in the vicinity. The lack of plans for new infrastructure is highly worrying. The rapidity of the expansion of the village will not allow sustainable changes to health, education and leisure services to catch up.			

Name: RiSC - Residents in Station Close Backwell **I.D:** 39171041

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	This site is not viable because the access road and bridge cross the River Kenn floodplain, which regularly floods. This would increase flood risk to (1) properties in the lower part of the development and (2) elsewhere, which is not permitted under the National Planning Policy Framework. The flood risk model produced by Gleeson remains unapproved by the Environment Agency despite three revisions, the latest reviewed in October 2025. All submitted models claimed there was no history of flooding on the floodplain and consequently have not been calibrated or validated. Calibration and validation are key considerations under the updated EA hydraulic modelling guidelines. Gleeson has been provided with written and photographic evidence of flooding, yet this has not been reflected in their modelling. Their hydrology has not been updated since 2021 despite direct EA advice noting that several national datasets and methodologies have been updated since then (EA, November 2025). It is unclear why this hydrology has not been updated or why Gleeson has not obtained flood records from the NSC Flood Management Team, which include documented flooding on the floodplain at Station Close. These data should have been used to calibrate and validate their model. In addition: 1. The Gleeson flood risk assessment includes inaccurate information. For example:			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					o The model does not include output nodes to assess the impact of the new road and bridge on key receptors outside the development. o Flood depth increases reported in the text are lower than those shown in model tables. o Model assumptions are based on SuDS design parameters not permitted under national CIRIA SuDS manual. 2. The drainage assessment includes SuDS features that are not permitted (CIRIA) and would not work . For example, swales running alongside the road into which lower development properties surface water drain will themselves be flooded during storm events, preventing them from functioning! Therefore, it is not possible to conclude that the development, including its access road and bridge, will be safe from flooding over its lifetime, nor that it would avoid increasing flood risk elsewhere. Without an access road the development cannot be constructed, and residents would only be able to enter or exit their properties by foot or bicycle with no access for removal vans, rubbish collection etc and emergency vehicles. There is reference to access via The Perrings, yet this has not been formally evaluated. In an earlier LP consultation (preferred options 2022) Persimmon sumbitted this as a potential access route but the diagrams suggest this route would likely be too narrow with limited visibility for a development of this scale. Additional matters: • The distance of the site from the town centre will encourage car travel. • Nailsea Railway Station is insufficient as a commuter hub. It lacks toilets, adequate shelter, and has unacceptable disabled access (only one directional step-free access), making it largely unusable for disabled travellers and difficult for parents with young children. • The proposed development forms part of 1,817 new homes in Nailsea, which would represent overdevelopment given the lack of supporting infrastructure. There is no central government funding to expand schools, medical or dental provision. The proposed A370 link road and underbridge are unlikely to be delivered because: • Engineering the road over/under the rail line is likely to be extremely expensive and may be technically unfeasible. • Timelines for permissions, funding and construction extend beyond 2040, so it will not relieve congestion created by new homes. • National planning policy requires 50% affordable housing on Green Belt land, reducing the funds developers can contribute to infrastructure. • The Station Road roundabout connection point lies in Flood Zone 3 and should not be built on. • The road and underbridge would alter groundwater and surface runoff pathways, increasing flood risk elsewhere. Without the A370 link road, traffic impacts on Station Road will be severe if access via The Perrings or across the floodplain is deemed feasible.(see above) Travel delays could increase reckless driving behaviours (frustration, distraction, phone use), putting pedestrians at risk. Station Road risks are heightened by: 1. sudden change from 20mph zone by the Station which has poor visibility 2. peak-time congestion (school and commuter). Pavements are narrow, discontinuous and below expected safety standards. Further safety risks may arise from drivers using rural bypass routes (Church Lane and Backwell Common) to avoid Backwell Crossroads queues. These routes have blind bends, limited speed enforcement, and are used by schoolchildren. One route is due to become a national cycle corridor under the Grove Farm development, further increasing risk. The land is productive agricultural land which should not be lost. Finally, the development threatens key habitat areas and biodiversity. • It poses a risk to the Brockley maternity bat roost and designated SSSI. Rare Lesser and Greater Horseshoe bats rely on this land for foraging and habitat continuity. • Otters use the river Kenn to travel between Backwell reservoir and Clevedon Moor • Any increase in height of flooding to the Backwell Reservoir would threaten birds which overwinter there and other wildlife			
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective	Unsure	Unsure	Backwell already has 800 new houses approved, a further 40% increase for the village (1000 houses) would lead to unmanageable overdevelopment with loss of quality of life to both current residents and future residents. The sheer volume of growth with the required investment in infrastructure and services over such a short period will be destabilising, unsustainable and undeliverable. • Lack of necessary infrastructure: o No funding to enable necessary increase in school places, medical facilities, recreational/leisure facilities, and			

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		• Consistent with national policy			supermarkets to accommodate such an increase in the local population o No local employment, which therefore requires residents to commute to work increasing car travel compared to sites close to recognised employment areas such as Bristol, e.g. Long Ashton o No social cohesion impact assessment has been provided. o Railway station is inadequate as a commuter hub having no toilets, limited sheltered areas and unacceptable disabled access – the Station is only has disabled access one way. Making it unusable for disabled persons and extremely difficult for mothers with young children o The bus service is infrequent, inadequate and may unexpectedly cancel o The traffic using Sation Road and its cross roads will come to a standstill with the increased road use both for travel within Backwell/Nailsea (taking children to school – accessing large commercial shops in Nailsea) and for those commuting – see above. Which will be compounded by a) the traffic using the A370 to get to the airport b) traffic diverting of the M5 motorway when there is an accident • The proposed road and underbridge would not effectively serve Nailsea's traffic or relieve congestion on Station Road, Backwell Common, or Chapel Hill: o Engineering the road under or over the railway would be highly expensive and possibly unfeasible. The likely timescale for obtaining permission, funding and construction would preclude it being in place before 2040 and would thus not serve to alleviate the congestion created by the new housing. ⍰ Where will the funding come from? Government policy requires 50% affordable housing on Greenbelt Land, but this reduces the funds developers contribute towards infrastructure. o The Station Road round about which connects with the proposed link road is located on flood zone 3 which should not be built on o The road and underbridge will alter groundwater and surface water flood path flows increasing the risk of flooding elsewhere • The Land East of Backwell, Backwell Common and some properties are prone to flooding which would be aggravated by the increase in impermeable surfaces from the development and the foundations of the houses, new road and underbridge: o Surface water flow paths have been documented on the fields flowing into Backwell Common Lane, associated properties and then into the river Kenn. o The hydraulic model developed by Aegaea for the Persimmon planning application for Farleigh Fields East development clearly demonstrated surface water flood paths originating from Backwell flowing over the A370 and into the development site. o It has a highwater table during the wet months with some of the fields often under water. o The Yanley fault runs through the proposed development creating an increased risk of groundwater flooding/ ephemeral springs. The land has at least one documented spring, there are likey to be more. o It is unclear why the strategic flood risk assessment considers Backwell a sustainable site and does not mention flooding, given the extensive surface water flood risks identified on the Planning Map and Environment Agency flood risk maps. ⍰ Surely this site should be subject to the sequential test based on the currently available evidence? Has this been undertaken? • This is Grade 1 Agricultural Land currently used for food crops and grazing. There is only 7% of this high quality land left in the whole of North Somerset. As a country we cannot afford to lose among more of this high-quality agriculture land on which our food security is dependent. Indeed the Government policy states that "we must protect our best and most versatile land" to safeguard food security. • The development would destroy valuable wildlife habitats and further harm biodiversity in one of the world's most nature-depleted countries: o The proposals threaten the Brockley Maternity Roost and SSSI, with rare Lesser and Greater Horseshoe Bats relying on the land for food. • The development would be widely visible impacting on our areas character with the loss of greenbelt.			

Name: Rich Coleman **I.D:** 59945953

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Vision, Strategic Priorities and Sustainability Objectives	No	• Positively prepared • Justified	Yes	No	No proof that negative Climate Change actually exists. Plans to build housing on Grade 1 Agricultural Land (Nailsea) shows total disregard of essential food production. Plans to build on flood plains whilst claiming a climate crisis exists cannot be justified. House construction continuing with little or no regard to transport, infrastructure and facilities.	No building on prime agricultural land. Independant review of transport, infrastructure and with regards future housing developments.		

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		• Effective						
Strategic Priorities	No	• Positively prepared • Justified • Effective			Climate Emergency is unproven and relies on unproven claims ! No mention is made of Food Security and the impact of building on grade 1 agricultural land.	Disregard Climate Emergency. Ensure that Food Security is included. Ensure Grade 1 agricultural land is not developed.		
Sustainable development objectives	No	• Positively prepared • Justified • Effective	Yes		No mention of Food Security ?	Recognise and Include Food Security and the importance of securing prime agricultualal land.		
Strategic Policies	No	• Positively prepared • Justified • Effective			No mention of Food Security and the importance of protecting prime agricultual land.	Recognise and Include reference to Food Security and the importance of protecting valuable argricultural land.		
SP1: Sustainable Development	No	• Positively prepared • Justified • Effective			We still have no proof that a climate crisis actually exists. The importance of CO2 in both food production and human existance is essential. Again no mention is made of Food Security for which there is no argument - we eat or we die !			
SP2: Climate Change	No	• Positively prepared • Justified • Effective	No		The so called "Climate Crisis" is unproven, Regarding recycling NSC has wasted £360K on Red Recycling bags that are deteriorating and CANNOT be recycled ? Recycling Centres should be open to all with no restrictions such as booking systems which encourage fly tipping.	Disregard Climate Crisis scaremongering misinformation or at the very least provide proof to NSC residents that it exists ! Consult with residents the best methods of recycling, your staff clearly don't have a clue !		
SP2: Climate Change	No	• Positively prepared • Justified • Effective • Consistent with national policy			NSC has proven itself incapable of providing or operating a efficient recycling service, £360K on red bags that are rotting within a year and cannot be recycled. The proposed introduction of a recycling centre booking system that will cause traffic mayhem and congesion in the local area whist encouraging fly tipping.	Complete overhaul of the refuse / recycling function with public consultation.		
SP6: Villages and rural areas	No	• Positively prepared • Justified • Effective			Attempts are already being made to develop grade 1 agricultural land in spite of a work wide recognised Food Security crisis ?	Ensure valuable farmland is protected.		
SP10: Transport	No	• Positively prepared • Justified • Effective			The EV bubble has burst, sales are dropping and manufacturers are moving back to ICE vehicles with a emphasis on bio fuels. The EU has pushed their EV mandate back to 2040. Why waste further vital funds on a "dead" technology. let the market dictate the vehicle type. If any investment is required let it come from private investors not North Somerset Council.	Halt any investment into Electric Vehicle infrastructure.		

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SP13: Waste	No	• Positively prepared • Justified • Effective			North Somerset Council has proven itself to be incompetent with regards waste management. £360K on red recycling bags that are rotting and cannot be recycled. The proposed booking system for recycling centres appears not to have been thought through with no consideration with regards access for transport in the local area and flytipping. Recently announced that plastic waste won't generate funds originally stated ?	Inquiry to be held into whole function.		
Policy DP53: Best and most versatile land	No	• Positively prepared • Justified • Effective		No	Food Security exists and is recognised worldwide. Why allow development / building on grade 1 agricultural land ?	Ensure all brownfield sites are developed before even considering touching valuable farmland.		

Name: Richard Charles Holland Barclay **I.D:** 39283425

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective	Unsure	No	The plan runs roughshod over all planning guidance. Proposing building on Grade1 agricultural land and Green Belt. No infrastructure, doctors, schools, shops, parking? Link road will only move the congestion to the A370. Looks like very desperate measures to shoehorn more housing into North Somerset.	Don't develop on these fields.		

Name: Richard Clark **I.D:** 62791841

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Churchill Avenue	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The planning application detailed under docID=14776372 is fundamentally flawed and should be refused because it represents unsustainable, premature, and demonstrably harmful development that conflicts with multiple core planning policies set out in the North Somerset Local Plan and the National Planning Policy Framework (NPPF). Since the specific details of the proposal are unavailable, the following is a detailed, robust objection synthesized from the most critical and common grounds for refusal in UK planning law: Concise and Detailed Reason for Refusal The application is absolutely the wrong thing to be building because its potential benefits are significantly and demonstrably outweighed by the severe cumulative harm it will inflict upon the environment, local infrastructure, and the character and amenities of the area. This harm is compounded by the proposal's likely conflict with key policies governing settlement boundaries and protecting valuable open space. 1. Conflict with Core Planning Policy and Strategy The proposal is unacceptable as it fails the primary test of sustainable development, as defined by the NPPF, by conflicting directly with the statutory development plan for North Somerset (e.g., the Core Strategy and Site Allocations Plan). Unallocated Land/Green Belt Intrusion: The development is highly likely located on a site outside the defined settlement boundary, potentially in a Strategic Gap or Green Belt area. Such a location constitutes unacceptable encroachment into the countryside, which is contrary to policies intended to direct development to suitable, sequentially preferable brownfield or allocated sites. Premature Development: The application is likely premature, pre-empting the delivery strategy of the emerging North Somerset Local Plan 2039. Approving this unallocated site would undermine the Plan-led system, weaken the Council's ability to ensure holistic infrastructure delivery, and set a harmful precedent for speculative development.	No modifications are required because we as a community will do everything in our powers to make sure this does not get the go ahead.	No modifications are required because we as a community will do everything in our powers to make sure this does not get the go ahead	

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					2. Severe Environmental and Ecological Harm The scale and nature of the proposed development would cause irreversible damage to the natural and built environment. Ecological Loss: The site likely supports priority habitat or protected species (e.g., bats, great crested newts). The application fails to demonstrate a net biodiversity gain, and the proposed mitigation measures are insufficient, resulting in the irreplaceable loss of habitat and a breach of ecological planning duties. Landscape and Visual Amenity: The development would result in a major adverse visual impact on the existing landscape character, particularly if visible from an Area of Outstanding Natural Beauty (AONB) or if it destroys a valued local green space. The intrusion of urban structures (massing, density, hardstanding, lighting) would fundamentally erode the rural character of the locality. 3. Unacceptable Strain on Essential Infrastructure and Safety The proposal fails to demonstrate that the local infrastructure network has the capacity to absorb the resulting pressure, leading to detriment to existing residents. Highway Safety and Capacity: The new development will generate a significant increase in vehicular movements, resulting in unacceptable congestion at key junctions and a detrimental impact on highway safety, particularly on local lanes or nearby major road networks which are already at capacity. The proposed transport assessment (if submitted) fails to accurately mitigate this increase. Strain on Community Services: The development will place an unmanageable burden on existing community services, including local primary healthcare (GP surgeries) and schools, which are already oversubscribed. There is no clear, funded, and deliverable strategy for necessary expansion or provision of new services commensurate with the number of new residents. 4. Detrimental Impact on Local Amenity and Character The design, scale, and density are inappropriate for the setting, diminishing the quality of life for both existing and future occupants. Poor Design and Scale: The scheme demonstrates a monotonous or overly dense design that fails to respect the scale, built form, and architectural distinctiveness of the surrounding neighbourhood, contravening design policies that require high-quality, locally appropriate architecture. Loss of Residential Amenity: The proximity of the development would result in a loss of privacy, daylight, and outlook for neighboring properties due to overlooking and overbearing massing, directly impacting the living conditions of existing residents.			

Name: Richard Clarke **I.D:** 58534849

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Land at Lodway Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	No	There was minimal to no consultation for this area compared to other areas that are to be developed to this scale. there were no public events and many residents were/are completely unaware of the scale of development planned and have not had a reasonable chance to have their say. This is completely unacceptable and does noy uphold the Councils own Statement of Community Involvement. The council is planning to build on Green Field sites without having first considered all reasonable alternatives such as Brownfield land and other more suitable alternatives within North Somerset. Furthermore, the Councils own Golden Rules do not appear to have been met. Has the Council taken into account and funded the work needed to protect wildlife on the greenbelt land and also to deal with the flood risks that the proposed building will cause. Th local plan does not address the ongoing problem with the massive overuse of Junction 19 and the	Full and reasonable consultations and events to positively engage the community. Reassess the impact on Green Belt land following the Golden Rules and consider the use of Brown Field and other sites prior to destroying Green Belt and Grade 1 agricultural land. Full flood assessment and alternative lower flood risk sites should be considered To cooperate fully and be advised		

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					A369, both of which will be massively exacerbated by increased building at this level. The X4 bus is one of the most successful and cost effective in the area yet it is completely reliant on junction 19 and the A369 running smoothly. The slightest incident, roadworks or match at Ashton Gate stadium delay the bus sometimes by over an hour making it completely unusable. Further traffic on the road will add to increased unreliability of public transport thus making more commuters take to their cars! This is opposed to Council objectives. The proposed small hourly train service will not be a replacement for the X4 bus which runs every 20 minutes and on a much larger timetable. The train cannot be relied on to mitigate the extra traffic caused by the proposed building let alone deal with the current ongoing issues. There is also a concern that at peak times the train will already be full of Portishead passengers by the time it reaches Pill. The roadwork issues need to be addressed and resolved the proposed train is not an answer to this. The pavements in Pill are already completely inadequate and in some cases non existent. The council needs to fully asses the increased risks to pedestrians from extra houses/cars and make firm and costed plans to mitigate these risks.	by National Highways regarding traffic management and the already above capacity road networks		
Land east of Gordano Services	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	No	There was minimal to no consultation for this area compared to other areas that are to be developed to this scale. there were no public events and many residents were/are completely unaware of the scale of development planned and have not had a reasonable chance to have their say. This is completely unacceptable and does noy uphold the Councils own Statement of Community Involvement. The council is planning to build on Green Field sites without having first considered all reasonable alternatives such as Brownfield land and other more suitable alternatives within North Somerset. Furthermore, the Councils own Golden Rules do not appear to have been met. Has the Council taken into account and funded the work needed to protect wildlife on the greenbelt land and also to deal with the flood risks that the proposed building will cause. Th local plan does not address the ongoing problem with the massive overuse of Junction 19 and the A369, both of which will be massively exacerbated by increased building at this level. The X4 bus is one of the most successful and cost effective in the area yet it is completely reliant on junction 19 and the A369 running smoothly. The slightest incident, roadworks or match at Ashton Gate stadium delay the bus sometimes by over an hour making it completely unusable. Further traffic on the road will add to increased unreliability of public transport thus making more commuters take to their cars! This is opposed to Council objectives. The proposed small hourly train service will not be a replacement for the X4 bus which runs every 20 minutes and on a much larger timetable. The train cannot be relied on to mitigate the extra traffic caused by the proposed building let alone deal with the current ongoing issues. There is also a concern that at peak times the train will already be full of Portishead passengers by the time it reaches Pill. The roadwork issues need to be addressed and resolved the proposed train is not an answer to this. The pavements in Pill are already completely inadequate and in some cases non existent. The council needs to fully asses the increased risks to pedestrians from extra houses/cars and make firm and costed plans to mitigate these risks.	Full and reasonable consultations and events to positively engage the community. Reassess the impact on Green Belt land following the Golden Rules and consider the use of Brown Field and other sites prior to destroying Green Belt and Grade 1 agricultural land. Full flood assessment and alternative lower flood risk sites should be considered To cooperate fully and be advised by National Highways regarding traffic management and the already above capacity road networks		
Pill Green	No	• Positively prepared • Justified • Effective • Consistent with national	Unsure	No	There was minimal to no consultation for this area compared to other areas that are to be developed to this scale. there were no public events and many residents were/are completely unaware of the scale of development planned and have not had a reasonable chance to have their say. This is completely unacceptable and does noy uphold the Councils own Statement of Community Involvement. The council is planning to build on Green Field sites without having first considered all reasonable alternatives such as Brownfield land and other more suitable alternatives within North Somerset.	Full and reasonable consultations and events to positively engage the community. Reassess the impact on Green Belt land following the Golden Rules and consider the use of Brown Field and other sites prior to destroying Green Belt and Grade 1 agricultural		

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		policy			Furthermore, the Councils own Golden Rules do not appear to have been met. Has the Council taken into account and funded the work needed to protect wildlife on the greenbelt land and also to deal with the flood risks that the proposed building will cause. Th local plan does not address the ongoing problem with the massive overuse of Junction 19 and the A369, both of which will be massively exacerbated by increased building at this level. The X4 bus is one of the most successful and cost effective in the area yet it is completely reliant on junction 19 and the A369 running smoothly. The slightest incident, roadworks or match at Ashton Gate stadium delay the bus sometimes by over an hour making it completely unusable. Further traffic on the road will add to increased unreliability of public transport thus making more commuters take to their cars! This is opposed to Council objectives. The proposed small hourly train service will not be a replacement for the X4 bus which runs every 20 minutes and on a much larger timetable. The train cannot be relied on to mitigate the extra traffic caused by the proposed building let alone deal with the current ongoing issues. There is also a concern that at peak times the train will already be full of Portishead passengers by the time it reaches Pill. The roadwork issues need to be addressed and resolved the proposed train is not an answer to this. The pavements in Pill are already completely inadequate and in some cases non existent. The council needs to fully asses the increased risks to pedestrians from extra houses/cars and make firm and costed plans to mitigate these risks.	land. Full flood assessment and alternative lower flood risk sites should be considered To cooperate fully and be advised by National Highways regarding traffic management and the already above capacity road networks		
Land at Pill Road	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	No	There was minimal to no consultation for this area compared to other areas that are to be developed to this scale. there were no public events and many residents were/are completely unaware of the scale of development planned and have not had a reasonable chance to have their say. This is completely unacceptable and does noy uphold the Councils own Statement of Community Involvement. The council is planning to build on Green Field sites without having first considered all reasonable alternatives such as Brownfield land and other more suitable alternatives within North Somerset. Furthermore, the Councils own Golden Rules do not appear to have been met. Has the Council taken into account and funded the work needed to protect wildlife on the greenbelt land and also to deal with the flood risks that the proposed building will cause. Th local plan does not address the ongoing problem with the massive overuse of Junction 19 and the A369, both of which will be massively exacerbated by increased building at this level. The X4 bus is one of the most successful and cost effective in the area yet it is completely reliant on junction 19 and the A369 running smoothly. The slightest incident, roadworks or match at Ashton Gate stadium delay the bus sometimes by over an hour making it completely unusable. Further traffic on the road will add to increased unreliability of public transport thus making more commuters take to their cars! This is opposed to Council objectives. The proposed small hourly train service will not be a replacement for the X4 bus which runs every 20 minutes and on a much larger timetable. The train cannot be relied on to mitigate the extra traffic caused by the proposed building let alone deal with the current ongoing issues. There is also a concern that at peak times the train will already be full of Portishead passengers by the time it reaches Pill. The roadwork issues need to be addressed and resolved the proposed train is not an answer to this. The pavements in Pill are already completely inadequate and in some cases non existent. The council needs to fully asses the increased risks to pedestrians from extra houses/cars and make firm and costed plans to mitigate these risks.	Full and reasonable consultations and events to positively engage the community. Reassess the impact on Green Belt land following the Golden Rules and consider the use of Brown Field and other sites prior to destroying Green Belt and Grade 1 agricultural land. Full flood assessment and alternative lower flood risk sites should be considered To cooperate fully and be advised by National Highways regarding traffic management and the already above capacity road networks		

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Land at Ham Green	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	No	There was minimal to no consultation for this area compared to other areas that are to be developed to this scale. there were no public events and many residents were/are completely unaware of the scale of development planned and have not had a reasonable chance to have their say. This is completely unacceptable and does noy uphold the Councils own Statement of Community Involvement. The council is planning to build on Green Field sites without having first considered all reasonable alternatives such as Brownfield land and other more suitable alternatives within North Somerset. Furthermore, the Councils own Golden Rules do not appear to have been met. Has the Council taken into account and funded the work needed to protect wildlife on the greenbelt land and also to deal with the flood risks that the proposed building will cause. Th local plan does not address the ongoing problem with the massive overuse of Junction 19 and the A369, both of which will be massively exacerbated by increased building at this level. The X4 bus is one of the most successful and cost effective in the area yet it is completely reliant on junction 19 and the A369 running smoothly. The slightest incident, roadworks or match at Ashton Gate stadium delay the bus sometimes by over an hour making it completely unusable. Further traffic on the road will add to increased unreliability of public transport thus making more commuters take to their cars! This is opposed to Council objectives. The proposed small hourly train service will not be a replacement for the X4 bus which runs every 20 minutes and on a much larger timetable. The train cannot be relied on to mitigate the extra traffic caused by the proposed building let alone deal with the current ongoing issues. There is also a concern that at peak times the train will already be full of Portishead passengers by the time it reaches Pill. The roadwork issues need to be addressed and resolved the proposed train is not an answer to this. The pavements in Pill are already completely inadequate and in some cases non existent. The council needs to fully asses the increased risks to pedestrians from extra houses/cars and make firm and costed plans to mitigate these risks.	Full and reasonable consultations and events to positively engage the community. Reassess the impact on Green Belt land following the Golden Rules and consider the use of Brown Field and other sites prior to destroying Green Belt and Grade 1 agricultural land. Full flood assessment and alternative lower flood risk sites should be considered To cooperate fully and be advised by National Highways regarding traffic management and the already above capacity road networks		

Name: Richard Coombs **I.D:** 62856545

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Land east of Backwell	Unsure		Unsure	No	Backwell cannot sustain any further development.. 800 new houses already approved which is an increase of 40% - these additional numbers would lead to disastrous overdevelopment. The proposed new road would not effectserve nailsea's traffic or relieve congestion on Station Road, Backwell Common or Chapel Hill. Constructing a road and negotiating the railway line by going under or over would ne expensive and unfeasible. The village has lack of infrastructure and services and could not support an additional 1000 houses. There is a deficit in school places and no investment in health services. The existing health services are already under strain without the completion of the planned 800 houses at Grove farm and Farleigh fields. Backwell is allocated a higher number of houses than any other village in North Somerset and a higher growth percentage than other towns. Backwell is expected to take 7% of the district's housing compared to Clevedon's 2%. There is no needs or viability analysis for an extra 1,000 houses. Backwell is not an employment hub - most residents commute. No social cohesion impact assessment has been provided. I am particularly concerned that there is only 7% of high quality grade 1 agricultural land left in the whole of North Somerset - building on grade 1 agricultural land is short sighted - we need to have land available fir crops abd grazing. Government policy states that "we must protect our best and most valuable land" to safeguard food security. The proposals contradict this policy and undermine food security. Development would destroy valuable wildlife habitats and further harm biodiversity in one of the world's most nature-			

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					depleted countries. The proposals the Brockley Maternity Roost and SSSI, with rare Lesser and Greater Horseshoe Bats relying on the land for food. The Infrastructure Delivery Plan lacks analysis and costings and there is no funding guarantees for the new road or services. Backwell Common and surrounding areas are prone to flooding which would be aggravated by more housing. Concerns regarding the strategic growth location designation include the impact on the area's character, the loss of Greenbelt and high-quality agricultural land, the risk of flooding,and uncertainty over whether the road can be funded and delivered on time to support the proposed housing. Backwell Lake and adjacent fields where the new roads and housing is planned and are on a floodplain, which floods regularly- given climate changes this us going to get worse in years to come and floodplain needs to be preserved. Government policy requires 50% affordable housing on Greenbelt, but this reduces the funds developers contribute towards infrastructure. The sheer volume of growth with the required investment infrastructure and services over such a short period is destabilising, unsustainable and undeliverable. The railway station is not fit for purpose as a transport- it remains inaccessible for people with mobility issues and presents serious challenges when travelling with young children. Backwell can not sustain 80% population growth and loss of grade 1 agricultural land. I strongly object to the proposals.			

Name: Richard Eke **I.D:** 62741057

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No		Too many new houses - widely disproportionate to other villages. 7% in Backwell! (Clevedon is only 2%) - resulting in an 80% increase in population. Backwell will no longer be a village. The proposed road is not funded and even if it were, filters traffic onto an already very busy road so does not solve any traffic issues. No employment here so most will need to commute - A370 is already very congested during commute times. Backwell common floods many times every winter - where will all that water go? The train station is not a viable transport hub; it is inaccessible and dangerous to use for anyone with mobility issues or small children. Such an explotion in population will overwhelm all services including schools, doctors, dentist, village shops.	Do not build on a flood plain that is greenbelt.		

Name: Richard Ivens **I.D:** 62772513

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I object to the scale of this development, which is a gross over development of this village site and would completely change the character of the village. It would result in the loss of Green Belt land. Furthermore, it is prime agricultural land, grade 1, which is strategically important for home food security to minimise imports which will become increasingly expensive in the future. On these grounds alone, I believe it would be inappropriate to zone this land for building development.	Zone less important land or more land in closer proximity to Bristol, where most new residents to the area would need to travel for work, shopping or leisure.	-	

Name: Richard Little **I.D:** 62864385

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP6: Villages and rural areas	No	‣ Positively prepared ‣ Justified ‣ Effective	Unsure	Unsure	This representation relates to Land north of Caswell Lane, Portbury, previously assessed within the Council's evidence base as HELAA/SHLAA reference HE202003. The Site was promoted through the Call for Sites process but has not been allocated in the Pre-Submission Local Plan 2041. This representation contends that the Local Plan is unsound under NPPF paragraph 35, as it is not positively prepared, not justified, and not effective, due to a failure to properly consider reasonable alternatives in a District that is heavily constrained by flood risk, geography, and administrative boundaries. Key Soundness Issues 1. Failure to Respond to Strategic Constraints North Somerset is significantly constrained by: • the Severn Estuary and extensive coastal and tidal flood risk to the west; • fluvial and surface water flood risk inland; • extensive Green Belt designation; • the Bristol administrative boundary to the north and east. In this context, the Plan must direct growth towards lower-risk, deliverable locations. The current spatial strategy fails to do so adequately. 2. Under-utilisation of Portbury as a Sustainable Location Portbury represents a sustainable northern settlement with: • strong functional and economic links to Bristol and Royal Portbury Dock; • excellent access to the strategic highway network (M5 Junction 19); • established local services and public transport connectivity. Despite these attributes, the Plan directs limited growth to the north of the District and instead relies heavily on locations that are more exposed to flood risk and delivery complexity. This approach is not justified. 3. Failure to Consider Reasonable Alternatives The Site was previously recognised in the HELAA/SHLAA evidence base and remains available, suitable, and deliverable. Its exclusion arises not from overriding technical constraints, but from an unduly restrictive settlement selection approach. The Plan therefore fails to properly consider reasonable alternatives, contrary to national policy and sound plan-making principles. 4. Grey Belt Considerations The Site exhibits clear Grey Belt characteristics, including: • strong physical containment by the M5 motorway and the existing settlement edge; • severance from the wider countryside; • limited contribution to Green Belt purposes due to infrastructure influence. The Plan fails to meaningfully differentiate between strong Green Belt land and Grey Belt land in sustainable locations such as Portbury. This renders the Plan not justified and inconsistent with national policy. 5. Deliverability and Effectiveness The Plan relies heavily on a small number of large sites, increasing delivery risk. By contrast, the Site: • is under single ownership; • has no known deliverability constraints; • can deliver approximately 50–80 dwellings with significant green infrastructure and community facilities; • lies predominantly within Flood Zone 1 and passes the Sequential Test. Incorporating such sites would improve flexibility and effectiveness.	Modification Sought To make the Plan sound, it should be modified to: 1. Recognise Portbury as an appropriate location for proportionate growth within the spatial strategy, and 2. Allocate Land north of Caswell Lane, Portbury (HE202003) for residential development (circa 50–80 dwellings), with associated green infrastructure and community facilities, and amend the Policies Map accordingly.		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP5: Housing, employment and mixed use allocations	No	‣ Positively prepared ‣ Justified ‣ Effective	Unsure	Unsure	This representation relates to Land north of Caswell Lane, Portbury, previously assessed within the Council's evidence base as HELAA/SHLAA reference HE202003. The Site was promoted through the Call for Sites process but has not been allocated in the Pre-Submission Local Plan 2041. This representation contends that the Local Plan is unsound under NPPF paragraph 35, as it is not positively prepared, not justified, and not effective, due to a failure to properly consider reasonable alternatives in a District that is heavily constrained by flood risk, geography, and administrative boundaries. Key Soundness Issues 1. Failure to Respond to Strategic Constraints North Somerset is significantly constrained by: • the Severn Estuary and extensive coastal and tidal flood risk to the west; • fluvial and surface water flood risk inland; • extensive Green Belt designation; • the Bristol administrative boundary to the north and east. In this context, the Plan must direct growth towards lower-risk, deliverable locations. The current spatial strategy fails to do so adequately. 2. Under-utilisation of Portbury as a Sustainable Location Portbury represents a sustainable northern settlement with: • strong functional and economic links to Bristol and Royal Portbury Dock; • excellent access to the strategic highway network (M5 Junction 19); • established local services and public transport connectivity. Despite these attributes, the Plan directs limited growth to the north of the District and instead relies heavily on locations that are more exposed to flood risk and delivery complexity. This approach is not justified. 3. Failure to Consider Reasonable Alternatives The Site was previously recognised in the HELAA/SHLAA evidence base and remains available, suitable, and deliverable. Its exclusion arises not from overriding technical constraints, but from an unduly restrictive settlement selection approach. The Plan therefore fails to properly consider reasonable alternatives, contrary to national policy and sound plan-making principles. 4. Grey Belt Considerations The Site exhibits clear Grey Belt characteristics, including: • strong physical containment by the M5 motorway and the existing settlement edge; • severance from the wider countryside; • limited contribution to Green Belt purposes due to infrastructure influence. The Plan fails to meaningfully differentiate between strong Green Belt land and Grey Belt land in sustainable locations such as Portbury. This renders the Plan not justified and inconsistent with national policy. 5. Deliverability and Effectiveness The Plan relies heavily on a small number of large sites, increasing delivery risk. By contrast, the Site: • is under single ownership; • has no known deliverability constraints; • can deliver approximately 50–80 dwellings with significant green infrastructure and community facilities; • lies predominantly within Flood Zone 1 and passes the Sequential Test. Incorporating such sites would improve flexibility and effectiveness.	Modification Sought To make the Plan sound, it should be modified to: 1. Recognise Portbury as an appropriate location for proportionate growth within the spatial strategy, and 2. Allocate Land north of Caswell Lane, Portbury (HE202003) for residential development (circa 50–80 dwellings), with associated green infrastructure and community facilities, and amend the Policies Map accordingly.		

Name: Richard Lloyd **I.D:** 9382337

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Netcott’s Meadow, north of Backwell Lake, west of Bucklands End, Nailsea	Yes	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure				I support the preservation of the greenbelt that includes Netcott Meadow. This meadow has cultural and local heritage as it was once the county's Coronation Meadow. The biodiversity and wildlife once found in the field will return once the landowner ceases destroying the habitats.	

Name: Richard O'Callaghan **I.D:** 50934881

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Further development would lead to complete overdevelopment in a village area. Backwell has been allocated a higher number of houses than any other village and most towns in N Somerset in an area with no employment and where most have to commute into Bristol. The roads are unfit for the current volume of traffic and as public transport links cannot cope, the building of further new roads will just multiply the problems on the A370 and surrounding roads. The proposed site is grade 1 agricultural land which is currently used food crops and grazing and the Govt. has already stressed its desire to 'protect our best and most versatile land' for food security, which in this case has been ignored. Also loss of this land will have a hugely detrimental effect on wildlife habitats. The site in question is also a flood plain which floods on numerous occassions. Overall the plans are poorly thought through and take no account of the impact on the existing area and its homeowners. There are no plans for improvements to services in an area which is almost at capacity and there are no guaantees for funding of the new road and additional services. The volume of growth is unsustainable, destabilising and undeliverable over such a short time period without major investment.			

Name: Richard Parsons **I.D:** 58544193

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I am writing regarding further proposals for new housing developments in Backwell. Whilst I understand the need for new houses it is the scale of future proposed developments that I am objecting to. There are already a large number of new houses currently under construction on sites at Farleigh Fields, Rodney Road etc. There are various other areas such as the very large development at Grove Farm which is likely to go ahead in the near future. I feel that enough is enough. Backwell is a village and too many more new houses will completely change the nature of the area leading to a strain on amenities such as the schools and health centre etc, not to mention the amount of extra traffic. I am against the new road that is being proposed from the lake as this would have a huge impact on agricultural land and the surrounding countryside.			

Name: Richard Skillen **I.D:** 62831969

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Objection to the East Backwell Development Proposal This proposal for development in East Backwell is both unnecessary and irreversible. The land in question is high-grade agricultural land, among the most productive and environmentally valuable forms of countryside in the UK. Once this type of land is built over, it is lost permanently. Its quality, biodiversity, and contribution to long-term food security cannot be replicated or replaced elsewhere. Protection of High-Quality Agricultural Land Grade 1 agricultural land is exceptionally rare in the UK and forms a crucial part of our national food-production capacity. In an era of increasing climate uncertainty and supply-chain instability, safeguarding such land is more important than ever. Beyond its agricultural function, this landscape supports a wide range of wildlife and acts as an essential green corridor. Development here would fragment habitats, reduce biodiversity, and permanently damage a landscape that has both ecological and community value. Questionable Need for Additional Housing in This Location Even if additional housing were required—an issue that remains debatable—building on prime rural land should be considered a last resort. There are far more sustainable solutions available. A significant number of existing properties in nearby urban areas, including Bristol, remain vacant or under-utilised. Various public reports and studies have highlighted thousands of empty homes across the region. Prioritising the renovation, conversion, and re-use of these properties would offer a far quicker, more environmentally responsible, and more economically beneficial solution than constructing entirely new developments on greenfield sites. Refurbishing existing housing stock reduces the carbon footprint associated with new construction, supports local trades and employment, and brings people closer to existing transport, healthcare, and infrastructure—rather than placing additional pressure on rural and already-strained village amenities. Environmental and Infrastructure Concerns Backwell's infrastructure is already under significant pressure. Roads, schools, GP services, and public transport are operating close to capacity. Adding a large new development would intensify congestion, increase emissions, and erode the village character that residents value. Building on greenfield land also increases surface-water runoff, elevating flood risks both locally and downstream. Conclusion This development is unnecessary, unsustainable, and deeply damaging to the long-term wellbeing of Backwell and the wider region. The irreversible loss of Grade 1 agricultural land cannot be justified when more responsible, environmentally sound alternatives exist. Priority should be given to making use of empty homes, utilising brownfield sites, and enhancing existing settlements—rather than sacrificing valuable countryside that supports wildlife, food security, and the rural identity of our community.	Leave the village as it is everyone is happy as things are, we don't want or need a link road and certainly don't want or need an enormous housing development.	Never	

Name: Richard Stockham **I.D:** 30790113

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP3: Spatial strategy	Yes		Yes	Yes			It looks as if the concerns of residents living in the villages outside the main urban areas have been taken in to consideration. The villages generally have a poor road infrastructure which are not suitable for further traffic growth so concentrating future housing developments where there are good transport links and the availability of work makes sound sense. If we are going to meet climate change and CO2 targets we must continue to reduce the dependency on the motor car. This will also make the roads safer for cyclists and pedestrians.	

Name: Richard Webber **I.D:** 62703777

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I object to the proposed building of almost 1000 houses to the east of Backwell, areas HE 203035, 202012, 208001, 202300. This development would be 'shoehorned' into an area between A370 and a railway line. At present this area of green belt is home to a variety of species of flora, insects, amphibians and mammals including deer and horseshoe bats which are considered rare. This proposal will have a huge impact on both habitats for wildlife and on biodiversity. This area is being used to grow crops and is an open country space which is accessed frequently by the local community. It has numerous rights of way within its borders. It is Grade 1 agricultural land of which there is only 7% remaining in North Somerset. Government policy states that , 'we must protect our best and most versatile land,' https://www.gov.uk/guidance/natural-environment, This proposal contradicts this policy. One of the main issues for me would be the proposed building of a major road going under or over the rail track and cutting a swathe through the countryside to join to Station Road near Backwell Lake. Surely the congestion caused by the increased number of vehicles using that road would be untenable. Traffic would be obliged to turn right onto Station Road then ultimately onto the High Street (B3130) in Nailsea. This junction is already congested and it's very difficult to turn right there at the best of times. Turning left from this new road would lead traffic under the railway bridge which is single rack and the amount of traffic using this route would cause serious congestion. This road would increase, not decrease congestion. There is little employment in Backwell and the majority of people need to travel to work, mostly by car. Whilst Nailsea/Backwell does have a railway station, this is not 'fit for purpose' and does not afford safety when travelling with young children or people with additional needs and is currently inaccessible for people who have physical disabilities. The proposed underpass or flyover would be phenomenally expensive and be a massive and lengthy piece of engineering. Presumably this money would need to come from Central Government and at this time, there are many other more worthy projects on which to spend millions of pounds of taxpayers' money. It would need to be in place to ensure the A370 did not become completely congested by construction vehicles. This road is a major route and does not have the capacity to accommodate the extra traffic that up to a 1000 houses would bring, which would very likely be 1600 cars, as according to some sources, 60% of households in the Southwest have 2 vehicles. If this development were to go ahead with two points of access, I can't imagine many drivers wishing to sit on Station Road, especially during 'school run' time, to wait to negotiate the junction to get on to the A370. I would be extremely concerned if the proposed new road were to include a junction to allow vehicles to turn east onto Backwell Common; to access either the road across the common or to Chapel Hill under the railway bridge. These two routes are predominately single track. Vehicular issues aside, there is the problem of the lack of infrastructure to support a housing development of this size. Backwell is considered a village and as such, has very few local amenities and residents need to travel to find large shops, entertainment etc. The GP surgery is already at capacity, as are the local schools. This proposal means that the village of Backwell will be expected to take 7% of the local housing allocation, whereas the town of Clevedon is allocated to take a mere 2%. Another issue that needs careful consideration is problems with flooding in the area. The land directly behind Chapel Hill and adjacent to the railway is continually sodden in the winter and after prolonged spells of rain throughout the rest of the year. This will be exacerbated by the construction of houses, tarmacked drives and roads. Considering that the change in our climate will bring wetter weather, surely this land is not suitable for housing in the longer term? Backwell has had 800 additional houses approved, which is already a 40% increase in the village. The addition of the houses proposed would lead to complete overdevelopment of a village that already has congested roads and little infrastructure to support its current residents.			

Name: Richard White **I.D:** 58041921

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	No	There is no evidence that ‘reasonable alternatives’ (NPPF para 36 c) have been considered. The development of the plan was avowedly developer-led despite National Planning Policy Framework guidance (NPPF para 73) that, “Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes, and are often built-out relatively quickly” and subsequent requirements notably (b) are not represented in the plan either with regard to sites across North Somerset or specifically with regard to the boost that this would bring to the local economy in Pill and Easton in Gordano where a number of building crafts people are based. Consistency with national policy: National Planning Policy Framework launch statement promised ‘proportionate development’ towards achieving the new-housing targets (https://www.gov.uk/government/news/our-plan-to-build-more-homes#:~:text=New%20targets%20will%20boost%20housebuilding,of%20step%20with%20local%20incomes.) "Our new housing targets will make sure local authorities plan for the homes that are proportionate to the size of existing communities, with an uplift in areas where house prices are the most out of step with local incomes" The proposed development LP11 will increase the population of the village by almost a half, with a consequential increase in vehicle traffic and demand for services at a location where services are already overloaded and road traffic at capacity. The village will be trapped between the river, the motorway and a choked A road. The green spaces all Green Belt and much prime agricultural land will be buried under concrete and tarmac. All mitigations short of reducing the number of homes are inadequate. This is not proportionate development In these terms this is NOT a sound plan Duty to Cooperate The North Somerset Council’s own Statement of Community Involvement (SCI) resonates with government directives including NPPF and other legislation including those in the Equality Act 2010, Public Sector Equality Duty The SCI commits North Somerset Council as follows: "We will target consultation to include people whom we consider would be most affected by any proposals or plans and where possible any known interest groups. We will seek views as early as possible. We will always aim to provide sufficient information to enable people to comment effectively (p3) We will consult with the general public. (p4) We will publicise consultations through a range of means, as appropriate to the subject matter. This can include press 5 Statement of Community Involvement adverts, leaflets, website, posters, displays, community and social media, existing community groups, community events and joining with other consultations. (p4-5) We will consider organising or supporting other consultation events, such as community based planning meetings. (p5)" An NSC consultation took place between February and March 2025 this year offering 5 potential sites in Pill for house building. During that consultation an impression was allowed to become established that the consultation was about identifying a consensus around the most appropriate sites, not that NSC planned to include all 5 sites. At the same time a more advanced outline planning application for the land adjacent to the Motorway services was out for consultation. This was well-funded by the developers, with an exhibition and public meeting.The timing of this ‘smaller’ consultation had the effect of confusing and obscuring the larger consultation. The NSC consultation was poorly publicised, there was no exhibition or consultative public meeting on the 5 sites, separately or together. Given the scale of potential change in Pill/EiG, as noted above not a 'proportionate development', an exhibition and public meeting would have generated considerable engagement. The people 'most affected' have not been consulted, this is in direct breach of the NSC SCI. The designation as Strategic Location for Pill/EiG and the plan that all 5 sites would go through to the 2041 North Somerset Local Plan was announced after the consultation had closed. No consultation opportunity was offered on this significant change. NSC has not met with their Duty to Cooperate	Suspend the plan, re-develop in accordance with NPPF. Suspend the developer-led approach and develop a community-led approach as advised (NPPF para 73) Conduct a full open consultation with exhibitions and public meetings, supported by information leaflets.		

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Land at Lodway Farm	No		Unsure	No	NPPF (para 187) requires plans to take full account of environmental impacts and to avoid/mitigate adverse effects, including Habitats Regulations Assessments (HRA). This requirement has not been fulfilled. The proposed development sites around Pill lie within consultation zones for the North Somerset & Mendip Bats Special Area of Conservation (SAC), with proximity to the Severn Estuary Site of Special Scientific Interest (SSSI). Where sites are adjacent to or affect SSSI, SAC or other habitats sites, or form important wildlife corridors, development proposals must avoid significant harm, apply buffers and secure measurable net gains for biodiversity (paras 193-5). Lodway Farm site adjoins SSSI the marshland down to the River. Details of protected species and habitats can be found in the Wild Service Ecology Review undertaken on behalf of the Neighbourhood Plan Steering Group in 2019. https://pillanddistrictplan.org/environment-and-landscape/wild-service-ecology-review/ Assessment of land removed from Green Belt inadequate, The 'additional sites viability addendum' suggests meeting the affordable housing targets may be 'challenging' for the proposed sites in existing Green Belt land around Pill and Easton-in-Gordano. Flood risk increased from development elsewhere including land East of Motorway services. Environment Agency maps indicate water draining from the area known as The Bottoms', old Coombe Lane north of A369 is channelled NW along the A369 and filters down to the River Avon along this site. No evidence that this has been considered. A cul de sac within a cul de sac, no evidence of planning how commuter traffic will filter out through the village. Inadequate consideration of potential traffic congestion through the village and at M5 J19. Concerns have been raised by National Highways (see NSC planning portal, ref 25/P/1413/OUT). The National Highways report stated that transport modelling is required to assess the cumulative impact of developments on M5 J19. There is no evidence of this. No evidence offered in the Local Plan that transport links, including buses and trains, will be sufficient for the proposed number of new homes. Inadequate consultation as stated elsewhere	Environmental Impact Assessment to be completed by competent persons in consultation with community groups. Substantial buffer zone to SSSI Full open consultation. Traffic modelling Traffic calming measures to prevent traffic from this development leaving through the village to Pill Road		
Land east of Gordano Services	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	No	NPPF section 15 requires that the best and most versatile agricultural land be protected. Although most of the agricultural land in England is classified as Grade 3, most of the land proposed for delisting from the Green Belt at Pill/EiG for housing development is Grade 2, in fact some of the land on this site is Grade 1. https://www.arcgis.com/apps/mapviewer/index.html?layers=5d2477d8d04b41d4bbc9a8742f858f4d The plan does not meet this requirement or even explain its failure to do so. NPPF (para 187) requires plans to take full account of environmental impacts and to avoid/mitigate adverse effects, including Habitats Regulations Assessments (HRA). The proposed development sites around Pill lie within consultation zones for the North Somerset & Mendip Bats Special Area of Conservation (SAC), with proximity to the Severn Estuary Site of Special Scientific Interest (SSSI). Where sites are adjacent to or affect SSSI, SAC or other habitats sites, or form important wildlife corridors, development proposals must avoid significant harm, apply buffers and secure measurable net gains for biodiversity (paras 193-5). Details of protected species and habitats can be found in the Wild Service Ecology Review undertaken on behalf of the Neighbourhood Plan Steering Group in 2019. https://pillanddistrictplan.org/environment-and-landscape/wild-service-ecology-review/ Assessment of land removed from Green Belt inadequate, The 'additional sites viability addendum' suggests meeting the affordable housing targets may be 'challenging' for the proposed sites in existing Green Belt land around Pill and Easton-in-Gordano. In the lower part of the site adjoining] the motorway the flood risk is increased from development elsewhere. Environment Agency maps indicate water draining from the area known as The Bottoms', old Coombe Lane filters along the A369 and down to the River Avon on either side of the motorway through to the marshland. No evidence that this has been considered. Inadequate consideration of potential traffic congestion at M5 J19 Concerns raised by National Highways (see	Environmental Impact Assessment to be completed by competent persons in consultation with community groups Full open consultation. Traffic modelling Traffic calming measures to prevent bottleneck at A369 junction and to stop traffic from this development leaving through the village via Rectory Road or the village centre and Pill Road		

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					NSC planning portal, ref 25/P/1413/OUT). The National Highways report stated that transport modelling is required to assess the cumulative impact of developments on M5 J19. Traffic from this site will turn out almost directly on to the A369 junction. Over-reliance on the impact of the proposed railway link, travel to the rail station from here is a considerable distance. No evidence offered in the Local Plan that transport links, including buses and trains, will be sufficient or accessible for the proposed number of new homes. Inadequate consultation			
Pill Green	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	No	NPPF (para 187) requires plans to take full account of environmental impacts and to avoid/mitigate adverse effects, including Habitats Regulations Assessments (HRA). The proposed development sites around Pill lie within consultation zones for the North Somerset & Mendip Bats Special Area of Conservation (SAC), with proximity to the Severn Estuary Site of Special Scientific Interest (SSSI). Where sites are adjacent to or affect SSSI, SAC or other habitats sites, or form important wildlife corridors, development proposals must avoid significant harm, apply buffers and secure measurable net gains for biodiversity (paras 193-5). The woodland alongside Markham Brook between this site and the Land at Pill Road is largely undisturbed ancient woodland and should be protected from development, including bridges. Details of protected species and habitats can be found in the Wild Service Ecology Review undertaken on behalf of the Neighbourhood Plan Steering Group in 2019. https://pillanddistrictplan.org/environment-and-landscape/wild-service-ecology-review/ As noted elsewhere NPPF section 15 requires that the best and most versatile agricultural land around the village is protected, most of the land proposed for delisting from the Green Belt and for housing development is Grade 2 (very good) https://publications.naturalengland.org.uk/publication/6713148559065088 Assessment of land removed from Green Belt inadequate, The ‘additional sites viability addendum’ suggests meeting the affordable housing targets may be ‘challenging’ for the proposed sites in existing Green Belt land around Pill and Easton-in-Gordano. No evidence of planning how commuter traffic will be be prevented from filtering out through the village or into the village. Inadequate consideration of potential traffic congestion at M5 J19 Concerns raised by National Highways (see NSC planning portal, ref 25/P/1413/OUT). The National Highways report stated that transport modelling is required to assess the cumulative impact of developments on M5 J19. No evidence offered in the Local Plan that transport links, including buses and trains, will be sufficient for the proposed number of new homes. Flood risk increased from this development elsewhere in the village: Environment Agency maps indicate water drains down through the village centre to the River Avon mostly via the Markham Brook. No assessment of what happens with increased rainfall and rising sea levels, a storm and a storm surge. No consultation has been held with competent persons in the village. Over-reliance on the impact of the proposed railway link. Inadequate consultation	Environmental Impact Assessment to be completed by competent persons in consultation with community groups. Substantial buffer zone to Markham Brook and between the site Land at Pill Road. Full open consultation. Traffic modelling Traffic calming measures to prevent/ deter traffic from this development leaving through the village to Heywood Road, Ham Green/Pill Road		
Land at Pill Road	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	No	NPPF (para 187) requires plans to take full account of environmental impacts and to avoid/mitigate adverse effects, including Habitats Regulations Assessments (HRA). The proposed development sites around Pill lie within consultation zones for the North Somerset & Mendip Bats Special Area of Conservation (SAC), with proximity to the Severn Estuary Site of Special Scientific Interest (SSSI). Where sites are adjacent to or affect SSSI, SAC or other habitats sites, or form important wildlife corridors, development proposals must avoid significant harm, apply buffers and secure measurable net gains for biodiversity (paras 193-5). The woodland alongside Markham Brook between this site and the Land at Pill Road is largely undisturbed ancient woodland and should be protected from development, including bridges. Details of protected species and habitats can be found in the Wild Service Ecology Review undertaken on behalf of the Neighbourhood Plan Steering Group in 2019. https://pillanddistrictplan.org/environment-and-landscape/wild-service-ecology-review/	Environmental Impact Assessment to be completed by competent persons in consultation with community groups. Substantial buffer zone to Markham Brook and between the site Land at Pill Road. Full open consultation.		

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					As noted elsewhere NPPF section 15 requires that the best and most versatile agricultural land around the village is protected, most of the land proposed for delisting from the Green Belt and for housing development is Grade 2 (very good) https://publications.naturalengland.org.uk/publication/6713148559065088 Assessment of land removed from Green Belt inadequate, The ‘additional sites viability addendum’ suggests meeting the affordable housing targets may be ‘challenging’ for the proposed sites in existing Green Belt land around Pill and Easton-in-Gordano. No evidence of planning how commuter traffic will be be prevented from filtering out through the village or into the village. Inadequate consideration of potential traffic congestion at M5 J19 Concerns raised by National Highways (see NSC planning portal, ref 25/P/1413/OUT). The National Highways report stated that transport modelling is required to assess the cumulative impact of developments on M5 J19. No evidence offered in the Local Plan that transport links, including buses and trains, will be sufficient for the proposed number of new homes. Over-reliance on the impact of the proposed railway link. Inadequate consultation	Traffic modelling Traffic calming measures to prevent/ deter traffic from this development leaving through the village via Ham Green/Pill Road		

Name: Rik Vanhoutteghem **I.D:** 62848513

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Pill Green	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	1. Currently traffic backs up frequently on Ham Green Hill. Increasing the population of Pill and Easton in Gordano by over 40% in one fell swoop, over 20% in one site only (Pill Green) seems disproportionate and unjustified and will add massively to traffic congestion and parking problems and interfere with the ability of the local Bus service X4 to function smoothly. 2. This is treasured Green belt. There appears to be no evidence (NPPF 147) of exceptional circumstances and no evidence of sequential testing. 3. The SEA Directive on Sustainability Appraisal has been ignored. There is failure to demonstrate Brownfield sites as an alternative to Pill Green. What will be left for wildlife to make a home, if this site is developed. 4. Deliverability plan for A369, J19 on M5 is lacking as is school places and management of drainage by 2041. Pill Green development is undeliverable. 5. Development of Pill Green breaches NPPF 159 due to absence of Sequential Testing for Non Green Belt sites in the proximity. 6. Brownfield first policy has been ignored. 7. Village Growth should be capped at <5% per site based on 1.2017 JSP and previous local plan allocations 2. NPPF 11 &130(f) plans must be deliverable and avoid impacts on local character and services. 3.Inspector decisions precedents: Local Plan examinations have found allocations causing a greater than 10% population increase to be unsound unless supported by exceptional infrastructure evidence which is lacking here.	Removal of Pill Green site (600 homes) from the LP8 Schedule of sites.		

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					8. There is no duty to cooperate on the unmet need of 8.000 homes in Bristol. Statement of common ground is lacking and there appears to be a unilateral and disproportionate allocation of 1100 new homes in PIEG.			

Name: Rob Arnold **I.D:** 62827297

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	This plan is totally unviable as the Grade 1 Agricultural land should be valued. This would destroy wildlife, habitats and natural beauty forever. This poorly thought out mindless expansion would also lead to chaos due to the lack of infrastructure planning. The A370 would be overloaded with traffic as the new residents would have be commuting on this route. The schools in Backwell and Nailsea are already at capacity which would lead to more traffic to provide for the school runs. This increased traffic would also be very dangerous on the flood risk areas around Backwell common. Backwell has been unfairly targeted with a higher number of houses allocated than any other village in North Somerset. This is causing and will continue to cause substantial unrest and discontent. This plan is extremely depressing as it stands to further deplete our countries wildlife and culture leaving us as a dull, grey urban sprawl of merely housing with less of the things that make our country great like its countryside			

Name: Rob Harvey **I.D:** 58529729

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP7: Green Belt		• Justified • Effective • Consistent with national policy	Unsure	No	Removal of greenbelt status and allowing development on high quality agricultural land - the bulk of the affected sites have the highest ratings (1 or 2) for agricultural land). - goes against the notion of sustainability that NSC has embraced while declaring a climate crisis. The recent National Emergency Briefing (supported by many members of our sitting government) detailed just how crucial our food security is in a time of climate crisis and high quality agricultural land must be protected. In North Somerset's strategic greenbelt assessment they erroneously refer to the M5 motorway as a barrier to incursion from the Port of Bristol. The M5 is a bridge as it passes Lodway Farm fields and there is access to the Pill side of the motorway. There is access to the motorway bridge relief road as well as to land that the Port of Bristol already own on hte PIll side of the motorway. So the notion that the M5 provides any barrier is a nonsense and in the same way that land to the east of Portishead has been kept as greenbelt to buffer against Port encroachment, so Lodway and Court House Farm fields should be allowed to stay within the greenbelt to protect the village of Pill from the Port. There is also a strange suggestion in NSC's that Markham Farm Fields (erroneously refered to as Pill Green) should be removed from the greenbelt because it does nothing to protect Nailsea. This is an odd thing; it is obvious that what Markham Farm fields are, apart from high grade agricultural land and a biodiversity hotspot, are buffers against ribbon development (which is part of the greenbelt's role), defending us from the A369 seeing a sprawl of urban development along the road from Leigh Woods to Portishead.	Markham Farm and Lodway/ Court House Farm Fields should remain within the green belt		
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Justified • Effective • Consistent with national policy	Unsure	No	NSC has not demonstrated that it has done due diligence with regard to expectations about traffic, flooding, wildlife, protected lands, the real impact of the reopened train line, access within the village, nor has it demonstrated that an exception is clear in its removal of green belt status when much of the land serves exactly the same purpose as the land between Portishead and the port of Bristol that has been protected. And, NSC have made no real effort to engage the inhabitants of Pill and Easton in Gordano in the consultation. While other villages and towns had meetings and publicity events; Pill and Easton in	NSC must comply with guidelines and specific advice from National Highways, the Environment Agency, English Nature and others. This might leave some sites free of development and an acceptable limit to development in others. Issues of national heritage (building trees and ancient woodland), access (opening up new routes from the proposed developments are unfeasible and untested - Lodway Farm's proposed access		

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					Gordano received none of this and after the initial consultation period had finished with not many more than 10 local residents commenting, the local feeling of the people that had no idea that the consultation had happened, very swiftly led to more than 2000 local residents signing a petition to protest the excessive amount of housing being foisted upon them.	point onto Beechwood road would lead the traffic, inevitably, onto Marsh Lane which would be unacceptable to Highways and Port of Bristol as well as to the village as a whole, is difficult and unlikely to open up into the village meaning that the bulk of the developments could only spill out onto the hugely congested A369 and then onto Bristol via Bower Ashton (a regular pinch point) or onto Junction 19 of the M5 which is already under vast pressure) and, on all sites, flooding is a significant risk and diverting runoff from the developments into Pill puts the rest of the village in jeopardy as well as risking pollution of the internationally important Ramsar site, the river Severn. The green belt should be restored for most sites, especially those up against the M5 as the bridge allows easy access to Pill from the Northwest and thus provides no barrier to the expansion of the Port of Bristol. I would propose re examining the pre submission plan and re submitting once the real effect of the railway (should it reopen) can be accurately judged as well as allowing for proper feasibility studies of traffic flow and the real cost of integral drainage plans that take water away from the village and the river. This would allow for a proper environmental study of the sites (more like the recent one undertaken by Metrowest for Lodway fields that was completed over the course of a year and was unarguable in its findings)		
Policy LP4: Strategic location: Pill and Easton-in-Gordano		‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	No	The assessment of Pill and Easton in Gordano as a strategic hub is wrong. No evidence or reasonable studies has been shown by NSC to prove that the population as is in the villages, let alone those thousands from peripheral sites to be developed, will benefit from the reopening of the Portishead to Bristol railway, nor that anyone would opt for using the train over the bus or their own car when the likelihood is that very few seats will be available by the time the train reaches Pill from Portishead and that very few trains will be able to serve the village at peak times. The nomination of Pill as a strategic transport hub should be left until the railway opens and we know what the situation is as well as getting proper data from National Highways about opotential weight of traffic on the A369 and at Hunction 19 of the M5			
Land at Lodway Farm		‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	No	Lodway Farm is integral to the purpose of a greenbelt site. Because there is access from the Port of Bristol to Lodway under the motorway bridge then the motorway provides no barrier to urban/industrial sprawl (Port of Bristol already owns land on thePill side of the Bridge and has previously bid on other parcels on the same side). Lodway Farm fields are prone to regular and considerable flooding and development should not be considered anywhere near the Northern boundary next to the M5 (especially important to rule out polluted water running off into the rhynes and entering the river. I do not believe that NSC has developed this plan in conjunction with EA and I believe it is unrealistic to go forward without specific guidelines from EA. This area is also an incredibly important wildlife site. The Northern rhynes can hold water vole (red data species along with redshank and lapwing for this site), there is considerable bat activity and it is a tremendously important wildlife migration route to and from the estuary for many species, not least, a nationally important population of common toads that have been carefully monitored for 20 years and live and move within the fields before crossing to their breeding pond on the far side of the motorway access/bicycle path.	Reduce the number of houses to around 40-50 and keep them near the farm buildings (which don't really have much rural appearance now they have mostly been converted) or running nearer to the Breaches e.t.c.., and allow a generous area for public access but also a large space behind that to the rhynes to be kept as a wildlife habitat/corridor with no public access running Northeast to Southwest from the M5 cyclepath approach to Marsh Lane with appropriate mitigation to allow access to the corridor for animals approaching from a different direction and especially, modified drain covers to prevent amphibian access.		

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					Access from the second point at Beechwood rd will cause similar problems to the rejected proposal for Court House Farm Fields. Access from Beechwood Road will lead residents to use Marsh Lane for onward travel (Debeccas Lane is a nightmare right turn and at present access to the Breaches is blocked and winding through quiet suburban roads to get out onto the Lodway seems likely to cause congestion at the very least but could be seen as potentially dangerous). I do not believe that NSC has developed this plan in conjunction with National Highways and I believe it is unrealistic to go forward without specific guidelines from National Highways. I would expect any application to require a significant environmental survey. I should also point out that, at present, Lodway Farm Fields are to be used as a depot site for the reconstruction of the Portishead to Bristol line. In mitigation Metrowest have agreed to restore the fields to their pristine greenbelt status (a legal requirement) once the work is over (this could be 2028 or considerably later...). Though no timescale has been given for this work I am lead to believe that it would involve working with professional environmental surveyors to check that the restoration is working/has worked and animals that have been removed are returned to the site and have started breeding e.t.c.. again - so could be another 2-3 years on top of the construction phase before this site became available			
Land east of Gordano Services	No	• Justified • Effective • Consistent with national policy	Unsure	No	Court House Farm fields should remain in the greenbelt; the M5 motorway does not provide a significant barrier against Port of Bristol expansion (given that they already own land on the Pill side of the motorway and operate regularly on both sides and have a significant interest in Marsh lane). These fields are of the highest quality for agriculture according to DEFRA, being judged at the highest levels of grade 1 and 2 and given that we are in the midst of a climate emergency (declared by NSC in 2019) where food security is of massive importance, then we cannot afford to lose our best agricultural land. The only part of these fields that is not of the highest quality agricultural land is the lowest and flattest part of the site, nearest theM5 motorway, that floods regularly. Any building above this point would seem likely to exacerbate the flood issues and I am not convinced that NSC have properly checked with National Highways about what further run off on this site could mean for drainage and potential flooding on the M5 slip road (which already happens very regularly) and on the motorway proper. The site is an important site for wildlife migration to and from the estuary (a Ramsar site and SSSI), it has regularly played host to redshank and lapwing (both red data species). Given that travel from the site onto Marsh lane has been prohibited, the only place for onward travel by car is high on St George's hill. At peak times, with increased traffic flow and buses moving and stopping around here, I wonder if NSC have done any work to make this exit safe as I can see no evidence of it? To have the entrance to the site so close to the junction with the A369 seems to create jeopardy for motorists turning right out of the site and if buses pick up passengers here, then it seems really dangerous and yet, if the residents cannot exit onto Marsh lane then I do not believe that there is another option possible. Has NSC done any studies to show that residents at this proposed site would be likely to access the rest of the community? Or would they be most likely to access the A369 directly to go to Bristol or the motorway rather than spending any time in Pill and Easton in Gordano? This is not a sustainable development proposal, it offers nothing to the community	NSC need to protect high quality agricultural land, maybe look for land elsewhere that is of poor agricultural quality (such as Failand). To make any settlement here work then there must be better options for access, but probably to do that you would have to drop numbers of houses to maybe 20 or so and allow them access via Marsh Lane.		
Pill Green	No		Unsure	No	The previous neighbourhood plan recommended that the housing stock in Pill and Easton in Gordano should grow by up to 200 (on a number of small sites) to more than cater for the housing needs of the local people up to 2038. NSC accepted this plan in 2020. So siting 600 new homes on Markham Farm fields (erroneously referred to as Pill Green) obviously has very little to do with	Do not allow this site to leave the greenbelt. A small extension of maybe 30 homes around the existing farm buildings would help with local housing need and not jeopardise the agricultural, rural and natural importance of the site nor put its very strong greenbelt purpose under		

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					meeting local need or sustainability. Markham Farm fields should not be removed from the greenbelt as they have an enormously important role in protecting the village and Abbot's Leigh from urban sprawl along the A369. Markham Farm fields are grade 2 agricultural land according to Defra. In a climate crisis that demands greater food security we cannot allow the highest quality agricultural land, such as this and other sites in Pill and Easton in Gordano, to be concreted over. They are too important for future sustainability. Markham Farm fields have notable wildlife species present, including red data species such as linnet, lapwing and skylarks that live there year round and breed on the fields. The old hedgerows of Markham Farm fields possess very high species counts, encouraging masses of butterflies, crickets, multiple species of insect pollinators and many species of wild flowers. the lowest part of Markham Farm Fields are the only part of the fields that are not classified as high quality agricultural land, because of their propensity to flooding. No significant development should be allowed as I have not seen evidence from NSC that the aquifers and underground streams that slowly drain from this site and take water into Pill, will be able to cope with the extra pressure. The most Eastern part of the Markham Farm fields runs along the edge of the ancient woodland along Markham Brook. According to Natural England guidelines on development near ancient woodland, not only should there be a minimum of 15 metre buffer zone from the edge of the woodland (and in the case of Markham Brook the site qualifies for considerably more buffer zone), but there should be fencing or other obstructions to any public access. The steep valley along Markham Brook has ancient trees, endangered bat feeding grounds and roosts as well as being habitat for endangered hazel dormice e.t.c.. It should be protected and, given that there are easy alternatives to the active travel overbridge (one running out of the site safely onto Brookside to the North or the second, taking the cyclist to the A369 from the Southeast of the site and some small adaptations to allow active travel along the road takes the cyclist back up to Pill road and the secondary school in no time). Given, as Natural England terms it, ancient woodland and the trees within it are "irreplaceable" and alternatives to destroying it should always be sought first, then the overbridge across Markham Brook should not be sanctioned. Markham Farm fields are well used community resource for the people of Pill and Easton in Gordano; significant development would deny them this resource and deny the village a buffer from busy roads and indutrial sprawl. Otherwise travel is a big problem for the Markham Farm fields site, there are no easy access points to the village for the considerable traffic that would be generated by 600 homes. I do not see any evidence that NSC have done any credible studies into how people would access the site, nor how they would choose to access it. Both the only possible exit areas into the village are constrained in terms of available width of road and both feed into a heavily (especially at peak times) congested road system where certain restrictions already exist to cut down dangerous traffic outside the Primary school. Putting more traffic on these roads at peak times would be dangerous for the children crossing while making exiting the village even more frustrating. Should the new rail link open, I have seen no from Metrowest or from NSC about how many passengers the hourly train would be able to take from Pill. The likelihood must be that the bulk of all traffic generated by 600 new homes would pass straight onto the A369 going into Bristol or to junction 19 of the motorway. These would require light controlled measures to allow traffic to exit the site as well as pedestrian crossings to allow new residents to access buses. I have seen no evidence that NSC has made any realistic studies of the likely amount of traffic needing to feed onto the A369 and have seen no evidence that they have worked with National Highways to find a solution that National Highways think will work (given the fact that they have always denied requests for crossings over the A369 in the past, even for active travel purposes, and	threat. These could be designed and provided by local housing initiatives thus avoiding the need for commercial developers to be involved and so keep costs and house prices at a much more sustainable rate,.		

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					that carrying capacity of the A369 seems to be around its limit given the congestion daily in evidence where the A369 meets with Winterstoke rd and the Cumberland Basin in Bristol). The transport issues at least, demonstrate how unsuitable this site is for development. It cannot be sustainable nor play a role in the community as there is so little opportunity for access to the village from this site and no real reason to try if all you are doing is living there in order to access Bristol or the M5.			
Land at Pill Road	No	‣ Justified ‣ Effective	Unsure	No	This small site has a significant problem; proximity to the ancient woodland running alongside markham Brook. The buffer zone should be at least 15 metres (I see no evidence that NSC have contacted Natural England to establish how much bigger than 15 metres the special conditions of this woodland demand the buffer zone to be) and it should be guarded by fencing or other device to prevent damaging public access. This protection precludes the provision of an active travel bridge across markham Brook. Natural England states that simple alternatives should be sought to prevent damage to these irreplaceable trees/habitat and simple solutions for active travel to other parts of Pill/Ham green/Easton in Gordano exist in terms of providing a cycle lane around Haberfield Hill and onto the Pill road and/or the narrow access points at Cross Lanes (to go to Easton) and onto Brookside to easily access the primary school, Pill centre). The woodland site must be protected from other disturbance; noise, lighting and pollution which could damage ancient trees and disturb nesting birds, bats e..t.c..; I feel this would suggest a smaller development than previously proposed. I am not convinced that NSC have done due diligence in terms of studies of how to remove waste and run off water from this site without it ending up in Markham Brook and putting flood pressures on the centre of Pill. Much of the site is angled towards the brook	Reduce the numbers of houses proposed. Keep a buffer zone of circa 30 metres or more from the ancient woodland to help avoid run off, disturbance e.t.c.. Ensure measures are in place to prevent public access to the ancient woods. Find a way to drain the site that doesn't take waste water and run off into Pill. Site the active travel link elsewhere so that it does not lead to the destruction of irreplaceable woodland.		

Name: Rob Hookham **I.D:** 62676097

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Sustainable development objectives	No	‣ Positively prepared ‣ Consistent with national policy	No	No	The Tower hill farm and Black rock areas of portishead proposal for upto 400 homes does not comply with Minimise impact on, and where appropriate enhance, sensitive landscapes. To conserve and enhance historic assets, heritage assets and their settings. Protect and where possible enhance biodiversity, geodiversity and green infrastructure and allow its adaptation to climate change, particularly with respect to protected habitats and species. Weston Big wood is a listed (1971) woodland and the Gordano valley corridor while brown field sites are being ignored. Tower farm is on top of a 300 foot hill with the high street, doctors/ dentist etc at the bottom. People will and do use cars to access the town services Ensure a range of job opportunities are easily accessible without having to use a car.	Consider brown field sites such as Wyndham way which have flat access to services and shops For industry consider the land on the north side of the road from M5 J17 and Portishead (Portway). It hs the M5 motorway as one boundary and Portway as the other. Technically it is in Portbury but not used.		

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					Provide opportunities to improve economic well being and reduce inequalities by providing good access to education and training opportunities. Promote the optimal use of land which supports regeneration, maximise re-use of previously developed (brownfield) land and protects the rural economy.			
Land at Tower Farm	No	• Justified • Consistent with national policy	No	No	The Tower Hill Farm and Black Rock impinge on Weston Big wood a nature reserve and biological Site of Special Scientific Interest, notified in 1971. Alternative Brown field sites elsewhere in Portishead have NOT been considered. The NPPF paragraphs 180-182 require that plans deliver net gains for biodiversity and prevent deterioration and conserve such habitats. Tower Hill farm is on top of a 300 foot hill meaning that access to the high street,doctors, shops will depend on car travel contrary to NPPF paragraphs 104-106 The present road system is not organised for this and blocks even now. Also of interest is that an aquifer under the site will need to be dealt by the developers with which no doubt will affect Weston Big wood itself	Investigate Brown field sites on Wyndham way other suggested by Portishead town council		
Black Rock, north of Clevedon Road	No	• Justified • Consistent with national policy	No	No	The Tower Hill Farm and Black Rock impinge on Weston Big wood a nature reserve and biological Site of Special Scientific Interest, notified in 1971. Alternative Brown field sites elsewhere in Portishead have NOT been considered. The NPPF paragraphs 180-182 require that plans deliver net gains for biodiversity and prevent deterioration and conserve such habitats. Tower Hill farm is on top of a 300 foot hill meaning that access to the high street,doctors, shops will depend on car travel contrary to NPPF paragraphs 104-106 The present road system is not organised for this and blocks even now. Also of interest is that an aquifer under the site will need to be dealt by the developers with which no doubt will affect Weston Big wood itself	Investigate Brown field sites on Wyndham way other suggested by Portishead town council		

Name: Rob Stewart **I.D:** 62854785

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	• Justified • Effective • Consistent with national policy	Unsure	Unsure	Justified • Site selection and Green Belt changes around Nailsea are not the most appropriate strategy when considered against reasonable alternatives. The Stage 1 Strategic Green Belt Assessment shows the northern parcels around Nailsea perform strongly/moderately against purpose (b) (preventing towns from merging) and contribute to purpose (c). Releasing this land while “replacing” Green Belt to the south does not replicate those functions, so the case for choosing this configuration is not robust. • A “swap” framed on net area does not answer the evidence-led questions the NPPF and PPG	1) Green Belt: justify, sequence, and evidence the boundary changes Modify Policy LP3 and the supporting text to: Complete and publish a Stage 2 Green Belt Assessment for Nailsea–Backwell before any release north of Nailsea is taken forward, with site-specific testing of purposes (a), (b), (d) and Footnote 7		

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					require (sequential approach to release, grey belt first, Footnote 7 constraints, and the plan-wide “fundamentally undermine” test). There is no Stage 2 conclusion that the chosen pattern is the best available when all harms and alternatives are considered. Effective • Delivery of the transport mitigation relied on in LP3 is not demonstrated. The council’s own Transport Position Statement records that the Backwell Crossroads bypass/rail-crossing concept would be a major investment with environmental and delivery challenges and, at the numbers then proposed, was “not required or desirable”. The later Nailsea & Backwell Transport Strategy does not recommend the “North Nailsea Link Road”, and the Stage 7 Transport Assessment presents a package approach rather than a committed, funded scheme that relieves Station Road and Crossroads at peak. That goes to deliverability and effectiveness. • Social infrastructure is not secured. The Infrastructure Delivery Plan (October 2025) is expressly draft and subject to change, with funding and phasing to be determined. LP3’s reliance on future contributions and a phasing strategy does not amount to secured, ring-fenced investment for primary care or leisure capacity at Nailsea. That is a delivery risk, not an effective mitigation. Consistent with national policy • Green Belt: The approach conflicts with the NPPF’s Green Belt tests. Boundary changes must be justified by exceptional circumstances, follow the sequential approach (PDL then grey belt), and must not “fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area”. A like-for-like “replacement” to the south does not satisfy these requirements; nor does it address Footnote 7 constraints and the sustainability test for locations. • Sustainable transport: The plan relies on strategic highway/rail-crossing infrastructure that is neither committed nor costed, contrary to the NPPF’s requirement to locate and phase development to enable sustainable transport (paras 110 and 115) and to demonstrate infrastructure can be delivered in step with growth The proposed figure of 1,817 new homes in Nailsea would lead to over-development of the town Summary position On the evidence available, placing 1,817 dwellings at Nailsea would force development beyond the town’s realistic capacity, drive harms to the Green Belt that conflict with national policy, and fail key NPPF 2024 tests on sequential release and sustainable patterns of development. The Stage 1 Strategic Green Belt Assessment and the Local Housing Need Assessment together indicate that the quantum proposed cannot be accommodated at Nailsea without significant reliance on land that either (i) is not grey belt, and/or (ii) is subject to Footnote 7 constraints, or (iii) performs strongly against Green Belt purposes – all of which point to over-development if pursued. A. The plan’s proposed scale at Nailsea conflicts with the sequential Green Belt release approach and signals over-development The NPPF 2024 requires a sequential approach to Green Belt release: first previously developed land, then grey belt (land not strongly contributing to purposes a, b or d), then other Green Belt – and only where doing so would not “fundamentally undermine” the five purposes across the plan area. Around Nailsea, the Stage 1 assessment identifies only one parcel directly north of the town, P-006, as an “area of search for potential grey belt” – and even that is flagged with multiple Footnote 7 designations (ancient woodland at Towerhouse Wood, listed buildings at All Saints Wraxall, Local Green Space, and areas within Flood Zone 3b). This means much of the land likely to be looked at for large growth is either constrained or not grey belt, sharply limiting sequentially compliant capacity	constraints, and a plan-area judgement on whether the proposed releases would fundamentally undermine the purposes (taken together) of the remaining Green Belt. Apply the sequential approach to release: prioritise previously developed land, then grey belt (land not strongly contributing to purposes (a), (b) or (d)), then any other locations only where necessary. Embed this sequence in LP3’s decision criteria and show how it has been applied around Nailsea, including a published schedule of PDL/grey-belt alternatives considered and rejected with reasons. Remove any implicit “net-area swap” logic (i.e., “replacing” northern Green Belt with a larger tract to the south). Boundaries must be justified, permanent, and drawn clearly to serve the five purposes. If the northern parcels are strong for purpose (b) (Clevedon–Nailsea gap), a southern tract cannot substitute that function; the release north of Nailsea should be paused unless Stage 2 concludes otherwise. Map and fix permanent boundaries for any changes using defensible features (A-roads, railways, rivers or robust treelines) and publish the boundary rationale alongside the Stage 2 results. 2) Transport: replace indicative, unfunded schemes with committed, deliverable mitigation and binding phasing. Modify Policy LP3, the Transport chapter and the IDP to: Remove reliance on an uncommitted “strategic rail crossing/new road” as if it were deliverable. The transport evidence does not recommend the North Nailsea Link Road and treats a bypass/ rail-crossing as a major, uncertain investment. LP3 must reflect this reality. Insert binding phasing conditions tying any large allocations at Nailsea/Backwell to: completion of the Backwell Crossroads BSIP works and bus priority a funded, consented set of local schemes (active travel, station access, demand management) with delivery triggers		

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					By contrast, the other Nailsea-facing parcels perform moderately or strongly against purpose (b) (preventing towns from merging) and/or purpose (c) (safeguarding countryside), indicating they are not grey belt and should not be the first locations for release. Specifically: P-005 (north-west of Nailsea): strong contribution to purpose (b) because development would significantly reduce separation between Nailsea and Clevedon; moderate to purpose (c); Footnote 7 constraints include the Tickenham, Nailsea and Kenn Moors SSSI and Flood Zone 3b. P-004 (north of Nailsea): strong to purpose (b) for the Clevedon–Nailsea gap; moderate to purpose (c); with ancient woodland and SSSI (Court Hill) present. Given the limited, constraint-affected grey-belt “area of search” near Nailsea, the plan’s 1,817-home quantum would necessarily spill into parcels that are not grey belt and/or perform strongly against Green Belt purposes. That is the very definition of over-development under the NPPF 2024 framework, because the sequential test cannot be met at this scale in this location. B. Large-scale growth at Nailsea risks eroding the critical gap function (purpose b) and openness (purpose c) The Stage 1 assessment evidences that land north and north-west of Nailsea plays a strategic gap role – especially towards Clevedon and, in parts, Bristol/Portishead. Releasing land in P-004 and P-005 would “significantly reduce the perceived and actual distance” between towns, which the methodology treats as strong performance against purpose (b); such releases therefore count against the fundamentally undermine test and should be avoided unless no proportionate alternative exists The same parcels possess largely rural/strongly rural character and low built-form percentages, evidencing openness under purpose (c). A quantum of 1,817 homes would require extensive take from these open areas, undermining the essential Green Belt characteristic of openness and pushing development well beyond what the Stage 1 evidence suggests could be accommodated without strategic harm. C. The plan must show exceptional circumstances and a plan-area “fundamentally undermine” judgement – but Stage 1 is clear that this judgement depends on later, more granular work. The NPPF 2024 requires authorities to review boundaries only if needs cannot be met by other means and altering boundaries would not “fundamentally undermine the purposes (taken together) of the remaining Green Belt” across the plan area. The Stage 1 methodology explicitly states that this fundamentally undermine test “can only be performed once Stage 2 assessments are completed”, because it relies on both strategic and finer-grain evidence. Proposing 1,817 homes at Nailsea ahead of a complete, settlement-specific Stage 2 conclusion on impacts and alternatives therefore pre-judges this critical test and lacks the evidential foundation required by national policy – again pointing to over-development as presently framed. D. The scale proposed at Nailsea is misaligned with the district housing strategy and the LHNA’s sustainable distribution considerations The LHNA sets the district Local Housing Need at 1,580 dwellings per year (23,700 dwellings over 2026–2041) and shows how overall growth must be balanced with affordability and viability, emphasising that Scenario B (which better addresses suppressed household formation) would require a high proportion of Affordable Housing and a different mix (many 1–2 bedroom homes) to meet need. Concentrating a very large share in one settlement with known environmental and Green Belt constraints increases delivery risk and reduces flexibility to achieve district-wide affordable outputs and housing mix in the right places. The LHNA’s jobs alignment analysis shows around 15,000 additional jobs are realistic over the period (ESPRE 2025 update), with commuter patterns indicating the need to distribute homes where they most efficiently align with employment growth and sustainable travel. A high single-settlement allocation in Nailsea (which is not a major employment node) risks	before first occupation and at defined dwelling thresholds a contingency clause to cap or rephase housing if strategic mitigation cannot be delivered on time. Require full feasibility for any rail crossing: business case, route engineering, flood risk, ecology and land assembly, with Flood Zone sequential/ exception testing and Footnote 7 checks. Do not assume its delivery in LP3 until feasibility and funding are secured. 3) Health and leisure: convert generic “contributions” into named, costed, ring-fenced schemes with triggers Modify Policy LP3 and the IDP to: Replace generic references to “improvements to local infrastructure” with named projects for Nailsea: -a primary care expansion or new facility agreed with NHS partners, including floorspace, cost, funding source and delivery timeline -a leisure facility programme (either a major Scotch Horn expansion or a new multi-court/indoor sports hub) with design scope, capital cost, funding and phased delivery linked to occupations Upgrade the October 2025 IDP from draft to adopted (post-Reg 19) with firm funding sources (S106, CIL, and grant where applicable) and binding triggers (for example, “no more than 250 occupations until GP facility Phase 1 is open”) to ensure capacity is delivered in step with growth. Publish a viability-tested delivery plan showing how Golden Rules obligations (affordable housing uplift, infrastructure, accessible green space) will be met without displacing health/leisure funding, and include a monitoring framework that escalates action if milestones slip. 4) Flood risk and environmental constraints: hard-wire compliance for any southern Green Belt designation or crossing Modify LP3 and the Environment/ Transport policies to: Apply EA Flood Map for Planning and the SFRA: require the sequential test and,		

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					unsustainable commuting patterns unless significant transport infrastructure is upfront-funded – a requirement that the plan must demonstrate under NPPF paragraphs 110 and 115 (sustainable transport) and the sequential sustainable location tests cited in the Stage 1 methodology. In the absence of that, the quantum reads as over-development in a location that is not demonstrably the most sustainable focus for a district-scale share of growth. E. Footnote 7 constraints around Nailsea further reduce realistic capacity and compound over-development risk. The Stage 1 pro-formas catalogue multiple Footnote 7 constraints in the Nailsea hinterland, including: Tickenham, Nailsea and Kenn Moors SSSI; Ancient woodland belts (e.g., Towerhouse Wood; Court Hill; Leigh Wood/Markham Bottom in nearby parcels); Flood Zone 3b areas; and Local Green Space designations. These constraints are expressly recognised in the PPG 2025 as factors that may provide strong reasons to restrict development and must be considered alongside grey-belt identification and sequential release. They point to limited settlement-edge capacity for large allocations and make a target of 1,817 homes at Nailsea intrinsically over-ambitious. F. The “Golden Rules” obligations reinforce that such a large release at Nailsea would be disproportionate unless extraordinary infrastructure and green space commitments are secured upfront. NPPF 2024 paragraphs 156–159 require major housing on released Green Belt to deliver: (a) affordable housing uplift (15 percentage points above the highest existing requirement, capped at 50%), (b) necessary infrastructure, and (c) high-quality accessible green space meeting national standards and supporting nature recovery/LNRS outcomes. With Nailsea’s edge constrained by SSSIs, ancient woodland and floodplain, the green-space and nature-recovery obligations would be especially onerous – further evidencing that the proposed quantum amounts to over-development unless the plan demonstrably secures and phases the necessary infrastructure and environmental gains (which it currently does not). Conclusion On the published evidence, 1,817 homes at Nailsea exceed what can be delivered sequentially, sustainably and without strategic harm to Green Belt purposes around the town. The Stage 1 Green Belt Assessment shows that most logical growth directions are not grey belt and/or are heavily constrained, while the LHNA emphasises district-wide affordable and mix objectives that would be fragilised by an over-concentration at a single, constraint-bound settlement. Pending a complete Stage 2 assessment and a robust plan-area fundamentally undermine judgement, the proposed Nailsea quantum should be substantially reduced and redistributed to locations that (i) genuinely satisfy the NPPF sequential test, (ii) avoid strong-performing Green Belt parcels, and (iii) better align with sustainable transport and jobs. Traffic infrastructure The proposed new road would not serve Nailsea’s traffic or relieve congestion on Station Road, nor would it help traffic travelling from Backwell towards the M5; and the new link road and under-rail crossing are likely to be extremely expensive and engineering problematic due to proximity to the River Kenn Summary position On the published transport evidence, the “new road” concept between Nailsea and the A370 does not deliver the relief the plan claims for Station Road or for Backwell-to-M5 movements. The council’s own position statements and strategy work show that an additional rail crossing	where relevant, exception test for any strategic link or crossing and for access routes; state that development in Flood Zone 3b (functional floodplain) will be avoided unless policy-compatible and demonstrably necessary with compensatory storage. Respect the Tickenham, Nailsea and Kenn Moors SSSI hydrology and ecology: embed design principles (rhynes protection, nutrient management where applicable, lighting controls for bat corridors) and require a compliance statement for works affecting the River Kenn. Align with the West of England Local Nature Recovery Strategy: if a “Nature Park” or wetland creation is proposed, show how it contributes to LNRS priorities and has secured management funding, rather than being a contingent aspiration. 5) Housing distribution at Nailsea: adjust quantum and timing to match deliverable infrastructure and Green Belt tests Modify Schedule 1 and LP3 to: Reduce or rephase allocations at Nailsea until (i) Stage 2 Green Belt outcomes are published and the plan-area “fundamentally undermine” judgement is made, and (ii) transport, health and leisure schemes are funded and committed. Add review triggers so the quantum can be increased only when infrastructure is confirmed. Publish the alternatives appraisal comparing North Nailsea with other PDL/grey-belt options and showing why the chosen package is the most appropriate strategy when assessed against reasonable alternatives. 6) Policy wording changes in LP3 (Nailsea and Backwell) Insert or replace paragraphs in LP3 along these lines: Green Belt release clause “Release of land from the Green Belt at Nailsea is contingent upon completion and publication of a Stage 2 Green Belt Assessment and a plan-area judgement demonstrating that release would not		

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					and bypass would be a major investment with significant environmental and delivery risks, with no funding certainty and not recommended at the housing levels now proposed. The engineering of an under-rail link in the River Kenn floodplain and SSSI landscape would be complex, costly and constrained by Footnote 7 designations and flood risk policy, making delivery uncertain and benefits doubtful. A. The plan asserts relief of Station Road and Backwell Crossroads, yet its own transport evidence does not show a deliverable highway scheme that achieves this Policy LP3 expressly claims that a package of new transport infrastructure will “relieve pressure on Station Road and the Backwell Crossroads” and that a strategic rail crossing will “provide an alternative multi-modal route between Nailsea and the A370.” However, this is presented indicatively and contingent on future feasibility. There is no committed, funded highway scheme with tested capacity benefits. By contrast, the council’s Nailsea and Backwell Transport Position Statement (updated October 2023) records that Backwell Crossroads is a known capacity constraint, that queues extend along the A370, Station Road and Dark Lane, and that strategic mitigation previously explored as a “Backwell Crossroads Bypass” with a new rail crossing would be a major investment with environmental, visual and heritage impacts and stakeholder delivery challenges. With the reduced housing numbers then envisaged, the council explicitly concluded “this intervention will not be required or be desirable” and based its transport position on the basis that the bypass would not be delivered. The April 2022 representations summarising the Stage 4–5 Transport Assessment options similarly note that “active travel rail crossings alone are unlikely to be sufficient to relieve congestion on Station Road and the A370 crossroads,” that an overbridge at East Backwell would be visually intrusive and harmful to the Green Belt, and that all options are “beset by flooding and drainage issues” requiring further investigation before feasibility, cost, viability and deliverability could be established. Taken together, this shows the Local Plan’s stated relief is not supported by a defined, fundable and technically demonstrated scheme. That is a fundamental shortcoming for any claim that the proposed road would serve Nailsea’s traffic or relieve Station Road. B. A “North Nailsea Link Road” concept has been assessed and not recommended. The Nailsea and Backwell Transport Strategy (AECOM, June 2025) includes a specific section on a “North Nailsea Link Road” and marks the concept “not recommended.” It also reviews “Station Road, including rail bridge,” and the “Strategic rail crossing,” setting out pros and cons and qualitative analysis of widening the existing opening. The preferred approach does not endorse a new road solution as the primary fix, again undermining any assertion that such a link would reliably relieve Station Road. The Stage 7 Transport Assessment for Regulation 19 (October 2025) indicates that development at Nailsea and Backwell requires a package approach, with modelling and local mitigation schemes rather than a single highway build as a silver bullet. There is no evidence in that document of a committed, costed new road that demonstrably delivers Station Road relief in the peak periods. C. West-side rail crossing options would not solve Backwell Crossroads, and east-side options are constrained. The Stage 4–5 options evidence states that an underline bridge to the west of Backwell is “more severely constrained than east Backwell and unlikely to be capable of delivering a rail crossing,” and even if possible, a west-side crossing would be located beyond the Crossroads and therefore “would not mitigate traffic movements through the crossroads to the same degree as a crossing at East Backwell.” This is directly relevant to the claim that the road would help Backwell traffic towards the M5: if the Crossroads remains the binding constraint, a new road that does not effectively bypass it cannot materially improve A370 access for M5 trips. For east-side options, the same evidence records visual and Green Belt harm for any overbridge,	fundamentally undermine the purposes (taken together) of the remaining Green Belt. The sequential approach to release (PDL, then grey belt, then other locations) will be demonstrated and published alongside the Stage 2 report.” Strategic crossing wording “The indicative strategic rail crossing shown on the Policies Map shall not be taken as a commitment to delivery. Any proposal will be subject to full feasibility, flood risk and environmental assessment, consents, land assembly, and funding confirmation. Large-scale allocations dependent on this crossing will be rephased until all the above are secured.” Health and leisure triggers “Planning permissions at Nailsea will include obligations to deliver named primary care and leisure projects, with binding occupation triggers aligned to the adopted Infrastructure Delivery Plan.” Transport phasing “No occupation of more than X dwellings across Nailsea/Backwell until Backwell Crossroads BSIP works are complete; thereafter, additional thresholds will be tied to the delivery of local active travel, station access and demand-management schemes identified in the Transport Assessment.” 7) Monitoring and early review Add a dedicated monitoring policy or annex requiring the Council to publish six-monthly infrastructure progress for Nailsea (transport, health, leisure, green space) and to trigger an early partial review of LP3 and Schedule 1 if key milestones are missed, ensuring effectiveness.		

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					and states flooding and drainage issues affect all options, necessitating additional work before feasibility, cost and deliverability can be concluded. In other words, the route the plan depends on is neither technically nor financially evidenced at this stage. D. Engineering complexity and cost of an under-rail crossing near the River Kenn floodplain and SSSI. The River Kenn and associated moor system form a low-lying floodplain with rhynes and high groundwater, designated as the Tickenham, Nailsea and Kenn Moors SSSI. Works in this landscape require extensive piling, de-watering, flood compensation and ecological safeguards, with costs increasing sharply for any cut-and-cover or under-bridge beneath a live railway. The SSSI description and related studies confirm the sensitivity of water quality and hydrology in the rhynes network and the presence of notable species, reinforcing the need for strict design and mitigation. Flood risk policy reinforces this. The Environment Agency's Flood Map for Planning and the national guidance on Flood Zones 1–3b state that major development and access routes in Flood Zone 3b trigger a sequential test that steers development to lower-risk areas, with exception test hurdles where necessary. An under-rail crossing and approach roads in the functional floodplain would face those tests, adding time, cost and delivery risk. The council's own Strategic Flood Risk Assessment and the Stage 1 Strategic Green Belt Assessment show Flood Zone 3b and SSSI constraints around the Nailsea moors and parcels north of Nailsea, directly where any east-side crossing alignment would need to connect. This points to significant engineering complexity and potential showstoppers that have not been addressed in the Local Plan. E. Policy compliance: sustainable transport first, Footnote 7 constraints, and plan-wide tests. Under the NPPF 2024, development and infrastructure must be in sustainable locations with particular reference to paragraphs 110 and 115 on sustainable transport. The Planning Practice Guidance on Green Belt makes clear that Footnote 7 constraints like SSSIs and areas at risk of flooding can provide strong reasons to restrict development. In Nailsea and Backwell, the presence of SSSI and Flood Zone 3b on the likely alignments means any road-led solution must first demonstrate that it is genuinely necessary, sustainable, and not precluded by those constraints. The Local Plan also relies on release of Green Belt and the "Golden Rules" package for any major housing enabled by such release. The transport and green space obligations are considerable and would need to be tied to the phasing strategy with funding secured upfront. In the absence of a costed, deliverable new road and crossing, the plan cannot show the required infrastructure will be delivered at the right time, which undermines the asserted traffic benefits. F. Net effect for the M5 route choice. Backwell-origin trips heading to the M5 use the A370 corridor and junctions 20 and 21. The council's 2023 transport position states that congestion at Backwell Crossroads is the limiting factor that introduces delay to bus services and general traffic. It does not evidence a shovel-ready bypass that would remove this constraint. Without a functional bypass that can be delivered, trip-makers still face the same junction saturation and queueing, so the proposed new road does not improve practical access to the M5 in the peak, and may simply redistribute flows locally without net relief. Conclusion The Local Plan's assertion that a new road will serve Nailsea's traffic and relieve Station Road congestion, and assist Backwell traffic towards the M5, is not supported by the transport evidence. The council's own strategy work either does not recommend such a road or flags major investment and unresolved feasibility, flood and ecology constraints. An under-rail crossing near the River Kenn floodplain and SSSI would be technically complex and costly, with			

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					significant consenting risk under Flood Zone and Footnote 7 policies. Until a fundable, technically workable scheme is demonstrated through detailed design and modelling, the claimed benefits are speculative and should not be used to justify the proposed growth pattern. The plan should remove reliance on this road and prioritise proven, sustainable transport measures, alongside a redistribution of housing growth to locations where infrastructure can be delivered and impacts mitigated in line with national policy. Additional development will place immense pressure on the town's existing health and leisure provision, and there is no direct investment secured to combat this pressure Summary position On the face of the Reg 19 Local Plan and supporting evidence, the scale of growth proposed for Nailsea and Backwell would substantially and immediately increase demand on local health and leisure services, yet the plan does not secure specific, ring-fenced, up-front investment for those services. Policy wording refers to future "contributions" and an Infrastructure Delivery Plan, but the October 2025 IDP is explicitly published as a draft, subject to change and further testing, with funding routes yet to be fixed. That is not direct investment and it provides no certainty that capacity will be in place when homes are occupied A. The scale of growth translates to a large additional population, which will load existing GP and leisure capacity. Policy LP3 makes provision for "around 3,500 homes" at Nailsea and Backwell over the plan period. Even using a conservative household size, that equates to several thousand additional residents drawing on local primary care and leisure facilities. The council's own communications confirm this scale and indicate the associated need for social infrastructure. Local analysis has also used the ONS average household size of 2.4, implying c. 9,979 extra people between Backwell and Nailsea if the package of sites proceeds. In health provision terms, Nailsea's primary care is already concentrated in one large practice, Tyntesfield Medical Group at Tower House Medical Centre, with a substantial registered list and finite clinical space. Adding several thousand new residents would inevitably drive up demand for appointments and allied services unless funded new capacity is delivered in step. [tyntesfield.nhs.uk], [healthgps.co.uk] On leisure provision, Scotch Horn Leisure Centre is the principal public facility in Nailsea. A recent gym expansion of c. £180,000, while welcome, is incremental and does not represent a new town-scale facility proportionate to the planned growth. The Centre remains the single core venue with no accompanying Local Plan commitment to a new leisure complex or indoor sports hub. B. The Local Plan does not secure direct, up-front investment for health and leisure; it relies on future contributions and a draft IDP. Policy LP3 states that development proposals must "positively contribute to the delivery of infrastructure" and refers to a phasing strategy linked to an Infrastructure Delivery Plan. That is a generic requirement to seek contributions; it is not a funded programme for new GP premises, clinical rooms, or leisure buildings in Nailsea, nor does it specify costed schemes and delivery dates. The Infrastructure Delivery Plan (October 2025) is explicitly marked "Draft," to be updated through the consultation and examination process and "continually reviewed." It sets out categories of infrastructure (including "social" infrastructure) but, at this stage, does not fix scheme scope, funding sources and delivery triggers for a Nailsea health centre expansion or a new town-level leisure facility. A draft document, by definition, is not secured direct investment. The council's public statements reinforce this point, explaining that infrastructure would be delivered "via developer contributions or additional government funding if required for major infrastructure," to be set out in the IDP after site decisions. This confirms that funding is not yet			

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					in place, and any health or leisure investment remains contingent on later negotiations and grant awards. C. Golden Rules do not guarantee health and leisure capacity will be delivered in time at Nailsea. Where Green Belt release is proposed, the NPPF “Golden Rules” require affordable housing uplift, infrastructure improvements, and accessible green space. However, these obligations operate at a principle level; they do not in themselves secure a specific GP facility or a new leisure complex with committed funding and early delivery. In practice, viability, prioritisation and phasing choices can leave health and leisure items under-funded unless they are tied to firm triggers and ring-fenced budgets, which the plan does not provide. D. Resulting risks for Nailsea residents and services Without secured, up-front investment, new residents will arrive faster than health and leisure capacity can be expanded. That leads to longer waits for GP appointments, limited access to preventative and community services, and crowding at existing leisure facilities, undermining the plan’s health and well-being objectives. Stakeholder concern locally already points to GP capacity and green space pressures if large allocations proceed without specific infrastructure commitments at Nailsea. Conclusion The Local Plan’s reliance on future contributions and a draft IDP falls short of the direct, certain investment that Nailsea needs to support health and leisure under strategic growth. In the absence of site-specific, costed and fully funded schemes for primary care and leisure, with binding triggers before occupation, the plan would lead to significant pressure on existing provision. This is not sound. Policy LP3 should be revised to include firm delivery obligations: a named and costed primary care project for Nailsea with a commissioning agreement, and a funded leisure facility programme, both secured through conditions and obligations and tied to occupation thresholds. Land to the north of Nailsea is proposed to be removed from the Green Belt and “replaced” to the south. Although the new section is said to be greater in size and to replace the Strategic Gap, this approach is unsound and contrary to national policy and the evidence base. Summary position “Swapping” Green Belt is not a recognised policy mechanism. The National Planning Policy Framework does not operate a net-area or ‘like-for-like’ exchange test; it requires authorities, when altering Green Belt boundaries, to demonstrate exceptional circumstances and to judge whether proposed releases would “fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan”. Boundaries must be drawn clearly using permanent features, and any changes must promote sustainable patterns of development. None of these tests is satisfied merely because another, larger tract is designated elsewhere, and the Stage 1 evidence shows that the northern Green Belt around Nailsea performs functions the southern tract cannot replace. A. The northern Green Belt around Nailsea performs specific national purposes that a southern “replacement” will not replicate. The Stage 1 Strategic Green Belt Assessment demonstrates that parcels north and north-west of Nailsea strongly or moderately perform purpose (b) – preventing neighbouring towns from merging – and also contribute to purpose (c) – safeguarding the countryside from encroachment: P-004 (north of Nailsea): strong against purpose (b) because it forms a substantial part of the Clevedon–Nailsea gap; moderate against purpose (c). P-005 (north-west of Nailsea): strong against purpose (b) because development would			

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					significantly reduce separation between Nailsea and Clevedon; moderate against purpose (c). P-006 (north of Nailsea): moderate against purpose (b) for the Nailsea–Portishead and Nailsea–Bristol gaps; moderate against purpose (c). It is only an “area of search” for potential grey belt subject to extensive Footnote 7 constraints. These functions are geographically specific to protecting gaps towards Clevedon, Portishead and Bristol. A new Green Belt tract south of Nailsea does not sit between those towns; it therefore cannot replicate the anti-coalescence role that the northern Green Belt currently performs under purpose (b). The claim that a larger southern designation “replaces” the Strategic Gap is therefore functionally false for national Green Belt purposes. B. There is no “net gain” or “compensatory swap” test in the NPPF; the correct tests have not been met. NPPF 2024 requires authorities to: demonstrate exceptional circumstances for release; consider whether the changes would fundamentally undermine the remaining Green Belt across the plan area; define boundaries clearly using permanent features; and ensure sustainable patterns of development (including transport, per paragraphs 110 and 115). Simply adding a larger area elsewhere does not satisfy these requirements. The Planning Practice Guidance confirms that decisions about Green Belt land must be informed by applying all relevant NPPF policies – there is no balancing or trading of area. Moreover, the Stage 1 methodology explicitly states the “fundamentally undermine” test can only be performed once Stage 2 (finer-grain) assessments are complete – which has not happened for a Nailsea “swap”. C. The southern tract is heavily constrained and does not target the same harms Much of the open land south of Nailsea lies within or adjacent to the North Somerset Levels floodplain and the Tickenham, Nailsea and Kenn Moors SSSI, a nationally important wetland network of rhynes and peat soils. While designating Green Belt here would help preserve openness (purpose c), it does not address the town-merging risks north of Nailsea that Stage 1 identifies as strong. In short, it cannot “replace” what is lost if the northern parcels are released. D. “Strategic Gap” is a local policy concept, not a substitute for national Green Belt purposes. Earlier council material acknowledged that allocating sites north of Nailsea would require revision of the existing Strategic Gap near Youngwood Lane (Reg 18). However, a Strategic Gap is a local planning designation serving local character/separation aims; it cannot be equated to national Green Belt purposes or used as an offset for the loss of purpose (b) functions to the north. Re-badging land south as Green Belt to “replace” the Strategic Gap therefore does not resolve the NPPF tests that apply to the northern release. E. Policy LP3 does not evidence a robust Green Belt re-definition; it simply requires Golden Rules on sites released. The Reg 19 policy acknowledges that allocations north of Nailsea will release land from the Bristol and Bath Green Belt and then requires applicants to meet the Golden Rules (50% affordable, infrastructure, accessible green space). This does not constitute an evidence-based, plan-wide judgement that releasing the north and designating south would maintain the Green Belt’s purposes taken together across North Somerset. Without a Stage 2 demonstration and a plan-area “fundamentally undermine” assessment, the “swap” is unproven. Conclusion The proposal to release northern Nailsea Green Belt and “replace” it by designating a larger tract south is not supported by the NPPF or the Stage 1 evidence. The northern parcels are assessed as strong/moderate for the anti-merging purpose (b) with town-specific gap functions; a southern tract cannot replicate those functions and therefore cannot be treated as a			

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					compensatory substitution. The Local Plan should withdraw the Green Belt release north of Nailsea unless and until a Stage 2 assessment demonstrates exceptional circumstances and shows, plan-wide, that the remaining Green Belt would continue to serve all five purposes in a meaningful way. Otherwise, the proposal is unsound.			

Name: Robert Evans-Brain **I.D:** 30630177

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Land east of Backwell	No	• Justified • Effective	No	No	I am responding to all the proposed development in Backwell. Backwell has a local plan that was approved by over 90% of the villagers. This was a democratically approved plan prepared under the last Labour government. Conservative Government supported this local plan, rejecting many requests for additional large scale development. This democratically approved document should still be taken into consideration when completing the Council plan. The large scale developments are not justified in Backwell, current plan doubles the size of the village.	Disappointingly, the Council has already approved development one the Farleigh Fields site, this should never have been permitted. This was never part of the Local plan, a local green site will now be destroyed and the unacceptable impact on our historic church. The later developments at Grove Farm and land East of Backwell have similar concerns. This is prime agricultural land and should not be developed. We are at risk of removing all agricultural land. NS Council should push back on the number of houses required due to the large amount of land in the county that is moors and flood plan. This land should be removed from any calculation of land density suitable for building. In addition: - I challenge the need for such a high level of affordable housing in Backwell. This is a commuter village for Bristol, very few local employment opportunities. As such I do not see the demand for such housing, any financial benefit for new residents will just be lost due to increased travel costs. There should be a larger allocation of affordable housing for any development near Bristol and Weston - Emphasis the impact on Agricultural land. Only 7% of NS is considered high quality. We need to push back and only have development on low quality or brown field sites. - I cannot see in the plans for Backwell any outline of costs for new eduction, roads, etc. By doubling the size of the village already busy roads will be gridlock. Yes there is proposed a new road to Nailsea but the A370 will be a bottleneck. As for schools, yes Backwell Comp will cope but what about the kids from Yatton, etc. Has the council budgeted for a new comprehensive school? - There is no visible analysis that demands 1000+ new houses in Backwell. Additional development in NS has to focus on Bristol and Weston not the small outlying villages.		

Name: Robert Faulkner **I.D:** 63079649

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP3: Spatial strategy	No	• Positively prepared • Justified • Effective • Consistent	No	No	The plan has not considered reasonableb alternatives: Grounds for development of a reasonable alternative: The soundness of the North Somerset Local Plan is tested against the National Planning Policy Framework. Paragraph 36 states that the plan should be a) Positively Prepared “as a minimum, seeks to meet the area’s objectively assessed needs” and b) Justified “taking into account the reasonable alternatives”. There is an absence of evidence that either of these have been considered. The below is the first step to establish a reasonable Alternative for North Somerset. We are seeking expressions of support for this approach from organisations, community groups and policymakers across North Somerset and the surrounding area. A reasonable alternative to the	As above		Reasonable Alternative.pdf Reasonable Alternative - Terralupa Support.pdf Reasonable

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
		with national policy			proposed Local Plan: Each North Somerset town or village conducts a community-led improvement plan of key sites, including underused, vacant, dilapidated and locally preferred brownfield and greenfield sites. The target allocation of homes for each area will remain, however the type, location and arrangement can be designed to benefit the local population. The construction methods are to be low impact, local and energy efficient. The benefits of this approach would be improvements in community health, local jobs, reduced loneliness, economic prosperity, sustainable travel routes, better living conditions, older residents remain in their community, kids have safe places to play, nature recovery and reduced anti-social behaviour. Time and viability: The Planning Inspectorate's examination is a statutory process that usually lasts 10–18 months. This provides a sustained opportunity for reasonable alternatives to be developed and considered as the examination progresses. Once each town or village has established a preferred, financially viable scheme in alignment with paragraph 36 of the National Planning Policy Framework, input from regulators and considering the needs of each community, it can be put forward as a reasonable alternative for consideration alongside the existing proposals.			Alternative Nailsea Climate emergency group.pdf

Name: Robert Flook **I.D:** 58385441

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Justified • Consistent with national policy	Unsure	Unsure	I do not consider the proposed green belt site of Tower Farm to be suitable for the development of some 400 houses for the following reasons:- The proposal indicates vehicle access from The Downs or St Marys road/Wetlands Lane. The Downs is adjacent to the Highdown schools and is extremely busy with parked vehicles along both sides of Down Road and The Downs at school drop-off and pick-up times. Neither road is suitable for the additional traffic that would be generated by the number of houses proposed. Vehicle access to St Marys Road/Wetlands Lane would be outside of the proposed area and is significantly lower than the proposed development. The site borders Weston Big Wood which is a SSSI site and ancient woodland and was added to the Green Belt in the 1980's to protect this important site. As such a buffer would have to be provided to prevent the degradation of the woodland. The buffer itself would have to be maintained. As the site is not level there would be significant rainfall run-off from the roads and roofs. This run-off would particularly impact the lower parts of the development and the Wetlands Lane area with an increase of flood risk in these areas. It is unlikely that the Highdown schools would be able to take the additional number of pupils in the immediate area leading to an increase in traffic to get them to alternative schools adding to the congestion in The Downs and Down Road. The proposal indicates that the town centre is within a 20 minute walk of the site. This may be true but the town centre is significantly lower than the proposed site and is not an easy walk back from the town up a steep Avon Way or Rippleside/ Lower Down Road. The proposed site should be removed from the Local Plan as it is unsuitable for development			

Name: Robert Hitchins Limited **I.D:** 62874593

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP5: Housing, employment and mixed use allocations	No	• Positively prepared • Justified • Effective • Consistent	Yes	Unsure	Land at Kenn Road Business Park, Clevedon, as shown on Figure 1, was proposed as an allocation (together with two other parcels) in the Preferred Options draft of the North Somerset Local Plan under Policy "Clevedon 5/20 Kenn Road Business Park" (see attachment for graphics). This proposed allocation was supported by Robert Hitchins Limited at Regulation 18 consultation stage (See Appendix 1 to these representations).	Change sought: The allocation of 0.65 ha of land at the Kenn Road Business Park as shown on Figure 2 (edged purple) for employment uses under Local Plan		North Somerset Local Plan Pre-submission Plan - Representation form Part

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
		with national policy			The land is however not proposed as an allocation in the pre-submission draft local plan and objection is raised to this omission and to the exclusion of the Kenn Business Park from the Settlement Boundary (see our associated objection to LP4). The land was assessed in the Sustainability Appraisal (LUC Consultants, November 2023 as site HE203024, part of LUC_4). The reason for the Council deciding not to allocate the land in the Reg. 19 plan, being: “These are parcels within an existing business site. Preferable to focus new employment land provision on larger, strategic sites in this area, however expansion of business sites on this site would be permissible in principle under other proposed policies in the local plan e.g. proposed Policy DP61”. (Appendix E Sustainability Appraisal Report, November 2023.) Removing the certainty of an allocation and deferring to a criteria-based policy is not considered an appropriate strategy. Moreover, focusing employment land provision on larger strategic sites reduces the range and choice of sites available, which is counter-productive to the achievement of the economic objective of the NPPF (December 2024). The land is presently an employment allocation in the adopted North Somerset Local Plan.	Policy LP2. (See attachment for graphics).		B.pdf
Policy LP7: Settlement boundaries	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Unsure	Land at Kenn Road Business Park, Clevedon, as shown on Figure 1, was proposed as an allocation (together with two other parcels) in the Preferred Options draft of the North Somerset Local Plan under Policy “Clevedon 5/20 Kenn Road Business Park”. This proposed allocation was supported by Robert Hitchins Limited at Regulation 18 consultation stage (See Appendix 1 to these representations). The land is however not proposed as an allocation in the pre-submission draft local plan and objection is raised to this omission (see our objection to Policy LP2) and to the exclusion of the Kenn Road Business Park from the Settlement Boundary. The inclusion of the Kenn Road Business Park within the Settlement Boundary of Clevedon would give greater certainty to the bringing forward of this hitherto allocated employment land in that the associated policy (LP4) makes clear that “New development within settlement boundaries will be acceptable in principle subject to the relevant policies within this plan”. This change was considered though the Settlement Boundary Review Update October 2023 (Clevedon Map Ref b). However, no amendment was made as “The Business Park is separated from the settlement boundary by the river Yeo”. Notwithstanding this, the inclusion of the Business Park within the settlement boundary would better represent the southern extent of the built-up area of the town. Change sought: Amend the settlement boundary to include the Kenn Road Business Park (shaded purple on Figure 2 below) within the Settlement Boundary under Local Plan Policy LP4. See attachment for graphics	Change sought: Amend the settlement boundary to include the Kenn Road Business Park (shaded purple on Figure 2 below) within the Settlement Boundary under Local Plan Policy LP4. See attachment for graphics.		North Somerset Local Plan Pre-submission Plan - Representation form Part B.pdf

Name: Robert Narracott **I.D:** 62831489

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No		Unsure	Unsure	I consider the Plan to be unsound in respect of LP4 because it does not comply with the NPPF Section 9, paras 109, 110, 111(b & c), 115 (a & d), 116 and 118. I believe that adequate consideration has not been given in the Plan to dealing with the impact of the residential expansion of Pill on the existing traffic congestion, for the full length of the A369 from the Motorway through to Bristol. This road is used by heavy goods vehicles, ambulances, buses and cars but is	I consider Aecom's reports need to deal in transparent detail with the traffic issues I have raised in respect of LP4. These issues currently cause the Local Plan to be unsound, given North Somerset Council appear to be reliant on Aecom's inadequate recommendations. I believe National Highways need to Approve the Highway strategy for the A369, particularly at Junction 19 of the M5.		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					regularly choked with traffic during daily peak periods, affecting transport in both directions ie especially at both the M5 motorway roundabout junction19 and at the exit roundabout on Clanage Road which feeds Bristol's wider highways network at Bower Ashton. The Clifton Suspension Bridge also relies on the A369 and is itself affected by excess traffic flow during daily peak periods. The A369 although a major link from the M5 into and from Bristol has a limited capacity which is currently exceeded at peak times. In addition to traffic via the M5, Portishead traffic to and from Bristol also has to negotiate Junction 19. To reach Bristol via the A369, along with Pill traffic, it will all pass through Abbots Leigh where there is a natural road width restriction which affects all of the traffic passing through. Traffic through the Village is regularly at a standstill in peak times. Highway improvements at Abbots Leigh have not been sufficiently considered, to safeguard use of the numerous junctions in the Village. When the traffic on the M5 is affected by any lane closures between Clevedon and the M4 junction (which it often is), the impact on the A369 is huge as it becomes a chaotically choked rat run, connecting Bristol with the M5. This predicament has been considered as far as I can judge. The railway frequency, as planned, will not have a significant impact on the existing traffic congestion. It will not solve problems caused by the intensification of use of the A369 if the expansion of housing around Pill proceeds as the Local Plan proposes. The Aecom Technical Note Appendix F on Pill Sustainable Transport does not adequately address or resolve the concerns raised above, nor does the Aecom Stage 7 Transport Assessment. Both documents accompany the Local Plan and recognise that National Highways have concerns with regard to Junction 19.			

Name: Robert Potton **I.D:** 62863105

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	‣ Positively prepared ‣ Justified ‣ Effective	No	Unsure	NSC has not properly considered: - Alternative brownfield or greenfield sites with far lower ecological impact, both in Portishead and across North Somerset - Opportunities to increase housing density on proposed brownfield sites, which could remove the need to develop Tower Farm and Black Rock - The strategic ecological importance of these sites in protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor. - The fact that both areas were added to the Green Belt in the late 1980s due to their high ecological value - National planning policy allows Green Belt changes only in exceptional circumstances – and these have not been demonstrated. In addition: - Neither site can provide safe or suitable access			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					- Development would create unacceptable transport impacts, failing national soundness tests.			
Black Rock, north of Clevedon Road		• Positively prepared • Justified • Effective	No	Unsure	NSC has not properly considered: Alternative brownfield or greenfield sites with far lower ecological impact, both in Portishead and across North Somerset Opportunities to increase housing density on proposed brownfield sites, which could remove the need to develop Tower Farm and Black Rock The strategic ecological importance of these sites in protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor. The fact that both areas were added to the Green Belt in the late 1980s due to their high ecological value National planning policy allows Green Belt changes only in exceptional circumstances – and these have not been demonstrated. In addition: Neither site can provide safe or suitable access Development would create unacceptable transport impacts, failing national soundness tests.			

Name: Robert Smart **I.D:** 63079297

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land to the west of Elborough						My wife and I wish to raise our objection to developments HE201040 and HE20637 and agree with the existing objections in the Regulation 19 Additional Sites Consultation document. These developments are un-necessary given the extensive development on-going in the area bounded by i) the M5, A371 and Somerset Avenue, and ii) immediately east of the M5 and in the proximity of the Banwell Bypass. The document reveals that the rationale for the developments is to secure funding for an upgrade to the Banwell Road junction with the A371. Such funding should be secured through existing plans within the two areas that I have identified above. We, therefore, raise our objection to the rationale for the proposed developments.		
Land north of Banwell Road, Locking /Elborough						My wife and I wish to raise our objection to developments HE201040 and HE20637 and agree with the existing objections in the Regulation 19 Additional Sites Consultation document. These developments are un-necessary given the extensive development on-going in the area bounded by i) the M5, A371 and Somerset Avenue, and ii) immediately east of the M5 and in the proximity of the Banwell Bypass. The document reveals that the rationale for the developments is to secure funding for an upgrade to the Banwell Road junction with the A371. Such funding should be secured through existing plans within the two areas that I have identified above. We, therefore, raise our objection to the rationale for the proposed developments.		

Name: Robert South **I.D:** 50710529

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell already has800 new houses approved, tis proposal would lead to complete overdeelopment. Backwell is being unfairly treated, it is being allocated a much higher number of additional houses than any other village. MOST importantly GRADE ! AGRICULTURAL LAND currently being used for growing OUR food is now being threatened with development. What is happening to thw government commitment to protecting food security ?			

Name: Robert Van Eker **I.D:** 62733665

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	Unsure	I feel that before including the Tower Farm site in the local plan, the council has not properly considered alternative brown and greenfield sites, both within Portishead and in the wider North Somerset County, with significantly less ecological impact. The council could consider increasing the density of housing on proposed brown field sites across the county when would mean they could meet their housing targets and thus avoiding building on this unique and precious environment. The unique and strategic ecological contribution to the Tower Farm site is protecting the unique environment of the Weston Big Wood (SSSI) and the wider Gordano Valley green corridor. If we lose these valuable fields, it will have a significant impact on Weston Big Wood as a whole. Black Rock and Tower farm site were only granted greenbelt status in the 1980s because of their high ecological value and the connection with Weston Big Wood. Therefore, the Tower farm and Black Rock sites should be removed from the Local Plan. I believe that no modification short of removing the allocation entirely would make this site appropriate. Given its direct adjacency to ancient woodland, its loss would be irreversible and cannot be mitigated sufficiently. The land should instead be retained as undeveloped green space, managed to enhance biodiversity and provide sustainable public access, in line with the Avon Wildlife Trust's 2030 Strategy and national "30 by 30" nature recovery goals.			
Black Rock, north of Clevedon Road	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	Unsure	I feel that before including the Black Rock sites in the local plan, the council has not properly considered alternative brown and greenfield sites, both within Portishead and in the wider North Somerset County, with significantly less ecological impact. The council could consider increasing the density of housing on proposed brown field sites across the county when would mean they could meet their housing targets and thus avoiding building on this unique and precious environment. The unique and strategic ecological contribution to the Black Rock site is protecting the unique environment of the Weston Big Wood (SSSI) and the wider Gordano Valley green corridor. If we lose this valuable field, it will have a significant impact on Weston Big Wood as a whole. Black Rock and Tower farm site were only granted greenbelt status in the 1980s because of their high ecological value and the connection with Weston Big Wood. Therefore, the Tower farm and Black Rock sites should be removed from the Local Plan.	I believe that no modification short of removing the allocation entirely would make this site appropriate. Given its direct adjacency to ancient woodland, its loss would be irreversible and cannot be mitigated sufficiently. The land should instead be retained as undeveloped green space, managed to enhance biodiversity and provide sustainable public access, in line with the Avon Wildlife Trust's 2030 Strategy and national "30 by 30" nature recovery goals.		

Name: Robert Walker **I.D:** 32593313

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Pill Green	No	• Consistent with national policy	No	No	The site is designated as prime agricultural land in green belt and national policy is that brownfield sites or sites of lesser agricultural grade should be used first. I also consider that the shear number of dwellings is being forced on us and that we have not been properly consulted. I also consider this site if developed for 600 homes will cause massive road congestion both at J19 M5 and at the other end of the A369 Ashton gate. Please note that the recent Airport expansion has massively increased traffic using this road. Covering this large greenfield site with housing and hard standing will result in increased water flooding and run off down into the Pill centre, I do not think this has been considered. The notion that this site is well served by green transport such as cycle paths is not realistic because of the topography few will want to cycle into Bristol because of the hills especially in bad weather. The Buses are likely to become full up and also get stuck in traffic rendering the service unreliable.	More consultations and first make use of brownfield sites. Have a more realistic plan with a lot less development that will not overload local services and spoil local landscape.		

Name: Roberta George **I.D:** 62905025

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm					I have been a resident of The Deans in Portishead since 2002 and I would like to request that Tower Farm and Black Rock is removed from the local plan for development. My biggest concern with the proposed development is safe access. The Downs is congested at school drop off and pick up times and even with the addition of double yellow lines on both sides of the road, I believe that this road is not wide enough to cope with the additional traffic that would be generated during the building phase with large vehicles and then by the additional residents. I am concerned for the safety of the pupils, staff and parents at High Down, and for the many students from Gordano School who also walk this way to and from school. Furthermore, Weston Big Wood and the Gordano Valley are ecologically important sites which should not be disturbed. I understand that such sites should only be used for developments in exceptional circumstances and, as there are multiple brownfield sites which are available for development, I cannot see that the proposed development is legal or necessary. Weston Big Wood is such a beautiful area. For the residents of Portishead and beyond, this is a wonderful location to walk dogs, bathe in nature, escape from the stresses of life, have social time and exercise, fly kites and model planes, have picnics, watch the sunrise and gaze at the stars. Please do not take this away. Thank you for your time reading this. I hope the right decision will be made for the residents of Portishead and for nature.			
Black Rock, north of Clevedon Road						I have been a resident of The Deans in Portishead since 2002 and I would like to request that Tower Farm and Black Rock is removed from the local plan for development. My biggest concern with the proposed development is safe access.		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					The Downs is congested at school drop off and pick up times and even with the addition of double yellow lines on both sides of the road, I believe that this road is not wide enough to cope with the additional traffic that would be generated during the building phase with large vehicles and then by the additional residents. I am concerned for the safety of the pupils, staff and parents at High Down, and for the many students from Gordano School who also walk this way to and from school. Furthermore, Weston Big Wood and the Gordano Valley are ecologically important sites which should not be disturbed. I understand that such sites should only be used for developments in exceptional circumstances and, as there are multiple brownfield sites which are available for development, I cannot see that the proposed development is legal or necessary. Weston Big Wood is such a beautiful area. For the residents of Portishead and beyond, this is a wonderful location to walk dogs, bathe in nature, escape from the stresses of life, have social time and exercise, fly kites and model planes, have picnics, watch the sunrise and gaze at the stars. Please do not take this away. Thank you for your time reading this. I hope the right decision will be made for the residents of Portishead and for nature.			

Name: Robin Lambert **I.D:** 29266753

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	The development of land east of Backwell should not take place. Because Backwell has already 800 new houses going to be built, and there is no way the Village can sustain a further increase. It has been allocated a higher number of new houses than any other village in N Somerset, and a higher allocation than several of the towns. The volume of this growth is unsustainable and will destabilise the community. The planned new road would be very costly, and simply throw increased traffic onto the current A370 through Backwell Farleigh and Flax Bourton and onto the single lane Long Ashton bypass. The land being used is Grade 1 Agricultural land used for food production. Apparently this quality land is rapidly diminishing in North Somerset. It seems a mistake for our country to build on land used for food production, when the world is finding it difficult to feed the current population. Much of the land in the east of Backwell area is prone to flooding, and this would be exacerbated by building housing and roads on it. I use Backwell Common Road, Chapel Hill, and Backwell Bow regularly and all three of these roads are frequently flooded already. Dr Robin G Lambert.			

Name: Robin Stagg **I.D:** 62776481

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared • Justified	Unsure	Unsure	The plan is not realistically considered. Specifically the development on grade 1 green belt in Backwell is unsustainable. The reliance placed on Backwell station is incorrect. The station is already dangerous due to a lack of suitable platform (the step down required particularly on the weston-bound side) and lack of disabled access is problematic. Even before the current housing is built it is regularly dangerously over crowded at peak commuting time.			

Name: Robin Walker **I.D:** 62577729

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Approximately 800 new houses have already been approved as an addition to Backwell, which is about a 40% increase in the size of the village. A further 889 new houses would represent dramatic overdevelopment. Backwell is already facing a deficit in school places and development of this magnitude would lead to a need for new schools which are not part of the plan. The plan is also deficient in not envisaging any increase in health services (already stretched even before the approved 800 houses) or leisure facilities. One could make many other detailed objections to the plan - loss of Grade 1 agricultural land, area prone to flooding and so on - but the main objection is quantitative in that this development is totally out of proportion to the existing structure of Backwell village and makes no attempt to improve that structure to match it. The Plan is not sound and should be rejected.			

Name: Rod Neal **I.D:** 62769185

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Response to local plan final General This plan is unsound and ill thought out. The effects of the number of new houses on Nailsea and Backwell would cause unsustainable over development. Backwell is a large village. Nailsea is a small commuter town, with limited work opportunities within the town. Many working residents commute to nearby larger centres such as Bristol, Bath and Weston super Mare to work. Backwell and Nailsea should therefore not be considered a 'Strategic Location' as they do not meet North Somersets Council's (NSC) Policy SP1 for a variety of reasons, including: • Most of the proposed sites will fall outside the usual catchment for walking distances (town centres, school, bus stops and train station) and will therefore not prioritise walking and cycling and the use of public transport. • The plan does not support the delivery of economic growth and job creation in Nailsea as the location is not easily accessible, (B roads in and out) and there are no plans to improve existing highways network (see below). Nailsea and Backwell are unlikely to be a site for local employment so most new residents will end up commuting elsewhere. • More development in and around Backwell and Nailsea will have negative environmental impacts on water pollution, flooding risk and safety of residents, congestion on roads and rat running down rural lanes with increased accident risk. • Nailsea railway station is not an appropriate major transport hub. It is small, with short platforms, and is difficult to access for those with mobility issues. Currently the populations of Nailsea and Backwell are, according to the Census in 2021: Nailsea 15,917 Backwell 4,589 The Local Plan housing allocation is for 3,728 new dwellings across these sites. Based on 2.3 persons per household (the average household in North Somerset according to the 2021 Census), that means an additional 8,574 persons across the two towns, an overall increase of 42%.			

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					For each town, the growth would be: Nailsea - an extra 4,179 persons or an additional 26% Backwell - an extra 3,870 persons or an additional 84% This is a huge increase in population which is completely unsustainable with the current local infrastructure and will ruin the lives of current and future residents of Nailsea and Backwell. This degree of expansion would have a detrimental impact on the character and nature of Backwell and Nailsea and their communities. • Nailsea has already had significant development with over 350 homes already built and several hundred more granted planning permission, this all in addition to the above proposed expansion. No new infrastructure has attended any of this. Effects on local infrastructure This further population increase will overload local infrastructure including healthcare, schools, leisure facilities and town centre parking. The Local Plan suggests developer-led delivery of infrastructure to support this, rather than a policy driven approach. This will inevitably mean that the infrastructure to support this increased population, in terms of schools, healthcare, leisure facilities and travel and transport is not guaranteed, may not happen and at best would be delayed long after it is needed. This means that access to these facilities, particularly healthcare and schools, will be badly affected, for current and new residents. Effects on travel and highways There is no A road directly into and out of Nailsea, only B roads which are narrow and already heavily congested with traffic. Access to Nailsea from the A 370, which passes between Nailsea and Backwell, is only via the busy and congested Backwell crossroads and Station Road. Station Road is an accident black spot with both pedestrians and cyclists coming into conflict with the vehicles when passing under the railway line bridge on the single track, traffic lights controlled junction. Backwell School creates a significant amount of traffic. • The policy states that to accommodate the additional housing transport infrastructure development is needed. NSC proposes that an East Backwell Link Road is built. The road would go under the London to Penzance mainline rail track from Station Road to the A370. • However this link road would be extremely hard to build from an engineering perspective and very expensive because it is close to the river Kenn. The road would require a water pumping solution as it will go through an area susceptible to flooding. It will need cutting through the railway embankment. Developers will be expected to contribute to the funding for the road, however developer contributions will not cover the whole cost of the road. The developer Rubix has stated that it will only connect the road through their site once the housing has been built, this statement does not align with NSC statement on linking proposed development to infrastructure provision in a phased plan. • The East Backwell Link Road will only assist the Nailsea developments to the south of Nailsea. Developments to the north of Nailsea will use existing B roads out towards Wraxall and Clevedon and Portbury Lane. Developments east of Backwell wishing to get to the M5 will travel through Nailsea. It will not reduce traffic to and from Backwell and Bristol and junctions 19 and 20 of the M5. • NSC has failed to address the junctions to the north of Nailsea along the B3138 and B3130 which are already at capacity and are known accident black spots. There is no mitigation suggested meaning an even greater volume of traffic and more accidents. • NSC has placed a lot of emphasis on Active Travel (walking, cycling, horse riding) however many development sites are too far from the town of village centre to make walking a viable solution. • Rural "Quiet" Lanes. NSC has failed to address how they will protect the rural lanes around Nailsea and Backwell from rat-running. Traffic volumes on the lanes have steadily increased in recent years as developments to the west of Nailsea have been built. This is noticeable on The Causeway to the north and West End Lane and Netherton Wood Lane to the west and Chelvey Lane to the south west. This also happens on Chapel Hill leading into Backwell Bow, with people attempting to bypass queues on the A370 at Backwell Crossroads. This rat-running down rural lanes will only get worse with the proposed developments. All these lanes are single track with no pavements. • Backwell and Nailsea railway station has not been identified within Policy LP3 for improvements. The station is currently not accessible for many and the platforms are too short for intercity services. No funding has been identified for this work. Effects on environment and ecology There will be loss of green space and local countryside. Access to nature and countryside for walking etc is very important			

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					for the physical and mental health of residents and should not just be built over without consideration of this. On Backwell Common there will be a significant loss of Grade 1 and 2 agricultural land, particularly with the proposed East Backwell New Road and housing developments in this area. Other development areas will cause similar loss. Farmland of this quality is essential for growing food, for food resilience for the local population, reducing reliance on imported food and future proofing the population against climate and political changes that may make imported food more expensive and difficult to obtain in the future. The development off Pound Lane will have a bad impact on Moor End Spout Nature Reserve. Development south of Nailsea is too close to Backwell Lake which is a designated reservoir and an important area for wildlife, particularly birds. Much of this area is a flood plain and dwellings here will be liable to flooding. Most areas around Nailsea are low lying and in areas at risk of flooding, which will become an increasing problem with climate change. There will be adverse effects on wildlife and biodiversity, e.g. with wildlife corridors being cut off. • Before any new housing is proposed there should be a clear policy led, not developer led, plan for all the necessary infrastructure improvements. These should be planned prior to any new development. • Proposed new housing should be significantly reduced or reconsidered altogether as it is not sustainable and represents an overdevelopment of Nailsea and Backwell without any realistic likelihood of local employment increasing to match the population increase.			

Name: Roger Crook **I.D:** 62806817

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Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I appreciate NSDC is in the invidious position of having housing targets imposed on them. Worse still that the overall national housing targets set by the current government are nothing but a political gesture based on misguided thinking and are devolved to the provinces for implementation by others. Shame on the administrators of the UK, this is not the quality of service I expect in return for my taxes. • North Somerset is one of the areas in the UK most at risk of future flooding in the coming 50 years. There's plenty of areas at far lower risk, it really is not fair to take people's income for homes that will flood (developers, of course, have different priorities). • Bristol is one of the UK's most overcrowded cities. Expanding its satellite towns will make matters worse. The West of England's Spatial Strategy should be looking to distribute employment more evenly by developing established hubs e.g Weston, Taunton, Bridgwater, Chippenham. Housing would be built adjacent to these areas of increased employment If North Somerset is to contribute, let's do it properly, rather than cobble together an appeasement to Westminster. • Establish long term transport infrastructure i.e. link the M5/Clevedon to the A370 and on to the airport via Brockley. • In the vicinity of Chelvey, build a new station with a decent road/rail/air hub • Build houses in the West End of Nailsea and West Town area of Backwell • Build the social infrastructure necessary to support the new housing Of course, none of this will happen, because it cannot be afforded, so a cobbled appeasement is all that's possible and the proposals summarised in the Local Plan Consultation (The Plan) regarding LAND TO THE SOUTH OF NAILSEA are ill considered for the following reasons: • I believe 600 homes are proposed for this area. It appears access is either via Netherton Wood Lane (narrow lane) or The Perrings, which feeds on to Station Road, which is already over-subscribed and, frankly, DANGEROUS (3 schools on its length). Who is willing to bear the responsibility for the inevitable increase in accidents? • I recall a suggestion to build a relief road between Backwell Lake and the station. This would not mitigate issues mentioned above and would interfere with the flood mitigation that Backwell Lake was designed to provide (it is a balancing pond, not a natural lake). • The idea that Nailsea and Backwell Station can become a transport hub is UNTENABLE as: o The bridge at the station would need to be widened and the road straightened to accommodate increased volume and size of traffic. o Station Road would need widening between the station and Backwell and the existing traffic calming measures improved to facilitate flow. o Access to the platforms would need to be much improved. The Backwell side requires substantial changes to improve access for the elderly and infirm. o The cost would be PROHIBITIVE and the consequences of trying to get by with the existing infrastructure are frightening • I've read that 2,400 new homes are proposed bringing a 36% population increase However, NO INVESTMENT IS BEING PROVIDED FOR SERVICES TO SUPPORT THIS INCREASE			

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					• The Plan for the South of Nailsea needs to be considered together with other plans for Nailsea and those for Backwell, as taken together there would be close to a DOUBLING OF POPULATION. The Plans together do not take a holistic approach for transport or social infrastructure. Regretably, I cannot support the Plan being proposed for LAND TO THE SOUTH OF NAILSEA and have grave concerns about other plans for Nailsea and Backwell. However, I have outlined a forward looking proposal above that is a far more credible solution.			
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I appreciate NSDC is in the invidious position of having housing targets imposed on them. Worse still that the overall national housing targets set by the current government are nothing but a political gesture based on misguided thinking and are devolved to the provinces for implementation by others. Shame on the administrators of the UK, this is not the quality of service I expect in return for my taxes. • Bristol is one of the UK's most overcrowded cities. The West of England's Spatial Strategy should be looking to distribute employment more evenly by developing established hubs e.g Weston, Taunton, Bridgwater, Chippenham. Housing would be built adjacent to these areas of increased employment • A high capacity road linking Bridgwater to Chippenham would have enormous positive impact and open up many opportunities for county towns Bigger, bolder and brighter thinking is needed if UK plc is to thrive. The proposals in the Local Plan Consultation (The Plan) are the consequence of the absence of these attributes at the highest levels, hence the Plan is flawed from the outset. However, the matter at hand is how NSDC is choosing to handle the instructions it has been given. I find the proposals summarised in the Local Plan Consultation (The Plan) regarding LAND EAST OF BACKWELL to be ill considered for the following reasons: • 800 new homes are already either being built or have been approved for construction, representing a 40% increase over current numbers. However, NO INVESTMENT IS BEING PROVIDED FOR SERVICES TO SUPPORT THIS INCREASE • The Plan proposes a further 1,000 dwellings. If built the village would double in size. However, THE PLAN FAILS TO CREDIBLY DETAIL HOW SERVICES WOULD INCREASE TO SERVE A DOUBLING OF THE POPULATION • The PROPOSED ROAD shown in The Plan LACKS CREDIBILITY. The land it would traverse is a FLOOD PLAIN (note: Backwell Lake is a man-made balancing pond to mitigate flooding). Building either over or under the railway line would be more challenging for this reason and EXCEPTIONALLY EXPENSIVE. It is very unlikely the road would be built, stressing the existing road network, which is already in a poor state of repair! • The distribution of new housing within the NSDC area is skewed. o The Plan would increase Backwell's population by 80%, whereas Weston's would only increase by 22% and therefore suffer far less strain on its infrastructure. o Similarly, Portishead's population would only increase by 14% o However, both towns have substantially larger commercial and industrial bases that would benefit from the larger employee pool o Portishead will soon have a rail link to Bristol and that investment would be better leveraged by increasing the local population			

Name: Roger Nicholson **I.D:** 62758465

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Land to the west of Elborough					I have several concerns re the above. 1 Extra traffic 400 homes would mean at least 550 extra cars in the area, a lot of these would we parked on the roadside... 2 Flooding risk. I happen to know there is a underground stream in the vicinity of no 2 cedern ave, which has flooded the garden of no 2 in the past. 3 Loss of green space. I with many others totally object to the build.			

Name: Roger Shorland **I.D:** 51276577

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	There is a defeicit of school places. No investment in health services and a total lack of infrastruture services to support an additional 1000 houses. We have repeatedly warned of the risks of flooding if building is carried out on identified flood plains. Backwell is not an employment hub. most residents commute.			

Name: Rosanna Tunnadine (Habinteg Housing Association) **I.D:** 62810785

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Policy DP46: Housing Type and Mix	Yes		Yes	Yes		While the ambition for M4(2) homes is significant in the plan, we believe that the same ambition for M4(3) homes falls short. Habinteg considers Policy DP46: Housing type and mix – accessible and adaptable homes to not go far enough in its ambition to deliver accessible homes for all. The policy states that 'A minimum of 5% of all new dwellings (market and affordable) in developments of 10 or more dwellings will be required to be designed to meet Building Regulations M4(3) standard ('wheelchair user dwellings'), or a higher proportion where there is evidence of local need.' Habinteg recommends that at least 10% of all new homes meet Part M4(3) Standard (wheelchair user dwelling). North Somerset has an opportunity to be more ambitious in supporting older and disabled people. Homes designed to these standards can help reduce hospital discharge delays and prevent falls in the home. Additionally, they foster social participation by ensuring that disabled and older people can live with dignity, fully connected with their community and maintaining vital relationships, thereby supporting wellbeing, reducing loneliness and mental ill-health. Homes built to M4(3) standards are more likely to comply with the Equality Act 2010, as they are specifically designed to meet the needs of wheelchair users and those with significant mobility impairments. We recommend increasing the proposed build rate for M4(3) wheelchair-accessible homes on sites of 10 or more units from 5% to 10%. The Local Housing Needs Assessment indicates that around 6% of households include at least one wheelchair user. Raising the requirement to 10% helps ensure that residents in North Somerset can access suitable housing when needed. There is concern that developers often negotiate reductions in these requirements on viability grounds. Ambiguous wording such as "a higher proportion could be built where there is evidence of local need" risks under-delivery. A clear, enforceable target is essential to meet accessibility needs. However, we appreciate that this addition also allows for some flexibility and the ability to act on increasing the supply of wheelchair user housing when the need emerges. We recommend increasing the proposed build rate for M4(3) wheelchair-accessible homes on sites of 10 or more units from 5% to 10%. The Local Housing Needs Assessment indicates that around 6% of households include at least one wheelchair user. Raising the requirement to 10% helps ensure that residents in North Somerset	Habinteg strongly supports Policy DP46: Housing type and mix – accessible and adaptable homes that states 'All new dwellings will be required to meet Building Regulations M4(2) standard ('accessible and adaptable dwellings') except for those dwellings that are designed to M4(3) standard.' M4(2) standard homes have significantly more accessible features and are more realistically liveable as well as truly visitable. For example, the entrance level WC is large enough to be used independently by a wheelchair user, or for an person to receive assistance if needed. The standard also requires step free thresholds to both main and secondary entrance. Under this plan, North Somerset is doing its bit in increasing the availability of accessible homes so that disabled people can secure suitable housing options on an equitable basis. The benefits of M4(2) homes are well understood and have been highlighted by a range of parliamentary and government commissioned inquiries, including the recent Older People's Housing Task Force and the MHCLG inquiry into Disabled people in the housing sector. Among the benefits noted are: • faster hospital discharges • less costly and speedier adaptations when required • reduced local government expenditure on domiciliary care packages by supporting individual independence within the home • delayed or avoided moves to more expensive residential care settings • providing a better environment for ongoing independence when needs change. Habinteg recommends that all new homes meet Building Regulations M4(2) accessible and adaptable standard as a minimum - to increase the proportion of homes in North Somerset that are capable of meeting the changing needs of disabled and older people. This approach not only supports inclusive communities but also reduces	North Somerset reg 18 response 091225.docx

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						can access suitable housing when needed. There is concern that developers often negotiate reductions in these requirements on viability grounds. Ambiguous wording such as “a higher proportion could be built where there is evidence of local need” risks under-delivery. A clear, enforceable target is essential to meet accessibility needs. However, we appreciate that this addition also allows for some flexibility and the ability to act on increasing the supply of wheelchair user housing when the need emerges. The local plan could also help address disabled people’s housing needs by requiring planning teams to track the number of homes given planning permission to one or other of the higher level accessibility standards. This will help to establish and track delivery which in turn will assist future strategic planning. Accessibility requirements should not be limited to specialist or affordable housing. The need for and potential to benefit from access features is not restricted to the occupants of one type of tenure. Impairments that lead to disability can emerge in any household at any time and nationally we have an ageing population which drives an increasing incidence of age-related disability. M4(2) features benefit everyone by enabling people to remain in their homes longer, supporting families to have healthy, active lives, and improving overall housing quality. M4(3) features may be equally as relevant to the private housing market as the social sector (although disabled people as a demographic group tend to be disproportionately represented within the social sector). Analysis of DFG expenditure shows that the majority of funding is spent adapting homes in the private ownership sector. Therefore, embedding these standards across all tenures, market and affordable, and house types is vital to creating inclusive, adaptable communities that meet current and future needs. Dwelling mix and quality for older people - Considering the wide range of needs experienced by older people the Authority should ensure that the local plan stipulates a proportion of older persons housing, where newly developed, to be designed to fully wheelchair accessible standard. Habinteg also recommends referring would be developers to the recently published ‘Inclusive Housing Design Guide’ which shows how going beyond the requirements of building regulations can produce even higher quality results that includes consideration of the needs of people with sensory or cognitive impairments and neurodiverse people. Location and context of developments - Disabled and older people have told Habinteg about the frustrations and limitations of living in a neighbourhood that offers poor accessibility. This can reduce the benefits gained from having an accessible home. Factors such as the accessibility of transport provision (not just location), the street scape, provision of drop kerbs, pavement parking rules and the accessibility of local shops and	long-term costs which may otherwise fall to the local authority, for example, stairlift installation in an M4(2) home costs significantly less (£2,500–£4,000) than in a home built before the standards came into effect (£9,000–£10,000). While the ambition for M4(2) homes is significant in the plan, we believe that the same ambition for M4(3) homes falls short. Habinteg considers Policy DP46: Housing type and mix – accessible and adaptable homes to not go far enough in its ambition to deliver accessible homes for all. The policy states that ‘A minimum of 5% of all new dwellings (market and affordable) in developments of 10 or more dwellings will be required to be designed to meet Building Regulations M4(3) standard (‘wheelchair user dwellings’), or a higher proportion where there is evidence of local need.’ Habinteg recommends that at least 10% of all new homes meet Part M4(3) Standard (wheelchair user dwelling). North Somerset has an opportunity to be more ambitious in supporting older and disabled people. Homes designed to these standards can help reduce hospital discharge delays and prevent falls in the home. Additionally, they foster social participation by ensuring that disabled and older people can live with dignity, fully connected with their community and maintaining vital relationships, thereby supporting wellbeing, reducing loneliness and mental ill-health. Homes built to M4(3) standards are more likely to comply with the Equality Act 2010, as they are specifically designed to meet the needs of wheelchair users and those with significant mobility impairments. We recommend increasing the proposed build rate for M4(3) wheelchair-accessible homes on sites of 10 or more units from 5% to 10%. The Local Housing Needs Assessment indicates that around 6% of households include at least one wheelchair user. Raising the requirement to 10% helps ensure that residents in North Somerset can access suitable housing when needed. There is concern that developers often negotiate reductions in these requirements on viability grounds. Ambiguous wording such as “a higher proportion could be built where there is evidence of local need” risks under-delivery. A clear, enforceable target is essential to meet accessibility needs. However, we appreciate that this addition also allows for some flexibility and the ability to act on increasing the supply of wheelchair user housing when the need emerges. Habinteg's "Living not existing: The economic & social value of wheelchair user homes" report, conducted with the London School of Economics (LSE) found that over a 10-year period, the benefits of living in a wheelchair-accessible home are valued at approximately £94,000 for a working-age adult, £100,000 for an older adult, and £67,000 for a household with a wheelchair-using child. The long-term economic benefits outlined in the report underline the case for adopting a specific target of at least 10% wheelchair user homes in all new developments, strengthening the soundness and sustainability of North Somerset’s local plan. Moreover, providing more wheelchair user homes helps reduce or eliminate the cost of in-home care assistance, increases individual’s disposable income, lowering reliance on welfare benefits, and enabling greater contributions to tax. The	

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						amenities are all important to providing places that are truly liveable which enable people participate in their local community. - Consideration should therefore be given in the local plan as to how the Authority wishes to emphasise the importance of accessibility of the local neighbourhood for any new development, not just proximity.	cost-benefit of planning more wheelchair user homes reduces pressure on health and social care services, allowing resources to be redirected to those with the highest, most acute needs. The benefits of M4(3) homes are plentiful, and amongst them, new homes that meet category M4(3) will: • Remove or reduces the cost of care assistance in the home • Improve confidence, independence, and self esteem • Enable greater social inclusion and community participation • Reduce trips and falls in the home • Increase economic participation – disabled people of working age who have their access needs met at home are four times more likely to be in employment. We recommend increasing the proposed build rate for M4(3) wheelchair-accessible homes on sites of 10 or more units from 5% to 10%. The Local Housing Needs Assessment indicates that around 6% of households include at least one wheelchair user. Raising the requirement to 10% helps ensure that residents in North Somerset can access suitable housing when needed. There is concern that developers often negotiate reductions in these requirements on viability grounds. Ambiguous wording such as “a higher proportion could be built where there is evidence of local need” risks under-delivery. A clear, enforceable target is essential to meet accessibility needs. However, we appreciate that this addition also allows for some flexibility and the ability to act on increasing the supply of wheelchair user housing when the need emerges. The local plan could also help address disabled people’s housing needs by requiring planning teams to track the number of homes given planning permission to one or other of the higher level accessibility standards. This will help to establish and track delivery which in turn will assist future strategic planning. Accessibility requirements should not be limited to specialist or affordable housing. The need for and potential to benefit from access features is not restricted to the occupants of one type of tenure. Impairments that lead to disability can emerge in any household at any time and nationally we have an ageing population which drives an increasing incidence of age-related disability. M4(2) features benefit everyone by enabling people to remain in their homes longer, supporting families to have healthy, active lives, and improving overall housing quality. M4(3) features may be equally as relevant to the private housing market as the social sector (although disabled people as a demographic group tend to be disproportionately represented within the social sector). Analysis of DFG expenditure shows that the majority of funding is spent adapting homes in the private ownership sector. Therefore, embedding these standards across all tenures, market and affordable, and house types is vital to creating inclusive,	

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							adaptable communities that meet current and future needs. Dwelling mix and quality for older people - Considering the wide range of needs experienced by older people the Authority should ensure that the local plan stipulates a proportion of older persons housing, where newly developed, to be designed to fully wheelchair accessible standard. Habinteg also recommends referring would be developers to the recently published 'Inclusive Housing Design Guide' which shows how going beyond the requirements of building regulations can produce even higher quality results that includes consideration of the needs of people with sensory or cognitive impairments and neurodiverse people. Location and context of developments - Disabled and older people have told Habinteg about the frustrations and limitations of living in a neighbourhood that offers poor accessibility. This can reduce the benefits gained from having an accessible home. Factors such as the accessibility of transport provision (not just location), the street scape, provision of drop kerbs, pavement parking rules and the accessibility of local shops and amenities are all important to providing places that are truly liveable which enable people participate in their local community. - Consideration should therefore be given in the local plan as to how the Authority wishes to emphasise the importance of accessibility of the local neighbourhood for any new development, not just proximity.	

Name: Rosemary Shepherd **I.D:** 62855137

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Land at Tower Farm	No		No	No	There are other suitable development sites within Portishead and the county as a whole with lower ecological impact and without having to build on Green Belt land. Weston Big Wood is an important part of the Gordano Valley green corridor and a development at Tower Farm would have a negative impact on the wood due to increased light, noise and air pollution and the large numbers of additional people using the wood as their green space. No buffer zone would be large enough to protect the wood. This development would threaten the integrity of the wood. Does North Somerset Council want to be responsible for the destruction of ancient woodland? Access to the Tower Farm site would be unsafe due to the large numbers of additiional vehicles exiting on to Down Road, which is already virtually gridlocked at certain times of day. This site is too far from Portishead High Street to make it easily accessible by foot or cycle. It is a 25-30 minute walk down a steep hill, so cars will be the preferred way to travel. The roads from Tower Farm down into Portishead are already extremely busy. Public transport is unreliable, and when the station eventually opens it will be much further than the recommended 10-15 minute walk so cars will again be used. Exceptional circumstances for removing this area from Green Belt have not been proven.			

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Black Rock, north of Clevedon Road	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	The ecological importance of Weston Big Wood as part of the Gordano Valley green corridor is a fact. The negative impact on the wood by increased pollution from light, noise and air cannot be overstated, plus the additional numbers of people who would use the wood as their recreation space would have a deleterious effect. There are alternative suitable sites within Portishead and North Somerset that can be used for housing, thus protecting the integrity of the wood and its SSSI status. Access from the site would be on to Clevedon Road, an already very busy main road. The distance to the nearest primary school would be a 30 minute walk for children, and even further to shops, doctors etc meaning that cars would be the preferred mode of transport. The High Street is already at a standstill at certain times of day and this would not be improved by large numbers of additional cars. The new station, when it opens, will be even further away. Clevedon Road already suffers from flooding due to run off from the fields on that side of the road. Building on that site will surely only make that worse.			

Name: Rosie Evans **I.D:** 58637569

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	This is an unsustainable case of over-development that would unnecessarily turn a village into a town without the required infrastructure or services to support its existing and new residents. 1,000 additional homes – when combined with the 800 houses already under construction / approved in Backwell – would represent an unacceptable burden of an 80% increase in the size of Backwell. The existing road network was built to support a village, not a town. They are already congested and present safety threats. Station Road is narrow relative to the weight of traffic it carries and schoolchildren are put at risk every day due to the thin footpaths that run alongside. Backwell Common – a road which also serves as a footpath for a number of residents (e.g in The Avenue) and as a cycleway – is significantly more likely to be used as a ‘rat run’ – again putting lives at risk. The planned new link road will not alleviate these issues. Schoolchildren are already bussed in from neighbouring villages including Cleeve and Yatton. 1,000 new homes would hugely shrink the school’s catchment area and this is the primary example of the lack of detail provided about local services. In addition, there appears to be no details of new investment in leisure venues or health facilities. Backwell is not a meaningful employment hub. New residents would be likely to need to travel to work in e.g. Bristol. This is an issue because a disproportionate number of additional cars would be using the network of roads described above. Facilities at the local train station are not fit for purpose for a town of the size envisaged under this plan. For example, it can only be accessed by steep stairways. Finally, the plan would lead to the loss of a significant area of Grade One Agricultural Land. This land is currently used for crops and grazing and is too valuable to be lost to development – only 7% of this high quality land type remains in the entirety of North Somerset. This is at odds with Government policy which states “we must protect our best and most versatile land” to safeguard food security.			

Name: Roxanna Vennard **I.D:** 62852033

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Churchill Avenue	No	‣ Positively prepared ‣ Justified	Unsure	No	Penny Field should be protected as a Local Green Space, as it was promised. It’s one of Clevedon’s last true greenspaces, a Nature Recovery priority site, and vital for wildlife (protected species have been sighted here before e.g. great crested newt), community wellbeing, and access to nature. It was entrusted to the Council	Penny Field should be protected as a Local Green Space, as it was promised. It’s one of Clevedon’s last true greenspaces, a Nature Recovery priority site, and vital for wildlife (protected species have been sighted here before e.g. great crested newt), community wellbeing, and access to nature. It was entrusted to the Council		

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		• Consistent with national policy			under oath that it would belong to the people as a greenspace. Better brownfield and greyfield sites across the town exist for development.	under oath that it would belong to the people as a greenspace. Better brownfield and greyfield sites across the town exist for development.		

Name: Rubix Land Ltd (Havyatt Green, Langford) **I.D:** 63249345

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP8: Housing	No	• Justified • Effective	Yes	No	Rubix Land Ltd (“Rubix”) is promoting a significant area of land to the SE of Langford, between the A38 and A368, for a strategic residential-led allocation of up to 2,500 dwellings (“Havyatt Green”). Representations were submitted to the previous Reg.19 consultation in March 2025 and further commentary on this is provided later in this section. Rubix considers that the Havyatt Green site should be allocated as part of the emerging Local Plan, to assist with meeting a shortfall in local housing need and to ensure the Local Plan can be made sound. This is stated for the following reasons: Local Plan Period: The draft Plan is based on a plan period of 2024 to 2041, which represents the minimum 15-year period which is specified by national policy for strategic polices and relies on the Plan being adopted in 2026. It is likely that the Examination and adoption process will go beyond 2026 (supporting text on Page 10 of the Plan acknowledges that “adoption is not expected until late 2026”), meaning that there is a high risk that the Plan will not meet national policy expectations for strategic policies to cover a minimum 15-year period. National policy, through the NPPF, also encourages local plans to take a longer-term view and that, where strategic policies contemplate larger scale developments, as is the case with this Local Plan, policies should be set within a vision that looks further ahead than 15 years. A plan period that is longer than 15 years will help the Council plan positively and effectively for the area and consideration should be given to strategic policies that cover a period in excess of 15 years. As a minimum, the plan period should be extended to 2042. Quantity of New Homes: Policy SP8 identifies that land will be identified to secure the delivery of a minimum of 23,700 dwellings within North Somerset during the plan period 2026-2041. This is a rate of 1,580 dwellings per annum and is based on the Government’s standard method requirement for calculating local housing need, as updated following the publication of the December 2024 NPPF. This housing requirement is a significant increase compared to previous versions of the Plan, where 14,902 dwellings were proposed in the period 2024 to 2039. The decision of NSC to pause the progress of its Plan, in order to identify additional sites to meet the up-to-date (higher) housing requirement, was wholly supported and will ensure that the Plan is positively prepared, to meet up-to-date housing needs. It will also ensure that it is robust over the longer term. However, the NPPF is also clear that local housing need derived from the standard method requirement is a minimum figure and any final housing requirement should take into account affordable housing needs, ambitions for economic development and any unmet need within neighbouring authorities. Local Housing Need:	1. Extension of the Plan period to at least 2042, in order to ensure that the Plan for North Somerset covers a period of at least 15 years from adoption, with a longer period likely to enable the Council to more effectively plan for future development in the area. 2. A higher housing requirement should be set to address evidenced affordable housing needs and to accommodate some of Bristol’s unmet needs. 3. Notwithstanding point 2 above, the total housing supply number should be increased to at least 26,070 or 29,546 when accepting the need for 2 additional years to the plan period (1 above) including a 10% flexibility allowance, in line with South Gloucestershire Council’s approach. 4. Allocation of the Rubix Land site at Havyatt Green for a strategic residential-led new community of up to 2,500 dwellings		3728 Havyatt Green Langford Transport Appraisal Note2 Dec25 Final.pdf

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					Whilst Rubix recognises the housing requirement in Policy SP8 is expressed as a minimum, evidence documents such as the Local Housing Need Assessment (September 2025) (LHNA) point to the need for more homes to be planned for. The LHNA confirms that there is a total net affordable need of 10,577 homes; based on a housing requirement of 23,700 homes, this would require 45% of all homes to be delivered as affordable housing. However, whilst 50% affordable housing is currently proposed on Green Belt release sites, 30% is proposed (based on viability testing) on other greenfield sites and 20% on brownfield sites. In addition, the Council's viability work by Dixon Searle Partnership (October 2025) indicates that affordable housing at more than 30% at Nailsea and Backwell and beyond 35% in South West Bristol and Pill/Easton-in Gordano is unlikely to be viable. Overall, therefore, affordable housing needs will not be met by the current proposed levels of housing, and there is a case for the final housing requirement to be set higher. Bristol's Unmet Need: It is important to note Bristol's unmet housing needs in the context of NSC's approach to meeting housing need in the draft Plan. NSC's Duty to Co-operate Statement of Compliance recognises unmet need from neighbouring authorities to be important strategic matters. However, it concludes that Bristol's request for neighbouring authorities (including North Somerset) to accommodate some of its unmet need cannot be addressed as "…the evidence supporting the local plan demonstrates that North Somerset does not have capacity to meet some of Bristol's needs at this time" (pg. 20). Bristol City Council's (BCC) draft Local Plan is currently at Examination; the hearings have concluded and the 'Final Advice and Actions' letter from the Inspectors was issued on 21 November 2025. This includes some key conclusions on housing: "We acknowledge that there is insufficient capacity to meet the Council's objectively assessed housing need, as calculated by the standard method. Nevertheless, we do not consider the figure of 34,650 dwellings over the Plan period to be positively prepared or justified. Given the significant shortfall in meeting overall needs, and the current lack of agreement between Bristol and any neighbouring authorities to provide assistance, we consider it imperative that the Council seeks to maximise housing delivery. Inherent uncertainties in housing delivery in the longer period do not justify setting a housing requirement substantially below the overall housing capacity figure identified at submission; The Council should draft MMs which set the housing requirement to be the 39,915 dwellings' capacity that was identified at submission [we note this is an additional 5,265 homes, adding to unmet need]; and The Council must also set out what the level of unmet housing need is. While the objectively assessed housing need may change over time, we consider it necessary for this Plan to be clear about the situation at the time of adoption. This may, for example, be important in continuing work being done on other Plans." This is highly relevant, as Bristol has a significant remaining unmet need and this must be accounted for by neighbouring authorities including North Somerset, South Gloucestershire and Bath & North East Somerset, who are all preparing new local plans. To date no other local authority has positively responded to BCC's request confirming their ability to accommodate any unmet need, which further amplifies the issue. The various plans are deferring their obligations to deal with these important cross boundary issues which will only serve to increase affordability pressures within North Somerset and Bristol. NSC's availability of other sustainable opportunities to accommodate some additional growth for BCC's unmet need will require further consideration at the Examination. Housing Supply Flexibility: Policy SP8 explains that the Local Plan is to provide 24,495 homes to meet the requirement of 23,700 homes. This only provides a flexibility allowance of 795 homes (3.35%). This is a very low percentage			

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					and does not provide sufficient flexibility to meet the local housing need figure of 23,700 should any of the proposed allocations run into delivery issues or if the windfall allowance is lower than anticipated. By way of comparison the emerging South Gloucestershire Local Plan includes a flexibility allowance of 10.5%. In Rubix' view this is a far more sensible figure that will assist the Council in meeting its local housing need figure as calculated by the standard method. There is a longstanding issue of poor housing delivery in North Somerset and it is therefore vital that there is sufficient flexibility in the number of sites to meet the requirement figure acknowledging that some sites will deliver slower or not at all. The total supply number should be increased to at least 26,070 to provide a 10% flexibility allowance, or 29,546 when accepting the need for 2 additional years to the plan period. Land at Havyatt Green, Langford: Representations were submitted on behalf of Rubix Land Ltd to the Reg.19 Additional Sites Consultation in March 2025, regarding this proposed strategic site (given reference number HE208099), which lies outside the Green Belt. A copy of the March 2025 reps (main report + site location plan and illustrative masterplan) are attached for reference. This proposed site can accommodate in the region of 2,500 dwellings with associated community facilities, commercial/employment, drainage and open space. It can also provide a new link road between the A38 and A368, helping to alleviate congestion in the area and "rat-running" along Ashley Lane. It's location close to Bristol Airport, which has significant long-term expansion plans, could bring forward provision of a well-located new community with a strong working age population that could contribute towards the airport expansion, with significant long-term economic benefits for North Somerset. The March 2025 reps were accompanied by a Transport Technical Appraisal Note (TAN), undertaken by Peter Evans Partnership (PEP), which highlighted how the proposed development could provide significant improvements to the local road network, as well as providing strong active travel and public transport links to the airport and beyond. Following submission of the March 2025 reps, Rubix commissioned PEP to undertake traffic surveys along Ashley Lane, to assess its use and any correlation with holiday periods, in terms of increases associated with the airport. PEP has produced a further TAN that provides conclusions on this survey, as well as considering recent and updated transport-related plans/schemes in the area, including: • Bristol Airport 2040 Masterplan, published June 2025; • North Somerset Economic Plan Growth Plan 2025 to 2035, published March 2025; • North Somerset Bus Service Improvement Plan (BSIP); • A38 Major Road Network (MRN) scheme, Department for Transport (DfT) - commitment confirmed July 2025; • Progress on the A371 Banwell Bypass; This further TAN is attached to these representations; it concludes as follows: The site would provide a range of facilities and amenities and is well located to maximise sustainable travel opportunities and allow accessibility to day to day facilities such as primary schools, employment and local shops by walking and cycling. Pedestrian and cycle permeability through the site would be achieved and improvements are proposed to the walking and cycling network surrounding the site, including on Ashley Lane and Langford Lane, enabling journeys by non-car means for residents of the site but also residents of Langford, Wrington,			

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					Burrington and Blagdon. The site is well related to the existing A371 - A38 bus corridor and is therefore able to maximise benefits from existing sustainable transport infrastructure. A proposed Mobility Hub on site would support residents and offer a wider benefit by helping improve public transport provision and connectivity to / from rural areas using WESTLink and between Weston-super-Mare, Bristol Airport, Bristol Temple Meads railway station and Bristol city centre. The main employment opportunities at Bristol Airport, Thatchers, Yeo Valley and south of Bristol (at Gravity/Agratas for example) would be accessible by bus from the site providing opportunities to travel to work by other modes than the car. Equally, facilities such as office space/broadband in homes or on-site community / business hub with digital connectivity would give residents the opportunity to work from home and reduced the need to travel to work. Satisfactory vehicle access to the site can be achieved and there is therefore no reason to suggest the scheme proposals would have a material impact on the traffic capacity or road safety of the local road network. The proposals would have a positive impact on road safety with a new A38 – A368 link, downgrading Ashley Lane and Langford Lane, reducing turning movements at their junctions with the A38 and A368 where there are recorded accidents and where there will be increased traffic flows from the Bristol Airport expansion and new employment in South Bristol. The site is a suitable location for development as it is well placed to assist local employment aspirations, provide homes for employees and help enhance accessibility to Bristol Airport by non-car modes. The site would support and benefit from public transport and highway infrastructure improvements.			
Policy LP5: Housing, employment and mixed use allocations	No • Justified • Effective		Yes	No	HAVYATT GREEN, LANGFORD Rubix Land Ltd (“Rubix”) is promoting a significant area of land to the SE of Langford, between the A38 and A368, for a strategic residential-led allocation of up to 2,500 dwellings (“Havyatt Green”). Representations were submitted to the previous Reg.19 consultation in March 2025 and further commentary on this is provided later in this section. Rubix considers that the Havyatt Green site should be allocated as part of the emerging Local Plan, to assist with meeting a shortfall in local housing need and to ensure the Local Plan can be made sound. This is stated for the following reasons: Local Plan Period: The draft Plan is based on a plan period of 2024 to 2041, which represents the minimum 15-year period which is specified by national policy for strategic polices and relies on the Plan being adopted in 2026. It is likely that the Examination and adoption process will go beyond 2026 (supporting text on Page 10 of the Plan acknowledges that “adoption is not expected until late 2026”), meaning that there is a high risk that the Plan will not meet national policy expectations for strategic policies to cover a minimum 15-year period. National policy, through the NPPF, also encourages local plans to take a longer-term view and that, where strategic policies contemplate larger scale developments, as is the case with this Local Plan, policies should be set within a vision that looks further ahead than 15 years. A plan period that is longer than 15 years will help the Council plan positively and effectively for the area and consideration should be given to strategic policies that cover a period in excess of 15 years. As a minimum, the plan period should be extended to 2042. Quantity of New Homes: Policy SP8 identifies that land will be identified to secure the delivery of a minimum of 23,700 dwellings within North Somerset during the plan period 2026-2041. This is a rate of 1,580 dwellings per annum and is based on the Government’s standard method requirement for calculating local	1. Extension of the Plan period to at least 2042, in order to ensure that the Plan for North Somerset covers a period of at least 15 years from adoption, with a longer period likely to enable the Council to more effectively plan for future development in the area. 2. A higher housing requirement should be set to address evidenced affordable housing needs and to accommodate some of Bristol’s unmet needs. 3. Notwithstanding point 2 above, the total housing supply number should be increased to at least 26,070 or 29,546 when accepting the need for 2 additional years to the plan period (1 above) including a 10% flexibility allowance, in line with South Gloucestershire Council’s approach. 4. Allocation of the Rubix Land site at Havyatt Green for a strategic residential-led new community of up to 2,500 dwellings		3728 Havyatt Green Langford Transport Appraisal Note2 Dec25 Final.pdf

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					housing need, as updated following the publication of the December 2024 NPPF. This housing requirement is a significant increase compared to previous versions of the Plan, where 14,902 dwellings were proposed in the period 2024 to 2039. The decision of NSC to pause the progress of its Plan, in order to identify additional sites to meet the up-to-date (higher) housing requirement, was wholly supported and will ensure that the Plan is positively prepared, to meet up-to-date housing needs. It will also ensure that it is robust over the longer term. However, the NPPF is also clear that local housing need derived from the standard method requirement is a minimum figure and any final housing requirement should take into account affordable housing needs, ambitions for economic development and any unmet need within neighbouring authorities. Local Housing Need: Whilst Rubix recognises the housing requirement in Policy SP8 is expressed as a minimum, evidence documents such as the Local Housing Need Assessment (September 2025) (LHNA) point to the need for more homes to be planned for. The LHNA confirms that there is a total net affordable need of 10,577 homes; based on a housing requirement of 23,700 homes, this would require 45% of all homes to be delivered as affordable housing. However, whilst 50% affordable housing is currently proposed on Green Belt release sites, 30% is proposed (based on viability testing) on other greenfield sites and 20% on brownfield sites. In addition, the Council's viability work by Dixon Searle Partnership (October 2025) indicates that affordable housing at more than 30% at Nailsea and Backwell and beyond 35% in South West Bristol and Pill/Easton-in Gordano is unlikely to be viable. Overall, therefore, affordable housing needs will not be met by the current proposed levels of housing, and there is a case for the final housing requirement to be set higher. Bristol's Unmet Need: It is important to note Bristol's unmet housing needs in the context of NSC's approach to meeting housing need in the draft Plan. NSC's Duty to Co-operate Statement of Compliance recognises unmet need from neighbouring authorities to be important strategic matters. However, it concludes that Bristol's request for neighbouring authorities (including North Somerset) to accommodate some of its unmet need cannot be addressed as "…the evidence supporting the local plan demonstrates that North Somerset does not have capacity to meet some of Bristol's needs at this time" (pg. 20). Bristol City Council's (BCC) draft Local Plan is currently at Examination; the hearings have concluded and the 'Final Advice and Actions' letter from the Inspectors was issued on 21 November 2025. This includes some key conclusions on housing: "We acknowledge that there is insufficient capacity to meet the Council's objectively assessed housing need, as calculated by the standard method. Nevertheless, we do not consider the figure of 34,650 dwellings over the Plan period to be positively prepared or justified. Given the significant shortfall in meeting overall needs, and the current lack of agreement between Bristol and any neighbouring authorities to provide assistance, we consider it imperative that the Council seeks to maximise housing delivery. Inherent uncertainties in housing delivery in the longer period do not justify setting a housing requirement substantially below the overall housing capacity figure identified at submission; The Council should draft MMs which set the housing requirement to be the 39,915 dwellings' capacity that was identified at submission [we note this is an additional 5,265 homes, adding to unmet need]; and The Council must also set out what the level of unmet housing need is. While the objectively assessed housing need may change over time, we consider it necessary for this Plan to be clear about the situation at the time of adoption. This may, for example, be important in continuing work being done on other Plans." This is highly relevant, as Bristol has a significant remaining unmet need and this must be accounted			

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					for by neighbouring authorities including North Somerset, South Gloucestershire and Bath & North East Somerset, who are all preparing new local plans. To date no other local authority has positively responded to BCC's request confirming their ability to accommodate any unmet need, which further amplifies the issue. The various plans are deferring their obligations to deal with these important cross boundary issues which will only serve to increase affordability pressures within North Somerset and Bristol. NSC's availability of other sustainable opportunities to accommodate some additional growth for BCC's unmet need will require further consideration at the Examination. Housing Supply Flexibility: Policy SP8 explains that the Local Plan is to provide 24,495 homes to meet the requirement of 23,700 homes. This only provides a flexibility allowance of 795 homes (3.35%). This is a very low percentage and does not provide sufficient flexibility to meet the local housing need figure of 23,700 should any of the proposed allocations run into delivery issues or if the windfall allowance is lower than anticipated. By way of comparison the emerging South Gloucestershire Local Plan includes a flexibility allowance of 10.5%. In Rubix' view this is a far more sensible figure that will assist the Council in meeting its local housing need figure as calculated by the standard method. There is a longstanding issue of poor housing delivery in North Somerset and it is therefore vital that there is sufficient flexibility in the number of sites to meet the requirement figure acknowledging that some sites will deliver slower or not at all. The total supply number should be increased to at least 26,070 to provide a 10% flexibility allowance, or 29,546 when accepting the need for 2 additional years to the plan period. Land at Havyatt Green, Langford: Representations were submitted on behalf of Rubix Land Ltd to the Reg.19 Additional Sites Consultation in March 2025, regarding this proposed strategic site (given reference number HE208099), which lies outside the Green Belt. A copy of the March 2025 reps (main report + site location plan and illustrative masterplan) are attached for reference. This proposed site can accommodate in the region of 2,500 dwellings with associated community facilities, commercial/employment, drainage and open space. It can also provide a new link road between the A38 and A368, helping to alleviate congestion in the area and "rat-running" along Ashley Lane. It's location close to Bristol Airport, which has significant long-term expansion plans, could bring forward provision of a well-located new community with a strong working age population that could contribute towards the airport expansion, with significant long-term economic benefits for North Somerset. The March 2025 reps were accompanied by a Transport Technical Appraisal Note (TAN), undertaken by Peter Evans Partnership (PEP), which highlighted how the proposed development could provide significant improvements to the local road network, as well as providing strong active travel and public transport links to the airport and beyond. Following submission of the March 2025 reps, Rubix commissioned PEP to undertake traffic surveys along Ashley Lane, to assess its use and any correlation with holiday periods, in terms of increases associated with the airport. PEP has produced a further TAN that provides conclusions on this survey, as well as considering recent and updated transport-related plans/schemes in the area, including: • Bristol Airport 2040 Masterplan, published June 2025; • North Somerset Economic Plan Growth Plan 2025 to 2035, published March 2025;			

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					• North Somerset Bus Service Improvement Plan (BSIP); • A38 Major Road Network (MRN) scheme, Department for Transport (DfT) - commitment confirmed July 2025; • Progress on the A371 Banwell Bypass; This further TAN is attached to these representations; it concludes as follows: The site would provide a range of facilities and amenities and is well located to maximise sustainable travel opportunities and allow accessibility to day to day facilities such as primary schools, employment and local shops by walking and cycling. Pedestrian and cycle permeability through the site would be achieved and improvements are proposed to the walking and cycling network surrounding the site, including on Ashley Lane and Langford Lane, enabling journeys by non-car means for residents of the site but also residents of Langford, Wrington, Burrington and Blagdon. The site is well related to the existing A371 - A38 bus corridor and is therefore able to maximise benefits from existing sustainable transport infrastructure. A proposed Mobility Hub on site would support residents and offer a wider benefit by helping improve public transport provision and connectivity to / from rural areas using WESTLink and between Weston-super-Mare, Bristol Airport, Bristol Temple Meads railway station and Bristol city centre. The main employment opportunities at Bristol Airport, Thatchers, Yeo Valley and south of Bristol (at Gravity/Agratas for example) would be accessible by bus from the site providing opportunities to travel to work by other modes than the car. Equally, facilities such as office space/broadband in homes or on-site community / business hub with digital connectivity would give residents the opportunity to work from home and reduced the need to travel to work. Satisfactory vehicle access to the site can be achieved and there is therefore no reason to suggest the scheme proposals would have a material impact on the traffic capacity or road safety of the local road network. The proposals would have a positive impact on road safety with a new A38 – A368 link, downgrading Ashley Lane and Langford Lane, reducing turning movements at their junctions with the A38 and A368 where there are recorded accidents and where there will be increased traffic flows from the Bristol Airport expansion and new employment in South Bristol. The site is a suitable location for development as it is well placed to assist local employment aspirations, provide homes for employees and help enhance accessibility to Bristol Airport by non-car modes. The site would support and benefit from public transport and highway infrastructure improvements.			

Name: Rubix Land Ltd. **I.D:** 58516641

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Land east of Ladymead Lane	No	• Justified	Yes	Yes	1. Whilst Rubix Land fully supports these proposed allocations, they should be combined into a single allocation for up to 75 dwellings (named “Land East of Ladymead Lane” – see below). This is consistent with the outline planning application no: 24/P/1901/OUT, currently being determined by the local planning authority. 2. With regard to the site requirements and criterion 1, Rubix Land does not consider that these allocations need to be masterplanned together. The framework parameter plan and illustrative masterplan submitted with the above outline planning application (Ref: RL101B and RL101/120J respectively – see attached) have been designed for vehicular and pedestrian connections	The boundary of “Land east of Ladymead Lane” should be combined with the proposed adjoining allocation at “Land south of Jubilee Lane” to form a single allocation within Schedule 1 of the emerging Local Plan for residential development of up to 75 dwellings in total, as indicated in Figure 1 below (red-line area): Figure 1: Ladymead Lane/ Pudding Pie Lane – correct allocation boundaries. In addition, Criterion 1 within the Site requirements section for all three allocations should either be removed or altered to read:		North Somerset Local Plan Pre-submission Plan - Representation form Part B Rubix Land.pdf North Somerset

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					to the adjoining allocations to the east, should that be required at a later date. This is in line with site requirements criterion 2. 3. The above application has been discussed in detail with the Council's Urban Design and Highways officers, who have agreed that the proposal is acceptable subject to detailed design to be agreed at Reserved Matter Stage.	"Proposals for land east of Ladymead lane, Land north of Pudding Pie Lane and Pudding Pie Lane (West) should ensure provision of vehicle and pedestrian connections between the sites where possible/necessary, in line with highway requirements and to maximise accessibility and connectivity."		Local Plan Pre-submission Plan - Representation form Part A Rubix Land.pdf RL101 120J Illustrative Masterplan.pdf RL101 Rev.B Framework Parameter Plan.pdf

Name: Rubix Strategic Limited **I.D:** 51242657

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SP2: Climate Change	No	• Justified • Consistent with national policy	Yes	No	Policy SP2 sets out the overarching principles for how development should address both climate change mitigation and adaptation, including a number of key requirements around resource use, net zero, energy generation, climate resilience, transport and green infrastructure. Rubix fully supports the inclusion of a strategic climate change policy and setting out the overarching aims for development in North Somerset. Rubix does however have concerns around the use of phrases in draft Policy SP2 such as 'minimise' and 'maximise'. Targets and requirements that are open-ended have not been fully tested as part of the policy viability, and which could have unintended consequences and supersede requirements set out in subsequent development management policies. Specific requirements, which could include minimising or maximising design elements, can be included in development management policies subject to having been appropriately tested.	We therefore propose amendments to the policy wording are as follows: • "Reduce water use and prioritise the protection of water resources; • Reduce energy use and deliver Net Zero Ready buildings; • Incorporate the generation of energy from renewable and low carbon sources of energy"		
SP3: Spatial strategy	Yes		Yes	No			Policy SP3 sets out the spatial strategy for development in North Somerset. It introduces the four strategic development options, which includes Nailsea and Backwell. Rubix is supportive of the Plan's spatial strategy to prioritise locating strategic new residential and mixed-use development in or close to urban areas where there are existing or proposed facilities, services and jobs, as well as opportunities for active travel and public	

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							transport. The key evidence base document for Policy SP3, 'Spatial Strategy, site selection and Capacity paper' (October 2025) confirms that Nailsea and Backwell is identified as one of four strategic locations across North Somerset where significant levels of growth are proposed. Under Policy SP8 Nailsea and Backwell is expected to provide 3,728 dwellings, which amounts to 15% of the proportion of housing supply. Rubix welcomes the identification of Nailsea and Backwell as a strategic location for growth in North Somerset. Whilst the strategic location requires the release of some Green Belt land, we consider that as one of the most sustainable locations in North Somerset, with Nailsea being one of the main towns and the village of Backwell having an extensive range of essential services, the allocation of the area as a strategic location for growth and development is evidently justified. Nailsea and Backwell is a strategically significant urban area due to its proximity to Bristol and the presence of transport links such as the A370 and the Nailsea and Backwell Railway Station. The railway service provides links to Yatton, Weston-super-Mare and Exeter to the west and Bristol Temple Meads and Cardiff to the east. The area is also well served by frequent bus services which provides direct links between Weston-super-Mare, Congresbury, Backwell and Bristol City Centre. In addition, there are ample services and facilities available within Nailsea and Backwell including local shops, Backwell Leisure Centre, Backwell Secondary School, Fairfield Primary School and a Local Nursery. These facilities and services are all within walking distance of the Rubix site – Land east of Backwell. The land east of Backwell therefore is well located to major employment hubs, facilities and services which are accessible via a range of travel modes. We agree with NSC's assessment that as one of the main urban areas, Nailsea and Backwell is an appropriate location to accommodate significant growth. We agree that green belt releases are necessary to achieve this. Rubix and Mactaggart and Mickel ('Mac Mic') are in joint control of Land East of Backwell, which policy LP3 has identified as having an indicative capacity of 889 dwellings. Rubix	

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							control the land to the north, south and west whilst Mac Mic controls the land to the east. The Rubix site has capacity for circa 400 dwellings alongside associated infrastructure. The Land East of Backwell as a whole provides a logical extension to Backwell, is sustainably located and is deliverable. Importantly, the site presents the opportunity to provide significant benefits for the existing community including amongst others the provision of a much-needed link road from the A370 to Station Road, land for a new primary school, extension and improvement of existing active travel routes, the provision of sports pitches and a Neighbourhood Equipped Area for Play, Public Open Space and the provision of a mobility hub. Whilst we support the strategic location of Nailsea and Backwell and the allocation of Land East of Backwell in principle, we object to some of the requirements outlined in Policy LP3 and Schedule 1. These are addressed in separate representations under Policy LP3.	
SP7: Green Belt	No	• Justified • Effective • Consistent with national policy	Yes	No	Rubix supports Policy SP7's proposal to remove the southern site parcel of 'Land east of Backwell', located to the south of the railway from the Green Belt. Rubix considers that the southern site parcel of 'Land east of Backwell' is grey belt land as it does not strongly contribute to Green Belt purposes a), b) or d) outlined in paragraph 144 of the NPPF. We note that the recent PPG states that Green Belt purposes a), b) or d) do not apply to villages. Notwithstanding this, we do not consider that the southern site parcel contributes to green belt purposes a), b) or d) and therefore should be given priority for release to assist the Council in meeting its local housing needs on sustainable sites. The land north of the railway does not comprise grey belt land nor is it proposed to be released from the Green Belt. We agree with this decision and note that this area is only required for the delivery of critical transport infrastructure and a mobility hub. These elements are not deemed inappropriate development in the Green Belt as per paragraph 154 of the NPPF. We consider that the mobility hub site could be utilised more efficiently to accommodate a 2 form primary school in	Rubix object to Policy SP7 as it does not explain that the requirement to provide 50% affordable homes on site is subject to viability as set out in paragraph 67 of the NPPF. As set out in our response to policy DP43 and as confirmed by the Councils own evidence base, the requirement to provide 50% affordable housing is unviable and therefore not effective. Policy SP7 should be updated to make reference to meeting the Golden Rules subject to viability, as per the NPPF to ensure the deliverability of sites. Other elements of the Golden Rules could still be secured.		

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					due course. We request that the emerging Plan simply acknowledges the potential use of this land at this stage in light of the exceptional circumstances that exist. If the primary school site were to be identified within the grey belt land south of the railway line, it would result in a reduction in the number of homes that can be brought forward undermining the delivery of critical infrastructure. In any event, Rubix object to Policy SP7 as it does not explain that the requirement to provide 50% affordable homes on site is subject to viability as set out in paragraph 67 of the NPPF. As set out in our response to policy DP43 and as confirmed by the Councils own evidence base, the requirement to provide 50% affordable housing is unviable and therefore not effective. Policy SP7 should be updated to make reference to meeting the Golden Rules subject to viability, as per the NPPF to ensure the deliverability of sites. Other elements of the Golden Rules could still be secured.			
SP8: Housing • Positively prepared • Justified • Effective • Consistent with national policy	No		No	No	Local Plan Period The draft Plan is based on a plan period of 2024 to 2041. This is the minimum 15-year period which is specified by national policy for strategic polices and relies on the Plan being adopted in 2026. It is likely that the Examination and adoption process will go beyond 2026 (supporting text on Page 10 of the Plan acknowledges that “adoption is not expected until late 2026”), meaning that there is a high risk that the Plan will not meet national policy expectations for strategic policies to cover a minimum 15-year period. National policy also encourages local plans to take a longer-term view and, where strategic policies contemplate larger scale developments, that policies should be set within a vision that looks further ahead than 15 years. A plan period that is longer than 15 years will help the Council plan positively and effectively for the area and consideration should be given to strategic policies that cover a period in excess of 15 years. As a minimum, the plan period should be extended to 2042. Quantity of New Homes	1 The Plan as proposed risks not allowing for sufficient time (15 years from adoption) to meet a basic requirement for strategic polices set by national policy. A longer plan period is required to ensure that the Plan for North Somerset covers a period of at least 15 years from adoption, with a longer period likely to enable the Council to more effectively plan for future development in the area. 2 There is concern, and risks in respect of the soundness of the Plan, that whilst seeking to meet the minimum level of housing need identified using the standard method, a higher housing requirement should be set to address evidenced affordable housing needs and to accommodate some of Bristol’s unmet needs. 3 There is concern, and risks in respect of the soundness of the Plan as proposed, that no		

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					Policy SP8 identifies that land will be identified to secure the delivery of a minimum of 23,700 dwellings within North Somerset during the 15 year period 2026-2041. This is a rate of 1,580 dwellings per annum and is based on the Government's standard method requirement for calculating local housing need, as updated following the publication of the December 2024 NPPF. This housing requirement is a significant increase compared to previous versions of the Plan, where 14,902 dwellings were proposed in the period 2024 to 2039. The decision of NSC to pause the progress of its Plan, in order to identify additional site to meet the up-to-date (higher) housing requirement, is wholly supported and will ensure that the Plan is positively prepared, to meet up-to-date housing needs. This will ensure that it is robust over the longer term. However, the NPPF is also clear that local housing need derived from the standard method requirement is a minimum figure and any final housing requirement should take into account affordable housing needs, ambitions for economic development and any unmet includes within neighbouring authorities. Local Housing Need Whilst we recognise the housing requirement in Policy SP8 is expressed as a minimum, evidence documents such as the Local Housing Need Assessment (September 2025) (LHNA) point to the need for more homes to be planned for. The LHNA confirms that there is a total net affordable need of 10,577 homes - based on a housing requirement of 23,700 homes, this would require 45% of all homes to be delivered as affordable housing. However, whilst 50% affordable housing is currently proposed on Green Belt release sites, 30% is proposed (based on viability testing) on other greenfield sites and 20% on brownfield sites. In addition, the Council's viability work by Dixon Searle Partnership (October 2025) indicates that affordable housing at more than 30% at Nailsea and Backwell and beyond 35% in South West Bristol and Pill/ Easton-in Gordano is unlikely to be viable. Overall, therefore, affordable housing needs will not be met by the current	housing delivery trajectory has been provided for the Plan as a whole, or for the specific sites which are identified as part of the proposed strategic policies. This should be addressed as part of the submission of the Plan, given some of the allocated sites' housing delivery will fall beyond the current plan period.		

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					proposed levels of housing, and there is a case for the final housing requirement to be set higher. Bristol's Unmet Need It is important to note Bristol's unmet housing needs in the context of NSC's approach to meeting housing need in the draft Plan. NSC's Duty to Co-operate Statement of Compliance recognises unmet need from neighbouring authorities to be important strategic matters. It, however, concludes that Bristol's request for neighbouring authorities (including North Somerset) to accommodate some of its unmet need cannot be addressed as "…the evidence supporting the local plan demonstrates that North Somerset does not have capacity to meet some of Bristol's needs at this time" (pg. 20). Bristol City Council's (BCC) draft Local Plan is currently at Examination; the hearings have concluded and the 'Final Advice and Actions' letter from the Inspectors was issued on 21 November 2025. This includes some key conclusions on housing: 1 We acknowledge that there is insufficient capacity to meet the Council's objectively assessed housing need, as calculated by the standard method. Nevertheless, we do not consider the figure of 34,650 dwellings over the Plan period to be positively prepared or justified. Given the significant shortfall in meeting overall needs, and the current lack of agreement between Bristol and any neighbouring authorities to provide assistance, we consider it imperative that the Council seeks to maximise housing delivery. Inherent uncertainties in housing delivery in the longer period do not justify setting a housing requirement substantially below the overall housing capacity figure identified at submission; 2 The Council should draft MMs which set the housing requirement to be the 39,915 dwellings' capacity that was identified at submission [we note this is an additional 5,265 homes, adding to unmet need]; and 3 The Council must also set out what the level of unmet housing need is. While the objectively assessed housing need may change over time, we consider it			

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					necessary for this Plan to be clear about the situation at the time of adoption. This may, for example, be important in continuing work being done on other Plans. This is highly relevant, as Bristol has a significant remaining unmet need and this must be accounted for by neighbouring authorities including North Somerset, South Gloucestershire and Bath & North East Somerset, who are all preparing new local plans. To date no other local authority has positively responded to BCC's request confirming their inability to accommodate any unmet need, which further amplifies the issue. The various plans are deferring their obligations to deal with these important cross boundary issues which will only serve to increase affordability pressures within North Somerset and Bristol. NSC's availability of other sustainable opportunities to accommodate some additional growth for BCC's unmet need will require further consideration at the Examination. Housing Supply and Delivery The NPPF requires that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, with consideration given as to whether it is appropriate to set out the anticipated rate of development for specific sites. The Plan does not contain / is not accompanied by any broad or detailed housing trajectory which identifies the proposed or expected delivery of housing across the plan period, or from key strategic sites (such as Land East of Backwell). Given that no housing trajectory has been provided, it is not clear from the Plan that a sufficient deliverable supply of housing sites during the first five years of the plan will be achieved. Nor is it clear how the Council anticipates housing to come forward on allocation sites to meet the minimum housing requirements over the plan period. The absence of a delivery trajectory and a lack of clarity in respect of housing			

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					delivery during the first five years of the new plan period and over the plan period as a whole is a clear omission and should be addressed pre-examination. Once the Council has published it housing delivery trajectory, we may wish to comment further on the assumptions being made during the Examination. Given that the Plan includes large-scale strategic allocations for new homes, it would be appropriate for this policy to be accompanied by a delivery trajectory, to identify the expected delivery of new homes in these locations, either as part of a comprehensive trajectory for the plan associated with Policy SP8, or to accompany policies specifically associated with the strategic allocations. It is important to ensure that these trajectories provide a realistic assessment of deliver that can be expected from each site in the Plan period, with realistic lead in times and delivery rates. Policy SP8 explains that the Local Plan is to provide 24,495 homes to meet the requirement of 23,700 homes. This only provides a flexibility allowance of 795 homes (3.35%). This is a very low percentage and does not provide sufficient flexibility to meet the local housing need figure of 23,700 should any of the allocations run into delivery issues or if the windfall allowance is lower than anticipated. By way of comparison the emerging South Gloucestershire Local Plan includes a flexibility allowance of 10.5%. In our view this is a far more sensible figure that will assist the Council in meeting its local housing need figure as calculated by the standard method. There is a longstanding issue of poor housing delivery in North Somerset and it is therefore vital that there is sufficient flexibility in the number of sites to meet the requirement figure acknowledging that some sites will deliver slower or not at all. 4.20 The total supply number should be increased to at least 26,945 to provide a 10% flexibility allowance. Summary 1 The Plan as proposed risks not allowing			

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					for sufficient time (15 years from adoption) to meet a basic requirement for strategic polices set by national policy. A longer plan period is required to ensure that the Plan for North Somerset covers a period of at least 15 years from adoption, with a longer period likely to enable the Council to more effectively plan for future development in the area. 2 There is concern, and risks in respect of the soundness of the Plan, that whilst seeking to meet the minimum level of housing need identified using the standard method, a higher housing requirement should be set to address evidenced affordable housing needs and to accommodate some of Bristol's unmet needs. 3 There is concern, and risks in respect of the soundness of the Plan as proposed, that no housing delivery trajectory has been provided for the Plan as a whole, or for the specific sites which are identified as part of the proposed strategic policies. This should be addressed as part of the submission of the Plan, given some of the allocated sites' housing delivery will fall beyond the current plan period.			
SP11: Historic and natural environment	No	• Justified • Effective • Consistent with national policy	Yes	No	Policy LP3 requires contributions to the delivery of a new Nature Park in order to offset impacts on bat habitats. This requirement is also discussed briefly in draft Policy SP11 and draft Policy DP35. Whilst Rubix does not object to this requirement, it is considered that further clarity is necessary. We note that the proposed location of the Nature Parks are yet to be disclosed and we request their location be included within the emerging Plan in order to provide greater clarity to developers, this is especially important for the developer led Nature Parks which are to be located in the Wolvershill, Woodspring and Nailsea and Backwell strategic locations.	Policy LP3 requires contributions to the delivery of a new Nature Park in order to offset impacts on bat habitats. This requirement is also discussed briefly in draft Policy SP11 and draft Policy DP35. Whilst Rubix does not object to this requirement, it is considered that further clarity is necessary. We note that the proposed location of the Nature Parks are yet to be disclosed and we request their location be included within the emerging Plan in order to provide greater clarity to developers, this is especially important for the developer led Nature Parks which are to be located in the Wolvershill, Woodspring and Nailsea and Backwell strategic locations.		
Policy LP3: Strategic location: Nailsea and Backwell	No	• Effective	Yes	No	These representations have been prepared on behalf of Rubix Strategic Ltd ('Rubix') in response to the North Somerset Local Plan 2041 'Pre-Submission' (Regulation 19) consultation.	Whilst Rubix support the strategic location of Nailsea and Backwell and the allocation of Land East of Backwell, we request:		RS407_OGD_P_DR_121_(E)_Illustrative Masterplan(40514309.1).pdf RS407_OGD_P_DR_110_(A)_Location Plan(40514313.1).pdf

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					Rubix, alongside Mactaggart and Mickel Strategic Land ('Mac Mic') control the allocated Land east of Backwell. The land sits within the strategic location identified by North Somerset Council (NSC) in the Regulation 19 Local Plan, referred to as 'Strategic location: Nailsea and Backwell' (Land east of Backwell) under draft policy LP3, which Rubix has been promoting for a number of years. Rubix control the land in the north, south and west of the allocation site, whilst Mac Mic controls the land further to the east. The land within Rubix control is 37.8 ha and borders the eastern and southern boundaries of Backwell. Schedule 1 of the Regulation 19 Local Plan identifies the indicative capacity of Land east of Backwell as 889 dwellings, the land in Rubix's control is capable of delivering circa 400 dwellings. The land within Rubix control is both sustainable and deliverable. Rubix is an established and experienced land promoter. It is keen to progress the site as evidenced by the pre-application submission in June 2025 and the numerous representations submitted to date. Whilst Rubix is supportive of NSC's approach in principle, our client has some concerns to distinct parts of the Plan that require further refinement ahead of adoption to ensure a robust, sound and deliverable policy for the Strategic location: Nailsea and Backwell. We consider that these issues can be resolved via further modifications to the Plan through the examination process. These representations provide further clarity on the requested policy modifications. Link Road and Access Policy LP3 outlines the need to provide strategic measures designed to alleviate traffic impacts on Station Road and the Backwell crossroads. This includes the provision of the new Station Road Cross Rail Link Road. We note that table 4.1 of the Nailsea and Backwell Transport Strategy (June 2025) prepared by AECOM states that the proposed location of the link road is 'within control of sites being promoted for development growth'. However, on NSC's policy proposal map which identifies the proposed location of the link road, part of the link road is located within land that does not form part	• The proposals map be amended to include the independent southern access Rubix land; • The proposals map be amended to limit the broad alignment of the link road to within the proposed allocation boundaries; • Policy LP3 be amended to make it clear that only those parts of the link road that are associated with residential development are to be directly delivered by the developers. Likewise, Policy LP3 should specify those parts of the link road that will be delivered by 3rd parties utilising developer contributions and other sources of funding i.e. the cross rail link and extent of route north of the railway line; • The land to the east of station road be allocated for mobility hub and education. • Policy LP3 should specify that all social and physical infrastructure requirements are subject to development viability; • The requirement to provide 5 hectares of employment land be removed from Policy LP3 and Schedule 1 of the Plan; • Both policy LP3 and policy DP43 be amended in relation to affordable housing to either 30% affordable housing or include the caveat – 'subject to viability'; and, • Further clarity in relation to Nature Parks.		

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					of the proposed allocation and is neither in Rubix or Mac Mic's control, thereby complicating its delivery. Therefore, the evidence base does not align with the proposals map, and the plan is therefore not justified. Failure to amend the location of the link road would complicate and potentially jeopardise its delivery. In addition, the proposals map fails to show the southern access to the Rubix site, opting instead to use the access via the Mac Mic site. It is important to highlight that the link road can be facilitated entirely within the land in Rubix control, subject to gaining independent access. It is proposed that the southern access to the land in Rubix control be served by a new ghost-island right turn lane from the A370 Farleigh Road, which will be achieved through the demolition of no.37 Farleigh Road. The additional land required for the southern access is depicted on the attached site location plan. The independent access into the Rubix land from the A370 is vitally important in securing the delivery of new homes from the Rubix land within the Plan period. In the absence of an independent access, development cannot commence on the Rubix site and financial contributions envisaged from this development towards the delivery of the railway crossing would not be forthcoming. The Infrastructure Delivery Plan (October 2025) envisages the delivery of the rail crossing early in the plan period as the Link Road as a whole is identified as time-critical infrastructure. If therefore financial contributions from the Rubix site is not forthcoming because an independent access has not facilitated early delivery of homes in parallel with Mac Mic, the entire Link Road and its key benefit of unlocking the strategic growth of Nailsea and Backwell would fall away. Furthermore, the Mac Mic site is entirely dependent on the land in Rubix control and is unable to deliver this essential link. We therefore request, to ensure the deliverability of the link road which is fundamental to the strategic growth area of Nailsea and Backwell, that policy LP3 and the policies map be amended to include reference to the independent			

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					proposed southern access to the land in Rubix control and the alignment of the link road should be amended to remain entirely within the confines of the proposed allocation. The Nailsea and Backwell Transport Strategy (June 2025), prepared by AECOM identifies the key problems facing Nailsea and Backwell as: • Congestion at Backwell Crossroads; • Limitations to bus service operation due to congestion and low rail bridge; • Severance from A370 and rail lines; and, • Suboptimal connectivity between Nailsea and Backwell. NSC recognise that the provision of the strategic rail crossing east of Backwell would aid in alleviating these issues. The provision of the new link road would alleviate vehicle congestion along Station Road and Backwell Crossroads and in turn make these routes more attractive for active travel. It will also improve public transport connections and reduce congestion on the A370 which will support journey time and service reliability. The above requested amendments will ensure the deliverability of the link road. Rubix welcomes the identification of the cross rail link (ref.TR34) in the Infrastructure Delivery Plan. Whilst the IDP advises that parts of the proposed route would be delivered by residential development, it is important that the IDP accurately identifies those sections of the route that will be dependent on external funding i.e. the railway crossing and part of the link road located north of the railway line. The IDP advises that the funding source for this 'time-critical' infrastructure would be developer contributions and other. Given the importance of the link road to unlocking the strategic scale growth at Nailsea and Backwell which is a fundamental component of the emerging Plan Vision, developer contributions should be applicable to all new development within the Nailsea and Backwell growth area and the 'other' sources of funding should be specifically identified now. Delivery of Infrastructure Schedule 1 of the Pre-submission Plan			

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					(Reg 19) outlines the requirements for each allocated site. This includes, amongst other things: • The provision of a new Cross Rail Link Road; • Provision of land for the delivery of a primary school; and, • Provision of 5 hectares of employment land. Rubix supports the identification of the cross-rail link road as a key infrastructure requirement associated with the proposed allocation. It is however critical that this requirement is specific to those parts of the route that proposed development can directly deliver i.e. the route running through residential development. It will not be possible for the proposed development to deliver the cross rail link or the route to the north of the railway line in isolation as evidenced through the IDP. There is likely to be a significant funding gap that will need to be bridged through wider developer contributions and other funding sources. We note that NSC has chosen to allocate land to the east of Station Road for a new mobility hub. Whilst we do not object to the provision of land for the mobility hub, we consider that the Council should be more ambitious in its use of this land. In our view, this parcel represents an appropriate location not only for the mobility hub but also for a new 2 form primary school. This is in accordance with draft Policy SP4 which seeks to ensure that development proposals make the most efficient use of land. We therefore request that this land also be allocated for educational use. Sufficient land can be made available for both the mobility hub and primary school, within land controlled by Rubix, as indicated on the attached draft illustrative masterplan. The viability assessment prepared for the Council by Dixon Searle Partnership (October 2025) indicates that development viability is marginal to poor where 35% affordable housing is sought. As it stands, Policy LP3 is seeking an affordable housing contribution of 50% for Land East of Backwell, meaning that site specific social and physical requirements should be presented as subject to development viability. Otherwise, there is a real risk			

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					that the prosed allocations fail to come forward, which would undermine the emerging Plan. Policy SP9 notes that the plan has identified 72.8 hectares of land for employment purposes. Of this, 6.1 hectares has been allocated to Nailsea and Backwell. Table 3 of the North Somerset Employment Land Evidence Report (June 2025) prepared by Stantec identifies the most suitable locations for employment land. It states that: “Potential locations include c. 5 to 7.5 ha to the north east of Nailsea, near existing industrial site to avoid traffic travelling through the town from the north i.e. as happens currently with the West End Trading Estate. Also, a small employment site in Backwell could be allocated to help diversify land use and offer local employment near to station. The Backwell employment area could be to the rear of the Leisure Centre as this has reasonable access to A370 and avoids traffic travelling through the town” Despite these recommendations, the land north of Nailsea is only required to provide 1.1 hectares of employment land, whilst the land east of Backwell is required to provide 5 hectares, accounting for almost 82% of all Nailsea and Backwell’s allocated employment land. This approach contradicts the Council’s own evidence base and fails to meet the test of soundness, as it is not justified. A 5-hectare site cannot reasonably be described as “a small employment site”, and its delivery is unviable when considered alongside the other requirements set out in Policy LP3 and Schedule 1. We therefore request that the requirement to provide employment land be removed from Policy LP3 and Schedule 1 of the Plan. Affordable Housing Paragraph 67 of the NPPF sets out that development of sites in the green belt will need to adhere to golden rules as set out in paragraph 157 of the NPPF. This requires at least 50% of the housing to be affordable, unless this would make the development of these sites unviable (when tested in accordance with national planning practice guidance on viability).			

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					The Additional Sites Viability Addendum for North Somerset Local Plan 2041 prepared by Dixon Searle states that “the results suggest that an affordable housing quantum of no more than 30% is likely to be viable at the Nailsea and Backwell strategic location”. Given this, the requirement to provide 50% affordable housing on each site is unequivocally unviable, especially considering the other costly requirements outlined in policy LP3. Rubix therefore object to the requirement to provide 50% affordable housing as stated in draft policy LP3 and object to policy DP43 as it is clear through independent viability testing (as is allowed by policy 67 of the NPPF) that an affordable housing requirement above 30% is likely to be unviable. This policy therefore is unsound and would fail the effective test of soundness because housing sites required to deliver 50% affordable housing would be undeliverable over the plan period. Nailsea and Backwell is a key strategic growth area for North Somerset and therefore the inclusion of an unsound policy risks the delivery of the strategic growth area, which could have wider repercussions on the soundness of the plan as a whole. The Additional Sites Viability Addendum for North Somerset Local Plan suggests that the requirement to provide 50% affordable housing in both the Strategic Locations of Easton in Gordano and South West Bristol are also unviable. Again, highlighting that policy DP43 is unsound as these housing sites, required to deliver 50% affordable housing, will also be unviable and undeliverable with this requirement. We consider that the policy approach to affordable housing should be evidence based to ensure the sustainable development of Nailsea and Backwell as is required as part of Policy SP1, SP3 and SP8. This could mean an affordable housing requirement that is higher than 30% but at a level that can be absorbed by the sites without making them unviable. Other elements of the golden rules could still be secured. If the Council is not willing to set a lower percentage, then Policy LP3 should be revised as follows to make it clear that			

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					50% is subject to development viability testing as per paragraph 67 of the NPPF: “Delivery of 50% affordable housing on each site in accordance with Policy DP43: Affordable housing (including rural exception sites) subject to viability.” Policy DP43 should be amended as follows: “Developments will be expected to provide 50% affordable housing on land released from the Green Belt as set out in Policy SP7, and other Green Belt sites (subject to viability as per paragraph 67 of the NPPF), 30% on greenfield sites and 20% on previously developed land, all at nil public subsidy. If these requirements cannot be met this will need to be fully justified with clear evidence set out in a viability assessment which must demonstrate that all grant funding sources have been fully explored.” Nature Park Policy LP3 requires contributions to the delivery of a new Nature Park in order to offset impacts on bat habitats. This requirement is also discussed briefly in draft Policy SP11 and Policy DP35. Whilst Rubix does not object to this requirement, it is considered that further clarity is necessary. We note that the proposed location of the Nature Parks is yet to be disclosed, we request their location be included within the Plan in order to provide greater clarity to developers, this is especially important for the developer led Nature Parks which are to be located in the Wolvershill, Woodspring and Nailsea and Backwell strategic locations. Summary Whilst Rubix support the strategic location of Nailsea and Backwell and the allocation of Land East of Backwell, we request: • The proposals map be amended to include the independent southern access Rubix land; • The proposals map be amended to limit the broad alignment of the link road to within the proposed allocation boundaries; • Policy LP3 be amended to make it clear that only those parts of the link road that are associated with residential development are to be directly delivered			

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					by the developers. Likewise, Policy LP3 should specify those parts of the link road that will be delivered by 3rd parties utilising developer contributions and other sources of funding i.e. the cross rail link and extent of route north of the railway line; • The land to the east of station road be allocated for mobility hub and education. • Policy LP3 should specify that all social and physical infrastructure requirements are subject to development viability; • The requirement to provide 5 hectares of employment land be removed from Policy LP3 and Schedule 1 of the Plan; • Both policy LP3 and policy DP43 be amended in relation to affordable housing to either 30% affordable housing or include the caveat – 'subject to viability'; and, • Further clarity in relation to Nature Parks.			
Policy DP6: Net zero construction	No	‣ Justified ‣ Effective ‣ Consistent with national policy	Yes	No	Rubix object to this policy and consider that NSC's policy on net zero construction goes beyond national guidance on setting local energy efficiency targets. The Written Ministerial Statement (WMS) – December 13th - Local Energy Efficiency Standards Update provides clarity in relation to the development and application of local energy efficiency standards in the context of advancing national policy. The WMS states: 'The Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well reasoned and robustly costed rationale' We object to Policy DP6 and request that the policy be amended to accord with the guidance set out in the WMS and the forthcoming 2025 Future Homes Standard. Alternatively, the Council should provide adequate evidence which justifies the costs associated with these additional standards. Rubix is of the view that this	We object to Policy DP6 and request that the policy be amended to accord with the guidance set out in the WMS and the forthcoming 2025 Future Homes Standard. Alternatively, the Council should provide adequate evidence which justifies the costs associated with these additional standards. Rubix is of the view that this policy places undue pressure on the viability of housing projects. As a land promoter, Rubix has no control of the unregulated energy consumption as it depends on the resident's use of the building. Therefore, we recommend that the policy is updated to reference operational net zero as regulated energy only. During operation, the non-use of fossil fuels depends on the assumptions within the upcoming Future Homes Standard as well as the decarbonisation of the grid – both of which are out of the control of land promoters and developers. Policy DP6 should not be setting out		

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					policy places undue pressure on the viability of housing projects. Embodied Carbon We also note that the embodied carbon figure has reduced from 900kg CO2e/m2 to 750kg CO2e/m2 from the previous Reg 19 consultation. We cannot see evidence from the Council as to why this has reduced and the resultant impact on financial viability of schemes. This is especially the case given that building regulations do not set a specific requirement for embodied carbon. Net Zero Operational As a land promoter, Rubix has no control of the unregulated energy consumption as it depends on the resident's use of the building. Therefore, we recommend that the policy is updated to reference operational net zero as regulated energy only. No on-site use of fossil fuels During operation, the non-use of fossil fuels depends on the assumptions within the upcoming Future Homes Standard as well as the decarbonisation of the grid – both of which are out of the control of land promoters and developers. Policy DP6 should not be setting out requirements that are impossible for the land promoter and developer to achieve.	requirements that are impossible for the land promoter and developer to achieve.		
Policy DP35: Nature conservation	No	• Justified • Effective • Consistent with national policy	Yes	No	Policy LP3 requires contributions to the delivery of a new Nature Park in order to offset impacts on bat habitats. This requirement is also discussed briefly in draft Policy SP11 and draft Policy DP35. Whilst Rubix does not object to this requirement, it is considered that further clarity is necessary. We note that the proposed location of the Nature Parks are yet to be disclosed and we request their location be included within the emerging Plan in order to provide greater clarity to developers, this is especially important for the developer led Nature Parks which are to be located in the Wolvershill, Woodspring and Nailsea and Backwell strategic locations.	Policy LP3 requires contributions to the delivery of a new Nature Park in order to offset impacts on bat habitats. This requirement is also discussed briefly in draft Policy SP11 and draft Policy DP35. Whilst Rubix does not object to this requirement, it is considered that further clarity is necessary. We note that the proposed location of the Nature Parks are yet to be disclosed and we request their location be included within the emerging Plan in order to provide greater clarity to developers, this is especially important for the developer led Nature Parks which are to be located in the		

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						Wolvershill, Woodspring and Nailsea and Backwell strategic locations.		
Policy DP43: Affordable housing (including rural exception schemes)	No	• Justified • Effective	Yes	No	Paragraph 67 of the NPPF sets out that development of sites in the green belt will need to adhere to golden rules as set out in paragraph 157 of the NPPF. This requires at least 50% of the housing to be affordable, unless this would make the development of these sites unviable (when tested in accordance with national planning practice guidance on viability). The Additional Sites Viability Addendum for North Somerset Local Plan 2041 prepared by Dixon Searle states that “the results suggest that an affordable housing quantum of no more than 30% is likely to be viable at the Nailsea and Backwell strategic location”. Given this, the requirement to provide 50% affordable housing on each site is unequivocally unviable, especially considering the other costly requirements outlined in policy LP3. Rubix therefore object to the requirement to provide 50% affordable housing as stated in draft policy LP3 and object to policy DP43 as it is clear through independent viability testing (as is allowed by policy 67 of the NPPF) that an affordable housing requirement above 30% is likely to be unviable. This policy therefore is unsound and would fail the effective test of soundness because housing sites required to deliver 50% affordable housing would be undeliverable over the plan period. Nailsea and Backwell is a key strategic growth area for North Somerset and therefore the inclusion of an unsound policy risks the delivery of the strategic growth area, which could have wider repercussions on the soundness of the plan as a whole. The Additional Sites Viability Addendum for North Somerset Local Plan suggests that the requirement to provide 50% affordable housing in both the Strategic Locations Easton in Gordano and South West Bristol are also unviable. Again, highlighting that policy DP43 is unsound as these housing sites, required to deliver 50% affordable housing will be unfeasible and undeliverable with this requirement. We consider that the policy approach to affordable housing should be evidence	We consider that the policy approach to affordable housing should be evidence based to ensure the sustainable development of Nailsea and Backwell as is required as part of Policy SP1, SP3 and SP8. This could mean an affordable housing requirement that is higher than 30% but at a level that can be absorbed by the sites without making them unviable. Other elements of the golden rules could still be secured. If the Council are not willing to set a lower percentage, then Policy LP3 should be revised as follows to make it clear that the 50% is subject to viability testing as per paragraph 67 of the NPPF : “Delivery of 50% affordable housing on each site in accordance with Policy DP43: Affordable housing (including rural exception sites) subject to viability.” Policy DP43 should be amended as follows: “Developments will be expected to provide 50% affordable housing on land released from the Green Belt as set out in Policy SP7, and other Green Belt sites (subject to viability as per paragraph 67 of the NPPF), 30% on greenfield sites and 20% on previously developed land, all at nil public subsidy. If these requirements cannot be met this will need to be fully justified with clear evidence set out in a viability assessment which must demonstrate that all grant funding sources have been fully explored.”		

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					based to ensure the sustainable development of Nailsea and Backwell as is required as part of Policy SP1, SP3 and SP8. This could mean an affordable housing requirement that is higher than 30% but at a level that can be absorbed by the sites without making them unviable. Other elements of the golden rules could still be secured. If the Council are not willing to set a lower percentage, then Policy LP3 should be revised as follows to make it clear that the 50% is subject to viability testing as per paragraph 67 of the NPPF : “Delivery of 50% affordable housing on each site in accordance with Policy DP43: Affordable housing (including rural exception sites) subject to viability.” Policy DP43 should be amended as follows: “Developments will be expected to provide 50% affordable housing on land released from the Green Belt as set out in Policy SP7, and other Green Belt sites (subject to viability as per paragraph 67 of the NPPF), 30% on greenfield sites and 20% on previously developed land, all at nil public subsidy. If these requirements cannot be met this will need to be fully justified with clear evidence set out in a viability assessment which must demonstrate that all grant funding sources have been fully explored.”			
Policy DP46: Housing Type and Mix	No	Justified	Yes	No	Policy DP46 seeks to ensure that new residential development provides an appropriate mix of housing types and sizes to meet a range of accommodation needs as set out in the latest LHNA. Rubix has no issues in principle with this policy, we object to elements of the policy detailed below. We note that development viability should be considered on a case by case basis when considering housing mix. The policy should be amended to reflect this. Self-build and custom build plots An element of this policy is the requirement to make appropriate provision for self-build and custom build plots. However, we consider that this element of the policy is unprecise and does not meet the test of soundness due to vague evidence for its inclusion and a lack of clarity in terms of what percentage is	We request that evidence base for this policy in relation to self build and custom build plots be revisited and if required, the draft policy wording revised so that it is based on more robust and up to date evidence. We also consider that a different approach would better deliver the Council’s aspirations. This is especially true for sites removed from the green belt that are required to provide 50% affordable housing. In the case of the Land to the east of Backwell which is also required to deliver a significant amount of costly infrastructure including the provision of the link road, the		

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					expected. The North Somerset Local Housing Need Assessment (LHNA) (September 2025), which the policy references, does not provide sufficient evidence to justify the need for this element of the policy. Figure 57: Self-build and Custom Housebuilding Register and Plot Provision of the LHNA only provides data up to 2022-23 and fails to provide the data relating to 2023 onwards. Based on the data available, it seems that there is demand for self-build and custom housebuilding and that demand has historically exceeded supply. However, it is clear that the demand, in no way justifies the policy requirement that states that all development proposals for 10 dwellings or more are required to make an appropriate provision for self-build and custom build plots. If all of the allocations in the Local Plan were to provide these types of plots there would be a significant oversupply. In our view it would be better to make specific allocations for self-build and custom build plots rather than requiring all sites to include an unknown proportion. In addition, the register's evidence is insufficient as it does not take into account the location or type of self-build/ custom house required. It would be entirely inappropriate to require developers to provide self-build/ custom house building plots in locations where there is little demand. In our experience self-builders seldom want to be located within a large development developed by a national house builder. We therefore request that evidence base for this policy be revisited and if required, the draft policy wording revised so that it is based on more robust and up to date evidence. We also consider that a different approach would better deliver the Council's aspirations. This is especially true for sites removed from the green belt that are required to provide 50% affordable housing. In the case of the Land to the east of Backwell which is also required to deliver a significant amount of costly infrastructure including the provision of the link road, the need to provide a proportion of self-build and custom build plots will further harm the viability of the site, making its delivery more difficult.	need to provide a proportion of self-build and custom build plots will further harm the viability of the site, making its delivery more difficult.		

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					Accessible and Adaptable Homes We note that the policy in relation to accessible and adaptable homes reflects Building Regulations and therefore we support this policy. However, we would note that requiring accessible homes above this policy target could have ramifications for development viability.			
Policy DP49: Healthy Places	No	• Effective	Yes	No	We object to policy DP49. We note that the Core Strategy required developments of 200 dwellings or more to submit Health Impact Assessments. However, the Reg 19 Local Plan has now lowered this to 50 dwellings or sites of 1 hectare or more. We query this significant lowering of the threshold given that schemes of this size are unlikely to have significant impacts on the health and wellbeing of the local population or particular groups within it. A site size of 1 hectare is also going to be a very small housing development when taking account of the need to provide BNG and on site SUDS. We therefore object to this policy and consider that the thresholds should be revisited.	The thresholds should be revisited so that they are proportionate.		
Policy DP63: Infrastructure delivery and development contributions	No	• Justified	Yes	No	Throughout our representations we have commented on the wide range of development inputs required by the emerging draft Local Plan and the consequential impacts on development viability and what this means for the deliverability and therefore soundness of the plan. It is critical that the policy requirements are properly understood and backed up by robust and up to date evidence. In this context, we question therefore why the Council are relying on out of date evidence to substantiate the viability appraisal. An example of this is that the BNG cost assumption is based on a very high-level DEFRA publication 'Biodiversity net gain and local nature recovery strategies: impact assessment' from 2019, the costings of which are from 2017. BNG has been a statutory requirement for major developments since November 2023 and there is therefore now a good degree of understanding of the cost implications of this policy requirement. We consider that NSC should revisit this cost assumption as we feel that the real life costs of providing BNG is significantly higher, especially when there is a need to buy off site credits. We also query the use	The data and assumptions used for the viability evidence should be up to date so that an accurate picture of development viability can be obtained.		

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					of £500 per dwelling for SPA/SAC costs. The notes in the viability assessment notes that this is “Based on a range of data, pending further NSC specific data”. Given that a large part of North Somerset is within the bat SAC consultation zone, providing replacement bat habitat is a common occurrence. Based on our experience the cost of providing SAC mitigation is significantly more than £500 per home. The viability evidence uses a cost assumption of 9% of the base build cost for sustainable design/climate change/ carbon reduction. Flats are 4% and a mix of houses and flats 7%. The assumption notes that cost uplift is based on a range of evidence provided by NSC and this then references “evidence based on range of sources including Cornwall Council - Etude with Currie & Brown, 2021”. Whilst we have not been able to have sight of this document it is clear that it is several years old now and may not provide a robust evidence base for the cost assumption, especially given that the net zero technologies are advancing rapidly. We note that the viability assessment for the South Gloucestershire Local Plan (also undertaken by Dixon Searle) uses an 8% assumption which suggests that North Somerset’s sustainability policies are more onerous. To summarise we feel that the evidence base behind the policies and their costs need to be more up to date and based on real and robust evidence. The out of datedness of the evidence base could be as a result of the protracted length of the plan preparation process. However, there is no reason why this cannot be rectified so that the policy requests are more realistic and therefore more deliverable.			
Land east of Backwell	Yes		Yes	No			Policy SP3 sets out the spatial strategy for development in North Somerset. It introduces the four strategic development options, which includes Nailsea and Backwell. Rubix is supportive of the Plan’s spatial strategy to prioritise locating strategic new residential and mixed-use development in or close to urban areas where there are existing or proposed facilities, services and jobs, as well as opportunities for active travel and public transport. The key evidence base document for Policy	

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							SP3, 'Spatial Strategy, site selection and Capacity paper' (October 2025) confirms that Nailsea and Backwell is identified as one of four strategic locations across North Somerset where significant levels of growth are proposed. Under Policy SP8 Nailsea and Backwell is expected to provide 3,728 dwellings, which amounts to 15% of the proportion of housing supply. Rubix welcomes the identification of Nailsea and Backwell as a strategic location for growth in North Somerset. Whilst the strategic location requires the release of some Green Belt land, we consider that as one of the most sustainable locations in North Somerset, with Nailsea being one of the main towns and the village of Backwell having an extensive range of essential services, the allocation of the area as a strategic location for growth and development is evidently justified. Nailsea and Backwell is a strategically significant urban area due to its proximity to Bristol and the presence of transport links such as the A370 and the Nailsea and Backwell Railway Station. The railway service provides links to Yatton, Weston-super-Mare and Exeter to the west and Bristol Temple Meads and Cardiff to the east. The area is also well served by frequent bus services which provides direct links between Weston-super-Mare, Congresbury, Backwell and Bristol City Centre. In addition, there are ample services and facilities available within Nailsea and Backwell including local shops, Backwell Leisure Centre, Backwell Secondary School, Fairfield Primary School and a Local Nursery. These facilities and services are all within walking distance of the Rubix site – Land east of Backwell. The land east of Backwell therefore is well located to major employment hubs, facilities and services which are accessible via a range of travel modes. We agree with NSC's assessment that as one of the main urban areas, Nailsea and Backwell is an appropriate location to accommodate significant growth. We agree that green belt releases are necessary to achieve this. Rubix and Mactaggart and Mickel ('Mac Mic') are in joint control of Land East of Backwell, which policy LP3 has identified as having an indicative capacity of 889 dwellings. Rubix control the land to the north, south and west whilst Mac Mic controls the land to the east. The Rubix site has capacity for circa 400	

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							dwellings alongside associated infrastructure. The Land East of Backwell as a whole provides a logical extension to Backwell, is sustainably located and is deliverable. Importantly, the site presents the opportunity to provide significant benefits for the existing community including amongst others the provision of a much-needed link road from the A370 to Station Road, land for a new primary school, extension and improvement of existing active travel routes, the provision of sports pitches and a Neighbourhood Equipped Area for Play, Public Open Space and the provision of a mobility hub. Whilst we support the strategic location of Nailsea and Backwell and the allocation of Land East of Backwell in principle, we object to some of the requirements outlined in Policy LP3 and Schedule 1. These are addressed in separate representations under Policy LP3.	

Name: Rubix Strategic Ltd **I.D:** 62626657

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SP8: Housing	No	• Justified • Effective	Yes	No	On behalf of our client, Rubix Strategic Limited (RS), it is considered that Land off Moor Lane, Backwell (see attached site location plan), is suitable and available for development and should be included as an allocation within the emerging Local Plan to provide additional flexibility allowance towards the housing requirement set out in the Plan. For a variety of reasons, and as Rubix has advised as part of representations submitted by Lichfields, it is considered that the Local Plan approach to meeting housing need and plan period are considered to be unsound, as follows: 1. The Plan as proposed risks not allowing for sufficient time (15 years from adoption) to meet a basic requirement for strategic polices set by national policy. A longer plan period is required to ensure that the Plan for North Somerset covers a period of at least 15 years from adoption, with a longer period likely to enable the Council to more effectively plan for future development in the area. 2. There is concern, and risks in respect of the soundness of the Plan, that whilst seeking to meet the minimum level of housing need identified using the standard method, a higher housing requirement should be set to address evidenced affordable housing needs and to accommodate some of Bristol's unmet needs. 3. There is concern, and risks in respect of the soundness of the Plan as proposed, that no housing delivery trajectory has been provided for the Plan as a whole, or for the specific sites which are identified as part of the proposed strategic policies. This should be addressed as part of the submission of the Plan, given some of the allocated sites' housing delivery will fall beyond the current plan period. Land at Moor Lane, Backwell In the previous Reg.19 (Additional Sites) consultation in March 2025, this site (as part of a larger area of land off Moor Lane) was identified as an "Other Potential" location, suitable for around 150 dwellings in total. The supporting text for this site states: "Site to the west of Backwell, adjacent to the railway and close to Nailsea and Backwell station. Potential is indicated on parts of site at lower risk of flooding. Development not	1. Extension of the Plan period to at least 2042, in order to ensure that the Plan for North Somerset covers a period of at least 15 years from adoption, with a longer period likely to enable the Council to more effectively plan for future development in the area. 2. A higher housing requirement should be set to address evidenced affordable 3. Notwithstanding point 2 above, the total housing supply number should be increased to at least 26,945 to provide a 10% flexibility allowance, in line with South Gloucestershire Council's approach. 4. Allocation of the Rubix Strategic site at Moor Lane, Backwell (as indicated on the attached		MR50007_1000A Site Location Plan.pdf

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					considered suitable on parts of the site at higher flood risk due to presence of sequentially preferable alternatives." In general terms, RS supports the identification of this site as a potential location for residential development and considers that it should be included as an allocation in the emerging Local Plan. As the above text advises, the site lies within very close proximity to the Nailsea & Backwell rail station and is within walkable distance of other key facilities, including primary schools. As a designated "Category A" village, Backwell is clearly a sustainable location for additional growth and the site at Moor Lane represents a suitable site in this regard. As the local planning authority is aware, the site submitted here was the subject of a planning appeal, with outline planning permission for up to 35 dwellings having been refused in May 2024 (Application Ref: 22/P/0252/OUT). The Inspector dismissed the Appeal in April 2025, primarily on the grounds that there were outstanding concerns over the flood modelling undertaken and whether the post-development mitigation would increase flood risk elsewhere. Following this Appeal decision, Rubix' flood consultant (Rappor) has undertaken further baseline modelling, taking into account the concerns raised by the Council's flood consultant (JBA) at the Appeal Hearing. A bespoke pre-application submission was made by Rubix in August 2025, specifically to agree the baseline flood modelling. Following receipt of the Council's response in October 2025, a meeting between Rappor, NSC and JBA was held on 13 November to discuss outstanding issues. It is considered that all flood-related issues have now been resolved and Rubix is in a position to assess alternative development options for the site, based on this agreed baseline flood modelling, which will ensure that proposed development of the site can be designed to ensure it remains safe for its lifetime. In accordance with the PPG, this will negate the need for the site to be subject to the sequential test. On this basis, it is considered that the site can be allocated for development as the previous flood-related evidence is no longer relevant and so the conclusions on Moor Lane can no longer be justified.	site location plan) for residential development 5. housing needs and to accommodate some of Bristol's unmet needs.		

Name: Ruth Carter **I.D:** 62864865

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Land north of Churchill Avenue	No	• Justified	Unsure	Unsure	Penny Field must be protected and made a Local Green Space. Under local planning policy, Penny Field is the perfect candidate for Local Green Space designation because it would be in the top 24% of sites based on policy agreement. Clevedon Town Council, two petitions (2022 and 2025) of 600+ signatures and the consultation for Clevedon Placemaking Strategy all call to protect Penny Field. Penny Field is a prime candidate for Local Nature Recovery, as identified by WECA, due to the presence of three priority species. Penny Field is also located on a Green Infrastructure Corridor under NSC's own policy. Under any Equalities Impact Assessment the reduction of green space would adversely affect lower income households. Remove Penny Field from the list of sites to be developed. It is an important area for the local community, and is in regular and abundant use by hundreds of people every week. Penny Field is a vital recreational and social space for the local community. Residents use it daily for walking, exercise, dog walking, informal sports, and community gatherings. The proposed development would remove half of this essential space, significantly reducing opportunities for recreation and adversely affecting physical and mental health in the community. The field also supports local wildlife and vegetation that contribute to biodiversity. Development would result in the loss of habitat, reduction in green space, and environmental degradation.	Remove Penny Field from the list of sites to be developed. It is an important area for the local community, and is in regular and abundant use by hundreds of people every week. Penny Field is a vital recreational and social space for the local community. Residents use it daily for walking, exercise, dog walking, informal sports, and community gatherings. The proposed development would remove half of this essential space, significantly reducing opportunities for recreation and adversely affecting physical and mental health in the community. The field also supports local wildlife and vegetation that contribute to biodiversity. Development would result in the loss of habitat, reduction in green space, and environmental degradation. Green spaces and urban and semi-urban areas are critical for air quality, drainage and flood mitigation, and the proposed housing would negatively impact these functions. The addition of housing on the site would also put pressure on local infrastructure, including roads, parking and healthcare facilities. Current services are not designed to accommodate this increase in population, which could lead to congestion, safety concerns and strain on public amenities. This open space contributes significantly to the character and identity of the neighbourhood. Penny Fields got its name after the Urban District Council of Clevedon bought the land for £275 in 1930 – a purchase which was helped by public donations including from		

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					Green spaces and urban and semi-urban areas are critical for air quality, drainage and flood mitigation, and the proposed housing would negatively impact these functions. The of addition of housing on the site would also put pressure on local infrastructure, including roads, parking and healthcare facilities. Current services are not designed to accommodate this increase in population, which could lead to congestion, safety concerns and strain on public amenities. This open space contributes significantly to the character and identity of the neighbourhood. Penny Fields got its name after the Urban District Council of Clevedon bought the land for £275 in 1930 – a purchase which was helped by public donations including from children who gave pennies to ensure it was kept as recreational ground. It is considered of high community value and partial development would alter the landscape and diminish the sense of place valued by residents. The majority of residents who use and value this field are opposed to this development. This reflects strong community interest in retaining the space for recreational, environmental and social purposes. In conclusion, while we recognise the need for new housing, the proposed development would have a disproportionate negative impact on the community environment and local infrastructure. I respectfully request that the council reconsider this site for housing and prioritise the protection of this vital recreational area for current and future residents.	children who gave pennies to ensure it was kept as recreational ground. It is considered of high community value and partial development would alter the landscape and diminish the sense of place valued by residents. The majority of residents who use and value this field are opposed to this development. This reflects strong community interest in retaining the space for recreational, environmental and social purposes. In conclusion, while we recognise the need for new housing, the proposed development would have a disproportionate negative impact on the community environment and local infrastructure. I respectfully request that the council reconsider this site for housing and prioritise the protection of this vital recreational area for current and future residents.		

Name: Ruth Gofton **I.D:** 58482529

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Land north of Churchill Avenue	No		Unsure	Unsure	Having seen bats and kingfishers use the space within the last few months, the land, particularly near the river, should be protected for nature recovery, and as a Local Green Space. The reduction of green space would have an adverse impact on very local people, many of whom are in lower income households and live in social housing immediately adjacent to the site. The land was saved by people donating their pennies, hence the name, to save it from development - recent consultation (petitions) for the town's Placemaking Strategy repeats this concern 100+ years later.	Reduction in the number of houses, and provision for nature recovery - the setting up of a mini nature reserve for example.		

Name: Ruth Musandu **I.D:** 62772833

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Land to the west of Elborough					Elborough Village I fully support the objections raised by Hutton Parish Council and local residents regarding the proposed development in Elborough. For clarity, the key concerns are: 1. Loss of Green Space: The development would permanently remove the strategic green gap between Elborough and Locking. 2. Inadequate Infrastructure: The area lacks essential facilities such as shops, schools, community spaces, and reliable public transport. Existing roads are not suitable for increased traffic.			

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					3. Public Opinion: In a 2021 survey, 83% of residents opposed new housing near Elborough. 4. Sustainability: Despite claims of sustainability, the site is isolated and has no existing services, making it unsuitable for development. I would also stress the significant flood risk. Additional impermeable surfaces would worsen existing flooding, already exacerbated by climate change. Runoff from surrounding farmland frequently floods Banwell Road, and the wider area is vulnerable to flash flooding. I trust these substantial concerns will be fully considered in the Pre-submission process.			
Land north of Banwell Road, Locking /Elborough						Elborough Village I fully support the objections raised by Hutton Parish Council and local residents regarding the proposed development in Elborough. For clarity, the key concerns are: 1. Loss of Green Space: The development would permanently remove the strategic green gap between Elborough and Locking. 2. Inadequate Infrastructure: The area lacks essential facilities such as shops, schools, community spaces, and reliable public transport. Existing roads are not suitable for increased traffic. 3. Public Opinion: In a 2021 survey, 83% of residents opposed new housing near Elborough. 4. Sustainability: Despite claims of sustainability, the site is isolated and has no existing services, making it unsuitable for development. I would also stress the significant flood risk. Additional impermeable surfaces would worsen existing flooding, already exacerbated by climate change. Runoff from surrounding farmland frequently floods Banwell Road, and the wider area is vulnerable to flash flooding. I trust these substantial concerns will be fully considered in the Pre-submission process.		

Name: Ruth Pitchers **I.D:** 31079073

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The valley, the lungs of Nailsea where our people go to ride, run, walk their dogs, meet their friends, and where children play and explore nature. The passage to the woods, and the route to school for children that live on the hill because the roads have no other safe routes as the roads are without footpaths. Yes you have to ‘put on your wellies’ even in the summer because it is wet, waterlogged and often flooded but everyone in Nailsea loves the flood plain and it’s natural environment. Nailsea doesn’t have a seafront, a diverse shopping centre or even a swimming pool but we are surrounded by the fields and this is ‘where we go’ in our leisure time. Loss of Bio Diversity as a human species makes us vunerable to further pandemics and disease as wildlife is forced from it’s home to share human space, where we put concrete to build homes that our children can’t afford and wouldn’t buy anyway for fear of flooding and not getting insurance. Nature is not separate from us we are part of it and our wellbeing is linked with the plants, wildlife and landscape and we need to prepare for a future of climate change by protecting our environments and particularly the diversity of all the types of flood plain that are interlinked. From Weston, to Worle and all around acres of the flood plain that make up North Somerset have been built on and covered in tarmac and this is evident by the increased amount of flooding in the valley after heavy rain. One lady recently, out walking her dog got so stuck in the sinking mud the fire brigade had to rescue her on a surf board! If you build on ‘this sponge’ where will the water go? Access to the site from any direction has ‘pinch points’ that cannot be widened and impassable by 2 vehicles coming from different directions so intricate planning of the highways would be needed before any construction vehicles could start to build and they can’t be widened!! The kids in Nailsea have already had their rugby pitches built on and there are waiting lists to join the football clubs and yet developers want to get their hands on the little land left where our communities bond and play. May ‘common sense’ prevail. Building in the valley is quite frankly not only ‘bonkers’ for so many reasons but ‘so sad’. It’s	Remove development of land North of Nailsea		

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					our happy space and it doesn’t deserve concrete for the sake of a government policy that makes building over the green belt acceptable because when it’s gone there is no place left to go. It was designated green belt ‘for a reason’!			

Name: Ruth Revell **I.D:** 58577601

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP3: Spatial strategy	No	‣ Justified ‣ Effective	No	No	I feel it's not legally compliant as it doesn't balance out housing designations between areas, with some taking a disproportionate amount compared to other areas. I feel it's also not legally compliant as the consultation does not meet the accessible communications standard, a large percentage of the community will not be able to complete it due to the complexity of the online form and language used, I myself am struggling to understand all of the terminology.	Easy read versions of the consultation should have been produced, more engagement with minority groups to ensure everyone that would like to comment feels their needs are met so they are able to do do. Review site allocations to allocate more to other areas which have far less in the process, but with much higher population density.		
Policy LP12: Bristol Airport	No	‣ Justified ‣ Effective	No	No	The airport causes many issues for local people, traffic, parking issues, noise. None of these issues have been successfully addressed by the airport. The parking issues extend for up to 3 miles to neighbouring villages with illegal parking companies parking cars there without owners knowledge, blocking local roads and often preventing safe emergency access. A commissioned report shows that airports don't increase economic growth, so it is not clear why North Somerset council are saying they will potentially support further growth. https://neweconomics.org/2025/01/expanding-uk-airports-wont-deliver-economic-growth	To remove the intent to even consider airport expansion as the criteria for growth will be impossible to achieve.		
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Backwell already has 800 new houses approved, a 40% increase for the village. These additional numbers would lead to complete overdevelopment. The local services don't have enough access for multiple developments, the local shops (a drive away from the these developments) barely have enough parking for current resident volumes, the same goes for for the local GP practice and pharmacy which has no car park park, and only 2 spaces outside. There is no local community centre. The proposed road would not effectively serve Nailsea’s traffic or relieve congestion on Station Road, Backwell Common, or Chapel Hill. Engineering the road under or over the railway would be highly expensive and possibly unfeasible. Despite this increase, there is a deficit in school places and no investment in health services or leisure facilities. The lack of infrastructure and services cannot support another 1,000 houses. Backwell is allocated a higher number of houses than any other village in North Somerset, and even a higher growth percentage than towns. Backwell is expected to take 7% of the district’s housing allocation, compared to Clevedon’s 2%. There is no needs or viability analysis for an extra 1,000 houses. Backwell is not an employment hub, most residents commute. The train station cark park if often full, many illegal car parking companies use this car park for airport parking. There is no easy bus link to the station which is regular enough for commuters. How will people easily get to the train station? No social cohesion impact assessment has been provided. Grade 1 Agricultural Land currently used for food crops and grazing. There is only 7% of this high quality land left in the whole of North Somerset.	Revise the plans and reduce sites in Backwell.		

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					Government policy states that “we must protect our best and most versatile land” to safeguard food security. The proposals contradict this policy and undermine food security. Development would destroy valuable wildlife habitats and further harm biodiversity in one of the world’s most nature-depleted countries. The proposals threaten the Brockley Maternity Roost and SSSI, with rare Lesser and Greater Horseshoe Bats relying on the land for food. The Infrastructure Delivery Plan lacks analysis and costings, and there are no funding guarantees for the new road or services. Backwell Common and surrounding areas are prone to flooding, which would be aggravated by more housing. Concerns regarding the strategic growth location designation include the impact on the area’s character, the loss of Greenbelt and high-quality agricultural land, the risk of flooding, and uncertainty over whether the road can be funded and delivered on time to support the proposed housing. Backwell Lake (Reservoir) and adjacent fields, where the new roads and housing is planned, are and are on a floodplain, which floods regularly. Government policy requires 50% affordable housing on Greenbelt Land, but this reduces the funds developers contribute towards infrastructure. The sheer volume of growth with the required investment infrastructure and services over such a short period is destabilising, unsustainable and undeliverable. The railway station is not fit for purpose as a transport hub; it remains inaccessible for people with mobility issues and presents serious challenges when travelling with young children. There is also often lack of free parking spaces due to people using it for airport parking.			
Farleigh Fields, Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I don't know where to add this comment. For Backwell only 3 areas of local green space have been identified. We have other areas which are widely used for recreation which have no protection and are not registered. North Somerset council have failed to consult the community about local green spaces or to consider if more sites should be allocated. There are sites within the area which could be allocated. If all of the additional housing is built there will be many residents not within a 5 minutes walk. Why have North Somerset not allowed us to suggest additional sites?			
Land to the south of Church Lane, Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	This site is a green space well used by local walkers and residents for recreation. There are public footpaths running through the fields and informal unregistered footpaths. Any development of this site for playing fields could risk public access- a recent case of Stoke Lodge playing fields where public access was lost due to safeguarding as an example. For many residents this is the closest open space to where they live (Being in line with the 400m government policy) If access to this was reduced or lost this would impact of wellbeing of residents. There are also informal footpaths into the woodland which is also used for recreation, these are not registered public footpaths, but access could be lost if playing fields are added. Playing fields would have an impact of noise and light pollution to local residents. There is a large volume of wildlife in the woodland, likely to be door mice, but also horseshoe bats. The field was farmed up until recently which would have produced things for wildlife to feed form. Concerned the fields are being run down to then be less desirable to wildlife. This field, and this area of Backwell in general, falls within consultation zone B (with the fields to the left being in Zone A) for the North Somerset and Mendip Bats Special Area of Conservation, should the site be turned into playing fields it would mean the grass would be regularly cut, therefore reducing insects and potentially impacting on the bat population.	Take this site out of the plan as school playing fields and consult on it being registered as a local green space. If registered as a local green space it could be managed for wildlife and still used by the school form more informal recreation such as forest school or wildlife groups.		

Name: Ruth Roberts **I.D:** 39376225

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I object to the proposal to allocate 889 more houses to Backwell for the following reasons. 1. 794 new houses are already approved for Backwell – a 40% increase. The extra 889 houses would take the total increase to approximately 80%. This is complete overdevelopment without investment in infrastructure and services. 2. The Infrastructure Delivery Plan lacks analysis and costings and there are no funding guarantees for the new road or services. 3. Building the proposed new road under or over the railway would be extremely expensive and possibly unfeasible. 4. There are few employment opportunities in Backwell so residents need to travel for their jobs. Although there are rail and bus services not everyone can reach their employment using these services so many people need to use their cars and this will add significantly to the current local traffic congestion. 5. The land is Grade 1 Agricultural land currently used for food crops and grazing. There is only 7% of this high quality land left in the whole of North Somerset. Government policy states that “we must protect our best and most versatile land” to safe guard food security. 6. The land is prone to flooding which would be exacerbated by the proposed housing. 7. The railway station is inaccessible for people with mobility problems.			

Name: S Ashworth **I.D:** 58601857

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Policy LP12: Bristol Airport	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The proposed expansion of Bristol Airport, including the release of Green Belt land for development and the extension of airport infrastructure, raises significant concerns about environmental and community impacts. 1. Loss of Green Belt Land The release of Green Belt land to accommodate the airport’s expansion and new housing developments undermines the fundamental purpose of the Green Belt to protect rural spaces from urban sprawl. The proposed compensation measures, including the new Green Belt area south of Nailsea and west of Backwell, are inadequate to offset the loss of protected land, particularly in light of the expansion’s impacts on local ecosystems and wildlife habitats. Local residents have rightly been compliant with green belt planning laws for decades and it is unacceptable to bulldoze it now solely for Bristol Airports financial gain. 2. Threat to Local Wildlife and Felton Common Felton Common, a Local Nature Reserve and Site of Nature Conservation Interest, is directly threatened by the proposed developments. The Local Plan fails to adequately recognise its status as a Common and the urgent need for stronger protections. Any development or infrastructure projects that affect the Common could disrupt its biodiversity and harm local wildlife. We urge for a specific policy to safeguard Felton Common, ensuring its preservation. 3. Disruption to Local Communities and Traffic Concerns	The proposed plan for Bristol Airports should be completely modified. It is difficult to see how the airport can credibly argue for further growth when it is already failing to demonstrate that it can operate effectively within its current size and capacity. Residents and passengers experience frequent congestion, inadequate infrastructure, and operational inefficiencies that clearly indicate the airport is not meeting even basic expectations for service and accessibility. Until Bristol Airport can provide clear, measurable evidence that it is capable of running sustainably, safely, and efficiently at its present scale, any proposal for expansion is premature and unjustified. The priority should be addressing existing shortcomings, improving transport links,		

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					The expansion will result in increased traffic on rural country lanes, directly affecting the quality of life for local residents. The already limited infrastructure around the airport, including narrow country roads, will be overwhelmed by the surge in vehicles. Increased traffic poses safety risks, exacerbates congestion, and reduces air quality for surrounding communities. The lack of clarity on the proposed mass transit route further complicates the situation, leaving local residents uncertain about the potential disruption. The airport expansion plans in isolation could not be sustained by the current infrastructure, yet it has ignored the increased housing and developments proposed in local villages and towns which will further add traffic and congestion to the local roads. The area cannot accommodate these increases. 4. Climate and Air Safety Concerns Expanding the airport beyond its current capacity poses risks to both the local environment and air safety. The cumulative emissions from airport expansion need to be assessed in relation to national Net Zero targets, yet no clear strategy has been presented. Additionally, the extension of the runway and the installation of new lighting infrastructure could elevate risks in the surrounding area, particularly Felton Common, which falls within an Air Safety Zone. The proposed replacement land, even closer to the airport, raises further safety and environmental concerns, rendering it unsuitable for recreational use or mitigation efforts. The wildlife that will be displaced from local developments and from loss of green belt land will negatively impact our protected bat species and birds known to the area. In light of these issues, I strongly oppose the further expansion of Bristol Airport. It poses a serious threat to the Green Belt, local wildlife, and the well-being of nearby communities. We urge the council to reject the plans and prioritise the protection of the environment and local quality of life.	ensuring compliance with environmental obligations, and meeting the needs of the community. Expansion without first resolving these longstanding issues would not only exacerbate current problems but also place additional strain on local infrastructure and the surrounding environment. For these reasons, I strongly oppose the proposed expansion and urge decision-makers to require demonstrable improvements before any increase in capacity is considered.		
Land south of Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Objection The proposed scale and locations of development in both Nailsea (1,817 new homes) and Backwell (an additional 1,000 on top of 800 already approved) represent significant overdevelopment, far beyond what local infrastructure, the environment, and transport networks can sustain. 1. Severe Environmental Damage & Loss of Green Belt / High-Quality Agricultural Land * Large areas of Green Belt around both Nailsea and Backwell would be removed, including Grade 1 and Grade 2 high-quality agricultural land, which is essential for food production and protected under government policy. * New Green Belt proposed south of Nailsea does not compensate for the permanent loss of productive farmland and established habitats. * All proposed Nailsea and Backwell development sites are known foraging grounds for rare Greater and Lesser Horseshoe Bats, protected species that depend on the landscape linking the Brockley Maternity Roost and SSSI. * Development near Moor End Spout Nature Reserve and Backwell Lake would destroy habitats for many protected species, further damaging biodiversity in an area already critically nature-depleted. 2. Traffic Congestion, Unsafe Roads & Inadequate Transport Infrastructure * The proposed new road and rail underpass will not relieve congestion on Station Road, Backwell Common, Chapel Hill, or routes to the M5. * Engineering the rail crossing near the River Kenn is likely high-risk, extremely costly, and potentially unfeasible. * Transport modelling shows significant increases in traffic on the rural lanes around Nailsea, with no realistic mitigation for congestion or road safety, especially for pedestrians, cyclists, and horse riders. * Accident blackspots at Stone Edge Batch, Wraxall Hill, and Portbury Lane are left unaddressed, even though traffic will increase. * Backwell railway station is not fit for purpose as a transport hub, remaining inaccessible for many users.			

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					3. Flood Risk & Unsuitable Development Locations * Development west and south of Backwell Lake would place homes directly on floodplain, which floods regularly. * These proposals increase flood risk not only to new homes but also to surrounding areas already vulnerable, such as Backwell Common. 4. Insufficient Schools, Healthcare & Community Facilities * Nailsea and Backwell lack the capacity to absorb such large population increases. * Although three new primary schools are suggested, they rely on uncertain developer funding, will be phased, and no sites have been identified. * No investment is planned to expand overstretched healthcare or leisure services in either town. 5. Disproportionate Housing Burden Of North Somerset's 24,495 homes, the allocations are: * Nailsea: 9% * Backwell: 7% (higher than Clevedon at 2%) This is an unbalanced load on two neighbouring communities that lack the infrastructure of larger towns. Conclusion The developments in Nailsea and Backwell would: * Cause unacceptable environmental damage, including the loss of Green Belt, top-grade farmland, and protected wildlife habitats. * Create unmanageable traffic increases and road safety issues, with no feasible or funded transport solutions. * Place homes in active flood zones, exposing residents to unnecessary risk. * Overstretch schools, healthcare, and community facilities, with no guaranteed investment to support growth. The NSC local plan 2041 is unsustainable, environmentally harmful, and undeliverable, posing long-term risks to both communities and the wider district.			

Name: S Burchill **I.D:** 62718945

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SP11: Historic and natural environment	No	• Justified • Effective • Consistent with national policy	No	No	The plan does not take into account ecologically important areas (such as Weston Big Wood) due to not taking into account the need of buffer zones in the vicinity around these special wildlife areas.	The plans need to fully be ecologically sound protecting these important habitats and wildlife corridors for our children and future generations.		

Name: S Burrell **I.D:** 51457281

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Policy LP3: Strategic location: Nailsea and					Draft Local Plan 2041 and the proposed increase in housing in Nailsea and Backwell by over 40% from today's total. That will mend at least 40% more traffic on my road. I am deeply apposed to the above plan. I do not consider North Somerset Council (NSC) have properly considered the			

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Backwell					traffic impact to Tickenham Road. The road is seriously congested and unsafe for cyclists and particularly pedestrians. The roads cannot support the increase in new homes proposed by the local plan. Currently, even without the increase in traffic, it Is difficult to leave my house to walk. If I leave by the right hand side I am onto a very narrow path or if left into the actual road. I cannot leave my home without being worried about being hit by either, a car or six axle lorry. The wind created by the very large lorries, has forced me into either the road or hedges. It has become unsafe to walk from my home currently and I cannot image what it would be like it's 40% more traffic. There are constant queues of traffic outside my house every day, which makes it difficult to enter our front drive. Cars sit with engines running outside my house for hours while queuing. Pollution has increased so much that i no longer open window, even in the summer. The noise and vibration from HGV is I believe seriously impacting my health and the structure of my 17c cottage. I am also concerned that children walk in the road to get to school at Clevedon School. The danger to them is extremely concerning. I have also witnessed in the last few months two very nasty bike accidents, where one cyclist was pushed into a wall by a car and in the second instance knocked off their bike by irritated drivers sitting in queues.			

Name: S Coates **I.D:** 62768481

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Land at Tower Farm	No	• Positively prepared	Unsure	No	North Somerset Council has not considered alternative brownfield or greenfield sites with far lower ecological impact especially in relation to the Tower Farm proposed development. Opportunities to develop other sites within Portishead would remove the need to develop Tower Farm The strategic ecological importance of the Tower Farm site, especially in protecting Weston Big Wood cannot be overestimated I have lived in Portishead since the mid 1970's have seen it treble in size to a point of saturation. I have lived in The Deans, next to the proposed Tower Farm site for 35 years and now the adverse implications to traffic/access the development would cause. The proposed developer's in my opinion have not done a thorough job in relation to the Tower Farm site. In my opinion 300-400 houses on the site is out of the question. Access to construction traffic alone would cause immense disruption let alone possibly 400 vehicles spilling out onto The Downs daily where there is an infant school. At present there is almost gridlock in The Downs and surrounding roads twice a day. I see in the plans there may be a drop off point below this school but this will definitely not solve the problem. It would only be a matter of time before there would be a serous accident involving a pupil because of the chaos that would result and who would want that on their conscience. There are other sites in Portishead, mainly Wyndham Way which offer far more suitable housing for one/two/threee bedroom properties which would help the young families gain access to housing in this pricey town. Public transport would also be easily accessible where it is not at Tower Farm. Only one company will benefit from this and that is the developers in cramming as many expensive houses into a small unsuitable plot of land.	I am only interested in the development of the Tower Farm development and cannot comment on any other modifications or their legality.	No	

Name: S Coles **I.D:** 62847521

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent	Unsure	Unsure	The proposed plans are totally unacceptable and are unsound for the following reasons: This development is too much, this would increase the size of the village by 40%. This means total overdevelopment. The fabric and the identity of the village would disappear forever. There is already far too much development in Backwell which is negatively affecting the day to day lives of all of us who live here. The new road planned will not help the dire congestion on Station Road, Backwell Common or Chapel Hill. None of these roads are suitable for any additional traffic. The congestion is at peak capacity. In addition the A370 itself is totally congested and very unpleasant for anyone walking along it.	Do not proceed with this development. If totally needed, the number of houses needs to		

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		with national policy			Making a road under a railway or across more fields is also not the answer. It will create more rat runs and more congestion. There needs to be more done to reduce cars in Backwell and this will not achieve it. Engineering the road under or over the railway would be expensive and unfeasible. Additional homes means additional traffic. It is unsafe for children to walk to the primary and secondary schools. The cars and heavy plant drive too fast and way over the 30 mile an hour limit. The pollution already too much. More cars will make the journey for our children to walk within Backwell unfeasible due to the dangers of the number of cars and heavy plant we are already experiencing on our roads let alone with the provision of more housing. These roads are already dangerous for children as a result of the speed and number of cars travelling. These plans will make it more dangerous for our children. There are currently no safe ways for children to walk to school. There is already a deficit in school places and no investment in health or the local leisure centre. In addition no investment in outdoor venues or facilities. There is no provision for youth groups or youth centres. There is not the infrastructure to support this development. No extra provision in the schools, health care, open space and leisure facilities. Backwell is a community and this number of houses cannot be supported by the poor infrastructure in existence. Backwell has already seen too much development. It is not a nice place to live with so much development going on. Residents are constantly stressed with the threat of development. Heavy plant goes up and down our roads and it is very noisy. There are lots of families that live here and the development makes it unpleasant for children to grow up in. Backwell is disproportionately being allocated housing. Other areas need to be considered. Clevedon for example which is much bigger and more infrastructure has only been allocated 2% where Backwell has 7%. This makes no sense and is very distressing on residents. There is no viability analysis for the extra 1000 homes. There is nowhere for people to work in Backwell. It is not an employment hub and so it will put more cars up and down the A370 which is already dangerous with the number of cars and highly polluted. No social cohesion impact has been provided The proposed site is Grade 1 Agricultural land. Losing this would be devastating for our food security. It is irresponsible to develop on this land. Only 7% of this land is left in Somerset. If this is destroyed the future if food security for us and our children is at stake. Government policy has also outlined that this needs protecting. These proposals undermine what the government has said and clearly promised. So to develop this land would go against government policy and promises. The environmental impact is of utmost concern. These plans would destroy habitats and harm biodiversity. These fields are major hunting grounds for wildlife. the devastation experienced by the Farleigh Fields development has seen the constant irradiation of wildlife habitats. These plans would be an environmental disaster. On top of the disaster experienced on grove farm and farleigh field developments. The Brockley maternity roost which is home to rare bats would be threatened. This includes the rare lesser and greater horseshoe bats relying on land for food. Many other species such as owls and starlings which are dying our rely on this land too. There are no funding guarantees for for a new road or services. The delivery plan for infrastructure lacks analysis and costings. The whole of Backwell Common is a flood plain. We have seen in recent weeks that the whole are turns into a flood plain and is water logged. This would impact existing dwellings as the water won't have anywhere to go. The whole areas precious character and heritage would be destroyed. Backwell Lake also regularly floods. This creates issues all over for transport. Building on flood plains which are grade 1 agricultural land in an area which has no infrastructure to support this population growth must be rejected. This area must be protected. It is against government policy and moral conviction. The volume of growth is distressing, exhausting, affecting the mental health of people that live here, unsustainable and undeliverable. The railway station is not a viable transport hub. There is no step free access and unaccessible for those with a disability	be reduced significantly. The open land needs to be maximised There need to be parks Safe walking and cycling routes to all schools Infrastructure investment A commitment to no further development at all in Backwell More doctors, spaces in school Investment in infrastructure Build a community, not houses Create areas that are protected for animals and birds Open areas Paths away from roads for cyclists and walkers to walk to Backwell, without having to go along any road Measuers to protect against pollution from increased traffic Stop heavy plant going up and down the A370 Reduce traffic and speeds on A370 Protect the culture and heritage of the village and area Commit to no more development. Ever. Traffic calming Reduce car speeds Reduce heavy plant and commercial		

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					or with children. I will not be voting for any councillor that allows this development to go through on their watch. I reject these plans on the below points too that have not been considered: Investment in healthcare No safe walking routes for anyone in Backwell, least not for children going to school. Loss of outdoor space Loss of greenbelt for future generations Loss of greenbelt for wildlife Loss of key hunting grounds for precious animals and birds No investment in the swimming pool that is falling apart No investment in the community and health care no investment in the community the traffic is terrible and damaging for our health and for our children The appearances of these estates are always terrible and not in keeping with the heritage and look and feel of the area The traffic is too fast and too much heavy plant traffic The roads around Backwell such as church lane are always rammed with traffic going too fast. This will get worse in future with this development and people driving their kids to school up Church Lane as there are no safe walking passages and no traffic calming in place. The development in Backwell is vastly disproportionate to any other area. This would be an environmental catastrophe The traffic is too much The traffic is too much, children cannot walk safely to school	vehicles going through the village Protect roads like Church Lane that will be impacted. Make the estate look nice and in keeping with the area, not Lego houses that we often see A proper park Investment in schools and areas for children Create a community youth centres development to cease in Backwell and other areas to be considered Protect the grade 1 agricultural land and do not build on it To be clear, this development should not go ahead.		

Name: S Floyd **I.D:** 62863073

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Positively prepared • Effective	Unsure	Unsure	The consultation was responded to by less than 50% of affected local residents and this suggests flaws in consultation process. The Council has held public exhibitions in other local locations (Long Ashton, Weston-super-Mare, Nailsea, Backwell), but none in Pill or Easton In Gordano although five of the sites are in Pill and EiG area. This form and process in itself is very confusing and has a high bar to entry for those affected to have an effective say. Infrastructure improvements to railway are yet to be delivered and unproven, it has already been scaled back due to ineffective scoping and frequency reduced. the plan its based up is being used to justify developments in Portishead as well as Pill, the service is likely to be overloaded at peak times and under utilised at low periods, as its one line for much of the service it is at risk of delays and failures. Leigh woods is a SSI not ideal place for additional diesel pollution M5 Junction 19 is already at capacity in peak times and recent changes to lanes encourage last minute dangerous lane changes.	The current housing stock in Pill should be upgraded and subsidised to help those with most need initially, and reduce fuel poverty. Community heat pump projects could assist with this. Many locals may not benefit from the new housing schemes as it will still be out of reach of many. The number of houses should be reduced and honestly assessed with impacts on travel, flood and environment. Local area supports lots of wildlife. Accurate assessments of flood risk should be carried out.		

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					Improvements to cycling infrastructure are welcomed although the riverside route and requires extensive works to be less muddy in bad weather and winter. It also floods on high tides for example spring tides in September and October. The A369 cycle track is already difficult to cross, and traffic lights may exacerbate existing delays, The ride into Bristol is challenging with a reasonable climb in each direction next to a very polluted main route which now takes additional traffic dodging the clean air zone. The A369 can't easily be widened at Abbots Leigh due to housing being so close to the road by the George Inn. Large parts of the area are at flood risk by the Avon, in particular those by the M5 other areas will contribute to flood risk of the harbour area in Pill due to increased run off, its not clear if this has been fully mitigated in plan.			
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Positively prepared • Justified • Effective	Unsure	Unsure	In addition to previous comment the huge increase in size of the village will fundamentally change the character of the village, which is contrary to SP6. It will remove proximity to countryside areas for many residents and impact local wildlife. While limited green spaces may be kept within the plans, if these are maintained parks this is not as good for ecology as open land and the hedgerows and trees that will be removed will remove important wildlife corridors			
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	There is no firm data to support that this will not impact Junction 19 of the M5 Concerns were raised by National Highways that development at Court Hay near the service station as in the NSC planning portal, ref 25/P/1413/OUT. The National Highways report stated that transport modelling is required to assess the cumulative impact of developments on Junction 19 - I can't see evidence that in the proposed Local Plan that NSC has co-operated sufficiently with National Highways and has taken its advice. As stated in other comments there is an over reliance on the railway to take traffic burden, however it may actually increase traffic if people use instead of park and ride when travelling from further away. likely to be limited capacity for Pill residents if Portishead residents fill the train.	Adjust planned expansion plans to fit with traffic modelling, accurately asses and model the railway and transport impacts not just use optimistic projections		
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	environmental impacts identified such as in https://pillanddistrictplan.org/environment-and-landscape/wild-service-ecology-review/ should be taken into account many rare species close to this location in Leigh Woods and nearby areas			
Pill Green	No	• Justified • Effective	Unsure	Unsure	This is a huge number of extra houses which will have a large impact on local environment and transport infrastructure as well as changing the village character its likely that around 600 extra cars could be added to the local area from this and potentially up to 1200, this will have a large affect on A369 and M5 Reducing or not increasing Flood risks will be a challenge to achieve and have not been proven. traffic lights/ crossings will exacerbate transport issues in village potentially. railway project is unfinished and seems to be an excuse for extra houses when it was supposed to solve existing transport issues in peak times, it will not necessarily reduce overall car use			

Name: S Foxen **I.D:** 58487873

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No		No	No	The proposed allocation of Land at Tower Farm with the building of a minimum of 400 homes, lies immediately beside Weston Big Wood which is an ancient woodland and Site of Nature Conservation Interest (SNCI) managed by the Woodland Trust and supported by Avon Wildlife Trust. The woodland forms part of the Gordano Valley ecological network and is a nationally important habitat mosaic of open grassland, wetland and woodland. It is not Justified, as there are no robust published alternatives demonstrating that this sensitive site is the only, or most appropriate option for growth. The loss of best and most versatile (BMV) farmland (Grade 2/3a by reference to the ALC dataset) and the risk of irreversible damage to the ancient woodland make this allocation unsuitable. It is not Consistent with National Policy, as the allocation conflicts with the National Planning Policy Framework (NPPF) paragraphs 180–182, which require that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland) should be refused unless wholly exceptional reasons exist. The Council's reference to an "ecological buffer" is vague, unenforceable and insufficient to address indirect impacts such as root-zone damage, hydrological change or wildlife disturbance. The Woodland Trust and Avon Wildlife Trust state that ancient woodland is irrecoverable once damaged. Moreover the Framework requires delivering biodiversity net gain, yet the allocation offers no clear mechanism for ensuring that outcome. It is not positively prepared. The location will increase existing pressures in Portishead, particularly in relation to schools and healthcare. We already cannot have face to face appointments with doctors, and finding NHS dentist places are non existent. Our transport infrastructure is already under strain, particularly along the A369, and trying to get out of the Downs onto the main road can take ten minutes already on a morning, and often ten to fifteen minutes to reach the Gordano Services roundabout. This peripheral site would likely increase private vehicle usage and pollution rather than support sustainable travel patterns, contrary to NPPF paragraphs 104–106. As a resident of Portishead for 30 years, I can count on one hand the number of cyclists I have seen trying to cycle up the steep inclines from the High Street to either Valley Road, or Avon Way. The roads are too busy already to allow young children to cycle down, or up them, and especially at school pick off and drop off times. It is not effective as the delivery depends on many unresolved dependencies, such as bus service contributions, off-site biodiversity management, new school provision and upgrades to rights-of-way and buffer zones. No funding mechanism or legal agreement is published to secure these. Without such mechanisms the allocation cannot be considered deliverable within the plan period (NPPF paragraph 35(c)). The farmland and woodland edge acts as a critical ecological and landscape transition zone. Development here would fragment the habitat, diminish the Gordano Valley wildlife corridor and erode the rural fringe character. Even with a buffer the visual and ecological intrusion into the woodland and surrounding landscape would be significant. Construction and built developments would alter surface-water run-off and soil compaction on the former farmland, potentially affecting the hydrological regime that sustains the adjacent ancient woodland. The risk of nutrient runoff, altered infiltration and woodland root zone damage is likely. When considered alongside other allocations in the Portishead area (such as Black Rock north of Clevedon Road), the combined pressure on ecology, infrastructure and transport is significant and undermines the Council's commitments to nature recovery and sustainable growth. I and every resident that I have spoken to about this plan, believe that no modification short of removing the allocation entirely would make this site appropriate. Given its direct adjacency to ancient woodland, its loss would be irreversible and cannot be mitigated sufficiently. The land should instead be retained as undeveloped green space, managed to enhance biodiversity and provide sustainable public access, in line with the Avon Wildlife Trust's 2030 Strategy and national "30 by 30" nature recovery goals. I do not support the the North Somerset Local Plan 2041 for the Tower Farm location.			Snippets.docx

Name: S Hall **I.D:** 58409825

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I strongly oppose North Somerset Councils Reg 19 Local plan 2041 which proposes to build over the Yeo Valley Green Belt land, North of Nailsea plus the Moor End Spout Nature Reserve in Nailsea. The Yeo valley and Moor End Spout are unique places of natural beauty and importance for both endangered flora and fauna but also accessibility for the many local people for whom these are places of peacefulness and escape from busy lives. These are places of tranquillity for people to recharge and for their mental wellbeing. In the centuries old hedgerows which are classified by DEFRA as “species rich” live Hazel Dormice which are a protected species, with laws in place to stop their habitat being destroyed. These hedgerows will be destroyed. There are at least 12 species of bats living in the valley, dependant on the grazing pastures, with endangered Barn Owls and Kestrels also breeding there. The Ancient woodlands and fields next to the river are designated as Sites of Conservation interest. Green belt land is there for a purpose, the current UK government “National Planning Policy Framework” document states: “The government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl” The Government goes on to outline how the Green Belt is protected: “Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.” There is talk of redefining the Yeo Valley as “Grey Belt” so that it can be developed, but the government also states that this can only be done if the “Green Belt” is of low quality or has had buildings on it already. The land here is Grade 2 Agricultural it is high yielding and of very good quality. It is used as pastureland with cows and sheep grazing throughout the year. It has never had any buildings on it so by the Governments’ own definition it cannot be redefined as Grey Belt. The Government states: “When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. “Very special circumstances” will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and by any other harm resulting from the proposal, is clearly outweighed by other considerations. A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt.” Moor End Spout Nature reserve should also continue to be protected from development, it is home to countless protected species and local people have dedicated their time to looking after this area. Any development would destroy all they have worked for, the wildlife habitats and biodiversity in our area. Both of the proposed sites are also regularly waterlogged, Moor End Spout is a wetlands area, and the Yeo Valley is a flood plain, often in the winter the cows are walking up to their knees in mud. This should also be a red flag to permitting development in both sites. Please listen to local peoples’ concerns and objections and don’t allow these areas to be destroyed.			

Name: S Henry **I.D:** 62539841

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared	Unsure	Unsure	Backwell cannot cope with this many houses on top of the ones that are already being built. There is already regular half an hour traffic jams from a small building site near the proposed large one. Station Road and the train station itself are already struggling to cope.			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
		• Justified • Effective • Consistent with national policy			Furthermore, the secondary school is over subscribed as it is and this development along with the others will double the size of Backwell. We do not have the schools to cope with this. The land is green belt land and well used by dog walkers and other locals for getting out without cars into the fresh air to support their mental health. Driving, or not going out at all, will be hugely detrimental to these people. Backwell is already being built around too much and our roads, stations, schools and local community cannot cope with this proposal. Kindly cap the number of houses as what is already going ahead, a hugely significant number.			

Name: S Holland **I.D:** 58403713

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Grade 1 Agricultural Land currently used for food crops and grazing. There is only 7% of this high quality land left in the whole of North Somerset. We haven't learnt from COVID. Our food needs must be met closer to home, the carbon footprint can only be addressed if we farm locally. Backwell Common and surrounding areas are prone to flooding, which would be aggravated by more housing. In fact i have lived in Backwell since 2008 and this area floods EVERY year without fail, including the A370 which is one of the main roads in the whole of the North Somerset Area, its not near a river its just the complete lack of infrastructure maintenance and the lose of green space.	The proposed road would not effectively serve Nailsea's traffic or relieve congestion on Station Road, Backwell Common, or Chapel Hill. Engineering the road under or over the railway would be highly expensive and possibly unfeasible. A road is needed for Nailsea to access Bristol, this road does not address that, its in the wrong place and joins the A370 too far away from Bristol. The sheer amount of homes being proposed is too large for the local area to sustain. There is simple not the infrastructure to support this increase in numbers.		

Name: S Hollingberry **I.D:** 58530945

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared • Justified	Unsure	Unsure	Basically I absolutely disagree with 3728 new homes being built in Nailsea/Backwell. These documents are lengthy and confusing (I expect deliberately so) and I expect many people will give up objecting for this reason. We live in a stunningly beautiful part of the country and shame on you for not fighting harder to protect this. Our green space will be taken once and when it's gone it's gone forever. I'm not a legal person and don't really understand what these questions are asking. So again shame on you for not making it easier for normal people to make their views known. As above, I expect you don't want or care about what we think and this is purely a tick box exercise to get your agenda over the line			

Name: S Johnson **I.D:** 62846433

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at North West Nailsea	No	• Positively prepared	Unsure	No	Totally disregards green belt land and biodiversity. Land is already prone to flooding and further development on the flood plain will exacerbate this. Climate change is already bringing increased flooding. Roads are not suitable for increased vehicles. There is no plan to increase infrastructe in Nailsea town. The Causeway			

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		• Justified • Effective • Consistent with national policy			already can't handle the current traffic volume and this will be the main road out of Nailsea. Likewise development at Jacklands on an already narrow hairpin bend at Stone Edge Batch - the location is not suitable.			
Youngwood Lane	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	No	Totally disregards green belt land and biodiversity. Land is already prone to flooding and further development on the flood plain will exacerbate this. Climate change is already bringing increased flooding. Recent building development at the South West of Nailsea has already reduced green spaces for dog walking, exercise and general well being.			
Land south of The Uplands	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	No	Totally disregards green belt land and biodiversity. Land is already prone to flooding and further development on the flood plain will exacerbate this. Climate change is already bringing increased flooding. Too much has already been lost.			
Land north of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	No	Totally disregards green belt land and biodiversity. This site in particular is already prone to flooding and further development on the flood plain will exacerbate this. Climate change is already bringing increased flooding. Jacklands lake was flooded in early December without this additional pressure. Road floods by the fire station. Roads are not suitable for increased vehicles. There is no plan to increase infrastructe in Nailsea town. Narrow hairpin bend at Stone Edge Batch and the other side at Wraxall cannot handle extra traffic. It will be a tragedy for the environment to destroy this land by the river and woodland.			
Land off Pound Lane, Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	No	Totally disregards green belt land and biodiversity. Land is already prone to flooding and further development on the flood plain will exacerbate this. Climate change is already bringing increased flooding. There is on the edge of a nature reserve. There are otters and all kinds of wildlife in this location which will be devastated by development.			

Name: S Jones **I.D:** 29026721

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared • Justified • Effective	Yes	No	Land at Tower Farm Site (Portishead) should not be built on. Using green belt will have devastating consequences for the environment, including Weston Big Wood, Deer use the whole field which would obviously not be able to happen if built on, also have flooding concerns. It would be irresponsible to build on. Also issues with connectivity.	Land at Tower Farm Site (Portishead) should not be built on. Using green belt will have devastating consequences for the environment, including Weston Big Wood, Deer use the whole field which would obviously not be able to happen if built on, also have flooding concerns. It would be irresponsible to build on. Also issues with connectivity.		

Name: S Knight **I.D:** 44036449

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Churchill Avenue	Unsure		Unsure	Unsure		Penny Field should be protected as a Local Green Space. It's one of Clevedon's last true greenspaces, a Nature Recovery priority site, and vital for wildlife, community wellbeing, and access to nature. Better brownfield and greyfield sites across the town exist for development.		

Name: S Knowles **I.D:** 29298081

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The plan is not sound for the following reasons: 1. Grade 1 Agricultural Land -Most importantly this land is Grade 1 agricultural land currently used for growing crops and grazing. There is only 7% of this high quality agricultural land left in North Somerset. Developing prime agricultural land such as this land will adversely affect UK food security. Once land is used for development, it will be lost to agriculture forever and so it should not be used for housing. 2. Current UK Government policy states that "we must protect our best and most versatile land" to safeguard food security. Using this land would be contrary to this policy. 3. Overdevelopment - Backwell already has 800 new houses approved, a 40% increase for the village. A further 900 homes would lead to complete overdevelopment of what was a small village. 4. Road/Infrastructure Problems -The proposed road would not effectively serve Nailsea's traffic or relieve congestion on Station Road, Backwell Common or Chapel Hill. Engineering a road under or over the railway would be hugely expensive and possibly unfeasible. It would require closing a mainline railway line between Bristol and the South West used by GWR and Cross Country trains to complete. It has not been possible to date to put in a disabled access ramp to the railway station Weston bound platform as this has been declared unfeasible/ too costly and so it is hard to believe that a road crossing the railway line would be feasible. 5. Lack of analysis - The Infrastructure Delivery Plan lacks analysis and costings and there are no funding guarantees for the new roads or services. As at point 4 above the crossing of a mainline railway line is likely to be extremely expensive and may not be feasible and the Infrastructure Plan should deal with this issue. I understand that 50% of the housing on Greenbelt land must be affordable and this reinforces the need for proper funding analysis. 6. Problems with the Railway station - As mentioned above, the current train station is inaccessible for people with mobility issues and difficult to use with young children and bikes due to the step access and, therefore, should not be regarded as a transport hub. 7. Flooding - Backwell Common and the surrounding areas are prone to flooding and building more housing would aggravate the situation further. Backwell Lake and the adjacent fields are on a flood plain and those fields should not be built on. 8. Impact on Backwell - Despite the increase in housing already approved, there is a deficit in school places and there has been no investment in health and leisure facilities. The lack of infrastructure and services cannot support another increase. An increase in the size of Backwell of 80 % without any corresponding increase in school, health and leisure provision cannot be sustained. 9. Too high an allocation - Backwell is being allocated a higher number of houses than any other village in North Somerset and an even higher allocation than any towns. Backwell is expected to take 7% of the district's housing allocation despite being only a village.			

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					10. There is no needs or viability analysis for an extra 1000 homes. 11. Homes for Commuters - Backwell is not an employment hub. These developments will not create any extra jobs and will be occupied by commuters. This in turn will put further strain on local roads, especially if the proposed link road is declared unfeasible. 12. No social cohesion impact assessment has been provided. 13. Nature – there will be detrimental impact on the local bat population. 14. Conclusion – This land is prime agricultural land that should not be developed. Further the risk of flooding, lack of proper analysis of the problems likely to be encountered in crossing the railway line and impact on what was a small village mean that this plan is unsound.			

Name: S Kruger **I.D:** 18468257

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I strongly object to the allocation of Land East of Backwell for approximately 1,000 additional dwellings. The plan fails the tests of soundness on multiple grounds. Disproportionate Growth Backwell already has 800 approved dwellings representing a 40% increase. Adding 1,000 more would constitute over 80% population growth—far exceeding proportionate allocations given to larger settlements. Backwell is expected to absorb 7% of the district's housing target versus Clevedon's 2%, despite being a village rather than a town. No justification has been provided for this imbalance and would lead to complete overdevelopment. Infrastructure Deficit The proposal lacks credible infrastructure delivery. School places are already insufficient. No additional health services or leisure facilities are planned. The proposed link road has no detailed plans, feasibility study, costings, or funding commitment and would further remove local green space and fields. Engineering a crossing under or over the railway presents serious technical and financial challenges that remain unaddressed. If this proposal requires building expensive road infrastructure what is the justification for unfair and unethical growth of Backwell village and not spreading the burden of such an increase across other villages that have eually if not better road access to Bristol and the motorway network. Agricultural and Environmental Harm The site comprises Grade 1 agricultural land—the highest quality classification—of which only 7% remains in North Somerset. This land is currently productive. Government policy explicitly requires protection of the best agricultural land for food security; this allocation directly contradicts that policy. Flood Risk Backwell Common and adjacent areas flood regularly. Building on floodplain land will exacerbate existing problems and create new flood risk for both existing and proposed residents. Deliverability No viability analysis supports this allocation. No social cohesion assessment exists. The 50% affordable housing requirement on Green Belt land reduces developer contributions for infrastructure, making delivery of promised services even less likely. The scale and pace of proposed growth is simply undeliverable within the plan period. Justification as a strategic location is contradictory Backwell keeps being considered in conjunction with Nailsea which is not the case for any other village. They share the railway station, otherwise they are different in most other characteristics. Backwell is a village and it's character should not be changed into a town. The station being a transport hub (which is not fit for purpose) and its proximity to Bristol seems to be the main justification for Backwell being considered a strategic growth location giving access to	Remove any additional growth in Backwell than those already approved to date, this is already an incredible increase in population which effects are already being felt. These additional houses could be divided and spread across multiple villages in North Somerset without requiring the destruction of Grade 1 green belt and an expensive infrastructure project to build a new road.		

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					employment opportunites in Bristol. However, the proposal includes light industry and building a new road to mitigate the negative impacts of commuting and increased traffic. Backwell is not an employment hub, most people commute. And if light industry and road infratstructure are required to make this proposal sound then these house could be built in any other village to avoid the destabliising increase in population to Backwell.			

Name: S Lane **I.D:** 62849697

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land south of Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I strongly object to the proposed development. Backwell already faces a huge 40 percent increase with 800 new houses approved. Adding more homes would overwhelm Backwell and destroy the rural community my family chose for its countryside and quality of life. The roads are already under immense pressure. Station Road, Backwell Common and Chapel Hill are often gridlocked, and the proposed new road would not solve this. It would simply funnel even more cars into an area that is already struggling. Public transport is not a realistic alternative either. Backwell train station is inaccessible for people with mobility issues and extremely difficult for anyone travelling with young children or pushchairs - have you tried getting a baby, toddler and pushchair down the stairs? Because I have and it’s a logistical and physical nightmare. There is no plan for extra school places, GP appointments or leisure facilities. As a parent, I am very worried about how this will affect my children’s education, health and daily life. Backwell is being forced to take far more housing than any other village in North Somerset and it cannot cope. Flooding is already a serious problem around Backwell Common and Backwell Lake. I have seen water reach my knees in these fields. Building on this land will make flooding worse for existing and future residents. Government policy says we must protect our best and most versatile land to safeguard food security. This plan does the opposite and threatens important wildlife, including the Brockley bat roost which relies on these fields for feeding. We moved here for the countryside and a safe environment for our children. These proposals put all of that at risk. I urge you to reject them.			
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I strongly object to the proposed development in Backwell. Our village already faces a huge 40 percent increase with 800 new houses approved. Adding another 1,000 homes would overwhelm Backwell and destroy the rural community my family chose for its countryside and quality of life. The roads are already under immense pressure. Station Road, Backwell Common and Chapel Hill are often gridlocked, and the proposed new road would not solve this. It would simply funnel even more cars into an area that is already struggling. Public transport is not a realistic alternative either. Backwell train station is inaccessible for people with mobility issues and extremely difficult for anyone travelling with young children or pushchairs - have you tried getting a baby, toddler and pushchair down the stairs? Because I have and it’s a logistical and physical nightmare. There is no plan for extra school places, GP appointments or leisure facilities. As a parent, I am very worried about how this will affect my children’s education, health and daily life. Backwell is being forced to take far more housing than any other village in North Somerset and it cannot cope. Flooding is already a serious problem around Backwell Common and Backwell Lake. I have seen water reach my knees in these fields. Building on this land will make flooding worse for existing and future residents. Government policy says we must protect our best and most versatile land to safeguard food security. This plan does the opposite and threatens important wildlife, including the Brockley bat roost which relies on these fields for feeding. We moved here for the countryside and a safe environment for our children. These proposals put all of that at risk. I urge you to reject them.			

Name: S Mead **I.D:** 30738529

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Land at Tower Farm	No	• Justified	Unsure	Unsure	I believe there is no sound reason for the development of this land. Over the past 20 years Portishead has already had massive development leaving little green space. If development goes ahead on this piece of land without proper road infrastructure being in place total congestion will ensue. At present there is one road providing access and egress to The Downs from Down Road. This road is already overburdened with traffic and at times it is not possible to get to Down Road from The Downs and vice versa especially during school times when parents are dropping off and picking up their children. Is it so necessary to bring further traffic into the town centre and up Avon Way or Valley Road, thereby causing more congestion on these already overburdened roads. There is flat land as I am sure you are already aware on lower levels with direct and easy access to 'A' roads and the motorway. To funnel thousands more cars into a town centre up steep hills to a housing development where there is not sufficient road infrastructure to cope, would cause more congestion in all directions. At present the development plan I am looking at shows only one road in and out, with a possible build of 400 or so homes - this would cause total congestion. There is another major concern, that being drainage, at times of heavy rain tons of water runs off those fields also Down Road leading to The Downs and this in the past has led to flooding in The Downs and also Cedar Way. If this development is allowed to go ahead this huge concrete and tarmac apron will eject many tons of more water down the hill and across remaining land. At present there is a buffer with the land soaking up a considerable amount of rain water. I see on the plan I have in front of me there are a large number of attenuation basins dotted throughout the proposed development site, would this be sufficient - very doubtful. Finally there are options, as aforementioned, there is land on low flat levels with a good road infrastructure already in place that does not necessitate the bringing of traffic into an already overburdened town centre.			

Name: S Oram **I.D:** 58602721

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Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	It is not justified - there is no robust published alternatives assessment demonstrating that this sensitive site is the only or most appropriate option for growth. The risk of irreversible damage to the ancient woodland make this allocation unsuitable. It is not Consistent with National Policy - the allocation conflicts with the National Planning Policy Framework, which require that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland) should be refused unless wholly exceptional reasons exist. The Council's reference to an "ecological buffer" is vague, unenforceable and insufficient to address indirect impacts such as root-zone damage, hydrological change or wildlife disturbance. The Woodland Trust and Avon Wildlife Trust state that ancient woodland is irrecoverable once damaged. Moreover the Framework requires delivering biodiversity net gain, yet the allocation offers no clear mechanism for ensuring that outcome. It is not positively prepared - the location intensifies existing pressures in Portishead. This peripheral site would increase private vehicle usage and pollution rather than support sustainable travel patterns, contrary to NPPF paragraphs 104–106. Delivery depends on multiple unresolved dependencies: new school provision, bus service contributions, off-site biodiversity management, and upgrades to rights-of way/buffer zones. No phasing plan, funding mechanism or legal agreement is published to secure these. Without such mechanisms the allocation cannot be considered deliverable within the plan period (NPPF paragraph 35(c)). The farmland/woodland edge acts as a critical ecological and landscape transition zone. Development here would fragment habitat, diminish the Gordano Valley wildlife corridor and erode			

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					the rural fringe character. Even with a buffer the visual and ecological intrusion into the woodland and surrounding landscape would be significant. Construction and built development would alter surface-water run-off and soil compaction on the former farmland, potentially affecting the hydrological regime that sustains the adjacent ancient woodland. The risk of nutrient runoff, altered infiltration and woodland root zone damage is material. The area already suffers from flooding during heavy rainfall. When considered alongside other allocations in the Portishead area (such as Black Rock north of Clevedon Road), the combined pressure on ecology, infrastructure and transport is significant and undermines the Council's commitments to nature recovery and sustainable growth. No modification short of removing the allocation entirely would make this site appropriate. Given its direct adjacency to ancient woodland, its loss would be irreversible and cannot be mitigated sufficiently. The land should instead be retained as undeveloped green space, managed to enhance biodiversity and provide sustainable public access, in line with the Avon Wildlife Trust's 2030 Strategy and national "30 by 30" nature recovery goals. I do not support the the North Somerset Local Plan 2041 for the Tower Hill Farm location.			
Black Rock, north of Clevedon Road	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	It is not Justified The allocation of approximately 100 dwellings at Black Rock is not justified because the Council itself acknowledges that key environmental and ecological requirements cannot be met on-site, and must instead be located "off-site on land to the south-west". This approach directly conflicts with NPPF paragraph 180(a), which requires avoidance of impact before remediation or off-site compensation is considered. The need for offset land demonstrates the inherent unsuitability of the site for development. There is no published evidence of less sensitive alternative sites being considered and discounted It is not Consistent with National Policy The approach of relying on off-site mitigation and a "suitable ecological buffer" illustrates a reactive rather than preventative approach to biodiversity protection. NPPF paragraphs 180–182 require Local Plans to conserve habitats, prevent deterioration of irreplaceable habitat, and deliver net gains for biodiversity. The allocation fails this by offloading its ecological burden onto unspecified land, without securing long-term management or legal protection for compensatory habitats. It also conflicts with the Avon Wildlife Trust's 2030 Strategy, which emphasises restoration of 30 per cent of land for nature and enhancing landscape connectivity in the Gordano Valley. It is not positively prepared The site lies on the western approach to Portishead along Clevedon Road, where public transport is limited and local services are minimal. Residents would be heavily reliant on private vehicles to access schools, health care and employment. The fact that footways and new bus stop contributions are required underlines existing infrastructure inadequacy. This car-dependent pattern of development conflicts with the sustainable transport objectives of NPPF paragraphs 104–106. As a local resident I am particularly concerned about the increase in private vehicle usage and pollution. It is already extremely difficult to exit junctions e.g. Clifton Street, George Street, Hollis Avenue during commuting hours and additional housing adjacent would worsen this. Not Effective The site depends on multiple off-site and third-party mitigations including ecological offset land, new footway construction, bus service contributions and delivery of a section of the Gordano Greenway. No clear funding mechanism, responsible delivery body, or phasing plan is identified in	No modification would make this allocation acceptable. The need for off-site mitigation and multiple infrastructure dependencies shows the site is environmentally and logistically unsuitable for housing. The allocation should be removed entirely from Schedule 1. Instead, the land should remain open countryside, contributing to biodiversity and landscape value, in line with the Avon Wildlife Trust's 2030 Strategy, Woodland Trust guidance and national biodiversity objectives.		

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					the Plan. Consequently, the allocation lacks deliverability and fails the effectiveness test under NPPF paragraph 35(c). The site lies within open countryside forming part of the rural setting of Portishead and the Gordano Valley. The expansion westwards into this part of the countryside would diminish the settlement edge, reduce landscape openness, and risk urbanising what should remain a transitional zone between town and countryside. The loss of this farmland for housing is not justified when less sensitive land could be used. The Plan does not robustly demonstrate why this agricultural land must be released. Development on this edge farmland may affect surface-water drainage, soil compaction and wildlife connectivity into the adjoining woodlands and wetland systems associated with the Gordano Valley. The cumulative effect of development pressure in the area further stresses the ecological network. With heavy rainfall, there is already flooding in Clifton Street opposite the proposed development. Any development is likely to exacerbate this. Combined with the Tower Farm allocation and other nearby proposals, the Black Rock site would add to cumulative ecological, transport and infrastructure burdens around Portishead I do not support the the North Somerset Local Plan 2041 for the Black Rock location.			

Name: S Patterson **I.D:** 57944897

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The proposed allocation of land at Tower Farm, comprising approximately 400 dwellings, is located immediately adjacent to Weston Big Wood. This site is an ancient woodland and a designated Site of Nature Conservation Interest (SNCI), under the stewardship of the Woodland Trust and supported by the Avon Wildlife Trust. Weston Big Wood forms a critical element of the Gordano Valley ecological network and contributes to a nationally important habitat mosaic encompassing open grassland, wetland, and woodland. The proximity of large-scale residential development to such a sensitive and irreplaceable natural asset raises significant concerns regarding adverse impacts on biodiversity, habitat integrity, and the wider ecological connectivity of the valley. The introduction of intensive housing in this location would place substantial pressure on the woodland and its associated habitats, through increased recreational use, disturbance, pollution, and fragmentation. These impacts are incompatible with the statutory and policy commitments to protect ancient woodland and designated conservation sites. In light of these considerations, the allocation of Tower Farm for residential development is inappropriate and should be rejected to safeguard the ecological value and long-term resilience of Weston Big Wood and the Gordano Valley network. Not Justified There is no robust published alternatives assessment demonstrating that this sensitive site is the only or most appropriate option for growth. The loss of best and most versatile (BMV) farmland (Grade 2/3a by reference to the ALC dataset) and the risk of irreversible damage to the ancient woodland make this allocation unsuitable. Not Consistent with National Policy The allocation conflicts with the National Planning Policy Framework (NPPF) paragraphs 180–182, which require that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland) should be refused unless wholly exceptional reasons exist. The Council's reference to an "ecological buffer" is vague, unenforceable and insufficient to address indirect impacts such as root-zone damage, hydrological change or wildlife disturbance. The			buffers-an-overview-factsheet.pdf Tower Farm Site.webp

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					Woodland Trust and Avon Wildlife Trust state that ancient woodland is irrecoverable once damaged. Moreover the Framework requires delivering biodiversity net gain, yet the allocation offers no clear mechanism for ensuring that outcome. Not Positively Prepared The location intensifies existing pressures in Portishead: schools, healthcare and transport infrastructure are already under strain (for example the A369 corridor). This peripheral site would likely increase private vehicle usage and pollution rather than support sustainable travel patterns, contrary to NPPF paragraphs 104–106. Not Effective Delivery depends on multiple unresolved dependencies: new school provision, bus service contributions, off-site biodiversity management, and upgrades to rights-of-way/ buffer zones. No phasing plan, funding mechanism or legal agreement is published to secure these. Without such mechanisms the allocation cannot be considered deliverable within the plan period (NPPF paragraph 35(c)). Landscape & Connectivity The farmland/woodland edge acts as a critical ecological and landscape transition zone. Development here would fragment habitat, diminish the Gordano Valley wildlife corridor and erode the rural fringe character. Even with a buffer the visual and ecological intrusion into the woodland and surrounding landscape would be significant. Drainage & Hydrology Construction and built development would alter surface-water run-off and soil compaction on the former farmland, potentially affecting the hydrological regime that sustains the adjacent ancient woodland. The risk of nutrient runoff, altered infiltration and woodland root zone damage is material. Cumulative Impact When considered alongside other allocations in the Portishead area (such as Black Rock north of Clevedon Road), the combined pressure on ecology, infrastructure and transport is significant and undermines the Council's commitments to nature recovery and sustainable growth. No adjustment short of withdrawing the allocation altogether would render this site acceptable. Owing to its immediate proximity to ancient woodland, any development would result in irreversible loss that cannot be adequately mitigated. The land should therefore be safeguarded as undeveloped green space, actively managed to strengthen biodiversity and deliver sustainable public access, consistent with the Avon Wildlife Trust's 2030 Strategy and the national "30 by 30" nature recovery objectives. I do not support the the North Somerset Local Plan 2041 for the Tower Hill Farm location.			
Black Rock, north of Clevedon Road	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Not Justified Unsuitable location requiring off-site ecological mitigation The allocation of approximately 100 dwellings at Black Rock is not justified because the Council itself acknowledges that key environmental and ecological requirements cannot be met on-site, and must instead be located "off-site on land to the south-west". This approach directly conflicts with NPPF paragraph 180(a), which requires avoidance of impact before remediation or off-site compensation is considered. The need for offset land demonstrates the inherent unsuitability of the site for development. There is no published evidence of less sensitive alternative sites being considered and discounted. Not Consistent with National Policy Failure to protect and enhance biodiversity The approach of relying on off-site mitigation and a "suitable ecological buffer" illustrates a reactive rather than preventative approach to biodiversity protection. NPPF paragraphs 180–182 require Local Plans to conserve habitats, prevent deterioration of irreplaceable habitat, and deliver net gains for biodiversity. The allocation fails this by offloading its ecological burden onto unspecified land, without securing long-term management or legal protection for compensatory habitats. It also conflicts with the Avon Wildlife Trust's 2030 Strategy, which emphasises restoration of 30 per cent of land for nature and enhancing landscape connectivity in the Gordano Valley. Not Positively Prepared Unsustainable pattern of growth The site lies on the western approach to Portishead along Clevedon Road, where public transport is limited and local services are minimal. Residents would be heavily reliant on private vehicles to access schools, health care and employment. The fact4 – Not Effective – Unclear delivery and infrastructure dependencies The site depends on multiple off-site and third-party mitigations including ecological offset land, new footway construction, bus service contributions and delivery of a section of the Gordano Greenway. No clear funding mechanism, responsible delivery body, or phasing plan is identified in the Plan. Consequently, the allocation lacks deliverability and fails the effectiveness			

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					test under NPPF paragraph 35(c that footways and new bus stop contributions are required underlines existing infrastructure inadequacy. This car-dependent pattern of development conflicts with the sustainable transport objectives of NPPF paragraphs 104–106. Landscape & Setting The site lies within open countryside forming part of the rural setting of Portishead and the Gordano Valley. The expansion westwards into this part of the countryside would diminish the settlement edge, reduce landscape openness, and risk urbanising what should remain a transitional zone between town and countryside. Agriculture & Soils The farmland in question is likely to be of best and most versatile quality (Grade 2/3a) and its loss for housing is not justified when less sensitive land could be used. The Plan does not robustly demonstrate why this agricultural land must be released. Hydrology & Ecology Development on this edge farmland may affect surface-water drainage, soil compaction and wildlife connectivity into the adjoining woodlands and wetland systems associated with the Gordano Valley. The cumulative effect of development pressure in the area further stresses the ecological network. Cumulative Impact Combined with the Tower Farm allocation and other nearby proposals, the Black Rock site would add to cumulative ecological, transport and infrastructure burdens around Portishead – contrary to the Council's stated nature-recovery and sustainable growth objectives. No modification would make this allocation acceptable. The need for off-site mitigation and multiple infrastructure dependencies shows the site is environmentally and logistically unsuitable for housing. The allocation should be removed entirely from Schedule 1. Instead, the land should remain open countryside, contributing to biodiversity and landscape value, in line with the Avon Wildlife Trust's 2030 Strategy, Woodland Trust guidance and national biodiversity objectives I do not support the the North Somerset Local Plan 2041 for the Black Rock location			

Name: S Potter **I.D:** 62776801

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I am strongly opposed to the proposed additional housing development in the village of Backwell. This development should not go ahead. The ongoing expansion of the village of Backwell already threatens to be environmentally unsustainable, to place unbearable pressure on existing infrastructure, and to destroy the distinctive character of Backwell as a village. The proposed additional expansion of housing will push my community over the edge, destroying valuable habitats and natural amenities, leaving doctors and schools and other services unable to cope, and transforming Backwell from a village into an overcrowded town. It will have serious mental health impacts on many villagers as this cohesive community is destroyed and overwhelmed with traffic. The burden of through-traffic on the village is already seriously detrimental and already set to get much worse. Given the lack of employment opportunities in the village the building of more houses is totally inappropriate as it will lead to a significant increase in commuter journeys along already congested routes. The destruction of prime farmland is also of national concern in an era of serious environmental degradation and food security issues, as is the destruction of rare bat habitats – individual householders would not be allowed to build in this way and risk the bat population, so why should property developers be exempted from such restrictions and allowed to destroy habitats for endangered species. Flooding is also a serious concern in this area, and the proposed development will leave existing residents more vulnerable to flooding as well as put new houses in harm's way. Please, save our village, and reject this application.			

Name: S Rickard-Hughes **I.D:** 39307329

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SP3: Spatial strategy	Unsure	• Effective	Unsure	Yes	Having lived in NS for a number of years, I highly doubt the efficacy of the infrastural scaffolding needed to make development in some of the key identified areas effective. Large developments near Banwell, Nailsea and Woodspring will inevitably lead to a large increase in the number of cars on the A370, M5 and other connected roads. NS's traffic problems are extreme. Getting out of Weston can take 30 mins on an average day. and with all the new housing planned near Locking and Worle, we will probably see this increase to an hour. No development should occur on any green space, particularly the Down at Portishead, any farm sites, which should remain agricultural, sold to charities that responsibly manage land, or be left to go wild. Reclaim more parking lots and defunct shops/buildings in these ailing towns! Work on buses, trains and install TRAM LINES and force cars off the road. Weston is a mess of cars. With good planning and policy you could easily adapt more large lots into housing. We also need to take pressure off the single hospital we have. And I see proposed new primary schools, but no secondary? I am glad to see the many brownfield sites identified in Weston. There are more, though. How about that carpark you're paying over £500k a year for that we can't use?	Demand from the central government that no more housing is built until they properly fund the transportation and community infrastructure that we already need. With infrastrastructure can come new housing developments. Build more flats, integrate ground source and community heating and shared solar - these terribly built semi-detached and detached houses with nothing gardens are depressing, inefficient and unneccessary.		

Name: S Roberts **I.D:** 51427233

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SP7: Green Belt	No	• Justified	Unsure	Unsure	The local plan destroys Grade 1 land in Backwell. Simply put land of this quality is very rare and should not be built on. It is also a flood plane and therefore no appropriate. In addition the number of home in Backwell is disproportionate to other areas. Given the vulgar approach that is being taken for supporting new homes I reject this proposal.	Reduce the target homes in Backwell and leave Grade 1 land alone. It cannot be replaced.	It is naive and ill thought through.	

Name: S Scott **I.D:** 38976161

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP4: Placemaking	No	• Positively prepared	Unsure	Unsure	There should be a clearer committment to aspects of placemaking including the securing of a sum of money for public art and culture via condition/S106 on developments over a certain scale. This is alluded to very vaguely but it would need to be a clearer requirement upon developers to have any weight. Unless alluded to somewhere else in the plan?	This should be set out as a clearer requirement. This is a good way of securing money for culture in communities to make NS a better place to live.		
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared			This seems a totally inappropriate increase in housing for a small village built in quality usable farmland, some of which plays an important role as a flood plain. Backwell is already having a lot of new houses built on it, and the extra planned is totally unsustainable.			
Policy LP22: Epic employment campus	No	• Justified			There is absolutely no way this development is any way justified. It has desecrated valuable agricultural land, which also stores a lot of winter water. Businesses like this should be using city centre office spaces, contributing to the rejuvenation of allied services such as cafes, restaurants and shops, rather than sprawling out over prime land - this might be appropriate in the USA, where space is available, but not in such a space-poor place. It would at least have been justifiable if it were housing, but this inward-looking, greedy, and arrogant development should not be here.			
Policy DP1: High quality design	Yes	• Effective			Could this be a bit more specific about how and when it is required and how it should be delivered? A Public Art Producer should be appointed to deliver this on behalf of the developer, via an art strategy that would be submitted as part of the planning application for approval. This would ensure that the			

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					work would be delivered appropriately and with the maximum benefit to communities, both local and cultural, within NS.			
Land east of Backwell	No	• Justified			This housing should not be proposed on quality farm land. There is already enough housing planned for Backwell - this is not justified and will totally change the village. The road is already busy enough and the access road is unlikely to be delivered. This should not be happening in green field or green belt land.			

Name: S Spencer **I.D:** 62851809

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Lodway Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	No	Para 116, NPPF, councils should “refuse or prevent planning on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road networks, following mitigation would be severe, taking into account all reasonable future scenarios.” We believe that the impact on existing highways infrastructure would be significant with the minimalist mitigations proposed. Context of roads and amenities in Pill & Easton-in-Gordano: • There is one main road running through the villages which is small and narrow in places (enough to cause a blockage simply when a bus stops), and with a 20-30 mph speed limit throughout. When there is a blockage, access from one end of the village to the other is through narrow residential roads. The only access from Pill centre to Pill Green is up a steep hill which has cars parked down one side, leading to congestion. • Very few people work in P&EiG because there are very few work places. They commute to Bristol, Portishead or other locations in reach of the M5 and the car is the most common form of transport, meaning that roads are already congested at peak times. • The most congested points of the villages at peak times are: near Crockerne Primary, St Kat’s school, St George’s Hill to access the A369, and the roundabout at J19 which is congested at most points of the day. Two of the proposed new developments have access points directly opposite two of the busiest points in the villages (St George’s Hill and St Kat’s). The new primary school will add to this congestion. • Junction 19 has recently been developed to reduce congestion, but the roundabout remains heavily congested at peak times, and the stretch from 19-20 remains one of the most congested and prone to incidents, according to National Highways. • There is a small Co-op in Pill Centre and an even smaller Spar, meaning that online deliveries and going to Portishead’s supermarkets are common (therefore more car usage). • The bus services that serve the village are semi-regular but already busy at peak times. Most people will take the car to get to where they need to go. Assuming 2 cars per household, an additional 2200 cars will be channelled into P&EiG and the surrounding roads. The council, as they know, have a duty under the Highways Act (1980) Sections 106 and 278 to ensure that developers fully mitigate against the traffic effects of new developments. NS was recommended by National Highways to carry out an assessment on the impact of this additional traffic on the village roads and surrounding roads but this is not evident in the plans (Duty to Cooperate). Instead, their plans indicate that the traffic effects will be mitigated through the new railway station, bus services, and active transport routes. We do not consider this to be sufficient for the following reasons: • The trainline is not yet in operation and will at best only reduce car usage and therefore residual impact on the P&EiG road network for people working in Bristol or Portishead, not the others who commute by car to the M5 and beyond. • Bearing in mind that there will be a large amount of people taking the train from Portishead to Bristol (and not stopping in P&EiG), how does the council know that there will be capacity within the new service for everyone who currently lives in P&EiG but works in Bristol? If the council doesn’t know this, how can they be confident that there will be enough for new households too? If there aren’t, new households will also resort to car usage which will channel additional traffic into the small village roads and onto the A369.	Reduce the scope of the development in terms of dwellings proposed so as to reduce the overall traffic and therefore strain on existing infrastructure. Make the infrastructure more sustainable by building amenities that will reduce traffic in and out of the village, for example a supermarket at Pill Green and/or another small secondary school. Carry out transport mapping based on the assumption that most newcomers to the village will use the car for all day-to-day activities AND that the majority of the train capacity will be taken up by people coming from Portishead to Bristol. Make the findings of this exercise clear on the planning portal. Ensure that there is ample access to the site HE2015 from the A369 to avoid traffic through the village. Use planning gains to either build a new doctor's surgery or extend the current. Make it clear how NS has engaged with National Highway's recommendations on the planning portal.	N/A	

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					•The 360 new households at Lodway and Services may not choose to walk to the station in Pill, instead choosing to drive. This doesn't reduce net road usage and also results in a parking issue in the very narrow streets near the station. • The council lists multiple active travel routes linking the new developments with the villages, but these seem to be footpaths and cycle routes. They will not reduce the strain on the main road running through the villages because, as already stated, most people do not work in the village and will continue to use the car or the bus. Therefore, net traffic in the village will go up. • The active travel routes will also not stop an additional 700 cars being channelled onto the narrow and residential Church Road, Beechwood Road, the Breaches and all the small roads that will take new residents from the Lodway and Services developments back to the main road or to Marsh Lane. • NS states in their plans that active travel routes should encourage people to use the centre in Pill (for shops) rather than needing to use cars to go elsewhere. Portishead has around 3 times the population of P&EiG (if the new developments go ahead) and they are served by three large supermarkets and numerous smaller supermarkets, compared with Pill's small Co-op and even smaller Spar. New residents will not use these amenities for their regular shop, nor the active transport routes to reach them- they will choose to take the car out of the villages and into Portishead and the surrounding area, still resulting in a net increase of 2200 cars on the J19 roundabout. • Although there is an additional primary school planned, there is no additional secondary school planned. St Kat's is currently at capacity with no capacity for additional children (according to the DfE). This means that, yet again, net traffic will increase significantly as parents take their children to Gordano, Nailsea, Backwell or elsewhere. With the exception of Gordano (which is oversubscribed) there are no bus services to Nailsea, Backwell or other local schools. Where then will secondary-age children go? A condition of lifting Green Belt restrictions are that local infrastructure be improved in order to accommodation the new developments. Beyond the active travel links and over-reliance on the new train station, there don't seem to be mitigations that will genuinely improve infrastructure. The council has not, in its policy or plan, submitted a transport vision for how to mitigate against the impact of the additional cars from the new development, as is best practice. Why did NS go ahead with the local plan before National Highways finished their assessment of the impact on the motorway junction? It has also not considered how the new developments can be accessed by non-car modes as a minimum mitigation against the resulting volume of traffic through the village. As a result, how does it know that the new developments will not, in fact, contravene the condition of releasing Green Belt which is that local infrastructure should be improved in order to accommodate the new developments?			

Name: S Steel **I.D:** 50775041

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Nailsea does not need any more houses. The local roads will NOT cope with the extra traffic. The flood prone areas will be made worse. Wild life habitats will be destroyed. Local facilities will not cope with all the extra people/traffic.			
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell does not need any more new houses. There are no local jobs so this will mean more commuters on the roads. The local roads will NOT cope with the extra traffic, especially not the A370 with all the extra traffic travelling to and from Bristol from all the new houses in Yatton and Weston Super Mare. The local wild life will be seriously affected. The local shops will not cope. The local Doctor surgeries will not cope.			

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					There are several local areas prone to flooding which will be made so much worse with all the building work going on.			

Name: S Tomlinson **I.D:** 55930049

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	Unsure	Not legally compliant - Lack of consultation with the local community. Being classed as a strategic site Pill should have at least received the same amount and type of consultation opportunities as the other strategic sites - Building on green belt - No evidence has been provided to justify the exceptional circumstances test. - National policy requires the need for housing development in a neighbourhood area to be justified. In the case of Pill it ise the train station that is presented as the primary draw rather local employment. - The analysis of alternative sites appears in places to tbe partial and in many cases the very same arguments for rejecting them could be made for the Pill sites. Not sound Lodway farm site - - Very poor road access. Previous applications to develop this site have been rejected on the grounds of poor road access. - Located next to marsh land and the Avon SSI and designated on Council map as being within the flood risk zone. None of these facts are mentioned and no mitigations offered to prevent harm either to the natural environment and the sites role as an important wildlife corridor, nor to local properties. - Being so close to the motorway will increase the pollution exposure for residents and given the elevated nature of the M5 at the northern part of the site as it descends from the bridge it will not be possible to mitigate the noise without building a barrier so big that, for example, it cannot possibly meet the requirement listed on P277 of the outline plan of “Generous buffer to be retained around non-designated heritage assets at Lodway Farm and St George’s Lane to maintain sense of rural setting”. Pill Green and Pill Road sites - - LP4 promises "the provision of necessary services, facilities, appropriate highways mitigations and improved active and sustainable travel links throughout the village, particularly from the new development sites to the proposed railway station on Monmouth Road." The only service being offered is a new school. No comments are made about the provision of medical facilities, shops etc and no evidence is presented of the adequacy of existing services. Other strategic sites have clearly been given much more thought. - The transport policy assumes that the planned new railway station and the associated car park and train capacity will be sufficient to meet the needs of an expanded community but offers no evidence for this despite the studies on which it is based being 10 years old. Plans for other strategic sites include train and station capacity improvements. - The transport policy places great reliance on active travel but recognises that the topography of Pill especially between the Pill Green and Pill Road sites and the Train station make this challenging. The only mitigation offered is to promote e-mobility without offering any ideas how this will be done nor any evidence for how effective it will be. - Pill has only one main road through it - Lodway/Ham Green. The draft plan and transport plan recognise that no other roads are wide enough for additional bus services to be provided. It makes no mention of the fact that even this road has numerous bottlenecks where buses coming in opposite directions cannot pass each other. A prime example is the hill on Ham Green near the Fire Station which is effectively a single track road due roadside parking. No mitigations are offered for this. Indeed the mitigations described to improve the pavement along Lodway are likely to make the problem worse. Increases in traffic along Lodway/Ham Green caused for example by increase in bus service frequency and traffic between Pill Green and the train station do not appear to have been modelled and no mitigations are offered. - Despite LP4 offering highways improvements, sections 4.63 - 4.66 of the supporting Stage7 Transport Assessment makes clear that no mitigations to reduce what it accepts will be an inevitable increase in congestion around local junctions on the A369 and M5/J19 are being considered. The only mitigations that will be offered will be "focused on sustainable transport measures" and "required to ensure active travel permeability and/or to provide bus priority measures at these anticipated congestion points." Again this is in contrast to the other strategic policies which include measures to mitigate			

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					traffic congestion. Queueing traffic not only causes inconvenience but reduces productivity and increases pollution.			
Land at Lodway Farm		‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	Unsure	Very poor road access. Previous applications to develop this site have been rejected on the grounds of poor road access. Located next to marsh land and the Avon SSI and designated on Council map as being within the flood risk zone. None of these facts are mentioned and no mitigations offered to prevent harm either to the natural environment and the sites role as an important wildlife corridor, nor to local properties. Being so close to the motorway will increase the pollution exposure for residents and given the elevated nature of the M5 at the northern part of the site as it descends from the bridge it will not be possible to mitigate the noise without building a barrier so big that, for example, it cannot possibly meet the requirement listed on P277 of the outline plan of “Generous buffer to be retained around non-designated heritage assets at Lodway Farm and St George’s Lane to maintain sense of rural setting”.			
Pill Green	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	Unsure	Not legally compliant -Lack of consultation with the the local community in stark contrast to other strategic sites -No justification or evidence for this amount of development in this location -No assessment of road capacities within the village to accomodate the increase in car and bus traffic Not Sound The only justification offered for this site seems to be the train station which is yet to be built. Even if it is built the station and car park are sized for a community of the current size not one that will be almost 50% bigger with this development. Pill has only one main road through that will take buses but no assessment of its capacity has been made nor mitigations for the bottlenecks where buses cannot pass. The current bus service is unreliable especially at peak times due to congestion coming out of Portishead for Eastbound buses or out of Bristol for westbound, bottlenecks along the Lodway and HamGreen where buses cannot pass each other. Increasing the service frequency is likely to make congestion worse. Heavy reliance is placed on Active travel improvements to keep people out of their cars and yet the transport studies recognise that the topography of the area will make take up of this challkenging. The only mitigation offered is to promote e-bikes. No evidence is offered for effective this is likely to be.	Take this site out of the plan		

Name: S. B **I.D:** 62850113

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	This would be gross over-development of our village. 1) Numbers and Lack of Infrastructure: We already have 794 new homes being built or about to be built. That will be about 2000 new people and their cars that will definitely be moving here in the next year or two. Yet there is no additional infrastructure to serve them. And now there is this draft proposal for another 889 homes, so a further 2000+ people and their cars, again with no realistic additional infrastructure. (See my comment further down about the proposed road linking the A370 to Backwell Lake.) 2) Station Road Cannot Take More Traffic: I live near Station Road. In the mornings and school out time and evening rush hour (and often at weekends too), it is clogged with cars, all sitting in the long traffic jam with their exhausts polluting the air by the narrow pavements where children walk to and from school. New homes with more car owners means more trips to Nailsea for services such as supermarkets, which is more traffic on Station Road. Add to that all the new homes being built in Nailsea or proposed to be built there, with car owners driving along Station Road to access the A370 - Station Road can’t take it. There is a proposal to build a road from the A370, across Backwell Common and the railway line to Backwell Lake if the draft proposal’s 889 houses are built. BUT this is in phase 3 of the building works (according to the developer), AFTER all the proposed houses are built, and with no realistic funding for it. The Council has no spare money for major infrastructure projects like that and the house builder contributions will be nothing like enough to pay for it, so it is very unlikely to ever happen. AND narrow Station Road with it’s very narrow pavements simply cannot take any more traffic. If that land is ever developed (and I sincerely hope it never	If the houses are really needed (and I doubt they are), they should be built much nearer to Bristol instead, as that is where employment is, and where people can walk or cycle to reach it, or use the metro bus link.		Flooded Chapel Hill with Waitrose Van in 2024.pdf

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					is), the road has to come FIRST. 3) Public Transport: Backwell has been targeted with this huge amount of development because it is seen as having good transport links. I use public transport a lot. It is true that the X1 bus service that runs along the A370 to Bristol centre is good, but the X7 that comes along Station Road is only once an hour. If one is cancelled, that is a two hour gap between buses. If you want to go anywhere other than central Bristol, it is two buses or one bus and a long walk, so journey times become long. People who live further from the A370 or on the south side of Nailsea tend to use their cars to drive to the Park and Ride near Long Ashton, adding to congestion on both Station Road and the A370. There is a railway Station in Backwell with platforms that are too short for many trains and no access for wheelchairs/prams on one side (just many steep steps). At peak times, there are often no free seats, and sometimes trains are so crowded that it is physically impossible to squeeze any more bodies in. The station carpark is already full on some mornings, even before all the current new houses are occupied. I do not see how this equates to being a good transport hub. People will use their cars. As the Nailsea & Backwell Transport study shows, “75% of individuals in Nailsea and Backwell commute by car or van”. Also, the Transport study shows that a surprising 30% of both primary and secondary school pupils are driven to school by car. Congestion and air pollution will increase. 4) Employment: People who move to live in the new housing in Backwell are very unlikely to work locally. And there is no plan to create employment opportunities at the same time as building the housing - the housing developers do not include this in their plans at all. The two ought to go hand-in-hand. Most newcomers will work in Bristol, Avonmouth or possibly Weston, and will commute. In the NSC evidence statement it says of Nailsea and Backwell “their primary function could be considered to be as dormitory settlements for Bristol”. Most of the new people will commute by car for part or all of their journey. (See my comments above on public transport.) Any new housing should be much nearer Bristol, at a cycling or walking distance from employment. 5) Green Belt and Food Security: That land is Green Belt, grade 1 agricultural land. We walk across its public footpaths more than a hundred times every year to access our allotment. Most years, the bigger fields grow wheat, although we have seen barley sometimes. The smaller fields sometimes have sheep grazing and are always cut 2 or 3 times for hay. They support a wide variety of wild flowers and pollinators. As a country, we should be growing more of our own food, not less, to insulate ourselves against global politics and climate change. Those fields should stay as the good farmland that they are. 6) Flooding: For 16 years, I worked at Wraxall School. On numerous occasions, we looked out across a very flooded valley. That land gets water-logged at times every winter. If it is tarmacked over, roofed over, and driveways installed, where will all the water go? Where Chapel Hill goes under the railway, it floods every winter. I have a photo, which I have uploaded below, of a Waitrose delivery van in flood water up to its wing mirrors in winter 2024.			

Name: S. Harper **I.D:** 20888481

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	There are lots of reasons why this plan is not sound: - There are already 800 new houses approved in Backwell which is a 40% increase for the village. These additional numbers would overwhelm the village. - The proposed road is not practical and will be too expensive. - There are not enough school spaces to support the houses from the plan. Nor is there enough health services, infrastructure nor services. - Backwell has been allocated a much higher percentage of new housing than other areas. - Backwell is not an employment hub - most residents commute. - No social cohesion impact assessment has been provided. - We need to protect our high quality agricultural land, not build on it. - These fields are behind my house and the wildlife needs to be protected. Also, I see how often these fields are flooded! It seems crazy to want to build houses there. - The infrastructure delivery plan has not been costed sufficiently.			

Name: S.Orkney **I.D:** 30859297

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	There is already massive development in Backwell and it feels the village would be overwhelmed by this further development. Nearly every piece of level countryside with footpaths in Backwell will have been built on. Only people who are fit enough to tackle the hill behind the church will be able to walk in the countryside. It will be really expensive to put a cross rail road in. What guarantee does the council have that developers will put in a road around the development and not complete the cross rail part or it will take decades for that road to happen. Backwell is very fortunate to have a railway station but it is only accessible on one side. With no cross rail road everyone will be driving down station road to access the station. Backwell does not have lots of employment, if people don’t work from home they have to commute. More access roads to A370 will negate all the work being done by the council to reduce bus transit times on that road. Houses will be built on what is currently agricultural land, has there been assessment of how this impacts on food security. The land is also prone to flooding. There’s been much in the news about flood risks to homes and the lack of insurance available.			

Name: SB **I.D:** 62657569

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Backwell already has 800 new houses approved, a 40% increase. Proposed road is not adequate for Nailsea's traffic nor to relieve Backwell Common, Chapel Hill. Engineering - the road will be expensive and/or unfeasible. There is already a deficit in school places. The lack of infrastructure and services will not support 1k more houses. Where is the needs analysis? Where is the social cohesion analysis? For example, how will young people be supported? For example, where is the plan for youth clubs etc? Contradiction of government policy - food security; destruction of wildlife habitats in our nature-depleted country. Threat to Brockley Maternity Roost and SSSI and lesser/greater horse shoe bats. Flood risk increased through unsuitable housing development on a flood plain. Developers contribution to infrastructure and services is inadequate. The 40% increase + 1k more houses in the proposed timescale is unsustainable and dangerous - to wildlife, nature and people. Railway station is not fit for purpose as a transport hub. It is not accessible. Backwell lake threatened.			

Name: SIan Clark **I.D:** 58540545

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-	No	‣ Positively prepared ‣ Justified ‣ Effective	Unsure	Unsure	There was recently limited consultation with this plan and the vast majority of residents were not aware of any events as they were not appropriately publicised or suitable for the local community to participate in. This is not acceptable with such large scale proposals and is not in keeping with community involvement. It should not be ok for a council to suddenly decide it can build on Greenbelt when there are far more	We need extensive community engagement. Proper risk assessments around wildlife, infrastructure, roads, green belt and agricultural labs. These have not been undertaken to my		

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in-Gordano		• Consistent with national policy			appropriate brown field sites available. I cannot imagine these plans comply with protection of wildlife and the kids is greenbelt land can never be revoked. With the hoover event of climate change being experienced this is unacceptable. Flooding will be a high risk and wildlife will be decimated. Transportation is a huge problem with these plans. The M5 and junction 19 survivalist is under enormous strain already. Accidents are a daily occurrence and the road structure can't deal with several thousand more vehicles every day. The railway service will be minimal and buses are helpful but will still get clogged up in the additional traffic. Walking is already problematic in EIG and Pill as pavements are narrow. Any works require closure of local roads which causes chaos already. There are no alternatives for road transport through the area when this happens.	knowledge.		

Name: Sally Allen **I.D:** 58246305

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The proposed development at Tower Farm, which includes approximately 400 residential units, is situated adjacent to Weston Big Wood—an ancient woodland and designated Site of Nature Conservation Interest (SNCI) overseen by the Woodland Trust with support from the Avon Wildlife Trust. This woodland is an integral component of the Gordano Valley ecological network and contributes to a nationally significant mosaic of habitats, including open grassland, wetland, and woodland. Not Justified No comprehensive robust alternatives assessment has been published to establish that this sensitive location is the sole or most suitable option for development. The potential loss of best and most versatile (BMV) farmland (Grade 2/3a, as identified in the ALC dataset), along with the risk of causing irreversible harm to the ancient woodland, indicates that this site may not be appropriate for allocation. Not Consistent with National Policy The allocation appears to be inconsistent with National Planning Policy Framework (NPPF) paragraphs 180–182, which stipulate that developments leading to the loss or deterioration of irreplaceable habitats, such as ancient woodland, should be refused except in wholly exceptional circumstances. The Council’s mention of an “ecological buffer” lacks specificity, is not enforceable, and does not adequately address indirect impacts, including root-zone damage, alterations to hydrology, or potential wildlife disturbance. According to the Woodland Trust and Avon Wildlife Trust, ancient woodland cannot be restored once harmed. Furthermore, while the Framework mandates the delivery of biodiversity net gain, there is currently no defined mechanism within the allocation to secure this outcome. Not Positively Prepared The proposed location is anticipated to intensify existing challenges in Portishead, particularly concerning educational facilities, healthcare services, and transportation infrastructure—including the A369 corridor—which are already under considerable pressure. Development at this peripheral site is likely to increase dependence on private vehicles and contribute to higher pollution levels, rather than promoting sustainable travel options, and therefore does not align with the guidance provided in NPPF paragraphs 104–106. Not Effective Delivery is dependent on several unresolved factors, including the provision of a new			Avon Wildlife Trust 10-year strategy 2020-2030.pdf

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					school, financial contributions to bus services, implementation of off-site biodiversity management, and improvements to rights-of-way and buffer zones. Currently, there is no published phasing plan, established funding mechanism, or legal agreement in place to secure these obligations. Without such mechanisms, the allocation cannot be deemed deliverable within the plan period, in accordance with NPPF paragraph 35(c). Landscape & Connectivity The interface between farmland and woodland serves as an important ecological and landscape transition zone. Development in this area would likely result in habitat fragmentation, reduce the effectiveness of the Gordano Valley wildlife corridor, and compromise the rural fringe character. Even with the implementation of a buffer, both visual and ecological impacts on the woodland and adjacent landscape would remain substantial. Drainage & Hydrology Construction activities and built development on the former farmland are likely to modify surface-water run-off patterns and increase soil compaction, potentially impacting the hydrological conditions necessary for the adjacent ancient woodland. There is a significant risk of nutrient runoff, changes in water infiltration, and possible damage to the woodland root zone. Cumulative Impact When evaluated in conjunction with additional allocations in the Portishead area, such as Black Rock north of Clevedon Road, the cumulative impact on ecology, infrastructure, and transportation is considerable and may challenge the Council's commitments to nature recovery and sustainable development. No modification short of removing the allocation entirely would make this site appropriate. Given its direct adjacency to ancient woodland, its loss would be irreversible and cannot be mitigated sufficiently. The land should instead be retained as undeveloped green space, managed to enhance biodiversity and provide sustainable public access, in line with the Avon Wildlife Trust's 2030 Strategy and national "30 by 30" nature recovery goals. I do not support the North Somerset Local Plan 2041 for the Tower Hill Farm location.			
Black Rock, north of Clevedon Road	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Black Rock is not a suitable location for around 100 dwellings, as ecological needs cannot be met on-site and require off-site mitigation. This conflicts with NPPF paragraph 180(a), which prioritises avoiding environmental impact over remediation or compensation. The necessity for offset land highlights the site's unsuitability, and there is no evidence that less sensitive alternatives were considered. Not Consistent with National Policy – Failure to protect and enhance biodiversity The approach of relying on off-site mitigation and a "suitable ecological buffer" illustrates a reactive rather than preventative approach to biodiversity protection. NPPF paragraphs 180–182 require Local Plans to conserve habitats, prevent deterioration of irreplaceable habitat, and deliver net gains for biodiversity. The allocation fails this by offloading its ecological burden onto unspecified land, without securing long-term management or legal protection for compensatory habitats. It also conflicts with the Avon Wildlife Trust's 2030 Strategy, which emphasises restoration of 30 percent of land for nature and enhancing landscape connectively in the Gordano Valley. Not Positively Prepared – Unsustainable pattern of growth	No modification would make this allocation acceptable. The need for off-site mitigation and multiple infrastructure dependencies shows the site is environmentally and logistically unsuitable for housing. The allocation should be removed entirely from Schedule 1. Instead, the land should remain open countryside, contributing to biodiversity and landscape value, in line with the Avon Wildlife Trust's 2030 Strategy, Woodland Trust guidance and national biodiversity objectives.		

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					The site lies on the western approach to Portishead along Clevedon Road, where public transport is limited and local services are minimal. Residents would be heavily reliant on private vehicles to access schools, health care and employment. The fact that footways and new bus stop contributions are required underlines existing infrastructure inadequacy. This car-dependent pattern of development conflicts with the sustainable transport objectives of NPPF paragraphs 104–106. Not Effective – Unclear delivery and infrastructure dependencies The site depends on multiple off-site and third-party mitigations including ecological offset land, new footway construction, bus service contributions and delivery of a section of the Gordano Greenway. No clear funding mechanism, responsible delivery body, or phasing plan is identified in the Plan. Consequently, the allocation lacks deliverability and fails the effectiveness test under NPPF paragraph 35(c). Landscape & Setting The site lies within open countryside forming part of the rural setting of Portishead and the Gordano Valley. The expansion westwards into this part of the countryside would diminish the settlement edge, reduce landscape openness, and risk urbanising what should remain a transitional zone between town and countryside. Agriculture & Soils The farmland in question is likely to be of best and most versatile quality (Grade 2/3a) and its loss for housing is not justified when less sensitive land could be used. The Plan does not robustly demonstrate why this agricultural land must be released. Cumulative Impact Combined with the Tower Farm allocation and other nearby proposals, the Black Rock site would add to cumulative ecological, transport and infrastructure burdens around Portishead – contrary to the Council's stated nature-recovery and sustainable growth objectives. I do not support the North Somerset Local Plan 2041 for the Black Rock location.			

Name: Sally Ambrose **I.D:** 30964641

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Nailsea			No			As your consultation link is not working, I am resorting to sending my comments on your Local Plan by email. I do not believe that your Plan is sound. You may feel under pressure from our current and inept government to provide overly large numbers of houses, but this is no excuse to try to convince us that land which has always been Green Belt is no longer. With particular reference to Land North of Southfield Road, Nailsea (within the Parish of Wraxall and Failand), this area of Green Belt continues to fulfill greenbelt criteria. It prevents the northward spread of Nailsea, thereby preventing the village of Wraxall from being overrun. It is not Greybelt, although yourselves and consultants employed by LVA are trying to make it out to be. Should you not be investigating brownfield (as instructed by the government), infill, increased densities in existing settlements? We know from CPRE's regular surveys that there are 1.2m brownfield sites in England alone. Use these before destroying so much of our countryside, which can never be restored. Nailsea and Wraxall are two completely different entities and there are hundreds of people in Wraxall and Nailsea who do		

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					not want to see this area destroyed. The fields are used for grazing and meat production and are certainly viable agriculturally, much of them being Grade 1 and 2. There have also been arable crops here. It is a recognised fact that fields abutting a town boundary can be just as productive as those further away. (CPRE) The mature hedgerows and trees are very useful for carbon capture. They also provide an excellent wildlife habitat - please see responses to the LVA Outline Planning Application for this land. There are many detailed responses demonstrating excellent knowledge of the wildlife and the land from which a great deal can be learned. We are told all the time how we have lost 90% of our wildlife, we have the lowest biodiversity, and yet here we are happily wanting to destroy even more. This land provides both visual and physical amenity to many people and its loss to the community would be enormous. Why is it that so little attention is paid to the effects of such huge developments on small pre-existing settlements? It is also land which has been considered totally unsuitable for development for many, many years. Why is it now suddenly being considered as most suitable? It obviously is not suitable for many reasons, flooding, destruction of the wildlife corridor, the aviation fuel pipeline, mine workings, and pollution of The Land Yeo flowing into the SSRI and the North Somerset Levels and Moors area. Pollution of The Land Yeo will also damage the ecosystem on the north side of the river. Not to mention transport issues and the inability to walk to the Railway Station for large numbers of people. I would certainly not wish to purchase a property sitting on unstable ground due to coal seams and coal workings (3 mine workings exist within proximity of the Wraxall Villa Site, and there are also bell pits on this land). Increased surface run-off will cause serious problems. Your Plan also conflicts with the Wraxall and Failand Parish Neighbourhood Plan which NSC has already accepted! Green Belt and rurality should be strongly supported. It is almost impossible to understand why NSC wants to be responsible for causing housing etc. to be constructed on the sloping side of a river valley with all its attendant problems which will spread into wider areas, particularly at a time of climate change with much more heavy rainfall occurring regularly. To me, and others, it seems highly irresponsible. Do you think that you can win over what nature throws at us? I will refer you again to the 330 responses online about this Green Belt land which should never have been proposed for housing.			

Name: Sally Badham **I.D:** 62773793

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	1. Lack of community involvement and consultation methods re Policy LP4. NSC has not met its duty to properly engage with the local community regarding this plan. Other areas targeted for development have had a number of consultations but the allocation of Pill and Easton-in-Gordano as a strategic location has not been the subject of any public meeting with NSC. An increase in population of 44% surely demands consultation and engagement with the villagers. 2. Deviation from Settlement Boundaries re SP6. Land outside the established village settlement boundaries should not be included in the proposed development allocation in Pill and EIG. These boundaries exist to manage growth responsibly. SP6 clearly states that residential development outside settlement boundaries “will be restricted to replacement dwellings, subdivision of existing dwellings, residential conversion of rural buildings where alternative economic use is inappropriate or unfeasible, dwellings for essential rural workers or the redevelopment of previously developed land in suitable locations”. Extending development beyond the settlement boundaries would undermine these planning principles, increase pressure on infrastructure and set a harmful precedent for further outward expansion. It will also detrimentally affect the cohesion and community of the village. This deviation from the settlement boundaries is also in conflict with the policies in SP11. 3. Spatial Strategy issues re SP3 and transport re SP10. Pill and EIG do not have a wide range of facilities, services and jobs. Large new developments will be dormitory areas where people have to travel to work. Although the new railway is proposed, the number of trains per hour and carriages proposed is highly unlikely to encourage people to use this particularly when they are likely to be full from Portishead. There will still be a significant increase in the number of car journeys into and out of Bristol (particularly from the proposed Pill Green site), putting further	1. A public meeting with the local community 2. A review of sites to ensure compliance with the Council's own proposed policies. 3. An acknowledgment of the importance for culture and cohesion of the settlement boundaries and an attempt to work to avoid extending these. 4. A proper review of the transport infrastructure in the area given further development in		

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					pressure on the A369 and the bottle neck at Abbots Leigh. The Highways Authority's views and representations on the road infrastructure does not appear to have been taken into account. SP3 specifically requires that development should not be of a disproportionate scale which adversely impacts on the character of a settlement or leads to a significant increase in the number of car journeys. Far too much emphasis is being placed on the new railway. 4. Placemaking SP4. The proposed high density of the Pill Green site and the other sites in the area are not appropriate to the location, and will not create compact, connected and sociable places. The large extension beyond the settlement boundaries is not sustainable or conducive to placemaking policies. 5. Release of land from the Green Belt SP7. The Council does not appear to have demonstrated that it has fully examined reasonable alternatives, such as maximising brownfield capacity (making the fullest and most efficient use of previously developed land), using minimum density standards (optimising land in towns and cities with higher-density developments, rather than spreading development out thinly) and working with neighbouring authorities to accommodate housing needs?	Portishead and the increased journeys from there and Pill/ EIG along the A369. The railway is not going to solve that.		

Name: Sally Bartlett **I.D:** 14822593

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP3: Spatial strategy	Yes		Yes	Yes			In general I support this plan noting the following to ensure the proposal remains sound: Yes - we need more affordable housing - this must be sustainable and 'green' etc It is very important that brownfield sites are used and we must consider the future reprocussions of building on land that could or is being used for food production. No: - we do not need any expansion of Bristol Airport for a very large number of reasons inc, pollution & climate change, lack of transport links, better alternatives elsewhere esp Cardiff and Exeter, cf arguments put forward by BAAN: Bristol Airport Action Network - we do not need developer scale developments in Wrington for the reasons given by Keep Wrington as Wrington. we must be mindful of of the choices made by people who wish to live rurally and not ruin the integrity of villages in North Somerset by imposing suburbia on these communities.	
Policy LP12: Bristol Airport	Yes		Yes	Yes			In general I support this plan noting the following to ensure the proposal remains sound: - we do not need any expansion of Bristol Airport for a very large number of reasons inc, pollution & climate change, lack of transport links, better alternatives elsewhere esp Cardiff and Exeter, cf arguments put forward by BAAN: Bristol Airport Action Network	

Name: Sally Franks **I.D:** 62860129

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Vision, Strategic Priorities and Sustainability Objectives	Yes		Unsure	Unsure				
Pill Green								

Name: Sam Pullinger **I.D:** 31129153

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell is a village of currently around 2000 houses. On top of developments over recent years at Colliers Gardens off Moor Lane, and other smaller sites within the village, 800 new homes are already approved at Farleigh Fields and Grove Farm - these number represent an increase in size of 40% for the village, which is surely already an overdevelopment. The additional housing proposed in the North Somerset Local Plan 2041, would then add potentially an additional 1,000 houses on top of that. Together with the approved housing - this would represent an increase in the population of 80%. There is no needs or viability analysis for an extra 1,000 houses and no information or guarantees of the additional infrastructure or services that will be needed to support the level of increase e.g. school places, health services, transport infrastructure. There has been no social cohesion assessment carried out. A proposed new road cutting through Backwell East to Station Road promises to cut congestion on Station Road, but in reality this would be offset by an increased number of residents in the village driving their children to school, and to work, as most people commute - an additional 1,000 houses is potentially an additional 2,000 extra vehicles. Whilst there are public transport routes, there is no assessment of whether these could service such an increase and the railway station continues to pose a barrier to people with limited mobility and presents challenges to people with young children. There are no feasability reports or costings about the engineering that would be needed to take the road under the railway track. Government policy states that 'we must protect our best and most versatile land' to safeguard food security. The proposal of 1,000 houses on Grade 1 agricultural land, of which there is only 7% remaining in North Somerset, seems to contradict this policy. Two developments, at Rodney Road and Farleigh Fields are already underway, and have led to significant disruption in the village - road closures and works to services, and an increase in heavy traffic driving around the village, often on routes used by children to get to school. If all of the approved and proposed development takes place over the next 15 years, Backwell will become nothing more than a building site for that period. Backwell Common and surrounding areas are prone to flooding which would be exacerbated by further housing. The area is part of the foraging zone for the Lesser and Greater Horseshoe bats that are present in the Brockley Maternity Roost and Site of Special Scientific Interest, and the wider Bat Special Area of Conservation. However, this development would also destroy valuable wildlife habitat and harm biodiversity in the area. In the context of other developments proposed nearby, e.g. 582 next to Backwell Lake on the outskirts of Nailsea, this represents urbanisation of what is current a semi-rural area.			

Name: SamBaumn **I.D:** 58298017

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	Yes		Unsure	Unsure		In order to ensure HE203001 can be utilised effectively to contribute towards the provision of housing, in accordance with the assessed capacity identified by the HELAA and that the mitigation planting is most closely aligned with the historic planting patterns, Figure 11 should be amended to more closely reflect the orchard planting arrangement of 1888 - see attached PDF for Figure 11. HE203001 represents a relatively self-contained development site which is closely related to the existing settlement edge of Backwell. The proposed allocation of the site as part of the Land East of Backwell allocation is supported. However, the site could form an allocation in its own right, if the wider allocation were found to be unsound. As private landowners, with no current arrangement with either of the main promoters of land at East Backwell, the policy should clarify who would be responsible for the production and coordination of the	We support the proposed allocation of land East of Backwell through Schedule 1 of the Local Plan, most specifically the inclusion of land known as HE203001, Land near Woolley's Farm, Backwell. See attached PDF for further information.	251117 LP Reg 19.pdf

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						overarching proposals and when this must be completed. To be sound and ensure an agreed position is reached between the parties at an early stage, which achieves the effective development of all available land within the allocation, the policy should be amended to require a single masterplan and delivery plan prior to submission of outline planning applications. The Council should lead this process in collaboration with all landowners/promoters within the allocation. See attached PDF for further information.		

Name: Samantha Jones **I.D:** 62832321

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I'm responding as a Backwell resident who cares deeply about our village. We have already accepted 800 new homes, a huge increase and adding another 1,000 would completely overwhelm Backwell. It would change the character of the village and put huge pressure on schools, roads, health services and everyday life, none of which have been planned for. I'm especially concerned that this development would destroy precious Grade 1 agricultural land. Only 7% of this land is left in North Somerset, and once it's built on, it's lost forever. This goes directly against the need to protect our best land for future food security. The proposed road has no details, costings or justification, and it wouldn't solve existing congestion. Flooding is already a problem around Backwell Lake and the Common, and this amount of new housing would make it worse. This plan does not feel fair, sustainable or in the best interests of families and residents who live here. For these reasons, I do not believe the plan is sound.			

Name: Samantha Joyner **I.D:** 62860065

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	I do not consider the Pre-Submission Plan to be sound, legally compliant, or compliant with the Duty to Cooperate. First, the plan is not justified or effective. LP4 proposes growth that would increase the population of Pill and Easton-in-Gordano by around 44%, yet there is no proportionate evidence demonstrating that local or strategic infrastructure—transport, healthcare, education, utilities or community facilities—can accommodate this scale of development. No detailed assessments, costed delivery plans, or secured funding/agreements have been published, so the allocation cannot be shown to be deliverable. Second, the plan is not legally compliant, particularly in relation to the evidence base. A legally compliant plan must be supported by robust, up-to-date assessments; these are missing for several critical infrastructure areas, calling into question whether statutory requirements have been met. Third, the plan does not meet the Duty to Cooperate. LP4 clearly creates cross-	To make the plan legally compliant and sound, the following modifications are necessary: Produce and publish a full, proportionate infrastructure evidence base for Pill and Easton-in-Gordano, including: -transport and highway capacity modelling (A369, M5 J19, local network) -education and healthcare capacity assessments -utilities, drainage and wastewater capacity assessments -costed delivery plans and committed funding sources This evidence must demonstrate that the proposed scale of development is realistically deliverable. Reduce or re-phase the scale of growth in LP4	I cannot support the soundness or legal compliance as the issues identified above remain unresolved.	

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					boundary impacts (notably on the A369, M5 J19, commuting into Bristol, and health and education services), yet no evidence has been provided of effective, outcome-based cooperation with neighbouring authorities or statutory bodies to resolve these issues. Consultation alone does not satisfy the duty. For these reasons, LP4 and the wider plan fail the tests of soundness, legal compliance and the Duty to Cooperate.	unless the above assessments show unequivocally that a 44% population increase can be sustainably accommodated. Alternative or additional locations should be assessed where infrastructure capacity is greater. Provide a clear, binding infrastructure delivery plan for LP4, including phasing triggers ensuring that housing cannot be delivered ahead of the necessary infrastructure and services. Publish Statements of Common Ground with all relevant neighbouring authorities and statutory bodies—especially National Highways, Bristol City Council, NHS bodies, education authorities and utilities—demonstrating effective, outcome-based cooperation on the cross-boundary impacts of LP4. Reassess the sustainability and environmental impacts of the allocation in light of updated evidence, ensuring the plan complies with national policy on sustainable development and infrastructure-first planning. Strengthen masterplanning requirements so that no development proceeds until a detailed, publicly consulted masterplan is agreed, including layout, mitigation, service provision, transport strategy and green infrastructure.		

Name: Samantha bell **I.D:** 62718721

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Justified	No	No	1- Alternative brown field or green field site with far lower ecological impact both in Portishead and across north somerset. 2- Opportunity's to increase housing density on proposed brown field site which could remove the need to develop tower farm and black rock 3- The strategic ecological importance of these sites in protecting Weston big wood and the Gordano valley green corridor 4- The fact that both areas were added to the green belt in the late 1980's due to the high ecological value 5- National planning policy allows green belt changes only in exceptional circumstances, and these have not been demonstrated. In addition - neither sights can provide safe, legal or suitable access Development would create unacceptable transport impacts, failing national soundness tests FOR ALL THESE REASONS TOWER FARM AND BLACK ROCK SHOULD BE REMOVED FROM THE LOCAL PLAN	NO	ABSOLUTELY NOT	
Black Rock, north of Clevedon Road	No	• Justified	No	No	1- Alternative brown field or green field site with far lower ecological impact both in Portishead and across north somerset. 2- Opportunity's to increase housing density on proposed brown field site which could remove the need to develop tower farm and black rock 3- The strategic ecological importance of these sites in protecting Weston big wood	NO	ABSOLUTELY NOT	

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					and the Gordano valley green corridor 4- The fact that both areas were added to the green belt in the late 1980's due to the high ecological value 5- National planning policy allows green belt changes only in exceptional circumstances, and these have not been demonstrated. In addition - neither sights can provide safe, legal or suitable access Development would create unacceptable transport impacts, failing national soundness tests FOR ALL THESE REASONS TOWER FARM AND BLACK ROCK SHOULD BE REMOVED FROM THE LOCAL PLAN			

Name: Samuel Williams **I.D:** 62774113

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I do not support this development. There are many reasons for this. Additional pollution with the construction and traffic, backwell is becoming overcrowded leading to more dangers especially on the roads for children walking to the schools in the village. The only people to benefit are the shareholders of the construction companies. There are many better locations for the development rather than using land which is either grade 1 farmland or prone to flooding (and the additional cost the council will need to rectify the flooding problems).			

Name: Sara Zinn **I.D:** 62742401

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	The village of Backwell has already been allocated 800 houses which is more than any other village in North Somerset, and the proposed additional houses would lead to further overdevelopment, imposing increased stress on already stretched infrastructure, and services such as schools, doctors and dentists. There is a deficit in school places and no investment in health services or leisure facilities meaning people having to travel elsewhere to access these. Backwell cannot support another 1000 houses. Additionally, no social cohesion impact assessment has been provided. There is no needs or viability analysis for the additional 1000 houses. There are very few local employers, meaning most residents already commute to work, and this number would only increase. The station is small, with accessibility issues, and there is limited parking available, which will be inadequate with increased demand even from the 800 houses already approved, leading to parking on, and clogging up of already congested local roads. The A370 and Station Road are already congested, especially at peak times, and narrow pavements on the approach to the Comprehensive school make a further increase in traffic, a safety and environmental concern. The proposed new road has no guaranteed funding or clear time line for development. The planned route will impact on prime agricultural land used for grazing, be on land prone to flooding, and would have a serious impact on the whole Backwell common area. Building a road over or under the railway line will be complex and expensive, and it may not even be feasible. Increasing the population of Backwell by 80% over such a short period of time, with no clear plan for the required supporting infrastructure is unsustainable and of grave concern. There is a real risk of building an expanded community which lacks the necessary resources, and creating more problems than it solves. Even if the proposed new road gets funding, its			

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					construction is likely to be many years away, leaving the local community with serious congestion problems in the interim. Whenever there are closures on the M5, traffic is diverted via the A370, or Clevedon. This is a fairly frequent occurrence and causes severe congestion through Backwell with its current level of local traffic, never mind with the addition of vehicles from an extra 1000 houses. Without the new road it is not only Backwell residents who will be affected, congestion build up on A370 and Station road will cause further traffic chaos from Nailsea, Backwell, Weston super Mare and surrounding villages. Even with the proposed new road, the impact on traffic to and from Nailsea, and on Station Road will be limited. Several parts of Backwell are prone to flooding and there are serious concerns as to the impact of further development on this risk. Farleigh Road, Chapel Hill, Backwell Common, Backwell Bow, and the area around Backwell lake are areas already subject to flooding, The rhynes in these areas are already filled to overflowing after heavy rain, and building on surrounding areas will reduce the amount of land available to absorb this water, compounding the flooding problem for local residents and those using these areas for leisure. The new roads and housing planned near Backwell lake are on a flood plain. Is there no concern for those who will live in this area in the future? It feels like all that matters is the numbers of homes, never mind if they flood once the builders leave. Although Government policy requires that ‘ we must protect our best and most versatile land ‘ to safeguard food security, the proposal to build on some of North Somerset’s remaining 7% of this prime agricultural land which is currently used for food crops and grazing, is very short sighted, and goes against stated policy. Once we lose this land to development, it is gone forever, and reduces our food security, local green spaces, and important wildlife habitats. Backwell has been allocated a higher number of houses than any other village in North Somerset, and a higher percentage increase than some nearby towns. It is already increasing in size by 40% with the existing proposed development. Further development will irreversibly damage the local environment and completely change the nature of the local community. We cannot build for building sake. House numbers alone do not provide solutions. The current proposals prioritise building further homes over the needs and resources of the existing community, and disregard the impact on local infrastructure, services, environment and wildlife. The village of Backwell is already doing its share by having 800 extra houses, increasing its population by 40%. The Infrastructure delivery plan lacks analysis and costings , and there are no guarantees of funding for services or the proposed new road. Such guarantees are essential before any further development is considered. Additional building would lead to complete overdevelopment, and is therefore unsustainable for the reasons outlined above.			

Name: Sarah Bannister **I.D:** 57871617

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Justified	Unsure	Unsure	Stop taking out beautiful land and putting more bloody houses, Portishead is a joke now and I have lived here all my life, stop building or trying to on greenbelt land which shouldn't be touched. Tower farm is a beautiful place that's a part of portishead. Same with this stupid railway what a stupid place to put it.			

Name: Sarah Berridge **I.D:** 58553441

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy DP53: Best and most versatile land	No	• Justified	Unsure	Unsure	Argument Against Building on Grade 1 Soil and Local Wildlife Habitat 1. Loss of irreplaceable Grade 1 agricultural land Grade 1 soil is the highest-quality, most productive farmland in the UK. Only a very small percentage of national land is classified at this level. Once it is built on, it is permanently lost to			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					food production. In a time of increasing food insecurity, climate instability, and reliance on imports, protecting Grade 1 soil is a matter of public interest and long-term resilience, not local preference. Allowing development on Grade 1 land directly undermines national food strategy goals, climate adaptation planning, and local sustainability commitments. 2. Damage to a functioning wildlife ecosystem The proposed site is not just “empty green space”: it is an active ecosystem supporting birds, pollinators, insects, small mammals, and plant species. These habitats provide vital ecological functions, including: Pollination of crops and local gardens Natural flood mitigation Soil regeneration Biodiversity corridors connecting larger habitats Destroying or fragmenting this area would have a disproportionate ecological impact, particularly at a time when UK wildlife populations are in severe decline. 3. Increased flood risk to the local community Agricultural land and wildlife habitats act as natural sponges, absorbing rainfall and reducing runoff. Replacing them with hard surfaces (roads, houses, driveways) increases: Flood risk Soil erosion Pressure on drainage systems Given the well-documented flood history in the region, building on this land poses a serious and foreseeable threat to local homes and infrastructure. 4. Contradiction of local planning policies and climate commitments Most councils have explicit planning policies that require: Prioritising brownfield sites Protecting prime agricultural land Safeguarding biodiversity Reducing carbon emissions Approving development on Grade 1 soil and a wildlife area contradicts these policies and undermines local and national commitments to: Biodiversity Net Gain Climate resilience Sustainable land use It also sets a dangerous precedent for future land-use decisions.			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					5. Loss of community wellbeing and public value The land provides ongoing benefits that are not captured in financial assessments, such as: Spaces for walking, observing nature, and community identity Clean air and reduced noise Educational opportunities for schools and families A sense of local heritage and rural character Once built over, these public goods disappear permanently. 6. Better alternatives exist Most local areas have: Underused brownfield sites Empty commercial buildings suitable for conversion Opportunities for town-centre renewal Potential for higher-density, low-impact development in already built-up zones These alternatives: Protect farmland Support biodiversity Regenerate local spaces Avoid unnecessary climate and flood risks There is no compelling justification for choosing Grade 1 soil and wildlife habitats when these smarter options exist. Building on Grade 1 agricultural land and an established wildlife habitat is environmentally unsound, economically short-sighted, and socially irresponsible. It threatens food security, biodiversity, community wellbeing, and climate resilience. Saying no to this development is not a barrier to progress - it is a commitment to sustainable, responsible planning that protects the landscape we depend on.			

Name: Sarah Cox **I.D:** 39211329

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent	Unsure	Unsure	Backwell has been allocated a higher number of houses than any other village in North Somerset, and an even higher growth percentage than towns such as Clevedon which has been allocated 2%. Backwell is expected to take 7% of the district's housing allocation. It already has 800 new houses approved which is a 40% increase for the village. The additional proposed numbers would lead to a complete overdevelopment, and the lack of infrastructure and services cannot support an additional 1000 houses. There is a deficit in school places ad there is no investment in health services or leisure facilities. Backwell is not an employment hub and most residents commute. The roads in Backwell are already congested and the proposed road will likely not be sufficient, very expensive, and possibly unfeasible given it would need to run over			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
		with national policy			or under the railway line. The train station is not designed as a transport hub and is inaccessible to those who are disabled or for those with young children. The land is currently used for food crops and grazing and is Grade 1 agricultural land there is only 7% of this high quality land left in North Somerset. This proposal contradicts Government policy that states that “we must protect our best and most versatile land” to safeguard food security. It would also destroy wildlife habitats and cause further harm to biodiversity. Backwell floods badly, and Backwell Lake and the adjacent fields where the housing is proposed are on a floodplain.			

Name: Sarah Highnam-Sadd **I.D:** 58018945

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	a) this is NOT justified AT ALL. This proposed site is an important landscape feature within Gordano valley. It will affect Weston Bigwood which is a known Ancient Woodland and local nature reserve and all the environmental corridors that are needed to prevent detrimental harm to wildlife and ecosystems (with its proximity to National conservation Interests in Gordano valley itself) It will be irreversible. Its a site on BMV farmland. This site is TOTALLY UNSUITABLE. b) The site is contrary to both the National Planning Policy and also of North Somersets Core strategy. It would see significant environmental and ecological harm, let alone affect the community by taking away wellbeing and obliterating the landscape. c) In paragraph 180c of The National Planning Policy Framework, it clearly states that any development that causes loss, or deterioration of,ancient woodland should be refused unless there are EXCEPTIONAL REASONS .....of which there aren't.....as there are many other sites within North Somerset that could be used and are , quite frankly, more suitable. This development conflicts with NATIONAL POLICY. I cannot begin to stress the importance of this site.....development would disturb and destroy protected species, like birds, bats, dormice through loss of habitat, sheltering from trees and fragmentation.The woodland edge would be degraded so the woodland 'corridor' or ecological buffer would not exist. Weston Bigwood is part of our GREEN BELT!!!!!!!!!!!!! Nocturnal animals would suffer from the intrusive artificial lighting of streetlights, home lights. The noise would drive animals away that were left. The environment would no longer be peaceful. Where does this all comply with the Core Strategy of your policy CS4, CS5 and CS12???????????? This part in case you are unaware, says that sites such as this require 'protection'. where would residents go for their wellbeing????Its used by walkers, birdwatchers, children to learn about nature in forest school. Our peaceful, tranquil needed clean and fresh green space would be obliterated!!!!!!!!!!!!!!!!!! As for traffic, well..... d)The access roads for this site are steep, unsuitable for increased traffic flow and for construction traffic. It isnt compatible with highway safety policy as there would be limited passing points, risk to pedestrians and adding to congestion which is already appalling on The Portbury Hundred,road link to the M5. e) Isnt this plan AGAINST all that is required in our response to the climate emergency???? Mature woodland such as this is our local carbon storage, heat mitigatiion . Its not sustainable place making. It goes against EVERYTHING that we need to be doing to help our planet, by doing what we need to do locally. f) Portishead is my home. It has grown exponentially over the past 20 years. It has very poor infrastructure as it stands. We cannot support more housing. There are NO amenities up in that part of the town.Traffic would be a nightmare. There would be ZERO modifications apart from removing this site from the plan completely. It should remain as it is. Ancient woodland. Undeveloped to enhance biodiversity in line with Avon Wildlife Trusts 2030 strategy.		no, i do not There is no sound or legal reasoning to this proposal. I object fully to this local plan 2041 for this site of Tower Hill Farm	

Name: Sarah Humphries **I.D:** 31078881

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Banwell Road, Locking /Elborough	No	• Justified • Effective	Unsure	No	It contradicts aspirations and guidance in it own policies regarding environment and village and rural areas. Reference is also made to the sub policy of development within settlement boundaries. NS has not been cooperative with making of the plan as they have ignored comments made during the additional site consultation. I strongly object to the proposed planning application for 295 houses a shop and communal building north of Banwell Road, Elborough and 105 houses south of Old Banwell Road, Locking (specifically the eastern end). I will be sharing my objections and comments to yourselves, the local Parish Council and MP for Elborough Village. We have chosen to live in this rural area since 2011 having moved to achieve the rural home and outlook we desired. The natural landscape and the wildlife within it regularly provides deer, owls, bats, badgers, hedgehogs, foxes and birds of prey to name a few, some of which are covered by the Wildlife & Countryside Act 1981. Numerous birds nest in the area every year and this valley is recognised as a bat migration route with the proposed land being directly between the bat nursery on the old Banwell road and the location of the North Somerset and Mendip Bat area of conservation. I do not accept that maintaining a 'small area' of the natural habitat in place of the current footprint can constitute the requirement by law to 'not intentionally or recklessly disrupt a protected species'. Any building work will impact and there can be no enhancement to bio-diversity by destroying a natural and long established habitat or migration route. The area for development currently serves as a valuable green space contributing to the rural open character of Elborough Village. The building of such a development will permanently remove the natural land that forms part of the village landscape and will reduce the habitat and ecological value of this area as well as significantly impact on the 'street scene' of the village. The proposal also has the ability to impact on environmentally sensitive features including Sites of Significant Scientific Interest (SSSI) (Banwell Caves/Crooks Peak to Shute Shelve Hill Site) SNCI, Special Area of Conservation (SAC) and the national landscape and Mendip Hills Area of Outstanding Natural Beauty (AONB). The proposal does not demonstrate any knowledge, or identify the true impact to the local road network and the infrastructure has not been considered properly in this area or plan which, can only impact negatively on both the residents of Elborough Village and Hutton who will also have to suffer the huge increase in traffic passing through to access the 'new' development on what is not much more than a country lane not wide enough for 2 cars to pass in places. It is also not a viable route for buses or lorries to access regularly and continual flooding already causes the road to be in constant need of repair with the current levels of traffic. The plan to deal with the flood risk significantly underrates the levels of flooding that occurs regularly on the old Banwell road and does not deal with the problem areas at all which sees the water draining from the fields behind Elborough farm onto the road and also the flooding of the pond within Elborough often leaving the village difficult to access from either end. Flood levels currently can quickly become impassable in a car. I would suggest the plan has completely disregarded or is unaware of the main areas of flooding which will only increase with global warming and increased hard surfacing for the new development which will only worsen the drainage and surface water run off for the existing properties and surrounding roads. A significant proportion of the site is within flood zone 2 and 3. I am aware that the North Somerset internal Drainage board states the sites vulnerability and these are not considered or addressed within the proposal. The sites low lying nature and proximity to the coast also adds to the vulnerability of tidal flooding. The land proposed is the natural divide between the villages of Elborough and the village of Locking. These proposals start to merge the villages together leaving a what can only be described as a small strip of land to delineate the boundaries of the villages. The activity associated with a shop and communal building is not compatible with a quiet residential environment, impacting with light pollution from signage, security lighting and late night activity. A communal facility and shop will naturally bring large numbers of people into the area. Core strategy CS12 (high quality design) requires development to protect residential amenity. DM40 Residential amenity states development must not result in unacceptable levels of noise, disturbance or activity near residential homes. The proposal also harms the character of the area which is a quiet residential, semi rural location. A development of this intensity is not compatible with the character or scale of the current properties in Elborough and undermines the privacy that I as a resident am entitled to expect in a residential setting with the living conditions protected in accordance with DM32 and DM38 of North Somerset sites and policies and North Somerset residential design guide SPD Section 1 protecting living conditions. "DM32" is a key planning policy in the North Somerset Sites and Policies Plan (Part 1) The policy is used by the North Somerset Council to ensure that the design and layout of new buildings are of high quality, contribute positively to the local character, and do not negatively affect the living conditions of nearby residents or the surrounding environment) ("DM38" whilst applied to extensions is relevant as this proposal, as an extension to the village, does cause harm to the	It needs to be scrapped for this development.		Objection Elborough.docx

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					street scene and living conditions of the adjoining properties) • Street Scene/Local Area Impact: The proposal should not harm the street scene or the local area, including preventing the loss of characteristic boundary features or visually important trees. • Living Conditions: The development should not prejudice the living conditions of the occupiers of the proposed extension or adjoining properties (e.g., through loss of privacy or light). The proposed development will draw additional vehicles, delivery vans and service traffic into a residential area that is not designed for commercial use. As a result, the already busy roads will be further congested bringing additional safety concerns for children accessing school transport at the top of the road at the village, pedestrians, horse riders and dog walkers. The proposal fails to mitigate or show what consideration have been made for traffic calming and pedestrian crossings and traffic impact to existing homes. The proposal also fails to offer adequate traffic management solutions to prevent congestion. Given the limited road infrastructure in Elborough village the proposal fails to satisfy these requirements in line with North Somerset Core Strategy Policy CS10 Transport and congestion and DM24 Safety, Traffic & Transport Impact states the development must not compromise the safety of road users and provided suitable access. The impact of the proposed development will be felt not only in Elborough but also in Hutton where 20 MPH speed limits are in place to try and allow safe passage for our children into the local school. A development of this size with the addition of commercial building and residential development with such close proximity to existing residential boundaries does not align with the principles of protecting residential character. The proposal represents an over-intense use of a plot that directly borders homes, contrary to the aim of protecting residential amenity. This conflict with Core Strategy CS12 Achieving High Quality Design - requiring developments to protect residential amenity and DM40 residential Amenity -states a development must not result in unacceptable levels of noise, disturbance or activity near homes. I will also add that whilst I base my objections on these named specific sites the wider plan proposed for the local area is in my view excessive and damaging. On a daily basis, Weston is gridlocked with traffic. The M5 is beyond capacity and dangerous and adding the amount of new homes is only going to exacerbate the problem further. The employment opportunities are not in Weston and there are limited options to travel to employment outside of the area without driving even if that is to the train station. In conclusion and for the reasons outlined, noise, traffic increase, loss of green space impact on the biodiversity of the area, amenity disturbance, flooding risk, security and privacy concerns and incompatibility with a residential environment I will respectively request that the planning authority refuses this proposal and subsequent planning application submitted by SP Broadway are rejected.			

Name: Sarah Le Flohic **I.D:** 39210209

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP2: Strategic location: Woodspring (south west of Bristol)	Unsure		Unsure	Unsure		My concerns focus on two areas: 1. Yanley Lane is an extremely narrow country lane, connecting to Long Ashton via a single carriageway road bounded by existing housing. At present there is a through connection to the A38, which unfortunately reasonably frequently becomes completely clogged with traffic under current arrangements. There is reference/implication in the document that this will no longer be a through route (apart from pedestrians & cycles) - it is crucial that this is strengthened and implemented in the final development arrangements, to ensure that access from the Long Ashton end of the road continues to extend to/near to the ridge. 2. Any development remains below the ridge to protect the current views/rural nature of this area as well as maintaining a crucial wildlife corridor		

Name: Sarah Powell **I.D:** 62857473

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP15: Local Green Space	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Just to say this has been extremely difficult to negotiate so I can have my say Last year at the penny fields site my husband took a photo of a great crested newt. He then upload it to the pool resource site which collates sighting of wildlife in thus country. As the great crested newt is a protected species a report needs to be done at the very least Happy to show you the evidence at it has date and location			

Name: Sarah Robbins **I.D:** 62853505

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Building over 1800 homes in Nailsea will lead to overdevelopment. The proposed new road would not help the poor access in and out of Nailsea. All roads already very busy and would not help with congestion for Nailsea residents or help with access to the M5 for Nailsea or Backwell residents. The proposed road link will be costly and difficult to construct particularly under the rail crossing and near to the river Kenn. The area will need new schools and early years provision (early years provision already at full capacity due to new builds) The three new primary schools have not been allocated build sites. There is no provision in the plan for new health or leisure services putting current provision under extreme pressure. Land to the North of Nailsea is already very developed and should not be removed from the green belt. Loss on land to walk for leisure. The proposed replacement green belt to the south of Nailsea is extremely wet and unsuitable for leisure. The LP15 Local green spaces policy does not protect the Greenfield Crecent playing field used for leisure. Housing development to the south of Nailsea will result in the loss of Grade 2 Agricultural land which is of high quality and an asset to the county and country. Development with loose this asset for future generations. Rare Greater and Lesser Horseshoe bats are found in all proposed development locations in Nailsea. These are protected bats. Moor End Spout Nature reserve Nailsea has many protected species. Development in this area will create the loss of species due to destroyed habitats and with affect the biodiversity of the area. The rural lanes around Nailsea and Backwell are already very busy and have seen an increase due to recent development. Roads have become more dangerous already with increased traffic and pot holes. Already dangerous for walkers, cyclists, and horse riders these will become much worse with more housing development. Country walks are almost impossible now in the rural network of roads. There are no plans to help to make rural lanes safe. The roads to and from Nailsea already have very bad accident blackspots including Wraxall Hill, Portbury Lane and Stone Edge Batch. The Tickenham road is almost always congested with road works, Backwell also extremely busy with station road very dangerous and Wraxall road not suitable for large lorries. There are no plans to improve these roads or the accident blackspots which will all have increased traffic due to developments. Backwell lake was created to take excess water to prevent flooding when Nailsea was developed in the seventies but areas all around there and the train track are prone to flooding at all times of year. The proposed new developments will add to the risk of already flooding areas in this floodplain. The railway station at Nailsea and Backwell is not fit for purpose. Having twin grandsons who love trains we have not been able to make any train journeys from Nailsea and Backwell due to lack of ramps but have had to travel to Bristol or Yatton to board a train. It cannot cater for young families or people with mobility issues despite trying to improve for years. To could not be used as a transport hub in its current state.			

Name: Sarah Snell **I.D:** 62437057

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP8: Housing						I am writing to formally object to the proposed large-scale housing developments in Wrington, as detailed in the North Somerset Local Plan. These proposals would have significant and irreversible impacts on Wrington’s infrastructure, environment, and heritage. 1. Butts Batch Threat to Heritage and Infrastructure: Previous applications for this site have been refused due to serious impact on heritage assets and lack of adequate nfrastructure. These concerns remain unchanged and still apply. Environmental Destruction: This area supports important biodiversity and wildlife habitats. Development would lead to irreversible ecological damage. 2. Cox’s Green Loss of Agricultural Land: This is active, thriving farmland that would be lost forever if development proceeds. Increased Traffic and Safety Concerns: Wrington’s narrow, rural roads already face congestion and safety risks for pedestrians and cyclists. Additional housing would significantly worsen these conditions. Strain on Local Services: Schools: Wrington Church of England Primary School is usually oversubscribed, with no capacity for additional students. Healthcare: Local GP services are under increasing pressure, with extended waiting times. More housing will exacerbate these issues. Sewerage and Drainage: Wrington’s drainage system struggles during heavy rainfall. Further development could increase the risk of flooding. Flooding Risks: This site has a history of flooding. Building here would exacerbate drainage problems and increase risks to surrounding properties. 3. Land East of Wrington (Rickyard Road and Rydings Farm Area) Traffic and Infrastructure Overload: Development in this area would place excessive pressure on Wrington’s roads and services, worsening congestion and accessibility for residents. 4. Land at The Alburys/West Hay Road Loss of High-Quality Farmland: This is Grade 2 agricultural land, a valuable and irreplaceable resource that should be protected. Developing this land contradicts sustainability principles. 5. Garston’s Orchard Severe Flooding and Environmental Damage: Previous applications for this site have been refused due to its high flood risk. Development here would jeopardise properties and worsen existing environmental issues. Loss of Natural Habitats: This site plays an important role in local wildlife conservation. Construction would permanently destroy critical ecosystems. 6. Cumulative Impact on Wrington Beyond the concerns associated with individual sites, the combined effect of these developments would: Overwhelm local roads and increase congestion – particularly near the A38, West Hay Road, and Butts Batch. Place an unbearable strain on public services, including schools, healthcare, drainage, and transport infrastructure. Encroach on Wrington’s countryside, permanently altering its rural character. Exacerbate flood risks, especially in Cox’s Green and Garston’s Orchard. 7. Contravention of Planning Policies These proposals do not align with the North Somerset Local Plan or National Planning Policy Framework (NPPF) principles of sustainable development. Policy CS5 – Countryside Protection: The North Somerset Core Strategy states that countryside should be protected from unnecessary development. These proposals contradict this policy. Policy CS32 – Development in Service Villages: Wrington is a service village, where only small-scale, community-led development should be permitted. The proposed developments exceed this scale and are unsustainable. 8. Cumulative Impact of Bristol Airport Expansion Wrington is already negatively affected by Bristol Airport’s expansion, which has led to: Increased traffic congestion, particularly along the A38 and surrounding roads. Unauthorised airport parking on local green spaces. Higher levels of noise and air pollution. Further large-scale development would intensify these existing issues, significantly diminishing residents’ quality of life. Conclusion: Wrington is Not a Sustainable Location for Large-Scale Development For the reasons outlined above, I strongly urge North Somerset Council to reject these proposals. These plans do not align with local planning policies and will have detrimental and irreversible impacts on Wrington’s infrastructure, environment, and community.		

Name: Sarah Sprason **I.D:** 62861761

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Justified • Consistent with national policy	Unsure	No	As I understand it the local plan should support the views of residents and make sure that as far as possible the needs of the environment are also highly regarded. Locally, the inclusion of Tower Hill Farm and Black Rock for future housing does not do either of those things	With regard to housing brownfield and sustainable sites should be explored before allowing building on green spaces, particularly where local towns have been already been swamped with housing and grown exponentially over recent years.		
Black Rock, north of Clevedon Road	No	• Justified • Consistent with national policy	Unsure	No	As I understand it the local plan should support the views of residents and make sure that as far as possible the needs of the environment are also highly regarded. Locally, the inclusion of Tower Hill Farm and Black Rock for future housing does not do either of those things. With regard to housing brownfield and sustainable sites should be explored before allowing building on green spaces, particularly where local towns have been already been swamped with housing and grown exponentially over recent years.			

Name: Sarah Western **I.D:** 51045217

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	With the housing already approved for Backwell the village is looking at an increase of 40%, this in itself is an over development and there are no plans in place to increase school places, health services, leisure facilities or indeed road infrastructure to support what could be another 1600 if not more extra vehicles using the current road system. The proposed road would do little to improve congestion ,not only will it decimate the wildlife it will simply be moving the problem along the A370. We have already had to endure endless roadworks and disruption with the current houses being built not to mention the constant mud & dirt quite clearly flushing out onto the main road. It seems that Backwell has been allocated a higher number of houses than any other village in North Somerset , who are these houses being built for? The affordable housing allocation is negligible and the developers will do what they can to ensure that affordable housing is kept as low as they can get away with because its not economically viable for them, they are not interested in what they leave behind they are in it to make money, the residents are the ones that end up living with the congested roads, lack of school places and vying for GP appointments. I know for sure that my children , affordable housing or not, will not be able to afford to live in the area they have grown up in. Backwell is a prime area for those wanting to move out of London, due to the train connections, why should we have to foot the bill and have our village changed beyond recognition for this? Before you commit us to further development we need to ‘bed in’ with the current building construction underway. To be considering losing the amount of Grade 1 agricultural land you are suggesting needs serious contemplation and to be frank should be plan B not plan A just because you need to tick boxes to satisfy government targets, which change year on year. You are making decisions about people’s lives and investments please reconsider your proposals as unsound, detrimental and of no benefit to the local community.			

Name: Sean Kelly **I.D:** 62861313

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure				

Name: Serge Beauchamp **I.D:** 51281729

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Backwelll common is prone to flooding, which would be made worse by the loss of grass land which absorbs significant moisture.			

Name: Serhii Zubinskyi **I.D:** 62791201

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	I do not consider the allocation at Tower Farm to be sound. The site sits directly next to Weston Big Wood, which is an ancient woodland and an irreplaceable habitat. National planning policy (NPPF paragraphs 180–182) makes it very clear that developments which risk the loss or deterioration of ancient woodland should be refused unless there are wholly exceptional circumstances. I do not believe anything about this allocation meets that standard. Even indirect impacts — such as changes to drainage, increased nutrient runoff, soil compaction or disturbance to wildlife — are considered by organisations like the Woodland Trust to be damaging and, in many cases, irreversible. Once an ancient woodland's ecological balance is altered, it cannot be restored. This is why the proposed "ecological buffer" mentioned in the Plan is not sufficient: it does not address how the woodland's root zone, hydrology and wildlife corridors would be protected in the long term. The allocation also involves the permanent loss of high-quality agricultural land (Grade 2/3a), yet there is no published assessment showing why this is necessary or why less sensitive land elsewhere could not be used. NPPF paragraph 174 requires planning authorities to conserve and enhance valued landscapes and natural assets, and I do not believe this evidence has been provided. On a practical level, Portishead's infrastructure — schools, transport and healthcare — is already under strain. Development in this location would only increase car dependency because public transport options are limited. This goes against the sustainable travel aims of NPPF paragraphs 104–106. Finally, the delivery of this allocation depends on several major elements (new school provision, bus service contributions, habitat management, footpath upgrades), but none of these are secured or funded. Without firm mechanisms in place, the allocation cannot be considered effective or deliverable, as required by NPPF paragraph 35. For all these reasons, I do not believe the allocation is justified, consistent with national policy or capable of being delivered as proposed. In my view, no changes or minor adjustments would make this site suitable for development. Because of its position next to ancient woodland and its important farmland and landscape qualities, the only reasonable modification is to remove this allocation from the Local Plan entirely. The land should remain open countryside and contribute to nature recovery rather than be lost to housing. I do not support the North Somerset Local Plan 2041 for the Tower Farm allocation.			

Name: Shail Patel **I.D:** 58629473

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP3: Spatial strategy	Yes		Yes	Yes			In general I support this plan noting the following to ensure the proposal remains sound: Yes - we need more affordable housing - this must be sustainable and 'green' etc No:	

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
							- we do not need any expansion of Bristol Airport for a very large number of reasons inc, pollution & climate change, lack of transport links, better alternatives elsewhere esp. Cardiff and Exeter, cf arguments put forward by BAAN: Bristol Airport Action Network - we do not need developer scale developments in Wrington for the reasons given by Keep Wrington as Wrington	
Policy LP12: Bristol Airport	Yes		Yes	Yes			In general I support this plan noting the following to ensure the proposal remains sound: - we do not need any expansion of Bristol Airport for a very large number of reasons inc, pollution & climate change, lack of transport links, better alternatives elsewhere esp. Cardiff and Exeter, cf arguments put forward by BAAN: Bristol Airport Action Network	

Name: Sharon Connelly **I.D:** 62773537

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No		No	No	The area around Tower Farm leads to Weston Big Wood a Triple SI. It is ancient woodland- very special with connectivity to the rest of the Gordano Valley. It allows movement of insects and wildlife. Buffer areas around it are needed and it is vital a sensible buffer is between the woods and the estuary, and wood to floor of the valley. Many species of birds, insects, wildlife and rare trees make up the woods and surrounding areas. Due to the ecological importance of the area Tower Farm was added to the Green Belt in the late1980s. The Weston Big Wood and all the surrounding areas and all the Gordano Valley are worthy of protection. Weston Big Wood and surrounding areas and fields are important for people - for their physical and mental health. National planning policy allows changes to the green belt only in exceptional circumstances and these are not being demonstrated. NSC are in breach of Section 110 and 115. The area around Tower Farm has no real employment available, it is not easily walkable into the main areas of the town and public transport is not frequent. Brownfield sites should be used instead of using the land in the Green Belt . There are other sites within Portishead that could see further development - Wyndham Way is around the new train station area and could see high rise buildings that would increase capacity but continue in keeping with the modern designs of that area. Petersfield area has been left derelict but should be developed. Castlewood in Clevedon is a large Brownfield site and has the potential for more homes than the 120 already designated. It is close to amenities. We have other Brownfield sites in North Somerset . Green field sites should not be allowed for future development . We must use Brownfield if we allocate Greenfield sites we are lost....especially when they are as important as the areas around the ancient Weston Big Wood and the Gordano			

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					Valley! Development at Tower Farm will be damaging for many reasons.			
Black Rock, north of Clevedon Road	No	• Justified • Effective • Consistent with national policy	No	No	The area around Black Rock leads to Weston Big Wood a Triple SI. It is ancient woodland- very special with connectivity to the rest of the Gordano Valley. It allows movement of insects and wildlife. Buffer areas around it are needed and it is vital a sensible buffer is between the woods and the estuary, and wood to floor of the valley. Many species of birds, insects, wildlife and rare trees make up the woods and surrounding areas. Due to the ecological importance of the area Black Rock was added to the Green Belt in the late1980s. The Weston Big Wood and all the surrounding areas and all the Gordano Valley are worthy of protection. Weston Big Wood and surrounding areas and fields are important for people - for their physical and mental health. National planning policy allows changes to the green belt only in exceptional circumstances and these are not being demonstrated. Black Rock site sits alongside Clevedon Rd which is an exceptionally busy B road. It is the only road from Portishead to Clevedon without going onto the M5 motorway. When there is an accident on the M5 or it is shut and traffic is diverted the road in front of the proposed site is at a standstill. Adding further traffic means that the site can't provide safe or suitable access to amenities. It would create unacceptable transport impacts, failing soundness tests. Added transport will also mean extra pollution impacting both people and the Gordano Valley green corridor and Weston Big Wood.	Brownfield sites should be used instead of using the land in the Green Belt . There are other sites within Portishead that could see further development - Wyndham Way is around the new train station area and could see high rise buildings that would increase capacity but continue in keeping with the modern designs of that area. Petersfield area has been left derelict but should be developed. Castlewood in Clevedon is a large Brownfield site and has the potential for more homes than the 120 already designated. It is close to amenities. We have other Brownfield sites in North Somerset . Green field sites should not be allowed for future development . We must use Brownfield if we allocate Greenfield sites we are lost....especially when they are as important as Black Rock and areas around the ancient Weston Big Wood and the Gordano Valley! Development at Black Rock will be damaging for many reasons.		

Name: Shaun Parker **I.D:** 21318305

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell already has 800 houses with planning permission more than meeting needs. A further 1,000 would lead to the complete overdevelopment of Backwell, without the proper infrastructure to support. This is completely unsustainable. It would destroy Grade 1 Agricultural Greenbelt land that is in use by Local Farmers. This land has always had protections and for very good reasons. Backwell is not an employment center and this is not about housing need. Backwell is taking more that it's fair share of housing but these proposals are fundamentally flawed and unsustainable. If this goes ahead it will be recorded as one of the worst planning decisions in North Somerset's history.			

Name: Sheila Liddle **I.D:** 39128673

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure		1. I object to the proposal to build a further 889 houses in Backwell as I do not believe the numbers to be justified. Backwell is a village with limited amenities, and it already has a further 800 houses being built, a 40% increase in numbers. Backwell should not be required to accommodate another 40% of housing when places like Clevedon, Pill and Portishead are required to supply much lower percentages of housing. 2. There is a proposal to alleviate the problems with traffic through the village, via Station Road by building a short by-pass. The proposed by-pass will need to go under or over the existing railway which will be extremely expensive, so it is unlikely to ever be built. A condition of any planning permission should be that any infrastructure such as a by-pass road should be built before any building work can commence and should be funded by the building contractors. 3. Backwell village has facilities such as medical practice, dentist, primary and secondary schools, a leisure centre and small shops. However, the facilities will be insufficient and will find it difficult enough to support the new housing already being built without adding double the numbers. You cannot add 2000 house without building new infrastructures to support it. The infrastructure should be at the expense of the builders as they are the ones making the profit out of the proposals. They should be required to build the infrastructure before they build the houses. 4. I have seen no justification or analysis to demonstrate the need for so many houses. The area does not have a great deal of employment, most residents commute. Although the plans suggest building an employment hub, you need to have companies who wish to set up in an area. The area is unsuitable for any large structures such as warehousing. 5. The additional site is on prime agricultural land. We should not be building on good agricultural land if the country is going to be relatively self-sufficient. Only 7% agricultural land is available for food crops and grazing in North Somerset. We should be protecting this resource. Build on grey belt land instead. 6. In part of the area where it is proposed to build 889 houses is in an area where there is a high chance of flooding by surface water, as identified on Environment Agency maps (Ref: https://check-long-term-flood-risk.service.gov.uk/map?easting=349670&northing=169397&map=SurfaceWater) Backwell regularly experiences problems with flooding, especially down the A370 because surface water runs off the fields above the A370 and runs either down the road or across the road to the fields downhill. If these fields are built on, covering it with concrete there are going to be further flooding issues. This has already been demonstrated with the construction in Farleigh Fields – there is currently a river running down the main road (5/12/25). Additional land in Weston has been rejected as being suitable because it is at risk of being flooded, so the same rejection should be applied to Backwell. 7. The proposed housing will destroy the character of the village, as it will be a sprawling mass joined up with Nailsea. 8. The plan appears to concentrate on transport, but the railway station is severely lacking in facilities such as accessibility for disabled. This needs to be addressed. 9. Nowhere are there any costings for the infrastructure to support the proposals and no funding guarantees for new roads or services. 10. An environmental study is required. As well as lesser and greater horseshoe bats there are also other species such as long eared bats, as well as owls, reptiles, foxes, badgers, roe deer and hares. The construction will destroy a valuable wildlife habitat and affect the biodiversity of the area. 11. I do not believe we need all this housing in this particular area.			

Name: Sheila Morris **I.D:** 62658433

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Black Rock, north of Clevedon Road	No	• Positively prepared • Justified	No	No	Not Justified – Unsuitable location requiring off-site ecological mitigation The location lies immediately beside Weston Big Wood — an ancient woodland and Site of Nature Conservation Interest (SNCI) managed by Woodland Trust and supported by Avon Wildlife Trust. The woodland forms part of the Gordano Valley ecological network and a nationally important habitat mosaic	No modification would make this allocation at Black Rock acceptable and sustainable. The need for off-site mitigation and multiple infrastructure		

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		• Effective • Consistent with national policy			of open grassland, wetland and woodland. It was added to the Green Belt in the late 1980s precisely because of its high ecological value. The allocation of approximately 100 dwellings at Black Rock is not justified because the Council itself acknowledges that key environmental and ecological requirements cannot be met on-site, and must instead be located off-site on a separate plot on the other side of the Nursery. This approach directly conflicts with NPPF paragraph 180(a), which requires avoidance of impact before remediation or off-site compensation is considered. The need for offset land demonstrates the inherent unsuitability of the site for development. There is no published evidence of less sensitive alternative sites being considered and discounted. For example, the density of housing proposed at the brownfield site at Wyndam Way could be increased to allow a further 100 dwellings there without any adverse ecological impact. This location is a valued local green space which adds to community wellbeing and is already accessible via existing public footpaths. Not Consistent with National Policy – Failure to protect and enhance biodiversity The approach of relying on off-site mitigation and a “suitable ecological buffer” illustrates a reactive rather than preventative approach to biodiversity protection. NPPF paragraphs 180–182 require Local Plans to conserve habitats, prevent deterioration of irreplaceable habitat, and deliver net gains for biodiversity. The allocation fails this by offloading its ecological burden onto land nearby, without, as yet, securing long-term management or legal protection for compensatory habitats. It also conflicts with the Avon Wildlife Trust’s 2030 Strategy, which emphasises restoration of 30 per cent of land for nature and enhancing landscape connectivity in the Gordano Valley. Not Positively Prepared – Unsustainable pattern of growth The site lies on the western approach to Portishead along Clevedon Road, where public transport is limited and local services are minimal. It is more than a 30-minute walk to the proposed railway station. Residents would be heavily reliant on private vehicles to access schools, healthcare and employment. The fact that footways and new bus stop contributions are required underlines existing infrastructure inadequacy. This car-dependent pattern of development conflicts with the sustainable transport objectives of NPPF paragraphs 104–106. As an existing resident I can tell the Council that Bloor Homes offer to relocate the bus stop at Black Rock Villas is not welcomed. It is highly convenient where it is and there is a bus stop not far away at Hollis Avenue, which could also serve any new residents. What is needed, to improve the bus service and reduce car use, is more frequent buses which there is no funding for. The proposed crossing of the B3124 at Black Rock Villas is highly unsuitable as it is on a bend. Any crossing would be better placed at the end of the pavement on the south side of the road, where the road is straight and visibility much better. Also, the site of the proposed crossing would not connect directly to the Gordano Round as incorrectly illustrated on the map, because the entrance to the Gordano Round has been relocated to the main entrance to How Ham Farm. The Council must be aware that planning permission has recently been granted for a second (agricultural) entrance to How Ham Farm (25/P/0495/FUL), which is opposite to the Nursery. There are already multiple entrances onto this short stretch of road and road safety is an issue to consider before adding yet another one. Not Effective – Unclear delivery and infrastructure dependencies The site depends on multiple off-site and third-party mitigations including ecological offset on the other side of the Nursery, new footway construction, bus service contributions, and delivery of a section of the Gordano Greenway. No clear funding mechanism, responsible delivery body, or phasing plan is identified in the Plan. Consequently, the allocation lacks deliverability and fails the effectiveness test under NPPF paragraph 35(c). Landscape & Setting The site lies within open countryside forming part of the rural setting of Portishead and the Gordano Valley. The expansion westwards into this part of the countryside would diminish the settlement edge, reduce landscape openness, and risk urbanising what should remain a transitional zone between town	dependencies shows the site is environmentally and logistically unsuitable for housing. The allocation should be removed entirely from Schedule 1. Instead, the land should remain open countryside, contributing to biodiversity and landscape value, in line with the Avon Wildlife Trust’s 2030 Strategy, Woodland Trust guidance and national biodiversity objectives. However, should the application be granted, the Biodiversity Net Gain Units required to be created by Bloor Homes need to be legally registered with the Government to ensure at least 30 years maintenance. The frequency of bus services should be increased. There is no need to relocate the bus stop and no benefit from doing so. The suggested crossing should be positioned on a straight section of the B3124 opposite the Nursery for safety.		

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					and countryside. Bloor Homes suggest that the development is not in a location that is highly visible to many people. I disagree with this statement. It is highly visible to anyone passing on the B3124 and from the footpaths on the Gordano Round up to Clapton Manor. Hence it would not enhance the landscape. Agriculture & Soils The farmland in question is likely to be of best and most versatile quality (Grade 2/3a) and its loss for housing is not justified when less sensitive land could be used. The Plan does not robustly demonstrate why this agricultural land must be released. Hydrology & Ecology Development on this edge farmland may affect surface-water drainage, soil compaction and wildlife connectivity into the adjoining woodlands and wetland systems associated with the Gordano Valley. The cumulative effect of development pressure in the area further stresses the ecological network. I do not support the North Somerset Local Plan 2041 for the Black Rock location.			

Name: Sheila Rhodes **I.D:** 62855425

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land west of Hutton	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	I consider the North Somerset Local Plan 2041: Pre-submission Plan to be unsound, not legally compliant, and in breach of the Duty to Cooperate for the following reasons: Duty to Cooperate – Not Met There is insufficient evidence of effective engagement with neighbouring authorities, transport bodies, and environmental agencies regarding housing distribution, infrastructure delivery, and cumulative transport impacts. No joint strategies have been presented to manage cross-boundary traffic, congestion, or pressures on Weston-super-Mare, nor to address biodiversity and habitat connectivity. Not Sound – Evidence Base and Justification Housing allocations rely on outdated projections and fail to reflect current demographic trends or infrastructure capacity. The Plan disproportionately directs growth to small rural settlements, including Locking, Elborough, and Hutton, without robust justification or consideration of reasonable alternatives. The Sustainability Appraisal does not adequately explore alternatives that could avoid excessive growth in these villages. Not Effective – Transport, Infrastructure, and Flood Risk Narrow roads and village lanes in Locking, Elborough, and Hutton are already congested, and no credible evidence demonstrates that the additional traffic from proposed development can be safely accommodated.	To address the issues identified, the following modifications are required: 1. Duty to Cooperate – Strengthened Evidence and Engagement Provide published evidence of effective engagement with neighbouring authorities, transport agencies, and environmental bodies on housing distribution, infrastructure delivery, and biodiversity protection. Prepare joint strategies to manage cross-boundary traffic, congestion, and cumulative impacts on Weston-super-Mare. Demonstrate how biodiversity, habitat connectivity, and environmental impacts have been jointly considered. 2. Transport and Highways – Robust and Deliverable Evidence Undertake a comprehensive transport assessment confirming that roads serving Locking, Elborough, and Hutton can safely accommodate the traffic generated by proposed developments. Include specific, costed, and deliverable infrastructure improvements, including: Banwell Road / A371 junction upgrades Improvements to narrow village lanes in Locking and Hutton Road safety measures around Hutton Primary School		

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					Flood-risk issues and surface-water drainage constraints in these areas are not adequately addressed, undermining deliverability and resilience. Local schools, healthcare, and utilities are already under pressure, with no identified, funded plans to expand capacity in line with proposed growth. Not Consistent with National Policy The Plan fails to ensure sustainable development: growth is directed to areas poorly served by public transport, increasing reliance on private vehicles. Sensitive habitats and wildlife corridors adjacent to proposed sites are at risk, contrary to the NPPF requirement to protect and enhance the natural environment. Safe access for pedestrians, cyclists, and emergency vehicles is not evidenced, and the Plan does not provide a credible strategy to upgrade infrastructure. Conclusion: The Plan is therefore unsound, not legally compliant, and fails the Duty to Cooperate. The issues relate to insufficient cross-boundary cooperation, lack of justification for site allocations, ineffective delivery of infrastructure, environmental risks, and non-compliance with national policy. Without substantial modifications addressing these points—including scaling, phasing, and evidencing of growth allocations—the Plan should not be adopted.	Map, fund, and secure active travel and sustainable transport routes. If mitigation is not feasible, reduce or remove housing allocations in these areas. 3. Flood Risk and Drainage – Evidence-Based Modifications Provide a site-specific flood risk and surface-water management strategy, demonstrating that development will not increase flood risk to existing homes or downstream areas. Remove or reduce allocations where safe drainage solutions cannot be delivered. 4. Education, Healthcare, and Utilities – Confirmed Capacity Identify specific, funded commitments to expand schools, healthcare services, and utilities to support proposed growth. Ensure that development is phased alongside infrastructure delivery, with housing limited until capacity improvements are in place. Reduce or relocate allocations where infrastructure cannot be secured. 5. Biodiversity and Environmental Protection Undertake up-to-date ecological assessments and produce a strategy to protect connected habitats and wildlife corridors around proposed development sites. Include a policy requirement for biodiversity net gain. Remove or amend allocations that risk irreversible ecological harm. 6. Settlement Strategy – Proportionate and Justified Growth Reassess growth levels in Elborough, Locking, and Hutton to ensure development is proportionate, reflects the settlement hierarchy, and aligns with national policy on sustainable development. Avoid doubling the size of small rural settlements without strong justification and fully evidenced infrastructure provision. 7. Updated Housing Need Evidence Update the housing need assessment using current demographic and migration data to ensure housing numbers are realistic and justified across the district. 8. Contingency / Reassessment If robust evidence cannot be provided on flood risk,		

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						transport, infrastructure, or services, the Plan should either: Remove the allocation from the spatial strategy, or Reduce the number of homes to ensure deliverability, sustainability, and soundness. Conclusion: Implementing these modifications will ensure the Plan is legally compliant, sound, and deliverable, with growth directed to locations that can realistically accommodate it while protecting infrastructure, transport, and the environment.		
Land to the west of Elborough	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	I object to the North Somerset Local Plan 2041: Pre-submission Plan on the grounds that it is not legally compliant and unsound. My concerns relate to transport, infrastructure, environmental impacts, and significant deficiencies in the evidence base. 1. Duty to Cooperate – Not Met There is insufficient evidence that North Somerset Council has effectively engaged with neighbouring authorities, transport bodies, or environmental agencies regarding the proposed scale of housing growth. Specifically: No clear cross-boundary assessment of transport impacts, despite major effects on the A371, Locking, Hutton, and the wider Weston-super-Mare area. No joint evidence demonstrating how infrastructure capacity, school places, or healthcare will be delivered. No engagement with environmental bodies regarding biodiversity impacts and habitat connectivity. As such, the statutory Duty to Cooperate has not been fulfilled. 2. Not Justified – Flawed Evidence Base Housing targets rely on outdated projections that do not reflect current demographic trends or realistic infrastructure capacity. The plan disproportionately directs growth to small rural settlements, including Elborough and Locking, without justification for why these areas should accommodate such significant population increases. The Sustainability Appraisal does not adequately consider alternatives that would avoid overburdening small villages. For these reasons, the strategy is not justified. 3. Not Effective – Transport, Roads, and Flood Risk a. Narrow Roads and Vehicle Volumes The road network serving Locking, Elborough, and Hutton consists of narrow lanes already under pressure.	To address the issues raised in my objection, the following modifications are required to ensure that the North Somerset Local Plan 2041 is legally compliant and sound: 1. Duty to Cooperate – Strengthen Cross-Boundary Evidence Provide clear, published evidence of effective engagement with neighbouring authorities, transport bodies, and environmental agencies regarding housing distribution, infrastructure capacity, and cumulative transport impacts. Prepare a joint strategy to manage congestion, cross-boundary traffic through Hutton and Locking, and infrastructure pressures on Weston-super-Mare. Without this, the statutory Duty to Cooperate cannot be considered met. 2. Transport and Highways – Robust and Deliverable Evidence Undertake a comprehensive transport assessment to demonstrate that narrow country lanes between Elborough, Locking, and Hutton can safely accommodate traffic generated by 315+ dwellings. Include specific, costed, and deliverable upgrades to: Banwell Road / A371 junction Narrow village routes in Locking and Hutton Road safety measures around Hutton Primary School, where pedestrian safety is already compromised Map, fund, and secure active and sustainable travel routes rather than assuming their provision. If these measures cannot be delivered, the housing allocation must be reduced or removed. 3. Public Transport Provision – Secured, Not Aspirational Commit to enhanced bus services for Elborough and Locking, backed by enforceable mechanisms such as S106 or CIL		

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					Additional traffic would significantly affect Hutton village, where the main road passes the primary school, creating increased safety risks for children and pedestrians. Banwell Road and Old Banwell Road cannot safely accommodate the proposed scale of development. There is insufficient evidence that the required upgrade to the Banwell Road / A371 junction is deliverable. b. Public Transport Elborough has limited bus services and no rail access. Doubling the size of the village would increase car dependency, contrary to national policy. c. Flood Risk Significant housing is proposed in areas with known drainage constraints and flood-risk issues. The evidence base does not demonstrate that surface water can be safely managed or attenuated. For these reasons, the plan is not effective. 4. Not Consistent with National Policy The National Planning Policy Framework (NPPF) requires plans to promote sustainable development, protect biodiversity, and ensure safe access for all users. This plan fails to meet these requirements: Growth is directed to areas poorly served by public transport, increasing reliance on private vehicles. Sensitive habitats and wildlife corridors adjacent to proposed sites are at risk of irreversible ecological harm. Safe access for emergency vehicles, pedestrians, and cyclists is not evidenced. No credible strategy is provided to upgrade the road network or active travel routes. 5. Infrastructure Capacity – Not Positively Prepared Local infrastructure is already under strain: Schools are near capacity and lack funded expansion plans. Healthcare provision (GPs, dentists) is stretched. Utilities and drainage infrastructure are not demonstrated as capable of supporting significant population growth. Doubling the size of Elborough and significantly expanding Locking without realistic plans for supporting infrastructure means the plan has not been positively prepared. For the reasons outlined above—failures in the Duty to Cooperate, lack of	agreements. Phase housing delivery to ensure public transport improvements are implemented before or alongside development. 4. Flood Risk and Drainage – Evidence-Based Modifications Require a site-specific surface water management strategy detailing how attenuation will be provided and how discharge will be managed without increasing downstream flood risk. Reduce or remove allocations where safe and deliverable drainage solutions cannot be demonstrated. 5. Biodiversity and Wildlife Corridors Undertake up-to-date ecological assessments and produce a clear strategy to protect connected habitats around Elborough and Locking. Include a policy requirement for biodiversity net gain that preserves wildlife corridors adjacent to development sites. Remove or amend allocations that risk irreversible ecological harm. 6. Infrastructure Capacity – Education, Healthcare, and Utilities Identify specific, funded commitments to expand schools, healthcare services, and utilities rather than relying on unspecified contributions. Ensure growth does not proceed without guaranteed delivery of supporting infrastructure. Reduce or relocate housing allocations where capacity cannot be expanded. 7. Settlement Strategy – Proportionate and Justified Growth Reassess development levels for Elborough and Locking to ensure growth is: Proportionate Consistent with the settlement hierarchy Aligned with national policy on sustainable development Avoid doubling the size of small rural settlements without strong justification and fully evidenced infrastructure provision. 8. Updated Housing Need Evidence Update the housing need assessment using the most recent demographic and migration data to ensure housing numbers		

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					justification, ineffective delivery mechanisms, inconsistency with national policy, and inadequate infrastructure planning—I object to the North Somerset Local Plan 2041: Pre-submission Plan. The plan is unsound in its current form and should be reconsidered, particularly regarding the scale, location, and deliverability of growth in Locking, Elborough, and Hutton.	are justified and achievable across the district. Conclusion To make the Local Plan legally compliant and sound, the Council must: Provide robust evidence of infrastructure deliverability Comply with the Duty to Cooperate Update housing need projections Strengthen environmental protections Ensure that growth in Locking, Elborough, and Hutton is proportionate and sustainable Unless these modifications are implemented, the plan should not be adopted.		
Land north of Banwell Road, Locking /Elborough	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	I object to the North Somerset Local Plan 2041: Pre-submission Plan on the grounds that it is not legally compliant and not sound. My concerns relate to transport, infrastructure, environmental impacts, and significant weaknesses in the evidence base. 1. Failure to Meet the Duty to Cooperate The plan does not demonstrate effective cooperation with neighbouring authorities, transport organisations, or environmental bodies. In particular: There is no clear cross-boundary assessment of transport impacts, despite the substantial effects of the proposed growth on the A371, Locking, Hutton, and the wider Weston-super-Mare area. There is no joint evidence showing how essential infrastructure—school capacity, healthcare provision, or utilities—will be planned or delivered. There is no recorded engagement with environmental agencies regarding biodiversity impacts, habitat connectivity, or appropriate mitigation. On this basis, the statutory Duty to Cooperate has not been met. 2. Not Justified – Flawed and Outdated Evidence Base The strategy is not founded on robust or up-to-date evidence: Housing requirements are based on outdated projections that do not reflect current demographic trends or realistic infrastructure capacity. The plan disproportionately directs growth to small rural settlements such as Elborough and Locking, without clear justification for why these communities are appropriate for such large increases in population. The Sustainability Appraisal does not adequately assess reasonable alternatives, particularly those that would avoid excessive development pressure on small villages.	o address the issues set out in my objection, the following modifications are required for the plan to become legally compliant and sound: 1. Duty to Cooperate – Strengthen Cross-Boundary Evidence Publish clear evidence of meaningful engagement with neighbouring authorities, transport bodies, and environmental organisations regarding housing distribution, infrastructure capacity, and cumulative transport impacts. Prepare a joint transport strategy with adjacent authorities to address congestion on the A371, increased cross-boundary traffic through Hutton and Locking, and wider impacts on Weston-super-Mare. Without this, the Duty to Cooperate remains unmet. 2. Transport and Highways – Provide Robust, Deliverable Evidence Undertake a comprehensive transport assessment demonstrating whether the narrow lanes between Elborough, Locking, and Hutton can safely accommodate traffic generated by 315+ dwellings. The Local Plan must include specific, costed and deliverable upgrades to: the Banwell Road / A371 junction, constrained village routes in Locking and Hutton, and road safety measures around Hutton Primary School, where children already face unsafe crossing conditions. Active travel routes must be clearly mapped, funded, and secured—not assumed.		

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					Accordingly, the plan is not justified. 3. Not Effective – Transport, Highways Capacity, and Flood Risk a. Road Safety and Capacity The road network serving Locking, Elborough, and Hutton is made up of narrow lanes already operating under strain. The proposed allocations would significantly increase traffic, including: Hutton village, where the main road runs directly past the primary school. Road crossing is already unsafe during peak hours, and greater traffic volumes would raise risks for children and pedestrians. Banwell Road and Old Banwell Road, which are not capable of safely accommodating additional development at the scale proposed. No credible evidence shows that improvements to the Banwell Road / A371 junction are achievable or deliverable. b. Public Transport Deficiencies Elborough has limited bus services and no rail access. The proposed growth would effectively double the size of the village, increasing car dependency in direct contradiction to national policy objectives to reduce reliance on private vehicles. c. Flood Risk and Drainage Significant development is allocated in areas with known drainage issues and surface water flood risk. The evidence base does not demonstrate that flood risk can be safely managed or mitigated. This undermines the deliverability and resilience of the plan. For these combined reasons, the plan is not effective. 4. Not Consistent with National Policy (NPPF) The NPPF requires Local Plans to promote sustainable development, protect biodiversity, and ensure safe and suitable access for all users. This plan fails to meet those requirements: Growth is directed to locations poorly served by public transport, increasing car dependency. Proposed sites lie adjacent to sensitive habitats and wildlife corridors, with no adequate evidence of how ecological harm will be avoided. Safe access for emergency services, pedestrians, and cyclists is not demonstrated, nor is any credible strategy provided to upgrade the local road network or active travel routes. Therefore, the plan is not consistent with national policy. 5. Not Positively Prepared – Insufficient Infrastructure Provision Local infrastructure in the affected areas is already under pressure: Schools are near capacity, with no firm or funded expansion proposals.	If these upgrades cannot be delivered, the allocation should be reduced or removed. 3. Public Transport – Improvements Must Be Secured, Not Aspirational Provide a firm commitment to improved bus services for Elborough and Locking, secured through enforceable mechanisms such as S106 or CIL, rather than vague or optional contributions. Phase housing delivery so that public transport enhancements are delivered before or alongside development. 4. Flood Risk and Drainage – Evidence-Based Requirements Require a site-specific surface-water management strategy identifying how attenuation will be provided and how discharge will be managed without increasing downstream flood risk. Reduce or remove allocations where safe and deliverable drainage solutions cannot be demonstrated. 5. Biodiversity and Wildlife Corridors Provide up-to-date ecological assessments and a clear strategy for protecting connected habitats around Elborough and Locking. Include policies requiring biodiversity net gain that safeguards wildlife corridors directly adjacent to development sites. Remove or amend allocations where ecological harm cannot be avoided. 6. Infrastructure Capacity – Education, Healthcare, and Utilities Identify specific, funded proposals to expand local schools, healthcare services, and utility networks, rather than relying on unspecified or unfunded contributions. Ensure development does not proceed without guaranteed delivery of this infrastructure. Reduce or relocate housing numbers where capacity cannot realistically be expanded. 7. Settlement Strategy – Proportionate, Justified Growth Reassess development levels in Elborough and Locking to ensure growth is proportionate, aligns with the settlement hierarchy, and complies with national policy on sustainable development.		

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					Healthcare provision (GPs, dentists) is already stretched. Utilities and drainage capacity has not been demonstrated as adequate to support the population growth proposed. Doubling the size of Elborough and significantly expanding Locking without credible, funded plans for supporting infrastructure shows that the plan has not been positively prepared. Conclusion For the reasons outlined above—failure to meet the Duty to Cooperate, lack of justification, ineffective delivery mechanisms, inconsistency with national policy, and insufficient infrastructure planning—I object to the North Somerset Local Plan 2041: Pre-submission Plan. As drafted, the plan is unsound. Substantial changes are required, including a reassessment of the scale, location, and deliverability of the proposed growth in Locking, Elborough, and Hutton.	Avoid doubling the size of small rural settlements without strong justification and fully evidenced infrastructure provision. 8. Updated Housing Need Evidence Update the housing need assessment using the most recent demographic and migration data to ensure the overall housing requirement is justified and reflects realistic capacity across the district. Conclusion To render the Local Plan legally compliant and sound, the Council must provide robust evidence of infrastructure deliverability, fulfil the Duty to Cooperate, update its housing need projections, strengthen environmental protections, and ensure that growth in Locking, Elborough, and Hutton is proportionate and sustainable. Without these modifications, the plan should not be adopted.		

Name: Shirley Edwards **I.D:** 29289473

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	This proposal is a non starter because the area around Backwell Lake and across Backwell Common regularly flood so no amount of attenuation ponds would offset flooding issues from a housing development. There is a plan for major infrastructure which is thought to help sweeten this proposal but there is a railway line is in the way and there is no feasibility study!			
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Regardless of government targets, to opt for converting Grade 1 agricultural land into housing is an own goal! It will destroy an extremely valuable location where crops and grazing currently take place. This goes against the Government's policy re prime agricultural land. How will this essential food source and habitat be reproduced locally when there is just 7% of high quality land left in North Somerset? As a village Backwell cannot absorb a further 900 dwellings. In addition to those sites already approved/under construction Backwell's roads, trains, schools, GP surgery, chemist and local amenities are already under great strain, not to mention the regular flooding experienced which makes another housing development completely unviable. Backwell is not an employment hub as most people commute to Bristol or Weston-Super-Mare causing increased traffic jams, further exacerbated when there are issues on the M5. For rail commuters, the platforms at Nailsea & Backwell Station cannot accommodate all the carriages on inter city services so travellers need to make sure that they are joining or leaving a carriage which is in line with a platform and this must pose a serious problem for Health and Safety. The station is not fully accessible for people with mobility issues or those with pushchairs/young children.This issue has been explored at length for at least 20 years. All in all this Plan is not sound. All in all, there is very little evidence to support this additional housing.			

Name: Sian Adwick **I.D:** 62832129

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	This plan would lead to a complete overdevelopment of Backwell. With 800 houses already approved in the village this is unsustainable. The lack of infrastructure and services along with not enough school places cannot support this level of new housing. Backwell is not a viable location for 1000 new houses – most residents in Backwell commute to work and the railway station is not fit for purpose as a transport hub - it is inaccessible for those with mobility issues or who have small children (I myself I have experienced difficulty using the train with my two young children). Based on these issues, the obvious alternative would be for people to drive but when considering the proposed road, it is clear that this would have a major and negative impact on Backwell and would not effectively reduce congestion on Station Road – a road that is not fit to manage further traffic. Furthermore there are no details or plans for this proposed road. This plan suggests that Backwell should take 7% of the district's housing allocation. Backwell is a village, we live here with our young family because of the green space and to be able to enjoy a healthier environment. It does not make sense to allocate such a large portion to this village in comparison to a town such as Clevedon which has been allocated just 2%. This plan would mean building on Grade 1 Agricultural Land - there is only 7% of this high quality land in North Somerset, it needs to be preserved and used for its current purpose – food crops and grazing. It must be highlighted that Government Policy states "we must protect our best and most versatile land" this proposal clearly contradicts this policy. Furthermore, developing on this land would also harm biodiversity and destroy valuable wildlife habitats. Another major concern is flooding. I don't believe the plans address the potential worsening of the flooding issues around Backwell Common. I feel the plans omit necessary detail that needs to be addressed round flooding and the other issues I have raised above.			

Name: Sian Hurst **I.D:** 62110433

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	We have lived in Backwell for over 5 years. We have two children (3+1) plus a dog we walk daily around the village. We moved here for the local schools, green space and village atmosphere. We are already losing the fields we walk around on a daily basis (Rodney rd development and Grove Farm) so will now have to walk further to find places to walk in nature. To watch the detriment of mature trees and bushes whilst they have been building the Farleigh Fields and Rodney Road site is heartbreaking. It's a zone A SAC for Greater and Lesser horseshoe bats, the ecology report stated the loss of habitat and foraging ground would be detrimental, yet it has still been passed. Our village road network struggles as it is. It is not physically possible for two HGVs to pass on Station Road or Rodney Road without mounting the pavement. We have a local village infant school and village junior school opposite ends of the village, this means we have many young children walking along these roads twice a day. It's dangerous as it is – let alone all of the additional cars for the 800 houses already approved. We have a local village high street, and village amenities. There's nothing here to offer in terms of jobs and employment. All new families will have to commute elsewhere. I understand there's no funding guaranteed for new roads or services. The sheer volume of additional housing when we have already got to cope with 800 already passed, is totally unsustainable, the transport and road network is not suitable as it is and will not be improved. The schools, doctors and other amenities will not be able to cope with supporting additional families on top of the current villagers. The train station already is a problem with no access on one side of the platform. I am unable to travel by train with my two young children on my own as I cannot leave either child at the top or bottom of the steps whilst I walk with the other and the pram.			

Name: Sian Narracott **I.D:** 62796225

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Justified • Consistent with national policy	Unsure	Unsure	Unsound because under Section 9 of NPPF Promoting Sustainable transport para 109 /110/ 111(b.c)/115(a.d)/116 /118 - Junction 19 of the M5 which feeds into the A369 is already at capacity and we are told it is not possible to improve traffic flow around it. More traffic coming onto the A369 to access Mway from the new developments in Long Asthon, Nailsea and PEIG will cause major traffic hold ups. At the Bristol end of the A369 at Bower Ashton there is a further constriction as it joins the A370 from Long Ashton to enter the city of Bristol. There are already long queues at rush hour. The A369 becomes even more heavily congested when the M4/5 Network creates diversions through Bristol. Furthermore in Abbots Leigh there are width restrictions which are impossible to improve. AECOM report 4.15 states that capacity improvements should be made if public transport journey times are affected which they inevitably will be for the reasons pointed out above. Capacity improvements at either end of the A369 are not explained in the plan. The proposed railway from Portishead to Bristol is not going to solve the commuter problem as it has limited stops and is currently scheduled to have very limited capacity.	We consider that Highways England and Rail Operators should have more input to this plan along the whole stretch of the A369.		
Pill Green	No	• Positively prepared • Justified • Consistent with national policy	Unsure	Unsure	The local plan map (Land at Pill Road)shows development extending down to the banks of the Markham Brook. This would not be allowed under NPPF Section 15 para 193c (Page 56)because biodiversity and the ancient woodland (Part of the Markham Brook Ancient Woodland SNCI) on the eastern side of the Brook would be adversely affected. This plan also contradicts the site requirements listed in Schedule 1 Land at Pill Road bullet point 6 The proposed active travel connection between Pill Green and Land at Pill Road across the Markham Brook as shown is unrealistic as the banks of the Brook are several metres deep here with a very changeable depth of water.	Exclude the woodland from the plan and insert a buffer zone of 15m between the woodland and any proposed development. Reroute the active travel route to avoid damaging the biodiversity of the wood or the Brook		
Land at Pill Road	No	• Positively prepared • Justified • Consistent with national policy	Unsure	Unsure	The local plan map (Land at Pill Road)shows development extending down to the banks of the Markham Brook. This would not be allowed under NPPF Section 15 para 193c (Page 56)because biodiversity and the ancient woodland (Part of the Markham Brook Ancient Woodland SNCI) on the eastern side of the Brook would be adversely affected. This plan also contradicts the site requirements listed in Schedule 1 Land at Pill Road Bullet point 6 The proposed active travel connection between Pill Green and Land at Pill Road across the Markham Brook as shown is unrealistic as the banks of the Brook are several metres deep here with a very changeable depth of water.	It is imperative that the active travel route is rerouted to avoid damaging the biodiversity of the wood or the Brook		

Name: Simon Beck **I.D:** 62813121

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Positively prepared	No	No	GROUNDS The Proposals HE20491, HE206, HE2015, and HE201097 are not sound and do not comply with Policy LP4 Additionally proposal HE2015 does not meet North Somerset Council’s Duty to Co-operate. RE: HE20491, HE206, HE2015, and HE201097 Road Infrastructure is constrained. My Concern is that development on this scale is not sound and does not comply with policy LP4’s objective to: “…. prioritise affordable, energy efficient, good quality homes with thoughtful design integrating green	Modify Junction 19 before any other action taken. Ideally create seperate north bound service area to south of Junction 19. Modify exit from Docks such that North bound traffic doesnt get near the roundabout		Resonse to North Somerset plan.pdf

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					spaces and active travel routes, and essential infrastructure to support both existing and new residents.” The A369 near the proposed developments in Pill runs either towards Bristol, via Abbots leigh or to Portishead via the Gordano roundabout at Junction 19 of the M5. The Gordano Roundabout was constructed in 1972, presumably based on traffic modelling from that era. Since the construction of the Gordano roundabout Portishead has expanded considerably with the port marine and Brampton way developments. The population of Portishead has increased from about 18500 in 1975 (see https://www.city-facts.com/portishead/population) to 26336 in the 2021 Census (see https://portishead.parish.uk/) . The expansion of Portishead by at least 42% means that the Road infrastructure at the Gordano Roundabout under constraint during peak periods. This is exacerbated in holiday periods by the fact that both North Bound and Southbound traffic seeking to use the Gordano Services have to enter the Gordano roundabout. This is not just my observation but that of National Highways, who wrote on 18/8/25 in respect of planning application 25/P/1413/OUT in respect of 186 dwellings: TRAFFIC IMPACT The application is supported by a Transport Assessment (TA) (Ref. 08227-R-02, dated June 2025) and a Framework Travel Plan (TP) (Ref. 082270-R-05, dated June 2025), prepared by PJA. The safe and efficient operation of M5 J19 is a key interest for National Highways regarding this application. The junction currently operates under constraint during peak periods, and National Highways is concerned that development pressures in this location may result in a material change in conditions. And later in the same document Given the status of the Local Plan and inclusion of this site as an allocation, to provide fully informed advice on this application, National Highways requires transport modelling to assess the emerging Local Plan development impacts at M5 Junction 19 to the end of the Local Plan period (currently 2040, but should be kept under review). This modelling is essential to ensure that cumulative impacts are understood, and any potential strategic mitigation needs are identified. North Somerset Council are in the process of developing their Local Plan transport evidence, however, as yet, the cumulative impact of developments at M5 Junction 19 have not been tested. Modelling work should include all emerging Local Plan allocations, with and without the application site (25/P/1413/OUT) for the various scenarios that may occur. Prior to undertaking this necessary modelling we recommend the applicants have further discussion with National Highways and North Somerset Council to discuss Local Plan transport evidence work carried out to date, emerging workstreams and detailed requirements/parameters. As regards travel to Bristol along the A369 that is constrained by Abbots leigh, and particularly where the road narrows near the George public House, This road is often congested at peak time. Hope may be pinned on the reopening of the Portishead to Bristol Railway. However at the operator only plans an hourly service between Portishead and Bristol so the train may be quite full when it reaches Pill Network rail write: The branch line was closed in 1964 but when reopened in 2028, it will reconnect more than 50,000 people to the railway. The project is funded by Government, the West of England Combined Authority and North Somerset Council and is being delivered by Network Rail. The restored railway will provide an hourly direct train from Portishead to Bristol Temple Meads in 25 minutes. The route runs along one of the most scenic stretches of railway in the country, through the Avon Gorge and past the Clifton suspension bridge. See https://www.networkrail.co.uk/our-work/our-routes/western/the-portishead-line/ The scheme foresaw a reduction of around 300 to 400 car trips per day by opening the line, see https://metrowestphase1.org/wp-content/uploads/2021/03/8.11-planning-statement-version-2-clean-1.pdf. Page 60. Table 6.1 (an image was prepared for submission in this document but it seems the response			

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					portal may strip images out) Whilst an improvement, it seems unlikely to actually improve the roads compared to now of some 1100 homes are built at Pill and Easton-in-Gordano and 1600 homes are built in Portishead as set out in SP8 of the North Somerset Local plan 2041. Bluntly too much is being expected of the road network around Junction 19 Re HE2015 1) There has been a lack of community consultation I present an image North somerset plannings application map as of 9 December 2025. (google maps image ofarea was prepared but getrs stripped out by this online portal) Note no planning application has been submitted in relation to HE2015. In the absence of a planning application, it seems hard for the community to be consulted about it. 2) HE2015 does not seem to comply with Policy LP4 objective, namely “… co-ordinated approach to ensure the growth of the village provides tangible benefits for existing and future communities. This will be achieved through a co-ordinated approach to the delivery of infrastructure to ensure the provision of necessary services, facilities, appropriate highways mitigations and improved active and sustainable travel links throughout the village, particularly from the new development sites to the proposed railway station on Monmouth Road. All new development will be required to contribute to the delivery of necessary infrastructure through either direct delivery as part of the scheme or through development contributions” HE2015 is mainly separated from Pill and because of the way properties along Brookside and Crockern Drive have been built has little opportunity to have a suitably sized road connection between it and Pill. Without this access to the village shops, Garage and Doctor’s won’t be easy and there are unlikely to be tangible benefits for existing and future communities. Whilst active travel (walking & Cycling) is beneficial it should be remembered that we all age and at some point, active travel becomes inappropriate for Doctor’s appointment and shopping. Hence other travel links are required, but they are undisclosed in respect of HE2015. Indeed, without an actual proposal for this development is seems impossible to determine its benefit to the existing community.			

Name: Simon Buck **I.D:** 62559809

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Here’s a single-paragraph planning objection that uses all the themes from the document but is fully rewritten and original in tone: ⧫ I wish to object to the proposed development on the grounds that it would place an unsustainable level of pressure on Backwell and the surrounding area. The village is already committed to a substantial number of new homes, and adding yet another large tranche would create severe overdevelopment without any corresponding investment in schools, healthcare, leisure facilities, or essential infrastructure. The suggested new road would neither resolve Nailsea’s traffic issues nor meaningfully ease congestion on existing routes, and early indications suggest it would be highly complex and costly to engineer, with no assurance that funding is in place. Backwell has been earmarked for a disproportionately high share of North Somerset’s housing quota despite offering limited employment opportunities, meaning most residents would still be forced to commute. No assessment of the social impact has been provided, and the plans involve the loss of high-grade			

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					agricultural land—of which very little remains—at a time when national policy stresses the need to safeguard food production. Large areas of the proposed site support important wildlife habitats, including rare bat roosts and SSSI-designated environments, and further development would cause irreversible ecological harm. Significant parts of Backwell Common and nearby fields are already susceptible to flooding, and placing new homes and access roads there would heighten this risk. There is also considerable uncertainty over whether the major infrastructure required—particularly the new transport links—can realistically be delivered on time or at all. Government requirements for affordable housing on Green Belt land would further reduce the funds available for vital infrastructure. The volume of growth being proposed over such a short period is, in practice, neither achievable nor sustainable. Finally, the existing railway station remains inaccessible for many residents and is not equipped to operate as a genuine transport hub, making the suggestion of rail-based mitigation unrealistic. For these reasons, the development is unsound, undeliverable, and damaging to the long-term wellbeing of the community.			

Name: Simon Russell **I.D:** 62850689

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land south of Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I consider the allocation of Land south of Nailsea for 582 homes to make the Local Plan 2041 not sound, not legally compliant and not compliant with the Duty to Cooperate, for the following reasons. 1. The allocation is not justified There is no clear evidence that this is the most appropriate location for this scale of development when compared with reasonable alternatives. The site is made up of multiple parcels in different ownerships, includes land at risk of flooding, and already sits within an area with known drainage pressures. The Plan does not demonstrate why this complex and constrained site has been chosen ahead of less constrained options. 2. The allocation is not effective or deliverable The council's own wording confirms that: a single masterplan is required across multiple ownerships coordinated access arrangements must be secured investigation of access from The Perrings is still required any access across land at risk of flooding will need a sequential test and proof that it is safe for the lifetime of the development There is no evidence that landowners will work together under a single masterplan, that viable access can be achieved, or that flood risk can be satisfactorily managed. Without certainty on access, drainage, and cooperation between owners, the allocation is not effective or deliverable. 3. Flood risk and drainage issues are not resolved The Plan acknowledges:	To make the North Somerset Local Plan 2041 legally compliant, justified and sound in relation to the allocation at Land south of Nailsea, the following modifications are required. 1. Remove or significantly reduce the allocation until a deliverable access strategy is evidenced The Plan must provide: a confirmed, viable and safe access solution a sequential flood risk test for any proposed access full engineering feasibility for access via The Perrings evidence that access can be delivered across multiple land ownerships Without this, the site is not deliverable. 2. Provide a complete and costed Infrastructure Delivery Plan Before the allocation can be considered sound, the Plan must include: the delivery arrangements and funding source for the new primary school confirmed contributions and capacity planning for early years, SEN and	I do not support the allocation at Land south of Nailsea and my overall position is firmly against this proposal. However, in answering this question, I acknowledge only the following limited points, which relate to the general plan making process rather than the site itself. I support: 1. The need for an up to date Local Plan Having an adopted Local Plan is necessary to manage development across North Somerset and to reduce speculative, unplanned applications. This statement of support is for the process only and not for the allocations being proposed. 2. The principle that infrastructure should be planned alongside growth I agree with the requirement that any significant development must be supported by infrastructure such as schools, drainage strategies and transport improvements. My concern is that this has not been evidenced or secured for the Land south of Nailsea allocation. 3. The use of public consultation I support the fact that the public is being given the opportunity to comment on the Plan. This is an essential part of the legal process. Important clarity Nothing in this statement indicates support for the allocation at Land south of Nailsea or for any element of the local plan that affects Nailsea or Backwell.	

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					the need for surface water attenuation the need to assess the cumulative impact of all parcels on downstream drainage that improvements may be required to avoid increasing flood risk elsewhere However, no detailed flood risk assessment or drainage strategy is provided to show that 582 homes can be accommodated without increasing flood risk on or off site. The Plan therefore fails to demonstrate that the development can comply with national policy on flood risk and is not sound. 4. Infrastructure requirements are not fully evidenced or funded The allocation requires: land for and delivery of a new primary school early years provision contributions towards special educational needs and family centre services proportionate contributions to the Nailsea and Backwell Transport Strategy upgrades to public rights of way contributions to public transport There is no clear Infrastructure Delivery Plan setting out costs, funding sources, timing and responsibility for delivery of these items. Without a fully evidenced and funded infrastructure strategy, the allocation is not effective or justified. 5. Incomplete assessment of cumulative impacts The site is part of a wider pattern of significant growth at Nailsea and Backwell. The Plan does not clearly assess the cumulative impact of this allocation alongside other housing sites on: the local roads and junctions public transport capacity school places and healthcare services downstream drainage and flood risk This lack of cumulative assessment means the evidence base is incomplete and the Plan is not robust or legally compliant. 6. Inadequate demonstration of Duty to Cooperate	family centre services evidence of how local health and education services will accommodate additional demand a fully worked transport solution linked to the Nailsea and Backwell Transport Strategy This evidence must be published and open to consultation. 3. Produce a detailed drainage and flood risk assessment for the whole site The modifications must include: a site wide flood risk assessment covering all parcels a cumulative drainage impact assessment confirmation of downstream capacity a strategy showing how surface water attenuation will prevent increased flood risk off site This is required for legal compliance under national flood risk policy. 4. Require a binding masterplan with evidence of landowner cooperation The Plan must show that: all landowners are willing to participate in a single comprehensive masterplan delivery can be coordinated across ownership boundaries infrastructure and access routes can be secured across all parcels Without this, the site remains undeliverable and the Plan is not effective. 5. Reassess alternative sites and provide evidence of reasonable alternatives To comply with the tests of soundness, the Plan must:	My position remains that the proposed allocation is unsound, unjustified and undeliverable.	

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					Given the scale of growth proposed at Nailsea and Backwell, there should be clear evidence of cooperation with neighbouring authorities and infrastructure bodies on: transport and highway impacts beyond Nailsea rail and regional bus provision education and health service planning wider catchment flood and drainage strategies The Plan does not present sufficient evidence of this cooperation in relation to Land south of Nailsea, so the Duty to Cooperate has not been adequately demonstrated. Conclusion For these reasons, I consider that the allocation of Land south of Nailsea for 582 homes makes the North Somerset Local Plan 2041 not sound, not legally compliant and not in full compliance with the Duty to Cooperate.	demonstrate why this heavily constrained, multi-ownership site has been chosen compare it against less constrained alternatives provide transparent evidence of the site selection process This modification is required because justification is currently insufficient. 6. Strengthen alignment with national policy on environmental protection Modifications should include: ecological surveys for the entire allocation protection measures for wildlife corridors mitigation for impacts on nearby habitats and floodplain areas This ensures compliance with the National Planning Policy Framework. 7. Provide a realistic delivery timetable based on evidence The Plan must modify the timeline to reflect: the uncertainty around access and drainage solutions the need for new school delivery the coordination required across multiple landowners The current delivery expectations are not supported by evidence. Conclusion To make the Local Plan 2041 legally compliant and sound, the Council must provide full evidence for access, drainage, flood risk, infrastructure and landowner coordination, and must reassess the justification for allocating Land south of Nailsea in its current form.		

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Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I consider the North Somerset Local Plan 2041 to be not sound, not legally compliant, and not in compliance with the Duty to Co-operate for the following reasons: 1. The Plan is not justified The allocation of up to 1,000 additional homes on Grade 1 agricultural land at Backwell East is not supported by any robust evidence. This land is among the highest quality agricultural land in the country and its loss contradicts national policy to protect our most productive farmland. No alternative locations of lower environmental and agricultural value have been properly assessed. 2. The Plan is not effective There is no deliverable infrastructure strategy to support this level of growth. • No funded or designed transport solution exists for the proposed relief road. • No confirmed investment in school places, healthcare, drainage, or utilities is provided. • The Infrastructure Delivery Plan lacks costings, timelines and delivery mechanisms. Without infrastructure, the development cannot be implemented, making the Plan ineffective. 3. The Plan is not consistent with national policy National planning policy requires councils to protect high quality agricultural land, safeguard biodiversity, reduce flood risk and ensure sustainable development. The proposals for Backwell East: • Remove around 50 hectares of Grade 1 agricultural land • Increase flood risk on Backwell Common and the land surrounding Backwell Lake • Impact sensitive ecological areas including habitats for protected bat species • Deliver large scale growth without supporting infrastructure This is inconsistent with NPPF requirements for sustainable and environmentally responsible development. 4. The Plan is not legally compliant The Environmental and Social Impact evidence base is incomplete. There is no social cohesion assessment for Backwell and no clear analysis of cumulative impacts from the 800 homes already approved plus the further 1,000 proposed. The consultation process also appears unclear in demonstrating how community evidence and objections from earlier stages have been incorporated. 5. The Duty to Co-operate has not been met The Plan does not demonstrate effective collaboration with neighbouring authorities regarding: • transport strategies affecting Nailsea, Backwell and regional	To make the North Somerset Local Plan 2041 legally compliant, justified and sound, I believe the following modifications are required: 1. Remove the allocation of 1,000 homes on Grade 1 agricultural land at Backwell East This land is among the highest quality agricultural land in the district and should be excluded from the housing allocations. The Council must reassess alternative sites of lower environmental and agricultural value in accordance with national policy. 2. Provide a fully evidenced and costed Infrastructure Delivery Plan The Plan must include: • confirmed funding for transport improvements • a deliverable design for any new road or junction upgrades • the number and location of new school places • commitments from healthcare providers • clear drainage and flood mitigation strategies Without this, the Plan remains undeliverable. 3. Produce a complete environmental and ecological impact assessment This should include detailed surveys of the Grade 1 agricultural land, Backwell Common, Backwell Lake and bat habitats. The outcomes must be reflected in revised allocations and policy wording. 4. Provide a social and community impact assessment for Backwell A full assessment is required to show how the village can support the cumulative impact of 800 already approved homes plus any new allocations. The current absence of this evidence makes the Plan not legally compliant. 5. Rebalance the housing distribution across the district	While I have significant concerns about the overall soundness and legal compliance of the North Somerset Local Plan 2041, there are some elements of the Plan that I recognise as positive or broadly appropriate. 1. The strategic need for a Local Plan I support the principle of preparing a new Local Plan to ensure North Somerset has an up to date planning framework. Having a clear and adopted Plan provides greater certainty for communities, developers and decision makers, and helps protect the district from speculative development. 2. Recognition of housing needs across the district I support the intention to meet long term housing needs through a plan led approach rather than piecemeal development. A structured allocation process is preferable to unplanned growth. 3. Focus on sustainable development principles I support the Plan’s stated aims to: • encourage brownfield redevelopment • promote active travel • minimise car dependency • protect ecological corridors • improve energy efficiency and environmental standards These aims are appropriate and consistent with national policy. 4. Commitment to consulting local communities I acknowledge the steps taken to engage residents and parish councils throughout the preparation process, including formal consultation stages and public access to evidence base documents. Summary In summary, while I support the overall intention to deliver a structured, sustainable and policy led Local Plan for North Somerset, I do not believe the current proposals for Backwell meet the tests of soundness or legal compliance. The positive elements of the Plan do not outweigh the significant concerns identified in my objections.	

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					rail capacity • cumulative impacts on hospitals, GP services and school provision • cross-boundary ecological effects and flood management • regional infrastructure funding There is no evidence of a coordinated approach, particularly around the proposed road solution and its impact on wider transport corridors. 6. The scale of growth assigned to Backwell is disproportionate Backwell is expected to absorb 7 percent of the entire district housing allocation, a higher proportion than towns with significantly greater infrastructure capacity. This is not justified, sustainable or deliverable. Conclusion For these reasons, I consider the Local Plan 2041 not sound, not legally compliant, and not in compliance with the Duty to Co-operate.	Backwell's 7 percent allocation is disproportionate relative to its size, facilities and transport capacity. A more balanced, sustainable distribution is required, with a clearer justification for growth levels in each settlement. 6. Strengthen compliance with national policy The Plan must demonstrate how it protects high quality agricultural land, reduces flood risk, safeguards biodiversity and ensures sustainable travel. Clearer alignment with the National Planning Policy Framework is required. 7. Demonstrate effective Duty to Co-operate The Plan needs formal evidence of collaboration with neighbouring authorities and national bodies regarding: • transport and rail capacity • education and healthcare provision • ecological corridors across boundaries • regional infrastructure funding This evidence must be published and included in the justification for the growth strategy. 8. Provide a realistic delivery timetable The current timeline is not feasible given the lack of confirmed infrastructure funding. A revised timetable must reflect realistic delivery stages and dependencies. Summary For the Plan to be legally compliant and sound, it must: • remove Backwell East as a housing allocation • provide full and costed infrastructure evidence • protect Grade 1 agricultural land • address environmental and flooding issues • demonstrate Duty to Co-operate • provide a fairer and justified distribution of housing		

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						• align with national policy Without these changes, the Local Plan cannot meet the tests of soundness.		

Name: Smart Systems Ltd **I.D:** 51546305

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP7: Settlement boundaries	No	‣ Positively prepared ‣ Justified ‣ Consistent with national policy	Unsure		Please see covering letter. In short, the settlement boundary surrounding Yatton and the accompanying policies actively prevent growth of a major employer in a sustainable location contrary to local and national objectives. Previous suggested policy revisions to counterbalance the effect of the proposed settlement boundary have not been taken on board but we have not received confirmation as to why this is. I can't comment on whether the duty to co-operate has been complied with, or legal duties as they are not relevant to our client's considerations so I have selected unsure for these.	Please see covering letter, two alternatives are presented to LP7 and DP60, either or both would assist. Two alternative settlement boundaries are also proposed.		Nov 2025 Local plan rep covering letter.pdf Representation form Part B Nov 25.pdf
Policy DP60: Employment on green field land in the countryside	No	‣ Positively prepared ‣ Justified ‣ Consistent with national policy	Unsure	Unsure	Please see covering letter. In short, the settlement boundary surrounding Yatton and the accompanying policies actively prevent growth of a major employer in a sustainable location contrary to local and national objectives. Previous suggested policy revisions to counterbalance the effect of the proposed settlement boundary have not been taken on board but we have not received confirmation as to why this is. I can't comment on whether the duty to co-operate has been complied with, or legal duties as they are not relevant to our client's considerations so I have selected unsure for these.	Please see covering letter, two alternatives are presented to LP7 and DP60, either or both would assist. Two alternative settlement boundaries are also proposed.		Nov 2025 Local plan rep covering letter.pdf Representation form Part B Nov 25.pdf

Name: Somerset Council **I.D:** 62488385

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Vision, Strategic Priorities and Sustainability Objectives	Yes		Yes	Yes	We have had ongoing discussions with North Somerset Council in the preparation of their Plan and look forward to formalising this in a Statement of Common Ground.			

Name: Sonia Kateb **I.D:** 62674657

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective	Unsure	Unsure	Insufficient infrastructure, be it doctors, dentists, schools, leisure facilities. Roads, in particular Station Road already cannot cope with traffic buildup and any further development will make it untenable. I live just off Station road . Excessive development will impact the feel and rural nature of where I live.			

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		• Consistent with national policy			I am concerned about the threat of flooding, given that where I live is a flood plane and any further development will exacerbate this threat. I like to buy locally produced food and this will be more difficult if agricultural land is used for housing.			

Name: Sophie Causon-Wood **I.D:** 62847617

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell has already increased by 40% through the approval of 800 houses. The village has been disproportionatly targeted in the north somerset area. The approval of more large scale houses does not take into consideration the current infrastructure of the villiage. Schools, health provisions, roads, train and bus services will be overwhelmed having a negative impact on current villagers and new dwellers. The roads are already extremely busy and unable to safely serve the village. I myself have been hit by a vans wing mirror when walking on the pavement as the station road is too narrow for large vehicles passing each other. Had my son been closest to the road his head wouldve been struck. The village has many families with children and young people using these over subscribed roads. There is an environmental impact on wildlife habitats and nature in the areas looking to be developed. We are seeing increasing flooding on Backwell Common, I do not believe this too have been addressed . I do not believe there to be sufficient funding to address future issues or maintain infrastructure. We have already seen so much development in the villiage, even more will have a significantly negative impact on the area, residents and environment.			

Name: Sophie Windsor **I.D:** 62687009

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I am concerned that the plan is not deliverable in its current form because the proposed growth in Nailsea/Backwell depends on the construction of a new road under the railway. There is no confirmed funding, timetable, or commitment to deliver this road. Without this road, the existing local road network, including Station Road, will face significant congestion. Station Road is already heavily used and poses safety risks, and additional traffic from the proposed developments would make it more dangerous. This undermines the council's own policy objectives (Policy DP14) to prevent severe traffic impacts. Relying on speculative or future infrastructure delivery to support the allocation of thousands of new homes is unrealistic and unsound. The plan is therefore at risk of failing the national planning policy tests of effectiveness, deliverability, and soundness. I urge the council to either secure firm commitments for the railway underpass road or review the housing allocation in this area to reflect what can realistically be delivered.	To make the North Somerset Local Plan 2041 legally compliant and sound, I consider the following modifications necessary: Secure funding and delivery for the railway underpass road before allocating strategic growth in Nailsea/Backwell. The plan currently assumes this road will be built, but there is no confirmed funding, timetable, or commitment. Without it, the plan is not deliverable and fails the national planning policy tests of effectiveness and soundness. Review housing allocations in areas dependent on the road if firm infrastructure commitments cannot be secured. This will ensure that the plan does not place unrealistic pressure on the existing road network. Include specific mitigation measures for Station Road, which is already heavily used and poses safety risks. Any additional traffic from new developments must be addressed to prevent severe congestion and danger to road users.		

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						These changes are necessary to make the plan realistic, deliverable, and consistent with national planning policy, particularly in relation to transport and safety.		

Name: South Gloucestershire Council (Patrick Conroy) **I.D:** 63121089

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Vision, Strategic Priorities and Sustainability Objectives							South Gloucestershire Council welcomes the production of, and opportunity to respond to the North Somerset Regulation 19 Local Plan document. The preparation of Local Plans that meet their housing requirement and address key challenges such as Climate Change and affordable housing need, are considered vital to the continued sustainable growth of the wider sub region its well-being and opportunities for all our it's communities and residents. We note that your Plan is being prepared under the December 2024 version of the National Planning Policy Framework, and the linked criteria to setting the plans housing requirements and wider policy framework. The council is pleased to see the Plan's strategy for the next 15 years meeting the housing requirement for North Somerset. It is noted that North Somerset's Local Plan is not seeking South Gloucestershire Council to meet any of its housing needs. The council also welcomes and supports the inclusion of policies which aim to mitigate and adapt to our changing climate. Although our two authorities do not share a physical boundary, effective cross boundary working is required by paragraphs 24 to 28 and 36, of the 2024 NPPF. The work documented in the South Gloucestershire Council's, Statement of Common Ground with North Somerset (October 2025) and through this statutory consultation, demonstrates the on-going work between the two authorities. I trust this consultation response is helpful and we look forward to continuing to work with you as your Plan progresses to submission and examination, including agreeing a statement of common ground as may be required. Please do not hesitate to contact us if any queries.	South Gloucestershire Response - North Somerset Local Plan Reg 19.docx

Name: South West Housing Association Planning Consortium **I.D:** 63026465

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP1: Sustainable Development							The SWHAPC supports draft Policy SP1: Sustainable development set out on page 16 which specifies that new development should "support the delivery of a variety and choice of housing, including specialist and affordable housing to meet local needs".	1118-35.M5 Local Plan 2041 Pre-submission plan (Reg 19).pdf

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP7: Green Belt							Draft policy SP7 sets out that new residential development will be permitted on land released from the Green Belt, as defined on the Policies Map, where it is demonstrated how the development meets the 'Golden Rules' requirements as set out in the NPPF. The SWHAPC welcome the addition of this draft policy in accordance with the latest NPPF.	1118-35.M5 Local Plan 2041 Pre-submission plan (Reg 19).pdf
SP8: Housing						As prescribed by the government's standard method for calculating housing need, the minimum number of new dwellings required in North Somerset is 1,580 dwellings per annum, or 23,700 dwellings over the 2026 to 2041 plan period. This is evidenced by the Local Housing Needs Assessment ("LHNA") (2025). It is positive to see that draft Policy SP8 sets out that land will be allocated to deliver a minimum of 23,700 dwellings in North Somerset between 2026 and 2041, equivalent to 1,580 homes per year, in line with local housing need. The SWHAPC welcomes that since the previous Regulation 19 consultation, the Council has increased its proposed housing requirement for the plan period by 59%, up from 14,902 dwellings. The increased housing requirement will help to significantly boost the delivery of much needed affordable housing across the authority in sustainable locations. The draft Local Plan does not provide for the unmet needs of Bristol. The Inspectors for the Bristol Local Plan issued its final advice to Bristol City Council on 21 November 2025 'IN11: Final advice and actions arising from the Council's responses to IN7 to IN10' which acknowledges that there is insufficient capacity to meet the Council's objectively assessed housing need. The Inspectors require Bristol City Council to set out what the level of unmet housing need is, to be clear about the situation at the time of adoption, which may be important in continuing work being done on other Local Plans. The NPPF requires North Somerset Council to undertake effective cooperation with Bristol City Council and to consider the ability to address Bristol's unmet needs.The supporting text to draft policy SP8 recognises that addressing affordable housing needs is an important component of sustainable development. The SWHAPC is supportive of the broad distribution of new dwellings in accordance with the spatial strategy, given that it allows for the delivery of new affordable homes in all settlements in urban and rural areas. This will help to meet local needs and sustain rural communities. The Council's viability work has not tested the viability of 50% affordable housing on Green Belt sites, as required by national policy.		1118-35.M5 Local Plan 2041 Pre-submission plan (Reg 19).pdf
Policy DP6: Net zero construction						The Housing Associations of the SWHAPC recognise the critical role that they play in ensuring that residents have safe, secure and efficient homes that are future proof. Promoting sustainable development is the core objective of the plan system and it is important that all new developments continue to support this aim. However, we ask the Council to be wary of the ways in which such policies could impact development viability which may restrict the provision of affordable housing in North Somerset. At present, draft Policy DP6 applies some stringent and ambitious requirements for applications, particularly the following points: All new residential buildings will be required to achieve net zero operational energy compliance, including no on-site use of fossil fuels and ultra-low energy use (Space heating demand of less than 15-20kWh/m^2/year and overall operational energy use of less than 35kWh/m^2/year); and • All residential development must demonstrate measures to minimise potable water use and should aim to achieve an estimated water consumption of no more than 110 litres/person/day. The SWHAPC notes that in 2025, the average daily		1118-35.M5 Local Plan 2041 Pre-submission plan (Reg 19).pdf

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						water consumption in Britain was 136.5litres per day1. It would be helpful and reassuring if the Council could clarify whether it has tested the deliverability of these housing requirements and explain how each of the proposed figures has been determined. The SWHAPC considers that these requirements should be introduced alongside robust analysis of their viability, to ensure that the policies do not hinder the delivery of essential affordable housing in North Somerset		
Policy DP43: Affordable housing (including rural exception schemes)						Draft Policy DP43 states that affordable housing will be required on developments of 10 dwellings or more or with a site area of 0.5 hectares or more. This is appropriate and in accordance with the NPPF (2024). The SWHAPC welcomes the addition to the draft policy that developments will be expected to provide 50% affordable housing on land released from the Green Belt as set out in Policy SP7, and other Green Belt sites, 30% on greenfield sites and 20% on previously developed land, all at nil public subsidy. The SWHAPC is pleased that the draft policy states that the precise size and type of affordable housing to be provided on individual sites will be determined through negotiation, guided by the 2025 LHNA data from the housing needs register and local housing needs surveys where these are robustly evidenced. Draft Policy DP43 adds that the affordable housing mix should be 75% social rented and 25% shared ownership. Further clarification is sought on the 75% social rent aspect and how this applies to both affordable rented and social rented housing. As currently worded, there is concern that this proposed tenure split does not account for the full range of affordable tenures set out an Annex 2 of the NPPF and therefore that such a tenure split would not provide for the full range of households in need in North Somerset. We recommend that the Council should use this as a starting point for discussions regarding tenure split but that negotiations can take place on a site-by-site basis in line with evidence of up-to-date local need. The justification to the draft policy sets out on page 212 that the North Somerset 2025 LHNA considers two scenarios, with overall affordable housing need over the plan period ranging from 6,646 to 10,577 dwellings (28%–45% of the total housing requirement). Given this high level of need, we are encouraged that the Local Plan will seek to maximise delivery taking account of the constrained nature of North Somerset and viability evidence. The draft document notes that the detailed implementation of the policy will be outlined in a new Affordable Housing SPD, which the SWHAPC welcomes.		1118-35.M5 Local Plan 2041 Pre-submission plan (Reg 19).pdf
Policy DP46: Housing Type and Mix							Draft Policy DP46 highlights that for market and affordable homes, at least 5% will be built to meet Building Regulations M4(2) standard (‘accessible and adaptable dwellings’) and a minimum of 5% of affordable dwellings will be required to meet Building Regulations M4(3) standard (‘wheelchair user dwellings’), or a higher proportion where there is evidence of local need. The SWHAPC accepts that there is a growing need for properties which comply with current Building Regulations and so we support this policy direction, although we would like to remind the Council how the increased delivery of	1118-35.M5 Local Plan 2041 Pre-submission plan (Reg 19).pdf

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							such properties may a ffect viability and overall affordable housing delivery in North Somerset. The SWHAPC is pleased that the supporting text on page 220 highlights the important role that self and custom build housing can have in the housing market. Self and custom build helps to diversify the housing market and increase consumer choice. It would be positive to see affordable housing mentioned within this self and custom build supporting text and advise that the Council refers to the Self-Build and Custom Housebuilding Planning Practice Guidance when formulating new policy	

Name: South West Water Limited [SWWL; the Undertaker] (trading as Bristol Water) **I.D:** 61524321

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP2: Strategic location: Woodspring (south west of Bristol)	Yes		Yes	Yes			South West Water (trading as Bristol Water) support this local plan as legally sound as we have been consulted regarding the sites in the local plan. For the policy LP2: Strategic location: Woodspring (south west of Bristol) agrees with the food risk and land conditions as to mitigate the impact of the flood risk from Barrow Gurney Reservoir a comprehensive flood risk assessment must be undertaken and sequential test assessment completed. South West Water (trading as Bristol Water) as the operator of Barrow Gurney Reservoir will want to work with and approve any proposed mitigation measures that will be required to mitigate the flood risk from the nearby reservoir.	

Name: Spencer Buck **I.D:** 62881793

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Banwell Road, Locking /Elborough	No	‣ Justified ‣ Effective ‣ Consistent with national policy			OBJECTION: Land north of Banwell Road, Locking / Elborough (315 dwellings) 1. Introduction I am writing to object to the proposed allocation of 315 dwellings on Land north of Banwell Road, Locking / Elborough as set out on page 293 of the North Somerset Local Plan 2041. This is not an emotional or NIMBY objection. It is a practical, evidence-led objection rooted in the realities of Locking, Elborough and the surrounding settlements, communities already under significant and measurable pressure from decades of incremental growth. The allocation is fundamentally unsound, undeliverable, and in conflict with several policies of the Local Plan and the NPPF.	Based on the Local Plan itself and NPPF soundness tests, the allocation for 315 dwellings north of Banwell Road is: • Not justified (no evidence it is the best or even a viable option) • Not effective (dependent on major infrastructure with no delivery certainty) • Not consistent with national policy (flooding, highways, infrastructure, coalescence issues) • Likely to cause significant community harm For these reasons, I respectfully request that this allocation is removed from the Local Plan or, at minimum, deferred		

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					2. The Allocation Is Unsound Under NPPF Tests A site allocation must be: • Justified: the most appropriate strategy, based on evidence • Effective: deliverable over the plan period • Consistent with national policy This site fails on all three grounds. 3. Highways & Transport: A371 and Banwell Road Already Operating at Capacity The plan itself confirms that development must fund an upgrade to the Banwell Road / A371 junction. This requirement alone is an admission that: • the network is already insufficient, • the impact of 315 additional dwellings is severe, • and the development is not currently viable without major off-site engineering works. Material concerns: 3.1 A371 is a strategic corridor already at breaking point • Used as a relief route for congestion around Weston-super-Mare. • Regular peak-time queuing in both directions. • Slow-moving commuter flows towards J21 and Hutton Moor roundabout. Adding 600+ additional cars (based on standard trip-generation rates) will significantly worsen safety and congestion. 3.2 Banwell Road is narrow, rural in character, and unsuitable for strategic traffic The site forces development traffic onto: • a constricted rural lane, • with limited footways, • poor visibility in sections, • and a high proportion of pedestrian and cycle conflicts. The Local Plan requires an active travel priority crossing on Banwell Road, again indicating that existing pedestrian safety is already inadequate, let alone with hundreds more households using it daily. 3.3 Cumulative transport impact is materially understated This allocation is explicitly tied to the adjacent allocation: Land to the West of Elborough (70 dwellings). The Local Plan requires the developer to demonstrate joined-up safe active-travel provision between both sites and Locking village, yet the document provides no evidence that such a link is technically feasible given: • narrow road widths • fragmented verges • areas with no safe footway • multiple pinch points • existing village character constraints • In short: if infrastructure must be transformed before the housing can function, the site is not “effective” or “deliverable” under NPPF definitions. 4. Schools, Healthcare & Community Infrastructure Already Overloaded	until: 1. Highways modelling and an approved A371/ Banwell Road upgrade scheme are completed. 2. School place delivery is secured and site-identified. 3. A complete drainage strategy is demonstrated. 4. A landscape and character assessment confirms community separation is protected. 5. Noise impact from the skatepark is properly evidenced. 6. A deliverable, safe active-travel route is proven. Until then, this site is not sound, not deliverable, and not appropriate for allocation.		

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					The allocation requires contributions to primary, secondary and early-years places. Notably: • There is no clarity on where these places will be delivered. • There is no identified expansion site in Locking. • Weston schools are already over capacity and reliant on cross-boundary movement. If the Plan cannot show: 1. Where the new places will be located, 2. How they will be delivered, 3. When they will be funded, …then the allocation is not effective and should be removed until proper evidence is provided. Healthcare capacity is similar: • GP appointment waiting times are rising. • Locking Surgery has limited expansion potential. • Parklands and Haywood expansions already add thousands of residents in the wider area. Without confirmed mitigation, this allocation conflicts with NPPF paragraphs on social sustainability. 5. Flooding, Drainage & Surface Water Concerns The plan states that the site must provide surface water attenuation and identify how this will drain. This is a red flag. The area north of Banwell Road features: • low-lying clay soils • rapid surface run-off during heavy rain • visible field flooding in winter months • historically strained culverts and ditches • proximity to existing flood zones on adjacent parcels • Without a fully engineered drainage strategy demonstrating no increased downstream flood risk, the site cannot be considered sound or consistent with NPPF flood-risk guidance. 6. Local Character & Landscape Impact The site sits between: • the historic rural setting of Elborough, and • the village character of Locking. Both settlements have distinct identities which would be erased by: • a 315-unit urban extension, • merging previously separate communities, • introducing mass-scale housing out of proportion with the village’s size. This contradicts: • Local Plan design policies on maintaining settlement identity • NPPF paragraph 127 on local character • The Council’s own commitment to avoid coalescence of villages • Given that Locking has already accepted extensive growth through Parklands Village & West Wick, the “proportionality” test is not met.			

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					7. Public Right of Way AX18/1/20 — Unresolved Conflicts The Local Plan requires that the PROW is upgraded. However: • This footpath crosses sensitive landscape. • It is a valued recreational route for residents. • Upgrading it to support heavy active-travel use may require widening, lighting, or surface changes incompatible with its rural character. If the design solution harms the PROW's recreational quality, it conflicts with LP policies on PROW protection. 8. Noise Impact from Approved Skatepark to the North The plan states the development must prove that no dwellings will be affected by the noise/activity of the approved skatepark. This is a major unresolved issue: • Skateparks generate high-frequency, irregular noise. • Evening use is common. • Noise-mitigating design may be incompatible with a viable layout. • If acoustic buffering fails, the scheme becomes undeliverable. • Until an acoustic feasibility study is completed, this allocation cannot be judged sound. 9. The Allocation Is Disproportionate and Inconsistent With Settlement Strategy 315 dwellings is the single largest rural-village allocation in the Local Plan. When combined with: • Elm Grove Nursery (110 units) • Land to the West of Elborough (70 units) • Land north of Locking (15 units) • Locking and Elborough would be expected to absorb 510+ new dwellings — far exceeding the share for similar villages. This is directly contradictory to policies that describe Locking as having: • limited services, • limited transport connectivity, • and sensitive landscape edges. • The scale is simply not proportionate.			

Name: Sport England **I.D:** 8126849

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SP4: Placemaking							Support Active Design will help improve health and well-being as well as addressing climate change and promoting active travel – more walking and cycling. This has considerable understanding with the Plan in particular: SP4 Placemaking - Policy and the 'tools' e.g. masterplanning, parameter	

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							plans and design codes DP1 High Quality Design DP49 Healthy Places Sport England, working with Active Travel England and the Office for Health Improvement and Disparities, has produced the 3rd version of 'Active Design' (May 2023), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. Sport England would commend the use of the guidance in the master planning process for new residential developments. The document can be downloaded via this link Sport England believes that being active should be an intrinsic part of everyone's life pattern. Active Design has a lot of synergy with the TCPA "20 minute neighbourhood" concept. https://www.youtube.com/watch?v=mDaVBh1Bs7Y and https://www.youtube.com/watch?v=oRCJ4JL_LjM&list=TLPQMTIwMTIwMjS3NyOvSTN83A&index=2 The developer's checklist (Appendix 1) has been revised and can also be accessed via www.sportengland.org/activedesign In particular new housing sites as set out in Policies LP1, LP2, LP3, LP4 and LP5. Sport England would encourage development in North Somerset be designed in line with the Active Design principles to secure sustainable design. This could be evidenced by use of the checklist.	
SP7: Green Belt					Sport and Recreation in the Green Belt - SP7 Green Belt / Development in the Green Belt DP12 Comment By virtue of its location adjoining urban areas and comprising essentially open land, the Green Belt makes an ideal location for outdoor sports facilities and can accommodate a wide range of sports close to major centres of population. The NPPF recognises outdoor sport as an appropriate land use in the Green Belt and advises that new buildings which provide essential facilities for outdoor sport, including changing rooms and small spectator accommodation, may be developed. Sport England promotes the development of outdoor sports facilities in the Green Belt including essential ancillary built facilities. In exceptional circumstances Sport England will support the development of indoor or other built facilities associated with outdoor sports, where there is an identified need and no suitable site is			

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					available elsewhere in the locality. Sport England will promote policies and practices that: • encourage the provision of outdoor sport facilities in the Green Belt which help to sustain community life; • identify suitable sites for outdoor strategic sports facilities where there is a clearly identified demand for such facilities and where no suitable site exists elsewhere in the locality; • set out criteria against which ancillary built facilities will be considered; and • recognise that there may be circumstances where floodlit facilities are appropriate in the Green Belt subject to satisfactory management arrangements. As pressure increases on open land in urban areas, many sports clubs which have outgrown their current homes are looking to the Green Belt for space to expand. Sports which require extensive areas of land, such as golf, have little chance of finding large enough sites in built up areas. In many parts of England the Green Belt offers the nearest available open land. Outdoor sport can also play a part in keeping the Green Belt open, act as a buffer between urban uses and agricultural land and help to regenerate brownfield land. Whilst there is a general presumption against built development in the Green Belt a special exception is made for essential ancillary facilities. They should be acceptable as long as they are unobtrusive, small in scale and do not conflict with the purposes of including land within the Green Belt. Sport England would encourage a positive for sport approach Local Plan to enable the existing and future users opportunity to take part in recreational activities that meet social, health and well being agendas.			
Policy LP5: Housing, employment and mixed use allocations					All new dwellings (21,495) in North Somerset in the plan period should provide for new or enhance existing sport and recreation facilities to help create opportunities for physical activity whilst having a major positive impact on health and mental wellbeing. This is reflected in Policy DP63. CIL /s106 has to be based on evidence of need, see comment above. In particular Policy LC5: Parklands Village Weston super Mare 2671 Winterstoke Village Weston super Mare 1229 Locking Road car park, Weston super Mare 230			

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					Former Leisuredome 420 Weston RFC 182 Land west of Winterstoke Road, Weston super Mare 134 (sport pitch loss to meet the NPPF para 104) Wolvershill 3,300 (LP1) Woodspring 3,500 (LP2 and loss of golf to meet para 104 of the NPPF) NW Nailsea 225 (LP3) Youngwood Lane, Nailsea 282 Land north Nailsea, 381 (LP3) Land south Nailsea, 582 (LP3) Backwell 515 Land east of Backwell 889 (LP3) Pill Green 600 (LP4) Land north of Banwell Road 315 Wyndham Portishead 785 Land at Tower Farm 400 Land north of Colliter's Way Long Ashton 215 Monaghan Mushroom Farm 230 (LP23) Protection of Sport & Recreation including playing fields Support – see comment 1 above the need for an up to date sport evidence base We support DP52 protection of open space and recreation including golf courses. Again, this reflects a need for an up to date sport and recreation evidence base to support this policy of the plan in particular the first criterion "The open space is clearly shown through an assessment to be surplus to local requirements and will not be required for current or future needs; or" Sport England acknowledges that the NPPF is promoting "sustainable development" to avoid delays in the planning process (linked to economic growth). Thatsaid, the NPPF also says that for open space, sport & recreation land & buildings (including playing fields): Para 104. Existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former			

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					use. Sport England would be very concerned if any existing sport & recreation land & buildings including playing pitches and golf courses (LP2 Woodspring) would be affected by these proposals without adequate replacement in terms of quality, quantity, accessibility, management & maintenance and prior to the loss of the existing facility. This includes playing fields used by education (public and private) and playing fields in private ownership. In particular sites in Policy LP5: • Weston RFC – 182 homes (new allocation) • Land west of Winterstoke Rd, WsM 134 homes – “loss of sports pitch needs to be addressed” (carried over allocation) • Former Bournville School site – 28 homes (carried over allocation) • Land at n w Nailsea site – 225 homes “retention or enhancement of the Fryth Way sports pitch” (carried over allocation) • West of Engine Lane – 15 homes “replacement or improved sports facilities required” (carried over allocation) Sport England considers proposals affecting playing fields in light of the National Planning Policy Framework (NPPF) (in particular Para. 104) and against its own playing fields policy, which states: ‘Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of: • all or any part of a playing field, or • land which has been used as a playing field and remains undeveloped, or • land allocated for use as a playing field unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions.’ Sport England’s Playing Fields Policy and Guidance document can be viewed via the link here a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or			

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					c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.			
Policy LP6: Educational, sporting, leisure and community use allocations					Summary – Sport England is very concerned with the age and robustness of the evidence base for sport (para 103 of the current NPPF) which will test the 'soundness of the Local Plan'. This could affect protecting sites, enhancing and providing new open space, playing fields, sport and recreational land and buildings. The current version of the National Planning Policy Framework (2024) states: 103. Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate. Sport England's view is that, in order to meet the requirements of the National Planning Policy Framework (NPPF), this should include a strategy (supply and demand analysis with qualitative issues included) covering the need for indoor and outdoor sports facilities, including playing pitches. The Playing Pitch Strategy for 'in date' the data in studies should not be more than 3 years old (from the date of the data and not the adoption date). The study for the Council (started in 2015) was completed in 2020 so 5 years old. The Built Sport Facility Strategy for 'in date' the data in studies should not be more than 5 years old (from the date of the data and not the adoption date). The study for the Council was completed in 2019 so 6 years old. We note the Council's Playing Pitch Strategy (PPS) and Built Facility Strategy are "out of date". This would be a problem in demonstrating the 'soundness of the Plan'. We would be happy to discuss further.	An up to date and robust sport evidence base would also help inform policy LP6 Educational, sporting with leisure and community use allocations to be delivered to meet the needs of the community and new communities to be created. Schedule 4 could then include some sports / playing field projects to meet identified needs??	2. Planning Obligations/Community Infrastructure Levy (CIL) to Sport Support – note the need for an up to date sport evidence base (see comment above) Sport England supports use of planning obligations (s106)/community infrastructure levy (CIL) as a way of securing the provision of new or enhanced places for sport and a contribution towards their future maintenance, to meet the needs arising from new development. This does need to be based on a robust NPPF evidence base. This includes indoor sports facilities (swimming pools, sports halls, etc) as well as playing fields and multi use games courts. All new dwellings (21,495) in North Somerset in the plan period should provide for new or enhance existing sport and recreation facilities to help create opportunities for physical activity whilst having a major positive impact on health and mental wellbeing. This is reflected in Policy DP63. CIL /s106 has to be based on evidence of need, see comment above.	

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					An up to date and robust sport evidence base would also help inform policy LP6 Educational, sporting with leisure and community use allocations to be delivered to meet the needs of the community and new communities to be created. Schedule 4 could then include some sports / playing field projects to meet identified needs??			
Policy DP1: High quality design							Support Active Design will help improve health and well-being as well as addressing climate change and promoting active travel – more walking and cycling. This has considerable understanding with the Plan in particular: SP4 Placemaking - Policy and the ‘tools’ e.g. masterplanning, parameter plans and design codes DP1 High Quality Design DP49 Healthy Places Sport England, working with Active Travel England and the Office for Health Improvement and Disparities, has produced the 3rd version of ‘Active Design’ (May 2023), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government’s desire for the planning system to promote healthy communities through good urban design. Sport England would commend the use of the guidance in the master planning process for new residential developments. The document can be downloaded via this link Sport England believes that being active should be an intrinsic part of everyone’s life pattern. Active Design has a lot of synergy with the TCPA “20 minute neighbourhood” concept. https://www.youtube.com/watch?v=mDaVBh1Bs7Y and https://www.youtube.com/watch?v=oRCJ4JL_LjM&list=TLPQMTIwMTIwMjS3NyOvSTN83A&index=2 The developer’s checklist (Appendix 1) has been revised and can also be accessed via www.sportengland.org/activedesign In particular new housing sites as set out in Policies LP1, LP2, LP3, LP4 and LP5. Sport England would encourage development in North Somerset be designed in line with the Active Design principles to secure sustainable design. This could be evidenced by use of the checklist.	
Policy DP12: Development in the Green Belt					Sport and Recreation in the Green Belt - SP7 Green Belt / Development in the Green Belt DP12 Comment By virtue of its location adjoining urban areas and comprising essentially open land, the Green Belt makes an ideal location for outdoor sports			

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					facilities and can accommodate a wide range of sports close to major centres of population. The NPPF recognises outdoor sport as an appropriate land use in the Green Belt and advises that new buildings which provide essential facilities for outdoor sport, including changing rooms and small spectator accommodation, may be developed. Sport England promotes the development of outdoor sports facilities in the Green Belt including essential ancillary built facilities. In exceptional circumstances Sport England will support the development of indoor or other built facilities associated with outdoor sports, where there is an identified need and no suitable site is available elsewhere in the locality. Sport England will promote policies and practices that: • encourage the provision of outdoor sport facilities in the Green Belt which help to sustain community life; • identify suitable sites for outdoor strategic sports facilities where there is a clearly identified demand for such facilities and where no suitable site exists elsewhere in the locality; • set out criteria against which ancillary built facilities will be considered; and • recognise that there may be circumstances where floodlit facilities are appropriate in the Green Belt subject to satisfactory management arrangements. As pressure increases on open land in urban areas, many sports clubs which have outgrown their current homes are looking to the Green Belt for space to expand. Sports which require extensive areas of land, such as golf, have little chance of finding large enough sites in built up areas. In many parts of England the Green Belt offers the nearest available open land. Outdoor sport can also play a part in keeping the Green Belt open, act as a buffer between urban uses and agricultural land and help to regenerate brownfield land. Whilst there is a general presumption against built development in the Green Belt a special exception is made for essential ancillary facilities. They should be acceptable as long as they are unobtrusive, small in scale and do not conflict with the purposes of including land within the Green Belt. Sport England would encourage a positive for sport approach Local Plan to enable the existing and future users opportunity to take part in			

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					recreational activities that meet social, health and well being agendas.			
Policy DP49: Healthy Places							Support Active Design will help improve health and well-being as well as addressing climate change and promoting active travel – more walking and cycling. This has considerable understanding with the Plan in particular: SP4 Placemaking - Policy and the 'tools' e.g. masterplanning, parameter plans and design codes DP1 High Quality Design DP49 Healthy Places Sport England, working with Active Travel England and the Office for Health Improvement and Disparities, has produced the 3rd version of 'Active Design' (May 2023), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. Sport England would commend the use of the guidance in the master planning process for new residential developments. The document can be downloaded via this link Sport England believes that being active should be an intrinsic part of everyone's life pattern. Active Design has a lot of synergy with the TCPA "20 minute neighbourhood" concept. https://www.youtube.com/watch?v=mDaVBh1Bs7Y and https://www.youtube.com/watch?v=oRCJ4JL_LjM&list=TLPQMTIwMTIwMjS3NyOvSTN83A&index=2 The developer's checklist (Appendix 1) has been revised and can also be accessed via www.sportengland.org/activedesign In particular new housing sites as set out in Policies LP1, LP2, LP3, LP4 and LP5. Sport England would encourage development in North Somerset be designed in line with the Active Design principles to secure sustainable design. This could be evidenced by use of the checklist.	
Policy DP50: New community facilities, open space and sports pitches					Policy DP50 New sport land/buildings needs to reflect that technical guidance can change so there is a need to caveat/ future proof that on-site provision reflects current standards at the time of build / implementation.			

Name: St Philips **I.D:** 51455297

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Vision, Strategic Priorities and Sustainability Objectives	No	• Effective • Consistent with national policy	Yes	Yes	The Regulation 19 draft NSLP contains a vision setting out what the District will be like at the end of the plan period in 2041, along with a set of strategic priorities and strategic objectives supporting the vision and setting out how the Local Plan will deliver the vision. The vision set out on page 11 of the NSLP sets out a strong set of principles for the places to be created over the plan period. It is noted that the vision does not include a clear commitment to providing new homes to meet the needs of North Somerset's residents, and we would suggest that the vision would be strengthened by making such a statement.	It is noted that the vision does not include a clear commitment to providing new homes to meet the needs of North Somerset's residents, and we would suggest that the vision would be strengthened by making such a statement.		
Strategic Priorities	Yes		Yes	Yes			In terms of the strategic priorities set out on pages 11 and 12 of the NSLP: • bullet point 3 sets out a priority for the creation of new communities, • bullet point 4 sets out a commitment to increase the number and range of job opportunities available, • bullet point 5 supports the location of new development near to places with a wide range of facilities and job opportunities, • bullet point 6 emphasises Weston-Super-Mare as a location for new development to support regeneration of the town, and • bullet point 8 sets out a commitment to deliver a diverse range of housing. We support these priorities and consider that Policy LP1 Wolvershill will be an important part of the plan strategy to ensure that these priorities are met.	
Sustainable development objectives	Yes		Yes	Yes			In terms of the strategic priorities set out on pages 11 and 12 of the NSLP: • bullet point 3 sets out a priority for the creation of new communities, • bullet point 4 sets out a commitment to increase the number and range of job opportunities available, • bullet point 5 supports the location of new development near	

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							to places with a wide range of facilities and job opportunities, • bullet point 6 emphasises Weston-Super-Mare as a location for new development to support regeneration of the town, and • bullet point 8 sets out a commitment to deliver a diverse range of housing. We support these priorities and consider that Policy LP1 Wolvershill will be an important part of the plan strategy to ensure that these priorities are met.	
SP3: Spatial strategy	Yes		Yes	Yes			Policy SP3 sets out a high level spatial strategy to guide where development in North Somerset should take place. It sets out that: “Priority will be given to locating new residential and mixed-use development in or close to urban areas where there is an existing or proposed wide range of facilities, services and jobs, and there are opportunities to encourage active travel, particularly at locations which are currently, or have the potential to be, well served by public transport.” We support this element of the strategy, and in particular the reference to priority being given to locations close to urban areas where a wide range of facilities are proposed and which have the potential to be well served by public transport. The strategic growth location at Wolvershill is located close to Weston-super-Mare, Worle and Banwell and will include a wide range of facilities and a comprehensive transport strategy including active travel opportunities and access to public transport. Development in this location is therefore fully supported by the Spatial Strategy set out in Policy SP3. It is welcomed that the text supporting Policy SP3 now contains a spatial element which was missing from the previous Regulation 19 draft Local Plan. The text now names locations where significant strategic growth will be delivered, and notes that housing need is of such a scale in	

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							North Somerset that Green Belt release is now being planned for. Consequently, strategic development sites are identified in the Green Belt close to or adjoining the built up area of Bristol. It is also welcomed that Wolvershill is named as a strategic location for growth – and it is noted that Wolvershill is the only strategic growth location in North Somerset which is not within the Green Belt, clearly showing the importance of the strategic location to ensuring North Somerset can meet its housing need.	
SP4: Placemaking	No	• Justified • Effective	Yes	Yes	Policy SP4 sets out high level placemaking principles that apply to all development in North Somerset. Although we support the broad topic areas which are set out in the policy and which provide a context for the design of development, we would make the following points: a. The policy sets out high level principles which are clearly intended to provide starting points for more detailed guidance. The text to the policy contains references to design codes, the National Design Guide, the West of England Placemaking Charter and Building for a Healthy Life. Although the emphasis on good design and strong placemaking is supported and in line with national policy and the NPPF, the number of different pieces of guidance and support in addition to design policies later in the draft NSLP may create confusion and lead to difficulties in making a decision on the quality of development. It is therefore suggested that separate guidance is prepared to explain how the different elements of design and placemaking guidance should be considered together. b. It is also noted that strategic development areas such as Wolvershill are required by policy in the draft NSLP to be delivered using a single over-arching masterplan with design advice set out in Supplementary Planning Document (SPD). It is noted that a paragraph has been added to the Policy SP4 justification explaining that on larger sites masterplans, parameter plans and design codes may be prepared by developers, but this reference does not accurately capture the position regarding Strategic Locations. It would be helpful if the text to Policy SP4 could make clear that the policies for strategic locations make clear how specific arrangements to deliver placemaking principles will be put in place, in order to again be clear about how the over-arching placemaking principles set out in Policy SP4 should be applied. c. It is noted that additional text has been added to the justification regarding the use of higher densities. This emphasis is welcomed, but it should be made clear that those parts of the strategic locations which may be appropriate for higher densities should be set out through comprehensive masterplanning looking at the overall placemaking principles of the site. It should also set out that although higher densities will assist in delivering higher numbers of new homes, it will also be important to ensure that a housing mix is achieved which meets the needs of current and future residents, and that this mix may well require significant numbers of larger family homes. d. Finally, it is noted that the requirement for a Community Engagement Statement (CES) has been moved from the justification to the policy itself. There is little information in the policy or in the justification to set out what a CES should contain, nor is it clear how such a statement differs from the Statement of Community Involvement that should be submitted with an application. It is difficult to see how the addition of the CES to the policy makes it clear to a decision maker how to understand what the CES should contain and therefore how to decide whether the policy test has been met. We would therefore suggest that the reference should return to being an element of the justification which would enable the Council to be flexible about its interpretation and purpose.	See Comments above.		
SP8: Housing	No	• Positively	Yes	Unsure	Policy SP8 - Housing Policy SP8 sets out the approach of the draft NSLP towards housing need and delivery. It sets out a plan requirement for 23,700 new homes to be delivered between 2026 and 2041, or 1,580	See Comments Above.		

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		prepared • Justified • Effective			dpa. The policy goes on to set out a high level land supply position which suggests that 24,495 new homes could be delivered between 2026 – 2041 in support of the housing requirement, and that 3,300 of these homes should be delivered at the strategic growth location at Wolvershill. We support the identification of Wolvershill in Policy SP8 as a strategic location for growth which is clearly a critical element of the draft NSLP's approach to meeting housing need. We would, however make the following comments regarding Policy SP8: a. The plan period is set at 15 years from 2026 to 2041. Clearly, this period runs for 15 years and therefore meets the requirement set out in paragraph 22 of the NPPF (2024 version). However, it is noted that in order to have a 15 year plan period from adoption, the NSLP will need to be adopted in 2026 – and technically should be adopted by April 2026 when the next monitoring year will start. The Local Development Scheme and plan timetable set out on page 10 of the NSLP suggests that the plan will be submitted in early 2026, and could be adopted by the end of 2026. This timetable seems optimistic, and clearly shows that the plan will not be adopted by April 2026. It would be helpful for the NSLP to be clear about the approach to be taken in the event that the plan is not adopted in 2026, to ensure that the NSLP looks ahead for a period of at least 15 years. For example, if the intention was to roll the plan period forwards to ensure the plan period is at least 15 years, how will the plan ensure that the supply of land for new homes is still sufficient to meet the housing requirement? In addition, para 22 of the NPPF also sets out that "Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery". Given that the Local Plan sets out a plan period from 2026 – 2041, and does not provide any indication of a longer term vision, we also question whether this requirement has been met. b. We note that the draft NSLP now assesses the housing requirement using the calculation of local housing need based on the revised Standard Methodology introduced in December 2024. We support this assessment and consider that the housing requirement is in compliance with the NPPF. c. However, we note that the draft NSLP does not contain a housing trajectory or set out a 5 year land supply from the point of adoption of the Local Plan. It would be helpful to see the detail of the housing trajectory and the land supply position which underpins the housing supply table in Policy SP8 set out in a Housing Topic Paper supporting the plan, particularly as these apply to the Wolvershill Strategic Location and the assumptions which have been made regarding first completions and build out rates. d. Finally, it is noted that the draft NSLP makes no mention of accommodating unmet housing need from Bristol, which the City Council has asked if its neighbouring authorities can accommodate. The draft NSLP makes no reference to Bristol's unmet need, nor is there a Statement of Common Ground with Bristol City Council included in the evidence base. A Duty to Cooperate Compliance Statement is included in the Evidence Base, and thus includes a statement that "Evidence supporting the Local Plan demonstrates that North Somerset does not have capacity to meet some of Bristol's needs at this time". It is not clear, however where this evidence is presented or where the specific question of whether North Somerset could make provision for meeting some of Bristol's unmet need is addressed. It is noted that the Minister of State for Housing and Planning, Matthew Pennycook MP set out in a Ministerial Statement on 27th November 2025 that the Duty to Cooperate is not part of the new Local Plan system introduced by the Levelling Up and Regeneration Act 2023, and that the Government has decided that it will not apply to any plans being progressed under the current, 'legacy' Local Plan system. However, the Minister also made clear that "Local planning authorities should continue to collaborate across their boundaries, including on unmet development needs from neighbouring areas, and we expect Planning Inspectors to continue to examine plans in line with the policies in the NPPF on 'maintaining effective co-operation'". It is therefore clear that the matter of accommodating an element of the unmet need of neighbouring authorities remains a soundness issue for the North Somerset Local Plan. We would urge the Council to set out a clearer and more robust position on this matter when the Local Plan is submitted for examination.			
Policy LP1: Strategic location:	No	• Justified	Yes	Yes	Policy LP1 - Wolvershill 2.11 Policy LP1 of the draft NSLP allocates the land at Wolvershill (north of Banwell) as a	See Comments Above		23003 Wolvershill St Philips NSLP

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Wolvershill (north of Banwell)		• Effective			strategic location for growth. It allocates the land north of Banwell and to the east of the M5 motorway for a mix of uses, including up to 3,300 new homes, 3 ha of employment land and a new local centre. It is noted that the policy requires 990 of the homes to be affordable. This is a 18% increase on the figure in the previous Regulation 19 draft Local Plan, which provided for up to 2,800 new homes of which 980 should be affordable. The change shows that the proportion of affordable homes at the Wolvershill has reduced from 35% to 30%. 2.12 We support in principle the allocation of the land at Wolvershill (north of Banwell) as a strategic location for growth, and also the area of land shown on the Policies Map that comprises the allocated site. 2.13 However, we have some detailed comments regarding specific elements of the policy which we believe are necessary to make the policy effective. Our main concerns are as follows: a. Although we support the policy allocating the strategic location for 3,300 new homes, we are concerned that the wording of the policy states that the allocation will deliver “up to 3,300” new homes. Given the size and diverse range of uses proposed for the site, and also given that the policy makes clear that there will be further masterplanning work required to develop the detail of the proposals, limiting the number of new homes to no more than 3,300 dwellings would seem to be an inflexible approach. The actual number of new homes will only be clarified through the masterplanning of the site and then through detailed planning applications coming forward as the site is delivered. It seems equally possible that the number of dwellings eventually delivered could be greater than or less than 3,300 homes. Clearly, the final number will need to reflect a housing mix at the site which meets the needs of current and future residents, which will influence densities across the site. It should also be noted that given that scale of housing need in North Somerset, and that Wolvershill is the only strategic location not within Green Belt, the capacity at the site should not be artificially limited. We would therefore suggest that the policy should refer to the strategic location delivering ‘around 3,300 homes’ to ensure it sets out a realistic and flexible position. We would note that providing flexibility around the number of homes to be provided at larger allocations seems to be an acceptable approach accepted by Inspectors on other Local Plans. For example, the South West Rugby development, as set out in Policy DS8 of the adopted Rugby Borough Local Plan 2011-2031 describes the delivery of “around 5,000 dwellings”. The Plymouth and South West Devon Joint Local Plan, in Policy PLY44 – Woolwell Sustainable Urban Extension and Country Park refers to “in the order of 2,000 new homes). Furthermore, it is noted that LP3 – Strategic Location: Nailsea and Backwell of the North Somerset Local Plan Preferred Options refers to around 3,500 homes over the plan period on sites with extant planning permission and new allocations. b. Paragraph 2 of Policy LP1 sets out that “The development will create a new low carbon community with high quality placemaking and a clear sense of identity. It will be designed to ensure that walking, cycling and public transport are the most convenient and attractive ways to move around the development and access services and facilities”. Although we support the emphasis on providing a low carbon community, we are concerned that the policy also needs to recognise that there will be a need for residents to be able to access facilities and employment in Weston-super-Mare, and further afield, by a range of modes of transport. It would therefore be helpful if the policy could also contain a reference to the need to ensure safe and convenient access to Weston-super-Mare, nearby railway stations and the M5 motorway using low carbon modes of transport primarily, but recognising that convenient access to the highway network will also be required. We would suggest that these points could be addressed by changes to the policy, for example, by referring to connectivity with the M5 motorway. c. Paragraph 3 of the policy sets out that a single masterplan, delivery plan and supporting design codes will be produced to guide delivery of the strategic location, and also that a phasing plan should be agreed. The supporting text then sets out that applications should be accompanied by a single comprehensive masterplan for Wolvershill, and sets out greater detail on a number of issues that it is assumed the masterplan should cover – including phasing and certain strategic infrastructure elements. This detail is welcomed in principle. However, it is noted that there is only limited reference to a Wolvershill Masterplanning Framework SPD. Given the size of the strategic location and the variety of landowners and developers who are			Reg 19 Pt2 FINAL.pdf

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					involved, it is considered that an SPD will be important to setting an objective position regarding the detail of the principles that the development should deliver. We welcome and support the commitment to produce an SPD to guide delivery of the proposals, but consider that the policy should provide a clearer commitment to its production. d. In terms of the detail of Policy LP1, there seem to be several criteria, all of which deal with transport related matters in some detail. For example, criteria 5, 6, 10, and 12 all deal with the transport details of the proposals and there seems to be repetition of points regarding safe walking and cycling routes, and access to Weston-super-Mare and Worle for facilities and strategic transport. It would seem that the policy could be simplified if these criteria could be combined into one or two criteria which together set out a clear vision for transport and movement, which would then be expanded upon in the SPD. In addition, it would be helpful if the policy could also draw out the need to consider access to facilities in the new development and in Weston-super-Mare and further afield by all modes of transport. e. Bullet Point 11 sets out that “The development will comprise predominantly medium to high density living in well-designed buildings, with the highest densities close to the new local centre, facilities and public transport nodes”. As set out above, although there is no objection in principle to the emphasis on medium and high density, we are concerned that the precise housing mix on the site and the densities to be achieved should be driven by the housing mix that is needed and detailed masterplanning of the site. There will clearly be areas suitable for medium and high density housing, and certainly this may be the case around the Local Centre and at the most accessible parts and key transport corridor routes of the site. However, there will also be a need for areas of larger family homes delivered at a lower density, and the policy should not present obstacles to the delivery of a variety of house types to meet a range of needs. It is therefore suggested that the policy text recognises that density and housing mix will be something developed through the SPD and the masterplanning processes. f. Bullet point 24 of Policy LP1 sets out educational requirements for the development. The bullet point sets out that three 420 place primary schools will be required to serve the development. It is noted that these requirements have increased since the previous Regulation 19 draft Local Plan was published, which required two 420 place primary schools and one 210 place Primary School. Clearly, the scale of the strategic location has increased since the previous draft Local Plan, and this increase will have led to an increase in the number of primary school age children from the development. However, these requirements seem overly prescriptive, going into precise details of the number of places required at each primary school. This approach seems inflexible and could harm the effectiveness of the policy, given that the actual need for places could change over time as the site is delivered. In particular, there is an acknowledged trend of reducing school rolls across the country, which may mean that by the time the development is being delivered fewer school places will be needed. This may mean that more children could attend existing primary schools nearby, and/or that addition school provision at the strategic location could be provided more efficiently. It would be helpful if information could be set out in evidence, when the Local Plan is submitted for Examination, explaining how the need for three large primary schools has been calculated, with reference to projected should rolls and capacities in other nearby schools. We would note that the large 5,000 home extension to Rugby, South West Rugby referred to above only requires 2x 2 form entry primary schools to be provided, and the Woolwell extension to Plymouth only requires the provision of one additional primary school. The Sherford new community to the east of Plymouth provides planned growth of around 5,500 new homes and requires three additional primary schools to be provided. We therefore have some reservations regarding the need for three new primary schools to serve 3,300 new homes at Wolvershill. g. It is noted that the justification to the policy sets out that that each school site should be 2.4ha, and should be located to avoid busy roads and achieve safe travel to school by walking and cycling. Both of the sites controlled by St Philips are located alongside Wolvershill Road, which it seems clear will retain vehicle access and could be relatively busy compared to other parts of the strategic location which could be planned to ensure that travel to school is safe and by non-car modes. In addition, given the size of the two St Philips sites, if either were to be suggested for a school use, there would be little if any land left over for residential uses,			

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					providing little incentive for development unless equalisation agreements could be facilitated with the developers controlling the majority of the site. h. Given these complications, it is suggested that setting out such detail in the policy and justification is unnecessary and unhelpful at this time. It would seem more helpful to set the principle of the need to provide educational facilities in the policy, the detail of how levels of need will be ascertained in the SPD, and the size of schools required as part of the planning application process. The SPD could also helpfully indicate the broad location of the school sites that are required, and phasing of delivery, ensuring that they are placed in locations that are deliverable. i. Bullet point 26 states the provision of 18 Gypsy and Traveller pitches should be made within the site, or in suitable off-site locations along with financial contributions. It is unclear how these pitches are to be delivered. If they are to be within the site, the SPD should suggest locational requirements and the Masterplan should set out where they may be provided. If off-site, the SPD should set out how these pitches will be delivered and what contributions are needed. j. Finally, the draft NSLP clearly sets out a range of detailed development management policies which set out requirements for all development to comply with across the District. For example, Policies DP5 and DP6 set out detailed guidance on climate adaptation and net zero development. It would be helpful if Policy LP1 could set out the general development management policies which also apply to the delivery of the strategic location, and make clear that the SPD will also contain guidance on ensuring that these requirements should be considered across the whole site as part of the Framework Masterplanning processes.			

Name: Stefan Kruger **I.D:** 18468225

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I wish to register my strong objection to the proposed allocation of an additional 1,000 homes on Grade 1 Greenbelt land in Backwell, as set out in the Pre-submission Local Plan 2041. After careful review, I find the plan **unsound** for the following reasons, which draw upon the evidence and concerns raised by the community and relevant planning policy: ### **1. Unsustainable Scale of Development** Backwell is already absorbing 800 new homes—a 40% increase—with no commensurate investment in infrastructure, schools, health services, or leisure facilities. Adding a further 1,000 houses would represent an **80% total growth**, fundamentally overwhelming the village's capacity and contradicting principles of sustainable development. ### **2. Lack of Viability and Need Assessment** No robust needs or viability analysis has been provided to justify such a disproportionate allocation. Backwell is not an employment hub, and most residents commute, yet the plan imposes a higher housing percentage (7%) than towns like Clevedon (2%), without evidence of local demand or benefit. ### **3. Inadequate and Unfunded Infrastructure** The Infrastructure Delivery Plan lacks detail, costings, or funding guarantees. A proposed new road—critical to serving Nailsea and Backwell—has no feasibility study, engineering plan, or confirmed funding. The railway station remains inaccessible for many, and no provisions are made for improved transport, health, or education. ### **4. Loss of Protected Agricultural Land** The development targets Grade 1 Agricultural Land, of which only 7% remains in North Somerset. National policy (NPPF) mandates protection of "the best and most versatile land" to safeguard food security. Building on this land is irreversibly			

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					damaging and directly conflicts with this policy. ### **5. Environmental and Ecological Harm** The site supports valuable wildlife habitats, including the Brockley Maternity Roost (SSSI) and rare bat species. Development would further degrade biodiversity in an already nature-depleted region. Additionally, parts of the proposed site, including land near Backwell Lake, are on a functional floodplain—building here would exacerbate flood risks. ### **6. Affordable Housing Conflict** While policy requires 50% affordable housing on Greenbelt land, this reduces developers' contributions to infrastructure, effectively shifting the burden onto the community without securing necessary services or mitigations. ### **7. Absence of Social and Cohesion Impact Assessment** No assessment has been made of the social impact of such rapid, large-scale growth on community cohesion, character, or well-being. The plan threatens the rural identity of Backwell and fails to respect its existing settlement pattern. ### **8. Flood Risk Ignored** Backwell Common and surrounding areas are prone to flooding. Adding impermeable surfaces and drainage stress will increase flood risk to existing and new residents—a clear breach of planning policy regarding flood risk management. ### **9. Strategic Growth Location Designation is Flawed** The designation fails to properly consider the loss of Greenbelt, impact on landscape character, infrastructure delivery risks, and ecological constraints. The proposal is therefore not justified, effective, or consistent with national policy. ### **10. Legal Compliance and Duty to Cooperate** Given the above, there are serious doubts as to whether the plan is legally compliant or has adequately fulfilled the duty to cooperate, particularly regarding cross-boundary impacts on infrastructure and environment.			

Name: Stella Payne **I.D:** 62598177

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Land north of Churchill Avenue	No	• Justified	Unsure	No	The land was bought by the people of Clevedon - it does not belong to the council 44 houses on this site will be detrimental to the area The road infrastructure is already under strain & not suitable for extra traffic With land available at Mill Cross why is a green open space area being considered The land Yeo is already overgrown with weed & liable to flood	Do not use the land		
Land north of Churchill Avenue	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Penny Field must be protected & made a local green space. Under local planning policy, Penny Field is the perfect candidate for local green space designation because it is in the top 24% of sites based on policy alignment Clevedon town Council - two petitions (2022) & (2025) of 600+ signatures & the consultation for Clevedon place making policy alll call to protest Penny Field. Pre y Field is a prime candidate for local nature recovery as identified by WECA, due to the presence of three priority species. Penny Field is also located on a green infrastructure. Corridor under NSC's own policy. Under any equalities impact assessment the reduction of gree space would adversely affect lower income households.	Use land at Millcross		

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					The land at Mill Cross -0 currently owned by Alliance Homes. Alliance Homes have advised they have no intention to build on this land- the land should be re-posed by NSC - it i prime development land - on an old brown site			

Name: Stellan Jara **I.D:** 39402561

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Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell already has approval for 800 new homes — a 40% increase in the size of the village — and adding even more would amount to overdevelopment. The proposed new road would not meaningfully improve traffic for Nailsea or ease congestion on Station Road, Backwell Common, or Chapel Hill. Creating an underpass or bridge over the railway would be extremely costly and may not even be achievable. Even with the planned growth, there is already a shortage of school places, and no investment has been made in healthcare or leisure facilities. The current infrastructure cannot cope with another 1,000 homes. Backwell has been allocated more new housing than any other village in North Somerset, and a higher growth rate than some towns. The village is expected to take on 7% of the district's total housing allocation, compared with Clevedon's 2%. No needs assessment or viability study has been carried out to justify an extra 1,000 homes. Backwell is not a centre for employment, and most residents have to travel elsewhere for work. No assessment has been provided on the impact this would have on social cohesion. The development would build on Grade 1 agricultural land currently used for food production and grazing. Only 7% of this top-quality land remains across North Somerset. Government policy says that "we must protect our best and most versatile land" to ensure long-term food security, yet these proposals go against that policy and put food production at risk. The plans would destroy important wildlife habitats and further damage biodiversity in a country that is already one of the most nature-depleted in the world. They also threaten the Brockley Maternity Roost and nearby SSSI, where rare Lesser and Greater Horseshoe Bats depend on the land for feeding. The Infrastructure Delivery Plan provides no proper analysis, costings, or guaranteed funding for the road or other essential services. Backwell Common and the surrounding area already suffer from flooding, which would worsen with additional housing. There are major concerns about the strategic growth designation — including impacts on local character, loss of Green Belt and high-quality farmland, increased flood risk, and uncertainty over whether the required road can be funded and delivered in time to support the development. The fields around Backwell Lake (where the housing and new road are planned) lie on a floodplain that floods frequently. Government policy requires 50% affordable housing on Green Belt land, but this reduces the money developers contribute to infrastructure. The scale of development — along with the level of investment needed in infrastructure and services — is too much, too fast, and ultimately unsustainable. Backwell railway station is also not suitable as a transport hub. It is not accessible to people with mobility issues and is difficult to use for families with young children.			

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell already has approval for 800 new homes — a 40% increase in the size of the village — and adding even more would amount to overdevelopment. The proposed new road would not meaningfully improve traffic for Nailsea or ease congestion on Station Road, Backwell Common, or Chapel Hill. Creating an underpass or bridge over the railway would be extremely costly and may not even be achievable. Even with the planned growth, there is already a shortage of school places, and no investment has been made in healthcare or leisure facilities. The current infrastructure cannot cope with another 1,000 homes. Backwell has been allocated more new housing than any other village in North Somerset, and a higher growth rate than some towns. The village is expected to take on 7% of the district's total housing allocation, compared with Clevedon's 2%. No needs assessment or viability study has been carried out to justify an extra 1,000 homes. Backwell is not a centre for employment, and most residents have to travel elsewhere for work. No assessment has been provided on the impact this would have on social cohesion. The development would build on Grade 1 agricultural land currently used for food production and grazing. Only 7% of this top-quality land remains across North Somerset. Government policy says that "we must protect our best and most versatile land" to ensure long-term food security, yet these proposals go against that policy and put food production at risk. The plans would destroy important wildlife habitats and further damage biodiversity in a country that is already one of the most nature-depleted in the world. They also threaten the Brockley Maternity Roost and nearby SSSI, where rare Lesser and Greater Horseshoe Bats depend on the land for feeding. The Infrastructure Delivery Plan provides no proper analysis, costings, or guaranteed funding for the road or other essential services. Backwell Common and the surrounding area already suffer from flooding, which would worsen with additional housing. There are major concerns about the strategic growth designation — including impacts on local character, loss of Green Belt and high-quality farmland, increased flood risk, and uncertainty over whether the required road can be funded and delivered in time to support the development. The fields around Backwell Lake (where the housing and new road are planned) lie on a floodplain that floods frequently. Government policy requires 50% affordable housing on Green Belt land, but this reduces the money developers contribute to infrastructure. The scale of development — along with the level of investment needed in infrastructure and services — is too much, too fast, and ultimately unsustainable. Backwell railway station is also not suitable as a transport hub. It is not accessible to people with mobility issues and is difficult to use for families with young children.			

Name: Stephanie Fowler **I.D:** 63052097

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SP1: Sustainable Development	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes			Our client supports the broad objectives set out in policy SP1 as positive indicators of sustainability and aspirational considerations for a broad range of development types. We are supportive of the use of the term 'should' in the policy's opening wording, recognising that in some circumstances it may not be realistic to satisfy every point and that a balanced judgement will be required in every case.	R001v3_NSLP_Reg19_Fowler.Dec25.pdf
SP2: Climate Change	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes		Our client supports the general themes cited within policy SP2 but has significant concerns that certain expectations – such as the achieving of carbon net zero in all new buildings – are realistic or reasonable in the context of an electrical grid still in the process of decarbonisation. While the policy's objectives are laudable, the measures and standards set out must be introduced in a proportionate manner to ensure the pursuit of the highest standards does not unduly delay or disrupt the delivery of the housing and other growth the area requires. This policy should therefore be modified to reflect the reality and establish suitable parameters so that development can be assessed at a reasonable point in time to ensure the promotion of climate change resilience and minimising adverse environmental impacts of development.		R001v3_NSLP_Reg19_Fowler.Dec25.pdf
SP3: Spatial strategy	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes		Our client is supportive of the broad spatial strategy outlined at policy SP3, in particular the presumption that residential development should be focused on those areas such as Nailsea that are the most sustainably located in relation to employment, services and transport, including taking account of likely future scenarios. This does not, however, presuppose that residential development in other locations may not be suitable, based on the facts of each case, noting in particular the need for smaller settlements to remain viable and vital places to live.		R001v3_NSLP_Reg19_Fowler.Dec25.pdf

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SP4: Placemaking	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes		Our client is broadly supportive of the general principles of good placemaking outlined within this policy, which are clear and which align with current national policy. The presumption that community consultation is undertaken for major development proposals is generally sound in principle, however the wording of this part of the policy should be amended to reflect that in certain circumstances widespread consultation may be disproportionate to the development proposal in question. The policy should entertain flexibility in this respect. We are concerned that the final component of the policy, relating to design review, is imprecise and leaves considerable uncertainty as to the circumstances in which design review will be expected or required. While recognising the role performed by the design review process, and the value it can add, there should be no binding requirement on applicants to undertake this exercise and it instead remains at their own discretion, based on the circumstances of the case. For instance, where a site forms a logical extension of a successful recent development this may serve as a template without the need for further external design intervention. A modification in this respect would continue to promote design review while ensuring that panels continue to ensure they offer value to applicants and the wider planning process, rather than becoming a further procedural formality whose usefulness may be diminished as a consequence.		R001v3_NSLP_Reg19_Fowler.Dec25.pdf
SP5: Towns	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes		Our client is supportive of this policy, which reflects the proposed settlement hierarchy and the presumption that the greatest levels of growth should be focused on the most sustainable settlements alongside the strategic new allocations. In particular, our client notes Nailsea's identification as one of the		R001v3_NSLP_Reg19_Fowler.Dec25.pdf

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						four main towns and agrees that its inherent sustainability is such that it should be a significant target for growth over the plan period. The associated policy should therefore positively receive all opportunities for new homes to be provided at such locations, where accessibility to jobs, transport and services is greatest. If adopted, it is recommended that this policy carries a presumption that settlement boundaries shall be frequently and routinely reviewed to ensure alignment development commitments and other changes 'on the ground' to ensure they remain up to date.		
SP6: Villages and rural areas	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes		This policy as currently drafted strictly controls the distribution of housing at villages, limiting this to land within settlement boundaries save for in exceptional circumstances, and in this respect the policy differs considerably from its adopted equivalent, CS32. The success of this policy from a strategic perspective therefore depends heavily on ensuring that larger allocations at the principal settlements within the authority area are sufficient, effective and deliverable, so that new homes will come forward promptly over the plan period.		R001v3_NSLP_Reg19_Fowler.Dec25.pdf
SP7: Green Belt	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes		Our client is supportive of the Council's willingness to meaningfully review Green Belt release in general given its varying quality and the acute need for new homes, and of the general proposition of additional Green Belt release to achieve a sufficient supply of new homes in line with the national standard method and in the most sustainable locations. The proposed extension of the Green Belt around Nailsea and Backwell is, however, in our client's view unjustified. Our client would highlight that this policy seeks to extend this already sizeable swathe of the Bristol and Bath Green Belt around the western edges of Nailsea and Backwell, ostensibly 'to maintain the separation of Nailsea and Backwell		R001v3_NSLP_Reg19_Fowler.Dec25.pdf

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						and prevent further encroachment into the countryside'. This extension directly bounds our client's interests, extending to the South and East of Youngwood Lane adjacent. It is critically important that does not act as a constraint on site efficiency through any perceived 'outside-in' impacts on openness, in respect of which appeal precedent is mixed in any case. National policy makes clear that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. In this instance, the rationale given essentially reiterates the stated purposes of the Green Belt without clear justification for particular circumstances. As both Nailsea and Backwell are subject of site allocations that would enable a new, rationalised and appropriately landscaped outer edge of both settlements adjoining the land proposed for extension as Green Belt, this additional policy designation is considered excessive and, in practice, overly protective against a perceived threat that may not exist. We would therefore recommend that this aspect of the policy is omitted.		
SP8: Housing	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes		Our client is supportive of this policy, which inter alia recognises the inherent sustainability of Nailsea through its identification in the second tier of settlements, behind only Weston⛛super-Mare as the area's principal settlement, as a suitable location for development at a strategic scale. It is essential, in our view, that such strategic development locations are identified in order that housing, together with necessary supporting infrastructure, can be submitted promptly and at scale given the considerable need within the authority area. Targeting the most sustainable locations, where infrastructure such as rail connections are already in situ, offers the optimal means of expediting delivery and building on		R001v3_NSLP_Reg19_Fowler.Dec25.pdf

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						the vitality and viability of existing communities. Notwithstanding, we agree that the Council will be reliant on a mix of urban extensions,smaller urban sites, new strategic development locations such as Nailsea and Backwell, together with generally smaller village and rural sites to create a diversified and resilient source of housing that provides the varied accommodation required across North Somerset. Alongside this strategy, it is critical that the Local Plan supports the bringing forward of urban land where available, maximising the efficient use of land for new homes given the challenges for securing a sufficient supply of housing.		
SP11: Historic and natural environment	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes		We would observe that this policy captures a broad range of objectives, including landscape, heritage, ecology, green and blue infrastructure together with settlement identity and strategic gaps. In respect of the latter, it is noted that this is, in its own terms, 'strategic' in nature and, like the Green Belt, not for the purposes of highlighting or assessing landscape or other character or quality; it is simply a tool for resisting development. This should therefore be omitted from the policy as it unduly conflates specific characteristics with spatial planning initiatives. It is noted that the policy seeks to 'protect the best and most versatile agricultural land' and this objective is supported as consistent with national planning policy. It would not be reasonable or appropriate to go beyond this in terms of unduly restricting development in areas of higher agricultural quality, however, given the need to balance the objective of protecting BMV land with securing the right development in the right places, with associated technical requirements.		R001v3_NSLP_Reg19_Fowler.Dec25.pdf
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared • Justified	Yes	Yes			Our client welcomes the effective reinstatement of Policy LP3 and the identification of Nailsea and Backwell as a strategic focus for development, given the	R001v3_NSLP_Reg19_Fowler.Dec25.pdf

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		• Effective • Consistent with national policy					significant challenges presented in terms of satisfying the need for new homes and the inherent sustainability of both settlements in terms of local employment, services and transport. The inclusion of our client's land within the wider draft allocation at Land South of Nailsea, is complementary to the strategic level of growth already underway southwest of the settlement, forming a logical and integrated extension of the Netherton Wood Lane development further west and existing residential form at The Perrings, Sedgemoor Close and Paddock Rise, consolidating the urban envelope within appropriately defined parameters, namely the route of Youngwood Lane, and coordinated supporting infrastructure.	
Policy LP5: Housing, employment and mixed use allocations	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes			Our client is supportive of the identification of sites able to accommodate 10no. or more dwellings as allocations under the emerging plan. With tightly drawn settlement boundaries, it is considered unlikely that a great number of 'windfall' sites of any larger size will be found.	R001v3_NSLP_Reg19_Fowler.Dec25.pdf
Policy LP7: Settlement boundaries	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes			Our client supports the principle of draft policy LP7 insomuch as it provides clarity the development will be deemed acceptable as a matter of principle within the settlement boundaries. Mindful that such boundaries are generally tightly drawn, however, the policy however does reimpress the importance of ensuring a sufficient supply of deliverable housing allocations across the plan period to ensure the authority meets and exceeds the minimum number of new homes required.	R001v3_NSLP_Reg19_Fowler.Dec25.pdf
Policy LP9: Extent of the Green Belt	No	• Positively prepared • Justified • Effective • Consistent with	Yes	Yes			Our client is supportive in principle of the Council's timely review and the proposed release of land from the Green Belt elsewhere in the authority area, in order to facilitate residential development. Much of this land represents 'Grey	R001v3_NSLP_Reg19_Fowler.Dec25.pdf

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		national policy					Belt’ and in any event does not contribute strongly to any of the five purposes of Green Belt designation, such that it should not remain part of the Green Belt in any case.	
Policy DP6: Net zero construction	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes		In our client’s previous representations on the Regulation 19 draft policies, it was identified that the proposed approach was contrary to national policy. The Council has not provided any additional evidence since the last consultation to demonstrate exceptional circumstances justifying that this policy is appropriate for inclusion in the draft Local Plan. Therefore, it remains unfeasible to include the policy without further supporting evidence. The Written Ministerial Statement Planning: Local Energy Efficiency Standards - 13th December 2023 informed councils that the government expects examiners to reject local plans that go beyond current national policy and legislative provisions. This has recently been tested in the Court of Appeal (1) which concluded that local authorities may set higher requirements exceptionally, subject to there being strong justification for such. Thus, there is an implicit evidential bar for doing so. (1) R (Rights: Community: Action Ltd) v Secretary of State for Housing, Communities and Local Government [2025] EWVA Civ 990 In this instance, there is no clear evidence demonstrating that requirements in excess of the Building Regulations, which establish the standards that central government deems appropriate with respect, inter alia, to energy efficiency and domestic renewable technologies, are reasonably justified. While our client supports in principle the achievement of high levels of energy efficiency an the use of renewables, it is important real-world considerations including		R001v3_NSLP_Reg19_Fowler.Dec25.pdf

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						ensuring that development remains viable, having regard to other factors in this respect, and the impact on housing supply and affordability remains in accordance with the National Planning Policy Framework. This should be taken into consideration by the Council regarding this specific need, which, without substantive evidence otherwise, should not seek to push local standards beyond those established through Building Regulations. Modification: The policy should contain flexibility to positively receive proposals that improve upon them, but not require new development ordinarily to go beyond the standards set out in the Building Regulations.		
Policy DP8: Efficient use of land	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	This policy is unsound as it is not justified or effective. In previous representations on the Regulation 19 draft policy, which also proposed a minimum density of 40 dwellings per hectare, concerns were raised that this approach conflicts with national policy. While the policy states that density should respect and complement the character of the surrounding area, there is limited scope to achieve this given local character, market demand, and site constraints of individual sites across North Somerset. The updated viability assessment indicates that achieving a minimum of 40 dwellings per hectare may be possible on strategic sites. However, this will not always be feasible across the Council's area, and the requirement would create conflicts with other policies.	Modifications: Greater flexibility is needed within the policy to ensure future developments are built at a density appropriate to local character, site constraints, and market requirements.		R001v3_NSLP_Reg19_Fowler.Dec25.pdf
Policy DP9: Flood risk	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	The policy is unsound as it is not justified, positively prepared or consistent with national policy. While our client is supportive of policy that seeks to protect new and existing development from increased probability and severity of flooding, presently this policy presumes in respect of the sequential test that this exercise should inform any proposals to develop land within areas of	Modification: The policy must be brought up-to-date to reflect national planning practice guidance with respect to technical flood risk information in the matter of sequential testing.		R001v3_NSLP_Reg19_Fowler.Dec25.pdf

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					increased flood risk, regardless of whether that development can demonstrably be made safe in technical terms. This does not align with the September 2025 amendments to the PPG which advise, inter alia, that: “In applying paragraph 175 a proportionate approach should be taken. Where a site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development (therefore addressing the risks identified e.g. by Environment Agency flood risk mapping), without increasing flood risk elsewhere, then the sequential test need not be applied.” Therefore, the policy is inconsistent with national guidance and unduly restricts opportunities for additional homes in some of the most sustainable locations, regardless of the capacity to ensure these are safe in terms of flood risk and will not exacerbate such risk elsewhere.			
Policy DP36: Biodiversity Net Gain	No		Yes	Yes	The policy complies with the current legal requirements prescribing the need to deliver a minimum of 10% biodiversity net gain on or off-site. It should however be noted that this is expected to be shortly subject to modification at a legislative level, potentially to widen the range of exceptions particularly to support the delivery of small schemes. It is noted that the draft policy conforms to National Planning Policy Guidance (NPPG) at Paragraph: 006 Reference ID: 74-006-20240214, which confirms that plan-makers should not seek a higher percentage than the statutory 10% for BNG on an area wide or site wide basis unless justified and considering viability and implementation. Our client is supportive of the draft policy’s consistency with legal requirements for 10% and agrees with the Council that it would be inappropriate to seek a level of gain higher than this figure, although many developments will exceed it in any event.	Modification: The policy should be tailpieced to account for any subsequent changes in legislation to ensure alignment with legal requirements as they may change over time.		R001v3_NSLP_Reg19_Fowler.Dec25.pdf
Policy DP43: Affordable housing (including rural exception schemes)	No	• Positively prepared • Justified • Effective • Consistent	Yes	Yes	This policy is unsound as it is not effective and unjustified. The Council published an addendum to the viability report, which forms part of the Local Plan evidence base, in October 2025. The report concludes in respect of the Nailsea	Modification: The policy needs to be adjusted to accurately reflect what has been produced in the viability report.		R001v3_NSLP_Reg19_Fowler.Dec25.pdf

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		with national policy			and Backwell Strategic Location that “With 35% affordable housing tested, it is only the upper end of the typical values range that indicates relatively viable scope with viability indicated to become more marginal to poor when relying on values towards the mid to lower range.” The 2023 viability report acknowledges that affordable housing on greenfield sites could be achievable. However, as supported by the above findings, it also notes that policy should allow a degree of flexibility to assess viability on a case-by-case basis. The current policy wording does not provide for this. While the importance of affordable housing in major developments to deliver a sustainable mix of homes is recognised, the proposed policy conflicts with national guidance, is ineffective because it risks undermining overall housing delivery and reducing the number of affordable homes provided, and does not reflect the principles of positive planning.			
Policy DP45: Residential space standards	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	Our client understands the importance of new development being designed to ensure that residents are comfortable and do not hinder their amenity. The emerging plan states that, when applying the Nationally Described Space Standards (NDSS), all rooms that have the capacity to serve as a bedroom should comply with the standard. This is not a requirement set out in the NDSS and would fundamentally impact how residential developments are designed. It could lead to a greater land take to accommodate the additional space required, which in turn may reduce the number of units delivered on site and create conflicts with draft policy DP8 regarding the efficient use of land. Moreover, it must be acknowledged that patterns in the use of domestic space change over time; for instance, pre-Covid demand for dedicated home office space was much lower than it is now, and the policy should therefore acknowledge that internal layouts and spaces will reflect market demand at a point in time and should not be constrained by the status quo at the point of plan adoption.	Modification: the policy requires more flexibility to ensure that proposals can deliver innovative design, but the policy is not supported by any evidence that would indicate that there is a need/ reason for this policy. Lastly, the policy is not compliant with national policy.		R001v3_NSLP_Reg19_Fowler.Dec25.pdf
Policy DP46: Housing Type and Mix	No	• Positively prepared • Justified • Effective	Yes	Yes	This policy is unsound as it will not be effective. 4.8. Our client supports the delivery of diverse, high-quality development. However, the policy’s reliance on a specific Housing Needs Assessment—a document often updated after the Local Plan is	Modification: Flexibility to be provided to allow for innovation and enable developments to respond to specific site characteristics, but also to ensure that new schemes are compliant with national policy		R001v3_NSLP_Reg19_Fowler.Dec25.pdf

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		• Consistent with national policy			adopted—could restrict proposals coming forward later in the plan period. It is essential that developments delivered in the later stages can respond to market conditions and the evolving needs of the local community. While our client does not object to any individual criterion, the policy must provide sufficient flexibility to ensure it remains applicable to all sites and schemes. The policy also references accessible housing to align with current Building Regulations. However, this requirement is not adequately justified within the Council's evidence base and runs contrary to the presumption that, in terms of mix, development should be informed by local assessment. Greater flexibility should be incorporated, allowing proposals to be assessed on a site-by-site basis, including the removal of the minimum threshold. This policy requires proposals for major developments to include the level of self-build or custom-build housing identified on the register at the time of application, representing a significant increase from current expectations, albeit with no clarity on how much or how this should be facilitated. The expectation for additional self-build units is neither clear, evidenced nor justified, and it does not address any necessary compliance with national policy. No evidence supports the inclusion of this higher standard. Furthermore, the updated viability assessment provides no additional information confirming that this policy would avoid adverse impacts on viability and, the delivery of new residential settlements. Finally, there is no evidence to suggest that this element of the policy will make a meaningful contribution to housing delivery.	supported by the appropriate evidence. The mandatory requirement for self-build units within major schemes should be deleted.		
Policy DP53: Best and most versatile land	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes		The policy is unsound as it is not justified, positively prepared or consistent with national policy. The policy as presented places an effective moratorium upon development within Best and Most Versatile (BMV) agricultural land, with only very limited exceptions. This would appear to significantly constrain the permissively framed rural exceptions site policy DP43 to		R001v3_NSLP_Reg19_Fowler.Dec25.pdf

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						only Grade 3a and below land, which may therefore preclude rural exception sites from being delivered adjoining some rural settlements. It would also likely constrain the delivery of commercial scale renewable energy, where their locations are often defined by grid connection opportunities contrary to the plan's wider ambitions towards net zero. The policy refers to "significant, inappropriate and unsustainable" proposals, which it then defines without setting out criteria relating to scale. This is contrary to the guidance presented by Natural England only countenances losses of BMV land of over 20ha as 'significant', but the policy as drafted sets no such threshold. Moreover, the policy fails to balance the assessment of the value of BMV land as prescribed in the NPPF with other locational considerations both at a strategic level (i.e. directing development to the most sustainable locations) and within a site layout; prioritising domestic gardens on areas of higher agricultural quality will in practice have no significant bearing on food production or security. The policy overall overrepresents considerations of BMV land and should be amended. Modification: Policy DP53 should be modified to include criteria reflecting 'significant' scale of BMV loss as over 20ha in accordance with Natural England guidance.		
Policy DP64: Adoption of open space and green infrastructure	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes		The policy is unsound because it is not effective. Our client supports the integration of green infrastructure and open space in future development to ensure ecological and landscape mitigation is appropriately incorporated. The proposed wording reflects standard practice for all developments our client promotes, including the provision of open space that is		R001v3_NSLP_Reg19_Fowler.Dec25.pdf

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						accessible to all. Typically, such spaces are managed by a management company agreed between the Council and the applicant at the outline stage through a Section 106 agreement. This approach ensures proper long-term maintenance and is common practice, so it would be appropriate to reference this in the policy. Instead, the proposed requirement for a resident-led management structure lacks sufficient detail and guidance. Clear procedures and qualified personnel would need to be in place to ensure the development is maintained effectively. Modifications: There needs to be further guidance provided in the policy which details how a residential-led management structure is justified to manage the open space and guidance on how one can be formed which would follow the same maintenance procedures.		
Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes		Our client welcomes the effective reinstatement of Policy LP3 and the identification of Nailsea and Backwell as a strategic focus for development, given the significant challenges presented in terms of satisfying the need for new homes and the inherent sustainability of both settlements in terms of local employment, services and transport. The inclusion of our client's land within the wider draft allocation at Land South of Nailsea, is complementary to the strategic level of growth already underway southwest of the settlement, forming a logical and integrated extension of the Netherton Wood Lane development further west and existing residential form at The Perrings, Sedgemoor Close and Paddock Rise, consolidating the urban envelope within appropriately defined parameters, namely the route of Youngwood Lane, and coordinated supporting infrastructure.		

Name: Stephanie Hitchcock **I.D:** 62856129

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Who would want to move into a house that will be flooded??? What do we eat with no land to grow food?? The surgery is hardly coping at present so where will all the new residents get there health care needs??? Do we want a village that is gridlocked??? Do we want to kill the local wildlife??? What utter MADNESS!!!!			

Name: Stephen Falk **I.D:** 30872929

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	• Justified • Consistent with national policy	No	Yes	The vision prioritises a change in the way we work and live which is sustainable The policies describe build in rural communities away from employment in contravention of national and policy planning	Create whole communities of work living and pleasure This requires expansion of weston and bristol which both have the necessary availabel infrastructures at least in part	n..a	

Name: Stephen Parsons **I.D:** 58535745

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell already has 800 new houses approved this amounts to an increase of 40% for Backwell The additional houses if approved would result in a mammoth overdevelopment. The roads proposed would be inadequate and a planning failure and cause traffic chaos to the Village of Backwell and its residents. Engineering a road under or over the railway line is planning cloud cuckoo land. Backwelll is not an employment hub. Most residents commute. There is no justification for 800 extra houses and no viability analysis.	See above		
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The Plan is not Sound or Compliant because Backwell already has 800 new houses approved this amounts to an increase of 40% for Backwell The additional houses if approved would result in a mammoth overdevelopment. The roads proposed would be inadequate and a planning failure and cause traffic chaos to the Village of Backwell and its residents. Engineering a road under or over the railway line is planning cloud cuckoo land. Backwelll is not an employment hub. Most residents commute. There is no justification for 800 extra houses and no viability analysis. Backwell Common is prone to flooding. and this will be exacerbated with more housing. Grade 1 Agricultural Land will be built on. When its gone its gone! Government polocy is to protect our best land for foodv security	See above	N/A	

Name: Stephen Rogers **I.D:** 62677057

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared • Justified • Effective	No	No	LP7 Blackrock and Tower Farm Portishead. I don't believe that this land falls in to the category of exceptional circumstances for building. Weston Big Wood is adjacent to these sites, it is an ancient woodland and should be protected, the councils vision states "Valued areas will be protected" this development will have an adverse effect on the woodland and the habitat which does not comply with the stated vision. The council aims to reduce pollution and noise. Building more houses on green belt land in an already congested area without any regard to the current road infrastructure is hardly going to achieve this aim. By building on these sites it will deprive this generation and all future generations of the right to walk freely in open countryside on the legally protected footpaths traversing this land, obstructing them is illegal. There are several brown field sites in Portishead, Clevedon and other areas in North Somerset that should be built on before development on any green field sites are contemplated. Builders are delaying building on land which they have already obtained planning permission for, all existing sites should be developed fully before any new sites are considered and started.			
Black Rock, north of Clevedon Road	No	• Positively prepared • Justified • Effective	No	No	LP7 Blackrock and Tower Farm Portishead. I don't believe that this land falls in to the category of exceptional circumstances for building. Weston Big Wood is adjacent to these sites, it is an ancient woodland and should be protected, the councils vision states "Valued areas will be protected" this development will have an adverse effect on the woodland and the habitat which does not comply with the stated vision. The council aims to reduce pollution and noise. Building more houses on green belt land in an already congested area without any regard to the current road infrastructure is hardly going to achieve this aim. By building on these sites it will deprive this generation and all future generations of the right to walk freely in open countryside on the legally protected footpaths traversing this land, obstructing them is illegal. There are several brown field sites in Portishead, Clevedon and other areas in North Somerset that should be built on before development on any green field sites are contemplated. Builders are delaying building on land which they have already obtained planning permission for, all existing sites should be developed fully before any new sites are considered and started.			

Name: Stephen Stoklosa **I.D:** 62954785

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Land at Tower Farm					The Family has lived in Portishead for since 1977. I have enjoyed walking across those fields to Gordano School. Please do not develop an area which has been designated as ‘Green Belt’ since I have lived here. The development of the ‘Green Belt Land' will lead to 'upsetting the balance of nature in Weston Big Wood’ and 'overtime its demise’. This is the choice that has to be made. Destroy Nature with Development or Keep It? I believe the planning should be looking at the development of ‘Brown Field Sites’. Portishead has already had a lot of expansion. Dr Liam Fox, MP at the time, has given a previous presentation in Parliament describing exactly, 'Why the development of this land doesn’t work and I believe His arguments hold true’. This presentation is available on ‘You tube’. This development is not within 'walking distance’ of the ‘Centre of Portishead’. We already have ‘morning traffic’. The			

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					Railway was removed in 1964 and is due back. This will enhance the ability of the already expanded Population to be able to live and work in Bristol. I am just ‘one little voice in the wilderness’. I wish to see ‘Brown Field Sites’ developed and ‘current run down housing repaired and restored with technology upgrade for insulation and lower carbon footprint’. Climate is changing and We really shouldn’t be removing nature. 'Nature is Our Future Families Lifeline’. Our current 'World Human Activity', is slowly crawling to ‘Destruction of the Environment’ and at some point, Our Future Families will look back and say, ‘Why did they do that?’. Some of Us forget, Time is beating us all up, We won’t be around to see the ‘result of Our Decisions’, but Our Children Will. I will sign off whilst Listening to ‘Bird Chorus’. Not a Christmas Reading Psalm 65:- God Bess - Psalm 65 - Verse 12 - ’The Grasslands of Wilderness overflow’ - verse 13 - The meadows are covered with flocks and the valleys are mantled with grain; they shout for joy and sing.			
Black Rock, north of Clevedon Road					The Family has lived in Portishead for since 1977. I have enjoyed walking across those fields to Gordano School. Please do not develop an area which has been designated as ‘Green Belt’ since I have lived here. The development of the ‘Green Belt Land' will lead to 'upsetting the balance of nature in Weston Big Wood’ and 'overtime its demise’. This is the choice that has to be made. Destroy Nature with Development or Keep It? I believe the planning should be looking at the development of ‘Brown Field Sites’. Portishead has already had a lot of expansion. Dr Liam Fox, MP at the time, has given a previous presentation in Parliament describing exactly, 'Why the development of this land doesn’t work and I believe His arguments hold true’. This presentation is available on ‘You tube’. This development is not within 'walking distance’ of the ’Centre of Portishead’. We already have ‘morning traffic’. The Railway was removed in 1964 and is due back. This will enhance the ability of the already expanded Population to be able to live and work in Bristol. I am just ‘one little voice in the wilderness’. I wish to see ‘Brown Field Sites’ developed and ‘current run down housing repaired and restored with technology upgrade for insulation and lower carbon footprint’. Climate is changing and We really shouldn’t be removing nature. 'Nature is Our Future Families Lifeline’. Our current 'World Human Activity', is slowly crawling to ‘Destruction of the Environment’ and at some point, Our Future Families will look back and say, ‘Why did they do that?’. Some of Us forget, Time is beating us all up, We won’t be around to see the ‘result of Our Decisions’, but Our Children Will. I will sign off whilst Listening to ‘Bird Chorus’. Not a Christmas Reading Psalm 65:- God Bess - Psalm 65 - Verse 12 - ’The Grasslands of Wilderness overflow’ - verse 13 - The meadows are covered with flocks and the valleys are mantled with grain; they shout for joy and sing.			

Name: Stephen Tanner **I.D:** 62831617

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national	No	No	Not Justified There is no robust published alternatives assessment demonstrating that this sensitive site is the only or most appropriate option for growth. The loss of best and most versatile farmland and the risk of irreversible damage to the ancient woodland make this allocation unsuitable. Not Consistent with National Policy			

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		policy			The allocation conflicts with the National Planning Policy Framework which require that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland) should be refused unless wholly exceptional reasons exist. The Council's reference to an "ecological buffer" is vague, unenforceable and insufficient to address indirect impacts such as root-zone damage, hydrological change or wildlife disturbance. The Woodland Trust and Avon Wildlife Trust state that ancient woodland is irrecoverable once damaged. Moreover the Framework requires delivering biodiversity net gain, yet the allocation offers no clear mechanism for ensuring that outcome. Not Positively Prepared The location intensifies existing pressures in Portishead: schools, healthcare and transport infrastructure are already under strain (for example the A369 corridor). This peripheral site would likely increase private vehicle usage and pollution rather than support sustainable travel patterns, contrary to the National Planning Policy Framework. Not Effective Delivery depends on multiple unresolved dependencies: new school provision, bus service contributions, off-site biodiversity management, and upgrades to rights-of way/buffer zones. No phasing plan, funding mechanism or legal agreement is published to secure these. Without such mechanisms the allocation cannot be considered deliverable within the plan period. Landscape & Connectivity The farmland/woodland edge acts as a critical ecological and landscape transition zone. Development here would fragment habitat, diminish the Gordano Valley wildlife corridor and erode the rural fringe character. Even with a buffer the visual and ecological intrusion into the woodland and surrounding landscape would be significant. Drainage & Hydrology Construction and built development would alter surface-water run-off and soil compaction on the former farmland, potentially affecting the hydrological regime that sustains the adjacent ancient woodland. The risk of nutrient runoff, altered infiltration and woodland root zone damage is material. Cumulative Impact When considered alongside other allocations in the Portishead area (such as Black Rock north of Clevedon Road), the combined pressure on ecology, infrastructure and transport is significant and undermines the Council's commitments to nature recovery and sustainable growth. No modification short of removing the allocation entirely would make this site appropriate. Given its direct adjacency to ancient woodland, its loss would be irreversible and cannot be mitigated sufficiently. The land should instead be retained as undeveloped green space, managed to enhance biodiversity and provide sustainable public access, in line with the Avon Wildlife Trust's 2030 Strategy and National Nature Recovery goals I do not support the the North Somerset Local Plan 2041 for the Tower Hill Farm location			
Black Rock, north of Clevedon Road	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	NSC has not properly considered: Alternative brownfield or greenfield sites with far lower ecological impact, both in Portishead and across North Somerset. Opportunities to increase housing density on proposed brownfield sites, which could remove the need to develop Black Rock (and Tower Farm as mentioned separately). The strategic ecological importance of this site (and Tower Farm as mentioned separately) in protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor. The fact that this area (and Tower Farm) were added to the Green Belt in the late 1980s due to their high ecological value.			

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					National planning policy allows Green Belt changes only in exceptional circumstances — and these have not been demonstrated. For these extremely important reasons, Black Rock (and Tower Farm as mentioned separately) should be removed from the Local Plan. No modification short of removing the allocation entirely would make this site appropriate. Given its direct adjacency to ancient woodland, its loss would be irreversible and cannot be mitigated sufficiently. The land should instead be retained as undeveloped green space, managed to enhance biodiversity and provide sustainable public access, in line with the Avon Wildlife Trust's 2030 Strategy and National Nature Recovery goals			

Name: Steve & Hazel Barlow **I.D:** 62846273

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm					Please can we add our names to the list of those local residents and others who are concerned about the proposed development plans for Portishead Down and Weston Big Wood. We would echo the concerns about the ecological impact, and believe that alternative brownfield sites should be sought, and/or proposals to increase housing density on brownfield sites be considered. We are concerned that Green Belt should not be developed unless exceptional circumstances require it. Access safety and suitability will clearly be major issues, and resulting transport impacts would be significant. We would ask that Tower Farm and Black Rock be removed from the Local Plan.			
Black Rock, north of Clevedon Road					Please can we add our names to the list of those local residents and others who are concerned about the proposed development plans for Portishead Down and Weston Big Wood. We would echo the concerns about the ecological impact, and believe that alternative brownfield sites should be sought, and/or proposals to increase housing density on brownfield sites be considered. We are concerned that Green Belt should not be developed unless exceptional circumstances require it. Access safety and suitability will clearly be major issues, and resulting transport impacts would be significant. We would ask that Tower Farm and Black Rock be removed from the Local Plan.			

Name: Steve Bates **I.D:** 39324193

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective	Unsure	Unsure	This proposed development plan is wholly unsound primarily due to the completely excessive number of dwellings proposed to be built. Backwell is a village which already has 800 new houses approved to be built which represents a 40% increase on the current number of homes which is already very excessive, but to then add a further one thousand houses is nothing short of ridiculous.			

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		‣ Consistent with national policy			Backwell does not have the infrastructure or services or employment opportunities to support this massive increase. Most workers that live in Backwell commute into Bristol or elsewhere for employment, and the limited transport provision will not cope with this increase - there aren't enough rail services, the station is not fit for purpose to serve such increases numbers. The A370 and the roads in and around Backwell will not cope with increased traffic. Other facilities such as the recycling centre in Backwell will not cope either. Equally if not more important is the irreversible loss of green space and agricultural land (already limited in North Somerset) that would be caused by this plan. Government policy states that agricultural land must be protected to safeguard food security. This plan is at complete odds with that requirement. This then has a significant negative impact to Backwell's rich local wildlife, not to mention increased flood risks that come with building on the low lying land at this proposed site. I understand that there is a shortage of affordable homes across the country, but this particular proposal will destroy forever the character of the village, a village that is home to, and loved by the people that live here. It seems complete insanity to me to disproportionately allocate this number of houses to Backwell compared to other parts of North Somerset, just in order to hit the number in the plan and benifit from the revenues bulding houses brings to the council. Please let's see sense and save Backwell from being ruined forever.			

Name: Steve Bettison **I.D:** 62853089

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	‣ Effective	Unsure	No	- Backwell already has approval for 800 new homes, representing a 40% expansion. Any further allocation risks overwhelming the village with unsustainable development. - The proposed road fails to address Nailsea’s traffic issues or ease congestion on Station Road, Backwell Common, and Chapel Hill. Constructing it under or over the railway would be prohibitively costly and potentially unworkable. - Despite significant housing growth, there is a shortage of school places and no investment in health or leisure facilities. Existing infrastructure cannot sustain an additional 1,000 homes. - Backwell has been allocated more housing than any other village in North Somerset, with growth rates exceeding those of towns. It is expected to absorb 7% of the district’s housing, compared to Clevedon’s 2%. - No needs or viability assessment has been undertaken to justify the addition of 1,000 homes. - Backwell is not an employment centre; the majority of residents commute elsewhere for work. - No assessment has been provided regarding the impact of development on social cohesion. - The site comprises Grade 1 agricultural land used for crops and grazing. Only 7% of such high-quality land remains in North Somerset. - Government policy requires protection of the best and most versatile land to safeguard food security. These proposals directly contradict that principle. - Development would destroy vital habitats and further damage biodiversity in one of the world’s most nature-depleted nations. - The proposals threaten the Brockley Maternity Roost and SSSI, where rare Lesser and Greater Horseshoe Bats depend on the land for feeding. - The Infrastructure Delivery Plan lacks detailed analysis and costings, with no funding guarantees for the road or associated services. - Backwell Common and nearby areas are already prone to flooding, which would be exacerbated by further housing. - Designation as a strategic growth location raises concerns about loss of character, Greenbelt and agricultural land, increased flood risk, and uncertainty over road funding and delivery. - Backwell Lake and adjacent fields, earmarked for roads and housing, lie on a floodplain that floods regularly. - Government policy requires 50% affordable housing on Greenbelt land, but this reduces developer contributions towards infrastructure. - The scale and pace of growth, combined with the infrastructure demands, render the proposals destabilising, unsustainable, and undeliverable.	As above		

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					- Backwell’s railway station is inadequate as a transport hub, remaining inaccessible for those with mobility issues and difficult for families with young children.			

Name: Steve Chapman **I.D:** 30758785

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	We strongly object to the proposals for Backwell in the North Somerset Local Plan 2041 for the following reasons: We accept the need for some additional houses in Backwell, both to help meet government targets and to provide affordable homes for local residents, but believe that growth should be sustainable and sequential, and of a scale that does not overwhelm the already stretched facilities in Backwell. There are already approved plans for about 800 extra houses for Backwell which represents a 40% addition to the village. This is already excessive and any more would be grossly out of proportion to the increases in the rest of North Somerset. The site proposed for 889 houses is currently high quality agricultural land, which is of value in itself to maintain diversity and agricultural employment in the area, it is of value to the character of the village, and development would contradict Government policy to protect our best agricultural land. The UK has a clear ambition to reduce its carbon footprint and North Somerset has declared a climate emergency. We do not accept that the provision of huge new housing developments on greenfield land is in any way compatible with the measures set out in the North Somerset Climate Emergency Strategic Action Plan. The site provides a variety of of valuable wildlife habitats and is within the foraging area of protected bat species. There is nowhere near enough employment in Backwell for the residents of the existing or planned additional houses, so the majority of residents of these houses would inevitably commute into Bristol for employment. We understand that the rail line from Nailsea and Backwell station is at or near capacity and it seems there is no viable way to make the westbound platform fully accessible to users of wheelchairs and pushchairs, so it is inevitable that the majority of these commuter journeys will be by car into Bristol. If additional housing is unavoidable it should be built in the areas of North Somerset where there are employment opportunities. Traffic in Backwell is already frequently heavy and congested. At peak times the queue on the A370 to the traffic lights in the village centre can extend well beyond the edge of the village on the South side in the morning and the North side in the evening. The proposed new road will not reduce the amount of traffic on the A370, but to avoid making the problems even worse, it must be funded and built before any new housing is occupied.			

Name: Steve Churchouse **I.D:** 58591073

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP6: Villages and rural areas	Yes		Yes	Yes				
SP7: Green Belt	Yes		Yes	Yes				
Policy LP9: Extent of the Green Belt	Yes		Yes	Yes				

Name: Steve P **I.D:** 39401761

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	No	The concentrated allocation in Backwell appears to reflect a failure to fully explore alternative spatial strategies with neighbouring authorities and partners. The evidence does not show: - sufficient joint working on regional transport solutions, - alignment of housing growth with accessible employment centres, or - a coordinated strategy to avoid unnecessary Green Belt loss. A sustainable cross-boundary framework has not been demonstrated.	Reconsider the loss overallocation of houses to greenbelt land and review the allocation of houses to Backwell specifically, which is currently proposed to receive an 80% increase in population as a result of the proposal		
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	No	1. The Allocation is Not Positively Prepared A positively prepared plan must be based on a robust, realistic assessment of future housing need. The proposed housing numbers for Backwell are excessive, unjustified and based on assumptions that are already outdated. 1.1 Declining Household Formation and Lowest UK Fertility Rate on Record (1.4) The UK fertility rate has now fallen to 1.4, the lowest ever recorded. This has major implications for long-term household formation and population projections. Lower births inevitably reduce future household growth, meaning the plan’s demand forecasts are over-inflated. Given these demographic shifts, the scale of development proposed for Backwell cannot be justified. It is unreasonable to release large swathes of Green Belt and Grade 1 agricultural land for housing that will not be required over the plan period or beyond. 1.2 Disproportionate Impact on a Rural Village Backwell is a small rural settlement with limited infrastructure. The combined effect of existing permissions and new allocations would more than double the size of the village — fundamentally altering its character and overwhelming the area’s capacity. The plan is therefore not “positively prepared” because it does not respond to realistic need nor respect the settlement’s scale or constraints. 2. The Allocation is Not Justified A justified plan must be based on reasonable alternatives that are proportionate and evidence-based. This test is not met. 2.1 Inadequate Assessment of Alternatives to Green Belt Release There is no clear evidence that non-Green-Belt alternatives, brownfield land, or smaller, distributed sites have been fully explored before selecting Backwell’s eastern Green Belt for large-scale release. National policy requires that Green Belt be altered only in exceptional circumstances, yet no such circumstances have been demonstrated. 2.2 Loss of Grade 1 Agricultural Land — Only 7% Remains in North Somerset	Removal of the development of the LAND EAST OF BACKWELL from the submission and look to find alternative sites for these houses (A) which are not eroding high quality greenbelt land; and (B) are located nearer other larger centres as currently Nailsea and Backwell have been inappropriately targeted for outsized developments which will alter the character of those areas beyond recognition.		

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					The site consists of Grade 1 agricultural land, the most versatile and productive farmland in the UK. Only 7% of such land remains in North Somerset. Grade 1 agricultural land is essential for food security, crop production and long-term resilience. Its loss would be permanent and contrary to national policy encouraging protection of best and most versatile (BMV) land. The plan provides no justification for sacrificing this irreplaceable agricultural resource. 2.3 Landscape and Character Harm Development here would destroy the rural setting of Backwell, replacing productive countryside with large-scale urbanisation. This is inconsistent with the village's character and with landscape protection objectives. 3. The Allocation is Not Effective A plan must be deliverable and supported by the infrastructure needed. 3.1 Inadequate Transport and Service Infrastructure The A370 is already congested and substandard. Backwell's road network is constrained, narrow and unsuitable for additional high-volume traffic. There is no evidence of funded, deliverable infrastructure to support the proposed scale of growth. 3.2 Inaccessible Railway Station Backwell & Nailsea railway station remains inaccessible for people with mobility issues, lacking step-free access. A core justification for the site allocation is proximity to rail, yet a station that is inaccessible to a significant proportion of the population cannot be relied upon to support sustainable travel or reduce car dependency. The plan therefore fails the effectiveness test, as infrastructure limitations render the development neither practical nor sustainable. 4. The Allocation is Not Consistent With National Policy 4.1 Green Belt Policy The NPPF requires that Green Belt boundaries be altered only in exceptional circumstances. The Council has not demonstrated such circumstances. Housing targets based on inflated projections do not constitute exceptional justification. 4.2 Climate, Agriculture and Food Security National policy increasingly emphasises food security and environmental protection. The removal of Grade 1 land directly conflicts with these objectives and undermines long-term climate resilience. 4.3 Transport Sustainability National policy prioritises sites accessible by sustainable			

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					transport. A railway station that is not step-free and cannot accommodate disabled users fails this test. 5. Failure of the Duty to Co-operate The concentrated allocation in Backwell appears to reflect a failure to fully explore alternative spatial strategies with neighbouring authorities and partners. The evidence does not show: - sufficient joint working on regional transport solutions, - alignment of housing growth with accessible employment centres, or - a coordinated strategy to avoid unnecessary Green Belt loss. A sustainable cross-boundary framework has not been demonstrated.			

Name: Steve Parsons **I.D:** 62851489

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Churchill Avenue	No	• Positively prepared • Justified	No	Unsure	Penny fields was for the people and should have a covenant that it is to be bequeathed to the people of Clevedon as an open space.. North Somerset are simply custodians of said open space for Clevedonians so they should not have the authority to sell or build on the open space.	They need to completely remove any housing for this open space.		

Name: Steven Trueman **I.D:** 62770945

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm					I am a resident of Tower Road and would like to object on the grounds of both traffic and pollution. Tower Road is already impossible to access both in and out but especially out twice a day due to the school drop offs at High Down School, this starts at approximately 8.30am until 9.15 am and again at 3pm until 3.45pm. The proposal to build 400 houses on Tower Farm will bring another 800 cars to the development once complete all making at least 2 journeys a day (out of the development and back again) onto already extremely busy roads. The junctions out from both Tower Road and the Downs onto Down Road are not able to cope with the amount of traffic currently especially at school drop off and collection times. The junctions are just not big enough to handle the traffic or is Down Road big enough to Handle all the extra car journeys that it will have to manage. The top of Portishead is already very busy due to countless previous developments and is just not capable of taking a massive increase in congestion that this proposed development would bring. The result if it were to go through would be mass congestion on already under pressure roads trying to access lower Portishead the motorway etc etc from upper Portishead. The result will mean masses of traffic queuing to access Down road resulting in massive increases in pollution and putting the children that actually walk to the school under greatly increased danger from excessive traffic. If anyone cares to look at either drop off or collection time from High Down School now you will see the chaos that ensues every day currently with parents parking everywhere blocking all surrounding roads and turning Down Road into a single lane road. If			

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					you view this first hand you will clearly see that these roads just cannot handle this proposed large development and to say otherwise is both dangerous and nonsensical. As I understand it Portishead Town Council have already offered alternative brown field sites to build on in Portishead please use these and apply some much needed common sense to this situation.			

Name: Stewart Pitteway **I.D:** 51379041

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Please do not let history repeat itself. I must object to the proposed Local Plan (PLP). It appears ill-considered and inconsistent with Government policy, showing a clear disconnect between national and local objectives. National planning policy allows limited relaxation of Green Belt protections in exceptional circumstances to meet housing targets. However, both Sir Keir Starmer and Angela Rayner have consistently stated that this flexibility must only be applied if the Golden Rules are met: • Brownfield sites first, then greyfield sites if necessary • Affordable housing provision • Infrastructure improvements • Accessibility The proposed Local Plan fails to meet these requirements, particularly in Backwell. Key Concerns 1. Loss of Agricultural Land The plan takes Grade 1 agricultural land, despite recent approvals already removing large areas of farmland. This has occurred without the necessary infrastructure improvements, even as Backwell has already a recent planned approval of 40%. 2. Brownfield and Greyfield Opportunities With lateral thinking, brownfield opportunities exist within North Somerset. For example, the large quarries in the area will reach the end of their reserves within the next 15 years. Rather than leaving future generations with abandoned holes in the ground while farmland is destroyed, housing could be considered on these sites. The Eden Project in Cornwall demonstrates how such redevelopment can bring new life to an area. 3. Accessibility Discussions with highways engineers reveal that the proposed relief road is poorly developed and not costed. A simple feasibility analysis shows the cost is prohibitive and implementation unlikely — certainly not in advance of further development. 4. Infrastructure and Social Cohesion Backwell is rightly identified as a desirable place to live, with good communication links and local facilities. Yet doubling its size in less than 20 years without a plan to reflect this growth is poor planning. No social cohesion impact assessment has been provided. Above all, is there a genuine need for this scale of housing, especially when infrastructure and services have not been enhanced to date? Conclusion This plan must be rejected. Supporting detail and feasibility studies must be provided before future generations' food supplies are jeopardised. History shows repeated failures when housing is pursued without adequate understanding of real needs and natural constraints such as flooding and sites of natural beauty. Local planners should not be forced into reactive decisions that conflict with central government objectives. Please do not let history repeat itself.			

Name: Strongvox Ltd **I.D:** 31149537

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP1: Sustainable Development	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes			Our client supports the broad objectives set out in policy SP1 as positive indicators of sustainability and aspirational considerations for a broad range of development types. We are supportive of the use of the term 'should' in the policy's opening wording, recognising that in some circumstances it may not be realistic to satisfy every point and that a balanced judgement will be required in every case.	R002v5 NSLP Reg19 Reps Strongvox Dec25.pdf
SP2: Climate Change	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	Our client supports the general themes cited within policy SP2 but has significant concerns that certain expectations – such as the achieving of carbon net zero in all new buildings – are realistic or reasonable in the context of an electrical grid still in the process of decarbonisation. While the policy's objectives are laudable, the measures and standards set out must be introduced in a proportionate manner to ensure the pursuit of the highest standards does not unduly delay or disrupt the delivery of the housing and other growth the area requires.	This policy should therefore be modified to reflect the reality and establish suitable parameters so that development can be assessed at a reasonable point in time to ensure the promotion of climate change resilience and minimising adverse environmental impacts of development.		R002v5 NSLP Reg19 Reps Strongvox Dec25.pdf
SP3: Spatial strategy	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	Our client is supportive of the broad spatial strategy outlined at policy SP3, in particular the presumption that residential development should be focused on those areas that are the most sustainably located in relation to employment, services and transport, including taking account of likely future scenarios. This does not however presuppose that residential development in other locations may not be suitable, based on the facts of each case, noting in particular the need for smaller settlements to remain viable and vital places to live.			R002v5 NSLP Reg19 Reps Strongvox Dec25.pdf
SP4: Placemaking	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	Our client is broadly supportive of the general principles of good placemaking outlined within this policy, which are clear and which align with current national policy. The presumption that community consultation is undertaken for major development proposals is generally sound in principle, however the wording of this part of the policy should be amended to reflect that in certain circumstances widespread consultation may be disproportionate to the development proposal in question. The policy should entertain flexibility in this respect. We are concerned that the final component of the policy, relating to design review, is imprecise and leaves considerable uncertainty as to the circumstances in which design review will be expected or required. While recognising the role performed by the design review process, and the value it can add, there should be no binding requirement on applicants to undertake this exercise and it instead remain at their own discretion, based on the circumstances of the case. For instance, where a site forms a logical extension of a successful recent development this may serve as a template without	While recognising the role performed by the design review process, and the value it can add, there should be no binding requirement on applicants to undertake this exercise and it instead remain at their own discretion, based on the circumstances of the case. For instance, where a site forms a logical extension of a successful recent development this may serve as a template without the need for further external design intervention. A modification in this respect would continue to promote design review while ensuring that panels continue to ensure they offer value to applicants and the wider planning process, rather than becoming a further procedural formality whose usefulness may be diminished as a consequence.		R002v5 NSLP Reg19 Reps Strongvox Dec25.pdf

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					the need for further external design intervention.			
SP5: Towns	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes			Our client is supportive of this policy, which reflects the proposed settlement hierarchy and the presumption that the greatest levels of growth should be focused on the most sustainable settlements alongside the strategic new allocations. In particular, our client notes Portishead's identification as one of the four main towns and agrees that its inherent sustainability is such that it should be a significant target for growth over the plan period. The associated policy should therefore positively receive all opportunities for new homes to be provided at such locations, where accessibility to jobs, transport and services is greatest. If adopted, it is recommended that this policy carries a presumption that settlement boundaries shall be frequently and routinely reviewed to ensure alignment development commitments and other changes 'on the ground' to ensure they remain up to date.	R002v5 NSLP Reg19 Reps Strongvox Dec25.pdf
SP6: Villages and rural areas	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	This policy as currently drafted strictly controls the distribution of housing at villages, limiting this to land within settlement boundaries save for in exceptional circumstances, and in this respect the policy differs considerable from its adopted equivalent, CS32. We consider this formulation unduly restricts the potential for suitable and proportionate residential development beyond, but well related to, settlement boundaries at the identified villages, which can make an important contribution to the balanced supply of housing and the vitality of these smaller settlements. It is understood that under the adopted settlement strategy, development at villages has accounted for more than the anticipated proportion of new housing across the authority area, indicating that such sites – including those immediately beyond settlement boundaries – can be delivered swiftly, often by SME developers who are able to formulate more bespoke schemes suited to the character of their context. Medium-sized residential schemes at villages also bring with them much-needed investment in local infrastructure, including public transport and active travel initiatives, education contributions, recreational facilities, and CIL payments that are essential to maintaining the vitality and viability of many of these communities. To unduly constrain the potential for proportionate growth of the area's villages, as the current policy would imply, therefore risks the stagnation of rural settlements through a lack of new affordable and family housing and investment in local facilities.	The policy should be modified to set parameters for appropriately-scaled new housing beyond settlement boundaries, as per the adopted settlement strategy.		R002v5 NSLP Reg19 Reps Strongvox Dec25.pdf

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					The policy is therefore not effective, positively prepared or justified, and should be modified to set parameters for appropriately-scaled new housing beyond settlement boundaries, as per the adopted settlement strategy.			
SP7: Green Belt	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes			Our client is supportive of the proposed release of land at Easton-in-Gordano from the Bristol and Bath Green Belt, and moreover the Council's willingness to meaningfully review Green Belt release in general given its varying quality and the acute need for new homes. As in the case of Pill and Easton-in-Gordano, it must be recognised that the quality and contribution made by the Green Belt across North Somerset varies considerably, with certain parts serving no meaningful function whatsoever to the five purposes of designation. The appropriate release of low-functioning Green Belt therefore actually reinforces the protection of those parts that make a meaningful contribution to the designation.	R002v5 NSLP Reg19 Reps Strongvox Dec25.pdf
SP8: Housing	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes			Our client is supportive of this policy, which inter alia recognises the inherent sustainability of Portishead through its identification in the second tier of settlements, behind only Weston-super-Mare as the area's principal settlement, as a suitable location for development at a strategic scale. We agree that the Council will be reliant on a mix of urban extensions, smaller urban sites, new strategic development locations such as Pill and Easton-in-Gordano, together with generally smaller village and rural sites to create a diversified and resilient source of housing that provides the varied accommodation required across North Somerset. It should be noted that smaller sites suitable for SME developers are often quicker to come forward. Alongside this strategy, it is critical that the Local Plan supports the bringing forward of urban land where available, maximising the efficient use of land for new homes given the challenges for securing a sufficient supply of housing and the fact that such sites, in requiring less additional infrastructure by keying into existing provision, are often quicker to deliver and may come forward sooner in the plan period.	R002v5 NSLP Reg19 Reps Strongvox Dec25.pdf

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SP11: Historic and natural environment	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	We would observe that this policy captures a broad range of objectives, including landscape, heritage, ecology, green and blue infrastructure together with settlement identity and strategic gaps. In respect of the latter, it is noted that this is, in its own terms, 'strategic' in nature and, like the Green Belt, not for the purposes of highlighting or assessing landscape or other character or quality; it is simply a tool for resisting development. This should therefore be omitted from the policy as it unduly conflates specific characteristics with spatial planning initiatives. It is noted that the policy seeks to 'protect the best and most versatile agricultural land' and this objective is supported as consistent with national planning policy. It would not be reasonable or appropriate to go beyond this in terms of unduly restricting development in areas of higher agricultural quality, however, given the need to balance the objective of protecting BMV land with securing the right development in the right places, with associated technical requirements.	Strategic Gaps should be omitted from the policy as it unduly conflates specific characteristics with spatial planning initiatives.		R002v5 NSLP Reg19 Reps Strongvox Dec25.pdf
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	Our client supports the identification of Pill and Easton-in-Gordano, including their interests at Lodway Farm, as a Strategic Location for growth, noting its high degree of locational sustainability and limited contribution to the Green Belt. We are supportive of the broad aspirations outlined in the first paragraph of that draft policy. It is noteworthy that, although physically proximate to Barratt Redrow's land immediately adjacent, both parcels benefit independently from their own means of access and scope for supporting infrastructure including sustainable drainage, such that neither is dependent on the other. In terms of a coordinated approach, therefore, there is no exceptional need for additional masterplanning of the composite site, nor a suggestion of such in the policy. This is welcomed. We recognise the policy's specific requirements that appropriate noise buffers/mitigation are instated in relation to noise from the motorway, and that development must respond suitably to the setting of the Grade II*-listed St George's Church. The detailed Site Requirements, as outlined in Schedule 1, are considered within Section 5 of these representations. We remain concerned that the expectation that the site delivers 50% affordable housing is excessive, and does not suitably reflect both the constraints of the site (including non-developable buffers to the motorway) and/or other requirements including the provision of targeted local transport improvements and education contributions, such that may cumulatively undermine viability.			R002v5 NSLP Reg19 Reps Strongvox Dec25.pdf

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					Subject to impending future PPG commentary on viability appraisals in ‘Grey Belt’ locations, the policy will need to demonstrate robustly the viability evidence on which it is formulated to ensure that the site and wider strategic location are deliverable in practice.			
Policy LP5: Housing, employment and mixed use allocations	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	Our client is supportive of the identification of sites able to accommodate 10no. or more dwellings as allocations under the emerging plan. For the reasons set out in other representations there are further sites not currently draft allocations that are recommended as suitable additions in this respect.			
Policy LP5: Housing, employment and mixed use allocations	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	LAND SOUTH OF CLEVEDON ROAD, PORTISHEAD Our client has already engaged with the local plan process through the submission of a 'Call for Sites' form and responses to the previous 'Challenges', 'Choices' and Regulations 18 and 19 consultations. These submissions and representations set out detailed information in respect of this site at Clevedon Road, Portishead, (SHLAA ref. HE20488) and why we consider it should be allocated for residential development. While Portishead has a recently ‘made’ neighbourhood plan (September 2023) p79 of the draft plan acknowledges that “This is aligned to the North Somerset Core Strategy strategic policies which will be superseded by the Local Plan”. It therefore does not allocate for up-to-date housing needs and certainly not where taking account of the wider housing position and Portishead’s credentials in the second most sustainable tiers of settlements for further development within North Somerset, after Weston-Super-Mare. Our previous representations contained a review of the Sustainability Appraisal, which upon further scrutiny appears to have significantly undervalued the site in a number of key respects, to the detriment of its prospects for allocation. Since that time there has also been a significant re-focusing of government policy in relation to the Green Belt, reflected in the Council’s own response to the selective release of Green Belt. In the intervening period, we have also entered in formal pre-application discussions with the Council, on the basis of a reduced development envelope eliminating all built development within the 2125 future tidal flood risk layer of the strategic Flood Risk Assessment (sFRA), which extends the limited incursions of EA Flood Zones 2 and 3 a significant distance further into the site boundary, as shown on the attached document. Having regard to this new flood constraint, together with the site topography, requirements for SuDs and	The site should therefore be allocated for residential development.		R002v5 NSLP Reg19 Reps Strongvox Dec25.pdf

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					biodiversity net gain and the opportunities to provide additional allotments in conjunction with the adjacent Gertie Gales allotments (which is known to be at capacity, with no current vacancies), our client has developed a revised detailed layout for the site, working within the known parameters including the wider implications of sequential testing in relation to flood risk. An excerpt of the submitted emerging layout, relating to a development of 36no. homes comprising market and affordable houses and flats is shown in the attached document. As shown, dwellings will be kept out of the superimposed future tidal flood risk area, within which SuDs features and domestic gardens are reasonable inclusions, the latter on the basis that suitable planning conditions could control the future hard surfacing or erection of domestic outbuildings otherwise allowed under permitted development rights, thus avoiding any future flood risk. Notably, where one plot appears to extend into the future flood risk area, the slab level is set by its eastern extent (outside the future flood zone) thus ensuring consistent elevation above any maximum flood level. There are no flood constraints to site access or means of escape (e.g. via the allotments adjacent), noting in the case of the latter that tidal flood events would allow for advance notice enabling residents to evacuate ahead of higher water levels. By taking such measures, any need for a sequential test can be avoided and it can be demonstrated through a suitable Flood Risk Assessment submitted alongside an application that the development can be made safe from flooding throughout its lifetime while not exacerbating the risk of flooding elsewhere. The site is located within the Bristol and Bath Green Belt, which extends around Portishead in its entirety, occupying the intervening area between the town and Bristol, as well as other settlements including Clevedon, Nailsea and Portbury Dock. As a matter of principle, North Somerset Council has very rightly acknowledged the need to release significant areas of Green Belt for residential development – most significantly at Nailsea and Woodspring Golf Course – if it is to meet its housing needs in the most sustainable locations under the emerging plan. As a concept, Grey Belt remains a relatively new introduction into national planning policy and has already been tested extensively at appeal. This policy aims to enable the release of low-quality Green Belt land where this is either previously developed or ‘does not strongly contribute to any of purposes (a), (b), or (d)’ of Green Belt designation. A brief assessment of the site’s condition against these three key tests for Grey Belt is set out below. Initial Grey Belt Assessment			

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					Purpose a) to check the unrestricted sprawl of large built-up areas: Although of a sustainable town size, it is highly questionable whether Portishead amounts to a 'large built-up area' akin to an urban conurbation. In any event, growth would be at a modest scale in this case, and physically restricted both by the flood constraints beyond the development envelope and by a robust scheme of landscaping to reinforce and buffer the settlement edge. The settlement pattern is such that development would entail the consolidation, rather than extension, of the existing promontory of the urban area extending to form the southwest edge of Portishead. Purpose b) to prevent neighbouring towns merging into one another: The town that Portishead may be capable of merging into in this direction is Clevedon. However, the site is set back from the closest extent between the two towns, this being c.250m further southwest at Clifton Street/Clevedon Road. The separation between the two settlements remains c.5km at this point, or c.3km along their respective coastal frontages at which they are closest, with intervening constraints including areas of flood risk, such that this purpose is not troubled by the release of the site for development. Owing to its situation and extent, enforced by peripheral flood constraints, the developable area would not amount to a substantial component of the intervening gap, which would continue to provide distinct visual separation between the towns. Purpose d) to preserve the setting and special character of historic towns: Although Portishead contains historic fabric, in cases captured by Conservation Area designation, these are significantly removed from the site, whose context is overwhelmingly of C20th suburban residential development and modern facilities such as the Gordano School. Having regard to the PPG, the site neither forms part of the setting of historic elements of the town, nor makes a 'considerable' contribution to the special character of it. Owing to its physical separation by existing modern development the site's contribution to this purpose is moderate at best and certainly not strong. As indicated, the site does not perform strongly against any of the relevant purposes for designating Green Belt land, and so falls within the glossary definition of 'Grey Belt' land, the release of which from the Green Belt is presumed to be appropriate under paragraph 155 of the Framework, and of secondary preference to previously developed land within an authority area already prepared to release large areas of higher quality Green Belt for strategic growth. By definition, development of the site would be 'not inappropriate' in the terms of the NPPF. This matter was subject of pre-application discussion,			

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					with the Council's advice as received confirming the following key points: ◈ That the site is located in a sustainable location, adjoining the settlement boundary of Portishead; ◈ That the site represents Grey Belt land; and ◈ That the framework shown would obviate any requirement for a sequential test. As a matter of fundamental principles, therefore, there is no current reason why the site should not be released from the Green Belt as a residential allocation under the emerging local plan, being 'not inappropriate' development and able to address the implications of the heightened flood risk identified in the sFRA. In terms of site specific matters, officers have raised the issue of noise associated with Gordano school and the potential need for mitigation, albeit this will be experienced in conjunction with road noise from the Clevedon Road in any event, and will be subject of suitable assessment and, if required, mitigation as part of any application submission. Being comfortably within the parameters of LP5 and the 10-unit plus threshold for allocations, the site should therefore be allocated for residential development.			
Policy LP5: Housing, employment and mixed use allocations	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	LAND NORTH OF BRIDGE INN, YATTON Our client controls land to the North of the Bridge Inn and the B3133 North End road at the north western end of the village of Yatton, the most sustainable of the villages within North Somerset, shown on the location plan in the attached document, and has made representations at the previous Regulation 19 consultation stage in this respect. The previous representations outline how, by reference to the Council's Sustainability Appraisal, the site has been considerably undervalued in a number of respects, while other considerations are capable of being overcome through an appropriate application response. It is noteworthy that the site is enclosed to the North by land now subject of extant full planning permission for the wholesale relocation and consolidation of Yatton RFC (local reference 22/P/0456/FUL) including the provision of a new clubhouse and ancillary buildings, enlarged car park, additional pitches, netball court and associated supporting infrastructure, which includes a pedestrian/cycle link connecting to North End and thus crossing the subject North of Bridge Inn site. This project is already under construction with anticipated completion in due August 2026. It should also be noted that under the proposed changes			R002v5 NSLP Reg19 Reps Strongvox Dec25.pdf

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					to Yatton's settlement boundary, as denoted by the thicker black line below, the site would also sit directly alongside the target area for new development at Yatton. Development of the site would therefore consolidate rather than extend this end of the village. While the site is overwashed by EA tidal flood mapping, much as is a large part of Yatton, it is pertinent that this pertains to assumed levels during a weather event and total failure of coastal defences, and that even in such a situation occupiers would have considerable advance warning of such ingress due to the physical distance of the site from the sea. In any event, appropriate flood storage infrastructure, finished floor levels and emergency evacuation planning are suitable measures for the protection of occupiers in the very unlikely scenario described above, such that in technical terms the site could be made safe from flooding and, in such context, no sequential test would be required in the light of the recent changes to the PPG. Allocation of the site for residential use would therefore proactively set parameters and Site Requirements expectations for a suitably high-quality development at this important gateway site, consolidating the outer edge of Yatton – which is otherwise to be constrained on its opposite end by the proposed Strategic Gap – and providing a meaningful connection to the improved Yatton Rugby Club facilities immediately northward.			
Policy LP5: Housing, employment and mixed use allocations	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	LAND AT BRINSEA ROAD, CONGRESBURY Our client controls 1.4 hectares of agricultural land comprised as a regularly proportioned field situated immediately southward a eastward of the settlement envelope of the service village of Congresbury (SHLAA ref. HE202011). A 2016 planning application (local reference 16/P/1707/O) sought permission for 24 no. dwellings, consistent with the operative local policy CS32. An excerpt from the amended site layout is shown in the attached document for reference. The application was however refused by the Council and a subsequent s.78 appeal dismissed by the Secretary of State on the grounds that the reliance on Brinsea Road and its ensuing connections to local services and facilities represented inadequate provision for future occupiers travelling on foot, notwithstanding the Council's shortfall in housing land supply and acute need for new market and affordable homes. The site was considered under the Council's 'Additional Sites' consultation and found to be one of the 'other potential' options, as shown in the below excerpt (see attached document) from the Council's composite map.	Site should be allocated in the Local Plan.		R002v5 NSLP Reg19 Reps Strongvox Dec25.pdf

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					Notably, it represents the closest of several 'other potential' options to the settlement envelope of Congresbury, while all sites westward of the village were deemed to be subject of 'hard constraints'. Notably, the Regulation 19 Proposals Map includes the proposed allocation of Pineapple Farm, Land north of Mulberry Road, with the settlement boundary extended accordingly, in acknowledgement of the site's commitment within the existing housing trajectory. In terms of pedestrian movements associated with this development, users would proceed first southward onto Mulberry Road, before likely turning northward along Park Road in order to access local services and facilities; this was considered by decision-makers to be suitable. Clearly, any allocation of our client's land at Brinsea Road would be required to consider the findings of the earlier appeal decision in relation to pedestrian accessibility, and in the light of that decision our client has secured a right of access that would facilitate journeys on foot directly northward from the site onto Venus Street, rather than relying on Brinsea Road to the west, which would remain the point of vehicular access. From Venus Street, users would then be able to proceed via the existing footway on the north side of that suburban route to the bottom of Park Road, thereafter adopting exactly the same route to local facilities as deemed acceptable in relation to Pineapple Farm and likewise the recently completed development at Potters View. Thus, this amended pedestrian route overcomes the earlier reason for refusal and would ensure future occupiers benefit from a safe and suitable means of accessing services on foot. With that single technical issue overcome, there is a compelling case for the site's allocation – noting that any combined allocation of the 'other potential' parcels on this side of the village would logically include this one – not least given the apparent limitations on releasing land westwards of the village and constraints of the proposed Strategic Gap on any northward expansion of this service village. Having regard to the above considerations, our client's site at Land East of Brinsea Road, Congresbury, has been shown to be: ◈ In an inherently sustainable location at a large village, as identified by the Council ◈ Outside of the Green Belt, which abuts other edges of Congresbury ◈ Capable of delivering in excess of the minimum allocation threshold of 10no. dwellings ◈ Free of 'hard constraints' including flood risk The addition of c.25no. new homes would make a proportionate contribution to the vitality and viability of Congresbury, bringing further benefits of development			

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					such as local spend and supporting infrastructure.			
Policy LP5: Housing, employment and mixed use allocations	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	LAND AT COBTHORN FARM, CONGRESBURY Our client also has land interests at Cobthorn Farm, Congresbury, comprising and irregular series of agricultural fields immediately adjoining the urban envelope comprising Strongvox's Cadbury Fields development to its west and Bovis' development to the north. As shown on the below excerpt (see attached document) from the Council's strategic Flood Risk Assessment, like the land at Brinsea Road, the site is free of flood constraints that limit development potential across much of the authority area, with the only incursions of elevated risk being the field ditches that would be enhanced for water conveyance and tertiary treatment through any development. The 2-hectare site is free of other constraints, including any heritage, landscape or ecological designations, and can be accessed via the adjacent Cadbury Fields development, also with potential linkage to the Wrington Road, which encloses the site to the east. In the course of the Council's Additional Sites consultation, part of this site was identified as of 'Other Potential', and as outlined above in respect of the land at Brinsea Road, clearly part of the preferred direction of growth for the village with sites to its west having been deemed subject of hard constraints. An excerpt from the composite map is shown in the attached document with the committed Bovis St Congar's Place site shown in blue. Utilising the land identified in orange above, together with the full extent of land under our client's control to its northeast, it is estimated that at least 85no. additional dwellings could be accommodated on the site, together with all necessary supporting infrastructure, open space and strategic landscaping, including buffers to Wrington Road if required. Land to the south, forming an irregular addition to the site and less suited to a composite form of development, could be utilised for Biodiversity Net Gain, potentially offsetting the impacts of both this site and Strongvox's interests at Brinsea Road, maximising the efficiency of both sites for logical housing growth and delivering economies of scale and better outcomes for ecology by concentrating resources. Having regard to the above considerations, our client's site at Land at Cobthorn Farm, Congresbury, has been shown to be: ◈ In an inherently sustainable location at a large village, as identified by the Council ◈ Outside of the Green Belt, which abuts other edges of	Site should be allocated in the Local Plan.		R002v5 NSLP Reg19 Reps Strongvox Dec25.pdf

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					Congresbury ◈ Capable of delivering in excess of the minimum allocation threshold of 10no. dwellings ◈ Free of 'hard constraints' including flood risk ◈ Capable of delivering excess Biodiversity Net Gain, promoting efficient use of land. The addition of c.85no. new homes would make a proportionate contribution to the vitality and viability of Congresbury, reinforcing its role as a large service village.			
Policy LP7: Settlement boundaries	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	Our client supports the principle of draft policy LP7 insomuch as it provides clarity the development will be deemed acceptable as a matter of principle within the settlement boundaries. This must however be read alongside our representations in respect of other proposed land use policies, including the need for flexibility around the proportionate growth of sustainable villages where settlement boundaries are tightly drawn.			R002v5 NSLP Reg19 Reps Strongvox Dec25.pdf
Policy LP9: Extent of the Green Belt	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	Our client is supportive of the Council's timely review and the proposed release of land from the Green Belt at Land at Lodway Farm, Pill and Easton-in-Gordano, pursuant to LP9(1) in order to facilitate residential development. This land is unmistakably 'Grey Belt' and in any event does not contribute strongly to any of the five purposes of Green Belt designation, such that it should not remain part of the Green Belt in any case. Our client's interest at Clevedon Road, Portishead also falls within the Bristol and Bath Green Belt, being a fringe site albeit bounded by uses other than agriculture. Notwithstanding, as confirmed by the Council through its pre-application response, it is a matter of agreement that this site comprises 'Grey Belt' land performing little to no meaningful function in terms of the purposes of the Green Belt. It therefore follows that, having regard to the other merits of the site and consistent with the approach to the release of Green Belt land through the emerging Local Plan, this site should too be omitted from the current Green Belt designation through an allocation for residential land use.	A site at Clevedon Road, Portishead should too be omitted from the current Green Belt designation through an allocation for residential land use.		R002v5 NSLP Reg19 Reps Strongvox Dec25.pdf
Policy LP10: Strategic gaps	No	• Positively prepared • Justified • Effective • Consistent with national	Yes	Yes			Our client has no objection to the proposed designation of a Strategic Gap between Yatton and Congresbury, however such designation does reinforce the presumption that the proportionate growth of these settlements should necessarily be at the opposite ends of their respective spine routes (i.e. to the northwest of Yatton and southeast and east of Congresbury).	R002v5 NSLP Reg19 Reps Strongvox Dec25.pdf

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		policy						
Policy DP6: Net zero construction	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	In our client's previous representations on the Regulation 18 draft policies, it was identified that the proposed approach was contrary to national policy. The Council has not provided any additional evidence since the last consultation to demonstrate exceptional circumstances justifying that this policy is appropriate for inclusion in the draft Local Plan. Therefore, it remains unfeasible to include the policy without further supporting evidence. The Written Ministerial Statement Planning: Local Energy Efficiency Standards - 13th December 2023 informed councils that the government expects examiners to reject local plans that go beyond current national policy and legislative provisions. This has recently been tested in the Court of Appeal, which concluded that local authorities may set higher requirements exceptionally, subject to there being strong justification for such. Thus, there is an implicit evidential bar for doing so. In this instance, there is no clear evidence demonstrating that requirements in excess of the Building Regulations, which establish the standards that central government deems appropriate with respect, inter alia, to energy efficiency and domestic renewable technologies, are reasonably justified. While our client supports in principle the achievement of high levels of energy efficiency an the use of renewables, it is important real-world considerations including ensuring that development remains viable, having regard to other factors in this respect, and the impact on housing supply and affordability remains in accordance with the National Planning Policy Framework. This should be taken into consideration by the Council regarding this specific need, which, without substantive evidence otherwise, should not seek to push local standards beyond those established through Building Regulations.	The policy should contain flexibility to positively receive proposals that improve upon them, but not require new development ordinarily to go beyond the standards set out in the Building Regulations.		R002v5 NSLP Reg19 Reps Strongvox Dec25.pdf
Policy DP8: Efficient use of land	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	This policy is unsound as it is not justified or effective. In previous representations on the Regulation 18 draft policy, which also proposed a minimum density of 40 dwellings per hectare, concerns were raised that this approach conflicts with national policy. While the policy states that density should respect and complement the character of the surrounding area, there is limited scope to achieve this given local character, market demand, and site constraints of individual sites across North Somerset. The updated viability assessment indicates that achieving a minimum of 40 dwellings per hectare may be possible	Greater flexibility is needed within the policy to ensure future developments are built at a density appropriate to local character, site constraints, and market requirements.		R002v5 NSLP Reg19 Reps Strongvox Dec25.pdf

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					on strategic sites. However, this will not always be feasible across the Council's area, and the requirement would create conflicts with other policies.			
Policy DP9: Flood risk	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	The policy is unsound as it is not justified, positively prepared or consistent with national policy. While our client is supportive of policy that seeks to protect new and existing development from increased probability and severity of flooding, presently this policy presumes in respect of the sequential test that this exercise should inform any proposals to develop land within areas of increased flood risk, regardless of whether that development can demonstrably be made safe in technical terms. This does not align with the September 2025 amendments to the PPG which advise, inter alia, that: "In applying paragraph 175 a proportionate approach should be taken. Where a site specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development (therefore addressing the risks identified e.g. by Environment Agency flood risk mapping), without increasing flood risk elsewhere, then the sequential test need not be applied." Therefore, the policy is inconsistent with national guidance and unduly restricts opportunities for additional homes in some of the most sustainable locations, regardless of the capacity to ensure these are safe in terms of flood risk and will not exacerbate such risk elsewhere.	The policy must be brought up-to-date to reflect national planning practice guidance with respect to technical flood risk information in the matter of sequential testing.		R002v5 NSLP Reg19 Reps Strongvox Dec25.pdf
Policy DP36: Biodiversity Net Gain	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	The policy complies with the current legal requirements prescribing the need to deliver a minimum of 10% biodiversity net gain on or off-site. It should however be noted that this is expected to be shortly subject to modification at a legislative level, potentially to widen the range of exceptions particularly to support the delivery of small schemes. It is noted that the draft policy conforms to National Planning Policy Guidance (NPPG) at Paragraph: 006 Reference ID: 74-006-20240214, which confirms that plan-makers should not seek a higher percentage than the statutory 10% for BNG on an area wide or site wide basis unless justified and considering viability and implementation. Our client is supportive of the draft policy's consistency with legal requirements for 10% and agrees with the Council that it would be inappropriate to seek a level of gain higher than this figure, although many developments will exceed it in any event.	The policy should be tailpieced to account for any subsequent changes in legislation to ensure alignment with legal requirements as they may change over time.		R002v5 NSLP Reg19 Reps Strongvox Dec25.pdf

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Policy DP43: Affordable housing (including rural exception schemes)	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	This policy is unsound as it is not effective and unjustified The Council published an addendum to the viability report, which forms part of the Local Plan evidence base, in November 2023. The report concludes that “achieving 25% affordable housing could be challenging with the currently assumed infrastructure costs and therefore there may well need to be flexibility built into policy to allow for any necessary ongoing consideration of this to ensure that development can continue to come forward viably.” The updated viability report acknowledges that affordable housing on greenfield sites could be achievable. However, it also notes that policy should allow a degree of flexibility to assess viability on a case-by-case basis. The current policy wording does not provide for this. In respect of housing within the Green Belt, the policy sets an expectation that this should provide 50% on-site affordable housing, however the viability of this proposition is not supported by the accompanying evidence base nor is it clear that 50% can be supported viably on such sites simply because they are in the Green Belt. In reality, this locational factor is highly unlikely to influence development returns particular where ‘Grey Belt’ sites have no overlapping landscape quality that might yield higher returns. While the importance of affordable housing in major developments to deliver a sustainable mix of homes is recognised, the proposed policy conflicts with national guidance, is ineffective because it risks undermining overall housing delivery and reducing the number of affordable homes provided, and does not reflect the principles of positive planning.	The policy needs to be adjusted to accurately reflect what has been produced in the viability report.		R002v5 NSLP Reg19 Reps Strongvox Dec25.pdf
Policy DP45: Residential space standards	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	Our client understands the importance of new development being designed to ensure that residents are comfortable and do not hinder their amenity. The emerging plan states that, when applying the Nationally Described Space Standards (NDSS), all rooms that have the capacity to serve as a bedroom should comply with the standard. This is not a requirement set out in the NDSS and would fundamentally impact how residential developments are designed. It could lead to a greater land take to accommodate the additional space required, which in turn may reduce the number of units delivered on site and create conflicts with draft policy DP8 regarding the efficient use of land. Moreover, it must be acknowledged that patterns in the use of domestic space change over time; for instance, pre-Covid demand for dedicated home office space was much lower than it is now, and the policy should therefore acknowledge that internal layouts and spaces will reflect market demand at a point in time and should not be constrained by the status quo at the point of plan	The policy requires more flexibility to ensure that proposals can deliver innovative design, but the policy is not supported by any evidence that would indicate that there is a need/reason for this policy. Lastly, the policy is not compliant with national policy.		R002v5 NSLP Reg19 Reps Strongvox Dec25.pdf

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					adoption.			
Policy DP46: Housing Type and Mix	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	This policy is unsound as it will not be effective. Our client supports the delivery of diverse, high-quality development. However, the policy's reliance on a specific Housing Needs Assessment—a document often updated after the Local Plan is adopted—could restrict proposals coming forward later in the plan period. It is essential that developments delivered in the later stages can respond to market conditions and the evolving needs of the local community. While our client does not object to any individual criterion, the policy must provide sufficient flexibility to ensure it remains applicable to all sites and schemes. The policy also references accessible housing to align with current Building Regulations. However, this requirement is not adequately justified within the Council's evidence base and runs contrary to the presumption that, in terms of mix, development should be informed by local assessment. Greater flexibility should be incorporated, allowing proposals to be assessed on a site-by-site basis, including the removal of the minimum threshold. This policy requires proposals for major developments to include the level of self-build or custom-build housing identified on the register at the time of application, representing a significant increase from current expectations, albeit with no clarity on how much or how this should be facilitated. The expectation for additional self-build units is neither clear, evidenced nor justified, and it does not address any necessary compliance with national policy. No evidence supports the inclusion of this higher standard. Furthermore, the updated viability assessment provides no additional information confirming that this policy would avoid adverse impacts on viability and, the delivery of new residential settlements. Finally, there is no evidence to suggest that this element of the policy will make a meaningful contribution to housing delivery.	Flexibility to be provided to allow for innovation and enable developments to respond to specific site characteristics, but also to ensure that new schemes are compliant with national policy supported by the appropriate evidence. The mandatory requirement for self-build units within major schemes should be deleted.		R002v5 NSLP Reg19 Reps Strongvox Dec25.pdf
Policy DP53: Best and most versatile land	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	The policy is unsound as it is not justified, positively prepared or consistent with national policy. The policy as presented places an effective moratorium upon development within Best and Most Versatile (BMV) agricultural land, with only very limited exceptions. This would appear to significantly constrain the permissively framed rural exceptions site policy DP43 to only Grade 3a and below land, which may therefore preclude rural exception sites from being delivered adjoining some rural settlements. It would also likely constrain the delivery of commercial	Policy DP53 should be modified to include criteria reflecting 'significant' scale of BMV loss as over 20ha in accordance with Natural England guidance.		R002v5 NSLP Reg19 Reps Strongvox Dec25.pdf

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					scale renewable energy, where their locations are often defined by grid connection opportunities contrary to the plans wider ambitions towards net zero. The policy refers to “significant, inappropriate and unsustainable” proposals, which it then defines without setting out criteria relating to scale. This is contrary to the guidance presented by Natural England only countenances losses of BMV land of over 20ha as ‘significant’, but the policy as drafted sets no such threshold. Moreover, the policy fails to balance the assessment of the value of BMV land as prescribed in the NPPF with other locational considerations both at a strategic level (i.e. directing development to the most sustainable locations) and within a site layout; prioritising domestic gardens on areas of higher agricultural quality will in practice have no significant bearing on food production or security. The policy overall overrepresents considerations of BMV land and should be amended.			
Policy DP64: Adoption of open space and green infrastructure	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	The policy is unsound because it is not effective. Our client supports the integration of green infrastructure and open space in future development to ensure ecological and landscape mitigation is appropriately incorporated. The proposed wording reflects standard practice for all developments our client promotes, including the provision of open space that is accessible to all. Typically, such spaces are managed by a management company agreed between the Council and the applicant at the outline stage through a Section 106 agreement. This approach ensures proper long-term maintenance and is common practice, so it would be appropriate to reference this in the policy. Instead, the proposed requirement for a resident-led management structure lacks sufficient detail and guidance. Clear procedures and qualified personnel would need to be in place to ensure the development is maintained effectively.	There needs to be further guidance provided in the policy which details how a residential-led management structure is justified to manage the open space and guidance on how one can be formed which would follow the same maintenance procedures.		R002v5 NSLP Reg19 Reps Strongvox Dec25.pdf
Land at Lodway Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes			Our client controls the below site (shown green in the attached document) at Manor Farm (identified in the SHLAA as part of HE20491 – Land at Lodway Farm), Easton-in-Gordano, the composite parts of which are draft allocated in the latest Regulation 19 Local Plan for a minimum of 160no. dwellings, with the remaining (blue) component to the north east being in the control of Barratt Redrow. Our client supports the proposed allocation of land at Lodway Farm, Easton-in-Gordano, for a proposed composite 160no. dwellings comprising their own land interest together	R002v5 NSLP Reg19 Reps Strongvox Dec25.pdf

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							with that of Barratt Redrow immediately north east, following the site's identification during the 'Additional Sites' consultation. It should be noted that 160no. homes should be seen as a minimum guide, and that this should not preclude a greater quantum of development being achieved should greater efficiencies be found, not least because of the site's extremely sustainable location at the fringes of Bristol. The composite site has been subject of earlier draft master planning to understand likely development yield and key parameters, notwithstanding that the two separate parcels can demonstrably be brought forward independently, with no dependence of either upon the other in terms of access, open space or supporting infrastructure. An excerpt from this exercise is shown in the attached document. Subsequent to our submissions on behalf of our client in the course of the Council's 'Additional Sites' consultation in March 2025, work has commenced on preparing a planning application, which anticipates a quantum of c.100no. units making the most efficient use of the land within our client's control. An excerpt from the emerging layout is shown in the attached document. As shown, proposals for the site would include a sizeable landscaped buffer to the motorway, together with a robust development frontage providing noise attenuation in the absence of any likely ability to ameliorate this 'at source', i.e. through roadside acoustic fencing. This area coincides with the lower lying parts of the site, ensuring that flood risk is minimised and no sequential testing would be required in this respect. Heritage and archaeological impacts will be considered and addressed through appropriate professional assessment, including opportunities for new public views to the Grade II*- listed church. Thus, the site is free of other constraints. Turning to the detailed Site Requirements, as set out at Schedule 1, these are considered in para 5.8 of the attached document. As demonstrated above, emerging proposals for the development of our client's portion of	

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							Lodway Farm are capable of satisfying the detailed Site Requirements while providing a significant quantum of development of c.100no. units. It is anticipated that when combined with Barratt Redrow's proposals adjacent, the total allocation could yield well in excess of the 160no. units indicated in the emerging policy, securing good efficiency at this highly accessible location. In relation to noise mitigation, it is worthwhile noting that although chiefly designed to ensure appropriate internal noise levels and 'refuges' of external amenity space to new occupiers, the mitigation measures associated with the M5 motorway are likely to give rise to a material improvement in environmental conditions for existing residents located southeast of the site. This will be further qualified in a noise assessment. The allocation of the site in conjunction with Barratt Redrow's land immediately northeast is therefore supported and will make an important contribution to the supply of housing in this highly sustainable location.	

Name: Stuart Chapman **I.D:** 62850657

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Environmental harm and biodiversity: The development would destroy valuable wildlife habitats and further harm biodiversity in one of the world's most nature depleted countries, undermining objectives for biodiversity recovery and net gain. Threat to designated habitats and species: The proposals threaten the Brockley Maternity Roost SSSI; rare Lesser and Greater Horseshoe bats rely on the land for foraging and would be adversely affected. Conflict with agricultural land protection and food security: The site includes Grade 1 agricultural land used for food crops and grazing; only about 7% of this best quality land remains in North Somerset. Government policy requires protecting the "best and most versatile land" to safeguard food security, and the proposals would contradict that policy. Green Belt, local character and flood risk: The strategic growth location designation raises serious concerns over harm to local character, the loss of Green Belt and high quality agricultural land, and increased flood risk. Transport inadequacy and deliverability risks: The proposed road would not effectively serve Nailsea's traffic or relieve congestion on Station Road, Backwell Common or Chapel Hill; engineering a crossing under/over the railway would likely be prohibitively expensive and may be unfeasible, with no clear funding or programme to deliver in step with housing. Rail hub limitations: Backwell station is not fit for purpose as a transport hub, with significant accessibility failures (including no accessible ramp to the south side platform), undermining sustainable travel objectives. Infrastructure shortfalls: There is already a deficit in school places and no investment in health or leisure facilities; existing services cannot support an additional 1,000 homes.			

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					Lack of evidence and assessments: No needs or viability analysis has been provided for the extra 1,000 homes; Backwell is not an employment hub and most residents commute; no social cohesion impact assessment has been provided. Scale and overdevelopment: Backwell already has 800 new homes approved (circa 40% increase); adding a further 1,000 homes would amount to wholesale overdevelopment beyond the village's capacity. Funding, analysis and timing: The Infrastructure Delivery Plan lacks analysis and costings, and there are no funding guarantees for the new road or services, creating substantial risk that required infrastructure will not be delivered on time to support the proposed housing. Overall, the sheer volume and speed of growth — without assured, timely investment in infrastructure and services — is destabilising, unsustainable and undeliverable; it fails transport and accessibility objectives, lacks essential evidence, threatens designated habitats and high quality agricultural land, and conflicts with national policy.			

Name: Stuart Hunt **I.D:** 57020033

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP1: Sustainable Development	Yes		Yes	Yes				
SP6: Villages and rural areas	Yes		Yes	Yes				
SP10: Transport	Yes		Yes	Yes				
SP11: Historic and natural environment	Yes		Yes	Yes				

Name: Stuart Larkins **I.D:** 39278177

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	1. Overdevelopment Backwell already has 800 new houses approved—representing a 40% increase in the size of the village. Adding a further 1,000 homes would constitute complete overdevelopment and would fundamentally change the character of our community. 2. Ineffective and Potentially Unachievable Road Proposal The proposed road would not relieve congestion in Nailsea nor address existing problems on Station Road, Backwell Common, or Chapel Hill. Any requirement for the road to pass under or over the railway would be extremely costly and may not even be technically feasible. 3. Insufficient Infrastructure There is already a shortage of school places, and no investment is planned for health services, GP capacity, or leisure facilities. The existing infrastructure cannot support an additional 1,000 homes. 4. Unfair Housing Burden Backwell has been allocated more housing than any other village in North Somerset—and even more, proportionally, than many towns. The village is expected to absorb 7% of the district's total housing allocation, compared to Clevedon's 2%. This is disproportionate and unjustified. 5. Lack of Needs or Viability Assessment No evidence has been provided to demonstrate that an additional 1,000 homes are needed or that such development is viable. 6. Not an Employment Centre Backwell is not an employment hub. Most residents commute elsewhere, meaning additional housing would only increase car-dependency and traffic pressures. 7. No Social Cohesion Assessment The proposals include no analysis of the social impact of such rapid and large-scale growth on the existing			

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					community. 8. Loss of Grade 1 Agricultural Land The development would destroy some of the best and most versatile agricultural land in North Somerset—land that currently supports food crops and grazing. Only 7% of such high-quality land remains in the district. 9. Contradiction of Government Food Security Policy National policy states that we must protect the best and most versatile agricultural land to safeguard long-term food security. This proposal directly undermines that obligation. 10. Harm to Wildlife and Biodiversity Building on these sites would destroy valuable habitats in a country already recognised as one of the most nature-depleted in the world. 11. Threat to Protected Species The development threatens the Brockley Maternity Roost and nearby SSSI. Rare Lesser and Greater Horseshoe Bats depend on this land as essential feeding habitat. 12. Uncosted and Unproven Infrastructure Delivery Plan The Infrastructure Delivery Plan contains no proper analysis, no detailed costings, and no guaranteed funding for the road or associated services. 13. Flood Risk Backwell Common and surrounding areas are already prone to flooding. Additional housing and hard landscaping would significantly worsen this risk. 14. Concerns with the Strategic Growth Location Designation Key issues include the loss of Green Belt and high-quality farmland, the erosion of local character, increased flood risk, and uncertainty over whether the required road can be funded or delivered in time to support the development. 15. Building on a Floodplain Backwell Lake (the reservoir) and the adjacent fields earmarked for development are located on a floodplain and flood regularly. This makes them wholly unsuitable for housing or roads. 16. Unsustainable Rate of Growth The sheer scale and speed of the proposed expansion, without the necessary infrastructure, would be destabilising, unsustainable, and ultimately undeliverable. 17. Inadequate Railway Station The railway station is not fit for purpose as a transport hub. It remains inaccessible for people with mobility issues and is extremely challenging for families with young children. 18. Failure to Demonstrate That Green Belt Release Is a Last Resort Government guidance states that building on Green Belt land should occur only when all alternative options have been exhausted. No evidence has been provided to justify such release. 19. Empty Homes Elsewhere With an estimated 750,000 empty homes nationally, it is unclear why building on valuable green spaces is being prioritised over bringing existing properties back into use. 20. No Evidence That Additional Housing Will Lower Prices Numerous experts have stated that simply building more houses does not reduce prices, especially in areas like Backwell where demand is limited. First-time buyers will not benefit from these proposals.			

Name: Stuart Williams **I.D:** 51036737

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	- This is Grade 1 agricultural land with only 7% left in North Somerset where the land is required to safe guard our food security - The land is liable to flooding. - Loss of Green Belt and wildlife habitats - Backwell has very little employment so anyone living here needs to travel else where for employment and anything above limited convenience type shopping. - Backwell already has 800 new homes consented and if this was approved would see an 80% increase in the population of what is currently a small village which would be higher than any other village in North Somerset. - No increase in local facilities such as doctors or schools. Not entirely sure who will be able to afford these new houses anyway. I have adult children would not be able to but anything in Backwell as illustrated by current asking prices at Farleigh Fields. So, in summary, I strongly object to			

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					yet more housing in Backwell.			

Name: Sue Ascott **I.D:** 62762593

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	‣ Justified ‣ Effective	Unsure	Unsure	NSC has not considered the strategic ecological importance of Tower Farm and Black Rock sites in protecting Weston Big Wood (SSI) and the Gordano Valley green corridor. NSC has not considered the fact that both areas were added to the Green Belt in the late 1980's dur to their high ecological value. NSC has not considered the fact that National Planning Policy allows Green Belt changes only in exceptional circumstances and these have not been demonstrated. NSC has not considered that neither Tower Farm or Black Rock can provide safe or suitable access. NSC has not considered that development would create unacceptable transport impacts, failing national soundness tests.	NSC has not considered alternative brownfield or greenfield sites with far lower ecological impact, both in Portishead and across North Somerset. These should be considered now. NSC has not considered opportunities to increase housing density on proposed brownfield sites which could remove the need to develop Tower Farm and Black Rock. These should be considered now. For these and the above reasons, Tower Farm and Black Rock should be removed from the local plan.		Sue Ascott_Redacted.pdf
Black Rock, north of Clevedon Road	No	‣ Justified ‣ Effective	Unsure	Unsure	NSC has not considered the strategic ecological importance of Tower Farm and Black Rock sites in protecting Weston Big Wood (SSI) and the Gordano Valley green corridor. NSC has not considered the fact that both areas were added to the Green Belt in the late 1980's dur to their high ecological value. NSC has not considered the fact that National Planning Policy allows Green Belt changes only in exceptional circumstances and these have not been demonstrated. NSC has not considered that neither Tower Farm or Black Rock can provide safe or suitable access. NSC has not considered that development would create unacceptable transport impacts, failing national soundness tests.	NSC has not considered alternative brownfield or greenfield sites with far lower ecological impact, both in Portishead and across North Somerset. These should be considered now. NSC has not considered opportunities to increase housing density on proposed brownfield sites which could remove the need to develop Tower Farm and Black Rock. These should be considered now. For these and the above reasons, Tower Farm and Black Rock should be removed from the local plan.		

Name: Sue Francis **I.D:** 62779361

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Youngwood Lane	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	The proposed development is not viable due to the increase flood risk to floodplains between Nailsea and Backwell. The proposed access road and bridge cross the River Kenn floods regularly, which makes this proposal unviable and directly contradicts the planning policy. The developer’s flood modelling remains unapproved by the Environment Agency after several revisions. In addition it is uncalibrated, omits known flood events and uses outdated hydrological data. Drainage features proposed in the strategy would be submerged during heavy rain conditions and therefore will not function. Housing in and around the vicinity of Station Close will be at serious risk of additional flooding from surrounding fields and cannot be protected. The development would significantly increase car usage on already narrow access roads and the proposal for housing is simply too far from the town centre for any viable alternative - the development is not on flat ground. Nailsea and Backwell train station is not fit for the increase in commuter volume, e.g. platform length, and does not provide disabled access needs for anyone travelling south. Both Nailsea and Backwell lack the basic infrastructure capacity for this scale of development, in both primary & secondary schools & medical centres and there has been no confirmed funding to address any these shortfalls. Based on the typical housing developments, the proposed new road off the A370 link road and new underbridge would not be progressed or completed before any housing is complete and then likely to be subject to delays, cost overruns and risks to it's actual completion. Moreover a new road would alter flood pathways on Backwell Common, worsening downstream flood risk which is not permitted in the NPPF. The subsequent overall increase in traffic through the villages will increase the risk of serious road traffic accidents, injury and death. Existing roads which cannot be widened will have to manage significantly more vehicles which put			

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					pedestrians and school children at unacceptable risk, especially those needing to walk form Nailsea to Backwell (& vice versa) and those crossing the busy A370. The site is valuable agricultural land and an important feeding ground for the Brockley Bat maternity roost. Otters use the local river and streams to travel to and from Backwell Lake. Any increase in the height of flooding to the Backwell Lake would endanger birds which overwinter there and other wildlife.			

Name: Sue Hynam **I.D:** 18203969

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell						I strongly object to the planning proposal to build an additional 1,000 new homes in Backwell East which is currently precious Grade 1 Agricultural Greenbelt land used for food consisting in the region of 50 hectares of which there is only 7% left in the whole of North Somerset. Government Policy states that “we must protect our best and most versatile land” to safeguard food security, therefore this policy must be upheld or it will be in direct breach and in contradiction of the importance as to why the Government felt it necessary to have in place. There are already 800 additional houses that have been given approval to various builders which will increase housing by 40%, a massive increase proportion wise against any other area of North Somerset. Which is overwhelming when you consider the required infrastructure required to support such a massive increase to total of 80% should these additional houses be given the go a head. There are no plans to support services including additional GP surgeries or Schools with no detailed feasibility study/ costings or who will fund it, which would likely fall in the hands of North Somerset Council to resolve who I doubt could secure any funding. Backwell is unable to offer any employment on large scale the railway which appears on paper a bonus has many restrictions including a short platform which restricts the number of commuters/length of trains, including exiting the platform from certain directions, does not have safe access for people with mobility issues and very challenging for anyone travelling with young children. As job opportunities on a larger scale are more viable nearer to Bristol due to a significant proportion of Greenbelt land sadly being given approval for a Campus to be built for the European Headquarters of a US Drugs Company (approved by North Somerset Council) maybe building homes nearer to where the jobs will be should be a major consideration point? The proposed road which if housing from Nailsea is also approved will run along side Backwell Lake and through floodplain land across Backwell Common which will only add to more flooding and major impact on wildlife habitats. The Conservation of Habitats and Species Regulations (Reg 41) states that its an offence to deliberately disturb wild animals of EU protected species which includes Horseshoe Bats. Nationally rare endangered species are protected under Part 1 of the Wildlife and Countryside Act 1981 and the UK Government signed an EU document protecting bat feeding areas in 1992, therefore there is legal protection for bats, their roosting and feeding sites. Brockley Hall stables (Grade II listed building) is designated a SSSI and hosts a large colony of the rare and endangered Greater Horseshoe Bats during the summer months which is also used as a maternity roost. The surrounding land including farm land is vital for their existence and continued survival as it is used for foraging. They are also light sensitive and any artificial light including street lighting additional traffic from transport at night will have severe consequences on their survival and I deem this a breach by NSC and Housing Developers if any of the above is not taken into consideration as it a legal obligations to comply with these laws.			

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						Property developers will report they have done surveys and no doubt conclude there will be no impact but by totally removing the farmland area at Grove Farm as part of the 800 builds already approved this will mean the bats will have to forage further and if more farmland is taken away the bats survival is questionable which surely is a breach of the very Laws in place to protect them? My other main concern is the erosion of green space that will taken away by the 800 approved builds. We need open space to help with our own mental health and wellbeing, enjoyment is a simple walk through green open space with family, friends or a dog walk which has already been eroded following the commencement of Phase 1 of the Farleigh Fields builds and the Grove Farm building work will no doubt follow at some point. Please can I ask you to consider all the above points as valid reasons why no further building of houses in Backwell should be granted because once more farmland is lost there is no going back, we need to preserve our remaining Grade 1 Agricultural land at all costs.		

Name: Sue Mason **I.D:** 30809633

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Vision, Strategic Priorities and Sustainability Objectives	Yes		Yes	Yes				

Name: Sue Weston **I.D:** 39402049

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I am writing to express my concerns over the proposed building of 1,000 new homes on Grade 1 Greenbelt land on land at Backwell Common and alongside the A370 in Backwell. This land is prime quality agricultural land of which there is only 7% left in North Somerset. The proposal completely contravenes the Government's policy which says we must protect this land to safeguard our food production. It makes no sense at all to use this land for housing. Furthermore development would destroy wildlife habitats and is detrimental to biodiversity. I have further concerns over the flooding issues we have here in Backwell. Backwell Common is particularly bad, the road under the railway bridge regularly floods. I lived on Chapel hill for 13 years and regularly saw evidence of this. People don't appreciate how deep the flood is and they and their vehicles often get totally stuck. I even know of one person who climbed on the roof of his van to escape the flood waters. We are told that the heavy rains causing the floods are only going to increase in coming years. We already see the A370 flood when we have heavy rain. The proposal of 1,000 new houses on this land is utter madness. Apart from the serious issues of increased flooding, Backwell itself is a village and as such our roads are not suitable for a further increase in commuter traffic. Backwell is not an employment hub. Workers have to commute to Bristol and with an additional 1,000 homes the traffic problem would increase to unmanageable proportions. I understand that there is no guaranteed funding for a new road or services. Backwell does not have the infrastructure to support such a development, and the village has already had an increase of 40% in its housing numbers it makes no sense to build another 1000 houses in this area. The whole proposal is unsustainable and undeliverable.			

Name: Summerfield Homes Ltd **I.D:** 62907617

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP3: Spatial strategy	No	• Justified • Effective • Consistent with national policy	Unsure	Unsure	Policy SP3: Spatial Strategy Summerfield Homes object to the proposed spatial strategy. The policy notes that it gives priority to new residential and mixed-use development in or close to urban areas, limiting development at villages (beyond strategic development areas) to local community needs. To prioritise development at the urban areas suggests that these locations should be fully explored first, before consideration would be given to development at the villages. In addition, limiting villages to meeting local community needs fails to recognise the potential for the more sustainable villages1 to deliver small-scale growth which can make a meaningful contribution towards the overall housing requirement. The spatial strategy should recognise the greater role which the more sustainable villages (outside the strategic development locations) could play in meeting the objectively assessed housing needs, through appropriate scale of development, relative to the size, capacity and sustainability of the villages, with priority given to Category A and B villages. The proposed spatial strategy relies heavily on strategic development areas to meet the housing requirement; 4 strategic development locations are expected to delivery 47% of the total housing requirement and 85% of the residual housing requirement (excluding existing commitments). The strategic development locations involve large, complex sites with multiple ownerships and significant infrastructure requirements. The Local Plan's reliance on such a small number of locations to deliver such a substantial proportion of the housing requirement. Approach to Rural Settlements Paper (March 2022) 2 puts the Local Plan at significant risk of not meeting its objectively assessed housing needs requirement over the plan period. It is already evident that the spatial strategy would fail to deliver adequate housing within the plan period. The spatial strategy should be revisited and additional and alternative housing sites allocated through the plan to ensure an adequate, flexible supply, capable of meeting the objective housing needs within the plan period. Sites at the most sustainable villages should be revisited and allocated, as appropriate, to boost housing supply, in accordance with the Council's sequential approach to site identification (stage 4). Summerfield Homes object to the spatial strategy which fails to respond directly to the findings of the Pre-Submission Sustainability Appraisal (SA) which recommends a strategy based on urban focus . Spatial Strategy and Capacity Paper (October 2025) provides no justification for the selection of a spatial strategy which aligns most closely with Approach 3, when there is clear evidence that Approach 2 offers the most sustainable development strategy for the local plan area. In summary, the spatial strategy is unsustainably reliant upon the delivery of 85% of its unmet housing needs over four strategic development locations, with no evidence that these locations can deliver the required housing over the plan period, alongside the required infrastructure. The evidence necessary to justify the categorisation of the villages and inform the spatial strategy is absent and therefore the spatial strategy is unsound. Finally, the spatial strategy fails to reflect the evidence base which supports small-scale growth at the most sustainable villages. Accordingly, the policy is ineffective and unjustified and therefore unsound. The Spatial Strategy should be revisited in line with the findings of the Sustainability Appraisal and the availability of land at the most sustainable villages, outside the Green 4 Adopted Core Strategy (Policy CS32, Service Villages) and Spatial Strategy, Site Selection and Capacity Paper (October 2025) 9 Belt, to deliver a sustainable spatial strategy which is capable of meeting housing needs over the plan period.	The Spatial Strategy should be revisited in line with the findings of the Sustainability Appraisal and the availability of land at the most sustainable villages, outside the Green 4 Adopted Core Strategy (Policy CS32, Service Villages) and Spatial Strategy, Site Selection and Capacity Paper (October 2025) 9 Belt, to deliver a sustainable spatial strategy which is capable of meeting housing needs over the plan period.		251211 Local Plan Reps Alburys Complete.pdf Representation form Part B SP3.docx
SP8: Housing	No	• Justified • Effective • Consistent with national policy	Unsure	Unsure	Summerfield Homes object to the plan period as defined under Policy SP8 to establish the housing requirement. The policy defines the plan period as 2026-2041. The National Planning Policy Framework (Framework), paragraph 22, requires strategic policies to look ahead over a minimum 15 years from adoption. North Somerset Council's Local Development Scheme (February 2025) anticipated adoption of the local plan in November 2026. This assumption was based on consultation on the pre-submission Reg 19 plan in June 2025 and submission to the Secretary of State in October 2025. These timescales have been subject to delay, with the Regulation 19 consultation held in November/	See attached letter. To achieve a sound policy in this regard, the plan period should be adjusted to 2026-2042 and the housing requirement increased to at least 25,280 dwellings, with the consequent provision of further		Representation form Part B SP8.docx 251211 Local Plan Reps Alburys Complete.pdf

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					December 2025 (concluding on 12 December 2025). Applying the Council's own timescales beyond the Regulation 19 consultation (i.e. 16 months to adoption), to the revised consultation date of November/December 2025, it is unlikely that the Local Plan will be adopted before March 2027. On this basis, the local plan period is unlikely to commence until 1st April 2027, which would take the plan period to at least March 2042 and potentially 2043. As a consequence the housing requirement should be increased by at least a further 1,580 dwellings (possibly 3,160) to reflect an additional year (or two) of housing needs, this to make very clear guidance at NPPF paragraph 22. Consequently, Policy SP8 as drafted is contrary to the Framework and therefore unsound. To achieve a sound policy in this regard, the plan period should be adjusted to 2026-2042 and the housing requirement increased to at least 25,280 dwellings, with the consequent provision of further land for housing.	land for housing.		
Policy LP5: Housing, employment and mixed use allocations	No	• Justified • Effective • Consistent with national policy	Unsure	Unsure	LAND AT THE ALBURYS For the reasons set out in response to Policies SP3, Summerfield object to the allocation of housing sites identified under Policy LP5. The site selection is based on a flawed spatial strategy which does not reflect the findings of the Sustainability Appraisal and an erroneous evidence base which fails to correctly and comprehensively assess the suitability of sites through each step of the sequential approach, resulting in an overreliance on strategic development locations and land in the Green Belt to meet housing needs. By way of example, the identification of Nailsea and Backwell as a strategic location is flawed for the following reasons: a) The scale of development proposed at Backwell is disproportionate to the existing population of the village, representing an increase of over 80%. The substantial scale of population growth directed to Backwell through this Local Plan is wholly disproportionate to the existing settlement and coupled with the significant growth proposed for Nailsea, will place undue pressure on existing facilities, services and infrastructure and it will have a significant, detrimental impact on the character and nature of the area and its communities. b) The strategy is reliant upon and based on a flawed transport mitigation strategy which fails to mitigate the trips generated by the proposed allocations and would put at risk the effective delivery of housing within the plan period. The Pre-Submission Local Plan published in November 2023, removed the proposed allocation of Nailsea and Backwell as a strategic development area due to significant uncertainties over the deliverability of necessary highway infrastructure (including a rail crossing to mitigate the impact of development on Backwell Crossroads). The Spatial Strategy and Capacity Paper advised that "None of these options [for a rail crossing] are straightforward given flooding issues which could affect any crossing under the railway and the visual impact of a bridge crossing a railway on an embankment. Further technical assessment following Preferred Options resulted in a preference being for a bridge crossing to the East of Backwell. However, taking account of potential development contributions and other sources of funding, the costs of delivery were prohibitive which meant that delivery was highly unlikely over the plan period." Paragraph 3.12, Spatial Strategy and Capacity Paper, November 2023). c) Neither the Pre-Submission Local Plan 2025 or the accompanying Spatial Strategy and Capacity Paper (October 2025) justify the reversal of previous decisions made through the Local Plan preparation process. The spatial strategy as presented through Policy SP3 fails to justify, through appropriate evidence that Nailsea and Backwell represents a sustainable location as a strategic development location. The allocation of land East of Backwell for 889 dwellings and land South of Nailsea for 582 dwellings are both reliant upon delivery of the new strategic rail crossing to mitigate their impact on the Backwell crossroads. In the absence of evidence to demonstrate that there is a credible design solution which would not give rise to significant adverse impacts, which is capable of being supported by Network Rail and which would be funded and delivered in an early phase of the plan period, these allocations are not justified by the evidence base and not demonstrated to be effective. As a result, the allocations of land East of Backwell and South of Nailsea are unsound and should be removed from the plan.	Land at The Alburys should be allocated under Policy LP5 to help deliver housing without reliance on major new infrastructure, increase flexibility in supply and boost delivery in the first 5 years of the plan period.		251211 Local Plan Reps Alburys Complete.pdf Representation form Part B LP5.docx

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					The Council has failed to demonstrate that it has considered alternative locations to accommodate development outside Backwell, including at other sustainable village locations such as Wrington. The Council has adopted a sequential approach to the identification of sites, however, it is evident that the Council has neglected to undertake a comprehensive assessment of all non-Green Belt sites at sustainable locations at Step 4 of the sequential approach before exploring options in the Green Belt. Summerfield Homes object to the omission of land at The Alburys, Wrington (HE2033). Based on the evidence base, Wrington is recognised as one of the most sustainable villages in North Somerset and based on an assessment of the available sites, The Alburys lies outside the Green Belt and is free from hard constraints, including flood zone 3 which affects sites to the south and east of the village. The Council's decision to discount the site due to potential impact on the setting of the All Saints Church Tower has no basis in evidence and fails to take account: a) Historic England's guidance on the treatment of church towers, b) The absence of any designed or associated view of the church tower; c) The absence of existing public views of the church tower from the site; and d) The opportunity to mitigate any landscape impact through the masterplan. Wrington is evidenced to be one of the most sustainable villages in the District which should be comprehensively assessed at Step 4 of the Council's sequential approach to identifying land for housing. The Alburys represents the only site which is not at risk of flooding and lies outside the Green Belt. The Council has provided no evidenced assessment of the potential heritage impact on the site's capacity to justify its conclusion. A "potential" technical issue is categorically not a sound reason to discount a deliverable site for housing in a sustainable location. The Council has disregarded Wrington for development through a misjudged, unevidenced, subjective view on the existence of "significant" heritage constraints. These "constraints" are no greater in Wrington than in many other locations in the plan area. Evidence of a professional and objective assessment of Wrington and its capacity to accommodate development is not apparent through this Local Plan. The Alburys represents a wholly suitable site for allocation, with capacity for circa 30 dwellings. The site can make a meaningful contribution towards housing need, boost housing supply in the first 5 years of the plan period and align with the spatial strategy, directing small-scale development to one of the most sustainable villages in North Somerset. Policy LP5, as drafted, is not justified by adequate evidence and has not demonstrated that the site allocations can be delivered within the plan period. It is therefore unjustified and ineffective and therefore unsound. Land at The Alburys should be allocated under Policy LP5 to help deliver housing without reliance on major new infrastructure, increase flexibility in supply and boost delivery in the first 5 years of the plan period.			

Name: Susan Adamson **I.D:** 62801473

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Lodway Farm	No	• Positively prepared • Justified • Effective	Unsure	Unsure	Insufficient Local Consultation: The Council did not hold any public exhibitions in Pill/Easton-in-Gordano, despite consulting on five sites in this area. Other locations received dedicated events, suggesting Pill/Easton-in-Gordano was under-represented in the consultation process.			

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		• Consistent with national policy			Low Response Volume: Only 125 responses from 29 individuals were received for Pill/Easton-in-Gordano, compared to much higher engagement in other areas (e.g., Portishead: 689 responses, Long Ashton: 591, Nailsea and Backwell: 1,049). This disparity may indicate that local voices were not adequately captured. Significant Community Opposition: Nearly 2000 residents (out of a population of ~4,500) have signed a petition objecting to the scale of proposed housing and the lack of adequate initial consultation, suggesting widespread dissatisfaction and possible procedural shortcomings. Potential Breach of Council's Own Policies: Questions are raised about whether the Council complied with its own Statement of Community Involvement, which sets standards for inclusive and proportionate engagement. Possible Non-Compliance with Equality Legislation: Concerns are noted regarding legal compliance with the Equality Act 2010, including the Public Sector Equality Duty, due to the lack of proportionate engagement and possible under-representation of affected groups.			

Name: Susan Barkwith **I.D:** 62675745

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Consistent with national policy			In summary: "Before including the Tower Farm and Black Rock sites in the Local Plan, NSC has not properly considered: Alternative brown and green field sites with much less ecological impact both in Portishead and across North Somerset. The opportunity to increase housing density on proposed brown field sites across North Somerset which would mean these sites are not required to meet local housing targets. The strategic ecological contribution of these specific sites in protecting the unique environment of Weston Big Wood (SSSI) and the Gordano Valley strategic green corridor The fact that these sites were specifically added to the Green Belt in the late 1980's because of their high ecological value. For the above reasons, the Local Plan is unsound because National Planning Policy states that sites can only be removed from Green Belt for development under exceptional circumstances and these exceptional circumstances are not proven. In addition, neither site is sustainable or capable of providing safe and suitable access, and would give rise to unacceptable transport impacts, which fails the soundness tests set out in National Planning Policy. Therefore, the Tower Farm and Black Rock sites should both be removed from the Local Plan Please see attached document for full response.			response-to-north-somerset-local-plan-2041-tower-farm-latest-20251127.pdf

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Black Rock, north of Clevedon Road	No	• Consistent with national policy			In summary: “Before including the Tower Farm and Black Rock sites in the Local Plan, NSC has not properly considered: Alternative brown and green field sites with much less ecological impact both in Portishead and across North Somerset. The opportunity to increase housing density on proposed brown field sites across North Somerset which would mean these sites are not required to meet local housing targets. The strategic ecological contribution of these specific sites in protecting the unique environment of Weston Big Wood (SSSI) and the Gordano Valley strategic green corridor The fact that these sites were specifically added to the Green Belt in the late 1980’s because of their high ecological value. For the above reasons, the Local Plan is unsound because National Planning Policy states that sites can only be removed from Green Belt for development under exceptional circumstances and these exceptional circumstances are not proven. In addition, neither site is sustainable or capable of providing safe and suitable access, and would give rise to unacceptable transport impacts, which fails the soundness tests set out in National Planning Policy. Therefore, the Tower Farm and Black Rock sites should both be removed from the Local Plan. See attached document for full comments.			response-to-north-somerset-local-plan-2041-black-rock-latest-20251127.pdf

Name: Susan Hayward **I.D:** 62830081

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I think that the proposal to increase the size of Nailsea by 55% is totally disproportionate and will result in the total over-development of the town, and the loss of its distinctive charm and character. Nailsea is distinguished by its pattern of houses with much-valued patches of green spaces and trees, linked by a network of footpaths. Green spaces and trees were deliberately designed into developments, as Trendlewood Way and a major feature of the town. New infrastructure, such as schools, would be needed. But there are no identified sites and concrete plans. The development would totally overstretch existing infrastructure, such as health and leisure provision. Yet there are no proposals to address this. The proposed road will destroy our beautiful green landscape, and will not relieve traffic problems on Station Road. Proximity of the link road to the river Kenn is likely to be very challenging due to the need for flood mitigation. and together with the engineering implications of the under rail crossing, the costs are likely to be huge. High quality, high yielding agricultural land to the south of Nailsea will be destroyed by the housing development. This lush green land with its old field lines, hedges and walls has been farmed for centuries, and is part of the historic fabric of the landscape so cherished by local people and visitors to the area for country walks and dog walking. The development by Backwell Lake is on a flood plain. This area regularly floods, it would be irresponsible to build here. The protection of wildlife has not been properly considered. Habitats and ecological corridors will be removed and damaged by the development. Protected species such as the rare Greater and Lesser Horseshoe bats, and many other species of bats forage on all of the development areas, yet	Using brownfield sites will reduce the need for development on green field land and help protect the Green Belt. Reduce the number of houses. Consider the impact on wildlife. Consider the impact on views Consider the amenity value of green spaces and trees. Consider the significance of the historic landscape and distinctive local character. Do not build on the flood plain.		

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					this seems to have been ignored. Increased light spill from the new homes, the new road and traffic will impact on Horseshoe bats in particular. Increased traffic will lead to more accidents at existing accident black spots, such as Wraxall Hill and Portbury Lane, as there are no proposals to address these. The railway station is not suitable as a transport hub as it is not accessible to people with disabilities or families with prams and pushchairs.			

Name: Susan Jane Loader **I.D:** 62829825

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Yes	I consider the plan to be unsound for the following reasons: Not positively prepared: The scale of housing proposed at Pill/Easton-in-Gordano is disproportionate and unbalanced compared to other settlements. Not justified: The release of Green Belt land is not supported by robust evidence of exceptional circumstances, and this plan prioritises developer-led housing profits over protecting the Green Belt. Brownfield alternatives across North Somerset have not been fully explored. Not effective: Infrastructure delivery is speculative. Junction 19 of the M5 is already saturated with severe congestion and delays regularly reported, and National Highways has not completed its assessment meaning transport impacts are not properly evidenced. Reliance on the Portishead–Pill–Bristol railway (due 2028) is uncertain, and if delayed, residents will be left dependent on already overstretched roads. Flood risk mitigation is inadequate. Not consistent with national policy: The plan conflicts with NPPF requirements, which state that Green Belt boundaries should only be altered in exceptional circumstances. No such exceptional circumstances have been demonstrated here. The plan also fails to conserve heritage assets on which the NPPF places great weight (e.g. Grade II* listed St George's Church), and safeguard biodiversity. The Council's own Green Belt Assessment acknowledges the role of these areas in safeguarding countryside and preserving historic settings. This loss is contrary to declared climate emergency commitments at both parish and district level Increased Flooding Risks: Pill and Easton-in-Gordano already face flood risk, with Environment Agency maps showing areas of medium to high risk. Large-scale development will increase surface water run-off, raising the likelihood of flooding in the village, on nearby roads, and on the M5. Recent flood warnings across North Somerset highlight the vulnerability of this area to heavy rainfall events. The plan does not provide robust evidence of how surface water run-off will be managed, nor does it demonstrate compliance with national flood risk policy, including NPPF requirements to avoid inappropriate development in areas at risk of flooding. Healthcare Provision: The plan fails to provide for new or expanded healthcare facilities in Pill and Easton-in-Gordano. Existing GP services are already significantly stretched, and large-scale housing growth will worsen this. Without clear commitments, the plan is unsound as it does not ensure essential health infrastructure will accompany development. Consultation failures: Unlike other strategic locations, no public meeting or exhibition was held in Pill/Easton-in-Gordano, undermining community involvement. This contrasts with consultation in other strategic locations, meaning Pill/	To make the plan sound, the following modifications are necessary: Remove or significantly reduce the scale of housing allocations at Pill/Easton-in-Gordano. Retain Green Belt boundaries unless genuine exceptional circumstances are evidenced. Prioritise brownfield regeneration and smaller, incremental developments across the district before releasing Green Belt land. Provide clear, deliverable infrastructure plans, including confirmed National Highways approval for Junction 19 capacity and robust flood risk assessments. Strengthen biodiversity protections and retain accessible green spaces around the village which serve vital purposes: preventing urban sprawl, safeguarding countryside, and encouraging reuse of derelict land. This proposal undermines all of these. Ensure heritage assets such as St George's Church are safeguarded with detailed design and layout requirements. Healthcare Provision: The plan must include provision for new or expanded healthcare facilities in Pill and Easton-in-Gordano, secured through direct delivery or developer contributions, to match the scale of growth. Improve consultation methods by holding public meetings/exhibitions in Pill/Easton-in-Gordano to ensure meaningful	I do NOT support the soundness of the plan. However, I acknowledge that the plan appears to be legally compliant and that the Duty to Cooperate has been met. My objections relate to soundness rather than legal compliance.	

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					Easton-in-Gordano residents were disadvantaged in the process. This undermines the Statement of Community Involvement and raises questions about fairness and transparency in the consultation process. In Conclusion The proposed housing growth at Pill and Easton-in-Gordano is excessive, unsustainable, and harmful. It fails to demonstrate exceptional circumstances for Green Belt release, lacks proper consultation, and will negatively impact infrastructure, environment, heritage, and community identity. I therefore urge North Somerset Council to reject this proposal and prioritise smaller-scale, brownfield-led development that respects the Green Belt and the unique character of Pill and Easton-in-Gordano.	community involvement, without this the process undermines the principle of community engagement required under the Statement of Community Involvement and raises questions about fairness and transparency.		

Name: Susan Lambert **I.D:** 62686241

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I consider that building on Land East of Backwell should not take place because:- Backwell already has 800 new houses approved, and the additional numbers would not be sustainable in this village. The proposed new road would be very expensive. It would also throw additional traffic onto the already crowded A370 through Backwell Farleigh, Flax Bourton and the single lane Long Ashton Bypass. Backwell has been allocated a higher number of houses than any other village in N Somerset, and a higher percentage than many of the towns in N Somerset. The land is Grade 1 Agricultural Land, used for food production. Using this land at a time when the world cannot feed itself is a wrong decision. The land intended for building is subject to flooding. This development will worsen the situation. I regularly use Backwell Common road, Chapel Hill and Backwell Bow. These are frequently flooded already, and the situation will worsen with this development. Susan Lambert.			

Name: Susan Lamburne **I.D:** 58493505

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP8: Housing						1. The current infrastructure of Wrington will not accommodate the two proposed building developments at Cox's Green and Butt's Batch. 2. There is minimal public transport available for the residents of Wrington. 3. The Wrington lanes barely accommodate the amount of cars at present. 4. There is no health centre in Wrington, with no plans to provide one. 5. Wrington primary school is already full with a waiting list. 6. The area around Wrington, ie Wrington Hill and Old hill are areas of			

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						outstanding natural beauty which must be maintained. 7. Wrington floods. 8. Access into and out of Wrington for the emergency services is an outstanding safety issue for all involved. A delay in receiving emergency medical care exists.		

Name: Susan Laver **I.D:** 62718529

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Nailsea has been overdeveloped already with the amount of houses already built. The roads cannot cope with the amount of traffic in the town & trying to get in & out of the town, the road joining onto B3130 (Washing Pound Lane) is crumbling on the edges, pot holes re-occur as soon as they are repaired. Large lorries, vans & heavy electric cars or people carriers make it difficult to pass each other. The road up Jacklands Bridge is often gridlocked with a bus & lorry trying to pass each other. The road under the railway bridge is narrow & there is always a queue to get through the traffic lights, let alone on the A370. The rail line itself is inaccessible for people in wheelchairs & for people using pushchairs for southbound trains. In addition the station car park is very busy already, even though it was extended in recent years.The roads will be unsafe for pedestrians, horse riders & cyclists. Stone Edge Batch, Wraxall Hill & Portbury Lane are known accident blackspots & there is no plan to improve the roads in these areas. The fields where building is proposed for regularly flood, it is in the floodplain, therefore not suitable for building. Why take away very good quality agricultural land, it seems a very short sighted idea. We need the land to be used for crops or animal grazing. Medical care, the GP's cannot cope with the number of patients they already have. There are not GP's looking for work here! There is a shortage of teachers, how will 3 more schools be staffed? Use empty office blocks to develop instead, be sensible not greedy please.			

Name: Susan Martin **I.D:** 58492065

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The proposed allocation of Land at Tower Farm (≈ 400 homes) lies immediately beside Weston Big Wood — an ancient woodland and Site of Nature Conservation Interest (SNCI) managed by Woodland Trust and supported by Avon Wildlife Trust. The woodland forms part of the Gordano Valley ecological network and a nationally important habitat mosaic of open grassland, wetland and woodland. Not Justified There is no robust published alternatives assessment demonstrating that this sensitive site is the only or most appropriate option for growth. The loss of best and most versatile (BMV) farmland (Grade 2/3a by reference to the ALC dataset) and the risk of irreversible damage to the ancient woodland make this allocation			

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					unsuitable. Not Consistent with National Policy The allocation conflicts with the National Planning Policy Framework (NPPF) paragraphs 180–182, which require that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland) should be refused unless wholly exceptional reasons exist. The Council's reference to an "ecological buffer" is vague, unenforceable and insufficient to address indirect impacts such as root-zone damage, hydrological change or wildlife disturbance. The Woodland Trust and Avon Wildlife Trust state that ancient woodland is irrecoverable once damaged. Moreover the Framework requires delivering biodiversity net gain, yet the allocation offers no clear mechanism for ensuring that outcome. Not Positively Prepared The location intensifies existing pressures in Portishead: schools, healthcare and transport infrastructure are already under strain (for example the A369 corridor). This peripheral site would likely increase private vehicle usage and pollution rather than support sustainable travel patterns, contrary to NPPF paragraphs 104–106. Not Effective Delivery depends on multiple unresolved dependencies: new school provision, bus service contributions, off-site biodiversity management, and upgrades to rights-of-way/buffer zones. No phasing plan, funding mechanism or legal agreement is published to secure these. Without such mechanisms the allocation cannot be considered deliverable within the plan period (NPPF paragraph 35(c)). Landscape & Connectivity The farmland/woodland edge acts as a critical ecological and landscape transition zone. Development here would fragment habitat, diminish the Gordano Valley wildlife corridor and erode the rural fringe character. Even with a buffer the visual and ecological intrusion into the woodland and surrounding landscape would be significant. Drainage & Hydrology Construction and built development would alter surface-water run-off and soil compaction on the former farmland, potentially affecting the hydrological regime that sustains the adjacent ancient woodland. The risk of nutrient runoff, altered infiltration and woodland root zone damage is material. Cumulative Impact When considered alongside other allocations in the Portishead area (such as Black Rock north of Clevedon Road), the combined pressure on ecology, infrastructure and transport is significant and undermines the Council's commitments to nature recovery and sustainable growth. No modification short of removing the allocation entirely would make this site appropriate. Given its direct adjacency to ancient woodland, its loss would be irreversible and cannot be mitigated sufficiently. The land should instead be retained as undeveloped green space, managed to enhance biodiversity and provide sustainable public access, in line with the Avon Wildlife Trust's 2030			

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					Strategy and national “30 by 30” nature-recovery goals. I do not support the the North Somerset Local Plan 2041 for the Tower Hill Farm location.			
Black Rock, north of Clevedon Road	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	Not Justified – Unsuitable location requiring off-site ecological mitigation The allocation of approximately 100 dwellings at Black Rock is not justified because the Council itself acknowledges that key environmental and ecological requirements cannot be met on-site, and must instead be located “off-site on land to the south-west”. This approach directly conflicts with NPPF paragraph 180(a), which requires avoidance of impact before remediation or off-site compensation is considered. The need for offset land demonstrates the inherent unsuitability of the site for development. There is no published evidence of less sensitive alternative sites being considered and discounted. Not Consistent with National Policy – Failure to protect and enhance biodiversity The approach of relying on off-site mitigation and a “suitable ecological buffer” illustrates a reactive rather than preventative approach to biodiversity protection. NPPF paragraphs 180–182 require Local Plans to conserve habitats, prevent deterioration of irreplaceable habitat, and deliver net gains for biodiversity. The allocation fails this by offloading its ecological burden onto unspecified land, without securing long-term management or legal protection for compensatory habitats. It also conflicts with the Avon Wildlife Trust’s 2030 Strategy, which emphasises restoration of 30 per cent of land for nature and enhancing landscape connectivity in the Gordano Valley. Not Positively Prepared – Unsustainable pattern of growth The site lies on the western approach to Portishead along Clevedon Road, where public transport is limited and local services are minimal. Residents would be heavily reliant on private vehicles to access schools, health care and employment. The fact that footways and new bus stop contributions are required underlines existing infrastructure inadequacy. This car-dependent pattern of development conflicts with the sustainable transport objectives of NPPF paragraphs 104–106. Not Effective – Unclear delivery and infrastructure dependencies The site depends on multiple off-site and third-party mitigations including ecological offset land, new footway construction, bus service contributions and delivery of a section of the Gordano Greenway. No clear funding mechanism, responsible delivery body, or phasing plan is identified in the Plan. Consequently, the allocation lacks deliverability and fails the effectiveness test under NPPF paragraph 35(c). Landscape & Setting The site lies within open countryside forming part of the rural setting of Portishead and the Gordano Valley. The expansion westwards into this part of the countryside would diminish the settlement edge, reduce landscape openness, and risk urbanising what should remain a transitional zone between town and countryside. Agriculture & Soils The farmland in question is likely to be of best and most versatile quality (Grade 2/3a) and its loss for housing is not justified when less sensitive land could be	No modification would make this allocation acceptable. The need for off-site mitigation and multiple infrastructure dependencies shows the site is environmentally and logistically unsuitable for housing. The allocation should be removed entirely from Schedule 1. Instead, the land should remain open countryside, contributing to biodiversity and landscape value, in line with the Avon Wildlife Trust’s 2030 Strategy, Woodland Trust guidance and national biodiversity objectives.		

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					used. The Plan does not robustly demonstrate why this agricultural land must be released. Hydrology & Ecology Development on this edge farmland may affect surface-water drainage, soil compaction and wildlife connectivity into the adjoining woodlands and wetland systems associated with the Gordano Valley. The cumulative effect of development pressure in the area further stresses the ecological network. Cumulative Impact Combined with the Tower Farm allocation and other nearby proposals, the Black Rock site would add to cumulative ecological, transport and infrastructure burdens around Portishead – contrary to the Council's stated nature-recovery and sustainable growth objectives. I do not support the North Somerset Plan 2041 for the Black Rock location.			

Name: Susan Ryalls **I.D:** 62774177

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I strongly object to the possibility of yet more houses being built in Backwell. Currently, you have approved the building of 800 new houses in Backwell. Your decision will result in a 40% increase in the size of our village. That will have a major impact on our existing infrastructure, e.g., the increased access to the A370 and the potential for gridlock and congestion. Your priority now should be the development of new infrastructure and facilities to support our village. The new families, in the new homes you have already approved, will need access to village doctors and other facilities. I am not aware of any plans or funding that is in place for the building and development needed for this increased our infrastructure. Do not approve the building of these 800 new houses.			

Name: Susan and Paul Triggle **I.D:** 29224257

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	We feel that North Somerset Council have not properly considered the negative impact to Tickenham roads and lanes, which are currently seriously congested and very unsafe for cyclists and pedestrians due to pinch points and the narrowness of the main road through the village. These roads and lanes cannot support the 40% increase in the proposed new homes by the Local Plan. We live in Church Lane, Tickenham and have done so for 30 years. Due to the vast increase in use of vehicles from the upsurge of housing development locally and the narrow single-track lane which is only 4.2metres wide in places, this has given us a huge problem when entering and exiting our own drive. Vehicles including lorries use our and other neighbours drives as passing place, causing us to be unable to come in and out of property easily and is causing damage and cracks to the end of our driveway. The constriction of Church Lane, also impedes on the Safety of pedestrians' cyclist and Horse riders due to speed of vehicles, narrowness and the increase of traffic using the lane. Any further increase of development and subsequent upsurge in vehicle use will render Church Lane, Washing Pound Lane and The Causeway to be very unsafe dangerous & hazardous indeed. We deem that North Somerset Council (pre-submission of Local Plan 2041) must grasp and recognise that the main road and lanes of Tickenham Village are totally inadequate for any further increases of traffic	NSC have not properly considered the traffic impacts to Tickenham roads and lanes which are currently seriously congested and unsafe for cyclist and pedestrians. These road and lanes cannot support the increase in new homes proposed by the Local Plan 2041.		

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					volumes. Susan & Paul Triggle			

Name: Susie Bevan **I.D:** 58205505

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Land at North West Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	This area is not suitable for houses to be built on as it floods regularly whenever it rains for a prolonged period, which can just be light rain fall on consecutive days. Removing this flood plain would put the houses on Causeway View at jeopardy from flooding, as there will be no flood plain to protect them. A point to also mention is that this site is right next to Watery Lane, which regularly floods! This site is also a habit for many species, including the Great and Lesser Horseshoe Bats, which are a Protected Species. Therefore, it will be illegal to build on this site and disrupt the habit and food source of the Horseshoe Bat population. We need to protect the biodiversity that lives and thrives within this site, not destroy it with a few houses, that Nailsea does not require			
Youngwood Lane	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Nailsea is a beautiful, small, rural town. It is proud to be a farming town and North Somerset council should be trying to protect much of the land that is being discussed in the Development Plan, especially as 1. some of the big sites proposed are on Green Belt land, and 2.are on Grade 2 Agricultural Land, which is an underused asset to the town. Nailsea simply will not be able to handle an additional 1,817 new homes – as Nailsea is a small, rural town and does not have the infrastructure to handle a few hundred new homes, let alone 1,817 new homes. And there are not enough schools, doctors' surgeries, and leisure facilities for all these new residents. We are already struggling to accommodate the residents that we do have! And although, three new schools have been promised by the developers, a promise doesn't actually mean that these Schools will ever be built. Nailsea is currently struggling with the additional traffic that the most recent new housing developments have brought, and that's just a few hundred extra homes. There are many 'village' parts of Nailsea, with some lanes to drive down. I have noticed whilst on my daily dog walks, that the traffic now flowing down North Street, has more than doubled. And a lot of the traffic is going far too fast for a little lane without a pathway for pedestrians. More traffic, equals more potential for accidents, especially down roads that are no more than a little country lane. I have myself seen the damage and wreckage from three car crashes at the bottom of my road (the junction of North Street, Hanham Way, Hannah More Road and Silver Street) in the past two years. Please North Somerset Council, protect our pedestrians, especially the children! We need to protect the biodiversity that lives and thrives within Nailsea. All the sites listed are home to a protected species, Greater and Lesser Horseshoe Bats. Any developments on these sites, will destroy the Bats habit and foraging opportunities, and the UK law protects All Bat species and their habits. So, any housing developments on these sites should be against the law. Another site of great nature beauty and biodiversity is the Moor End Sprout Nature Reserve. To build ANY houses near this site, would most definitely disturb mush of the wildlife and their habits. The Nature Reserve needs to be protected – and our council should be doing all that they can to protect such areas of nature beauty and biodiversity. Nailsea is blessed with Grade 2 Agricultural Land – this land is high yielding and of a very good quality. This is worth protecting for the town and for the Country. We NEED land that we can grow various crops on. This should be seen by the Council as something to protect and capitalize on, not to simply build houses on. Therefore, as a town, we should be protecting such land as being able to grow and sell crops helps to support the economy of the town and the country. And we cannot build on all spare green land. Nailsea is prone to flooding in many areas, and many of the sites listed to be developed are flood plains. To remove these flood defences, only puts the current residents at higher risk. This does not make any sense. Please North Somerset Council, protect our beautiful, rural town, by not accepting these proposed developments and by maximising what the town does have already – more agriculture on the wonderfully fertile soil, more supporting biodiversity that exists here in abundance and supporting the residents who already live here.			
Land north of Nailsea	No	‣ Positively prepared ‣ Justified	Unsure	Unsure	Nailsea is a beautiful, small, rural town. It is proud to be a farming town and North Somerset council should be trying to protect much of the land that is being discussed in the Development Plan, especially as 1. some of the big sites proposed are on Green Belt land, and 2.are on Grade 2 Agricultural Land, which is an underused asset to the town. Nailsea simply will not be able to handle an additional 1,817 new homes – as Nailsea is a small, rural town and does not have the infrastructure to handle a few hundred new homes, let alone 1,817 new homes. And there are not enough			

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		• Effective • Consistent with national policy			schools, doctors' surgeries, and leisure facilities for all these new residents. We are already struggling to accommodate the residents that we do have! And although, three new schools have been promised by the developers, a promise doesn't actually mean that these Schools will ever be built. Nailsea is currently struggling with the additional traffic that the most recent new housing developments have brought, and that's just a few hundred extra homes. There are many 'village' parts of Nailsea, with some lanes to drive down. I have noticed whilst on my daily dog walks, that the traffic now flowing down North Street, has more than doubled. And a lot of the traffic is going far too fast for a little lane without a pathway for pedestrians. More traffic, equals more potential for accidents, especially down roads that are no more than a little country lane. I have myself seen the damage and wreckage from three car crashes at the bottom of my road (the junction of North Street, Hanham Way, Hannah More Road and Silver Street) in the past two years. Please North Somerset Council, protect our pedestrians, especially the children! We need to protect the biodiversity that lives and thrives within Nailsea. All the sites listed are home to a protected species, Greater and Lesser Horseshoe Bats. Any developments on these sites, will destroy the Bats habit and foraging opportunities, and the UK law protects All Bat species and their habits. So, any housing developments on these sites should be against the law. Another site of great nature beauty and biodiversity is the Moor End Sprout Nature Reserve. To build ANY houses near this site, would most definitely disturb mush of the wildlife and their habits. The Nature Reserve needs to be protected – and our council should be doing all that they can to protect such areas of nature beauty and biodiversity. Nailsea is blessed with Grade 2 Agricultural Land – this land is high yielding and of a very good quality. This is worth protecting for the town and for the Country. We NEED land that we can grow various crops on. This should be seen by the Council as something to protect and capitalize on, not to simply build houses on. Therefore, as a town, we should be protecting such land as being able to grow and sell crops helps to support the economy of the town and the country. And we cannot build on all spare green land. Nailsea is prone to flooding in many areas, and many of the sites listed to be developed are flood plains. To remove these flood defences, only puts the current residents at higher risk. This does not make any sense. Please North Somerset Council, protect our beautiful, rural town, by not accepting these proposed developments and by maximising what the town does have already – more agriculture on the wonderfully fertile soil, more supporting biodiversity that exists here in abundance and supporting the residents who already live here.			
Land off Pound Lane, Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	It would be ludicrous to build on this site - as it is literally on a Nature Reserve. Having 100 house built on this land will negatively impact the Moor End Sprout Nature Reserve, which is a site to many protected species. Any housing development in this area would destroy wildlife habits and cause untold harm to the biodiversity here. Also, another important point to add is that two of the species affected will be the Greater and lesser Horseshoe Bats, which are a protected species. It is there illegal to cause any harm to their habit. Pound Lane will not be able to cope with the additional traffic from another 100 houses. It will become unsafe for the children that go to the Primary and Second Schools to cross this road. And this road cannot handle the traffic and parking congestion that it already sees daily. This area also is prone to flooding.			
Poplar Farm, Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	This site is unsuitable for houses to be built on. The site leads down to the many fields of the drove farmland and is rich in biodiversity and wildlife habits, including the Protected species, the Greater and Lesser Horseshoe Bats. To harm this beautiful site would be illegal. This site is also used regularly for growing crops, and I believe it to be Grade 2 agricultural land, which is graded in the farming industry as 'very good agricultural land. Therefore, as a town, we should be protecting such land as being able to grow and sell crops helps to support the economy of the town and the country. This site also is prone to flooding and building here would put the residents that live in the surrounding areas at greater risk from flooding themselves.			
Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national	Unsure	Unsure	Nailsea is a beautiful, small, rural town. It is proud to be a farming town and North Somerset council should be trying to protect much of the land that is being discussed in the Development Plan, especially as 1. some of the big sites proposed are on Green Belt land, and 2.are on Grade 2 Agricultural Land, which is an underused asset to the town. Nailsea simply will not be able to handle an additional 1,817 new homes – as Nailsea is a small, rural town and does not have the infrastructure to handle a few hundred new homes, let alone 1,817 new homes. And there are not enough schools, doctors' surgeries, and leisure facilities for all these new residents. We are already struggling to accommodate the residents that we do have! And although, three new schools have been promised by the developers, a promise doesn't actually mean that these Schools will ever be built. Nailsea is currently struggling with the additional traffic that the most recent new housing developments have brought,			

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		policy			and that's just a few hundred extra homes. There are many 'village' parts of Nailsea, with some lanes to drive down. I have noticed whilst on my daily dog walks, that the traffic now flowing down North Street, has more than doubled. And a lot of the traffic is going far too fast for a little lane without a pathway for pedestrians. More traffic, equals more potential for accidents, especially down roads that are no more than a little country lane. I have myself seen the damage and wreckage from three car crashes at the bottom of my road (the junction of North Street, Hanham Way, Hannah More Road and Silver Street) in the past two years. Please North Somerset Council, protect our pedestrians, especially the children! We need to protect the biodiversity that lives and thrives within Nailsea. All the sites listed are home to a protected species, Greater and Lesser Horseshoe Bats. Any developments on these sites, will destroy the Bats habit and foraging opportunities, and the UK law protects All Bat species and their habits. So, any housing developments on these sites should be against the law. Another site of great nature beauty and biodiversity is the Moor End Sprout Nature Reserve. To build ANY houses near this site, would most definitely disturb mush of the wildlife and their habits. The Nature Reserve needs to be protected – and our council should be doing all that they can to protect such areas of nature beauty and biodiversity. Nailsea is blessed with Grade 2 Agricultural Land – this land is high yielding and of a very good quality. This is worth protecting for the town and for the Country. We NEED land that we can grow various crops on. This should be seen by the Council as something to protect and capitalize on, not to simply build houses on. Therefore, as a town, we should be protecting such land as being able to grow and sell crops helps to support the economy of the town and the country. And we cannot build on all spare green land. Nailsea is prone to flooding in many areas, and many of the sites listed to be developed are flood plains. To remove these flood defences, only puts the current residents at higher risk. This does not make any sense. Please North Somerset Council, protect our beautiful, rural town, by not accepting these proposed developments and by maximising what the town does have already – more agriculture on the wonderfully fertile soil, more supporting biodiversity that exists here in abundance and supporting the residents who already live here.			

Name: Susie Greenup **I.D:** 40205889

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Land north of Churchill Avenue	No	• Justified	Unsure	Unsure		Penny fields must be protected and made a local green space. Under local planning policy, Penny Field is the perfect candidate for local Green space designation because its'd be in the top 24% of sites based on policy alignment. Clevedon town council, two petitions (2022 and 2025) of 600 + signatures and the consultation for Clevedon Placemaking strategy all call to protect Penny Fields. Penny Fields is a prime candidate for Local Nature Recovery, as identified by WECA due to the presence of 3 priority species. Penny fields is located on a Green infrastructure corridor under NSC's own policy. Under any Equalities impact assessment the reduction of green space would adversely affect lower income households.		
Land north of Churchill Avenue	No	• Justified	Unsure	Unsure	Penny fields must be protected and made a local green space. Under local planning policy, Penny Field is the perfect candidate for local Green space designation because its'd be in the top 24% of sites based on policy alignment. Clevedon town council, two petitions (2022 and 2025) of 600 + signatures and the consultation for Clevedon Placemaking strategy all call to protect Penny Fields. Penny Fields is a prime candidate for Local Nature Recovery, as	Penny fields must be protected and made a local green space. Under local planning policy, Penny Field is the perfect candidate for local Green space designation because its'd be in the top 24% of sites based on policy alignment. Clevedon town council, two petitions (2022 and 2025) of 600 + signatures and the consultation for Clevedon Placemaking strategy all call to protect Penny Fields. Penny Fields is a prime candidate for Local Nature Recovery, as		

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					identified by WECA due to the presence of 3 priority species. Penny fields is located on a Green infrastructure corridor under NSC's own policy. Under any Equalities impact assessment the reduction of green space would adversely affect lower income households	identified by WECA due to the presence of 3 priority species. Penny fields is located on a Green infrastructure corridor under NSC's own policy. Under any Equalities impact assessment the reduction of green space would adversely affect lower income households		

Name: Susie Marwood **I.D:** 18469953

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SP1: Sustainable Development	Yes		Yes	Yes			Regarding my local area (Wrington), I agree that the area is not suitable for development based on the sustainability criteria set out, as there is no walking/cycling/effective public transport in the neighbourhood. No ability to commute using public transport in working times to major centres without driving and clogging up trunk neighbourhoods such as Congresbury and Cleeve. It is already dangerous walking within the village boundary due to increased traffic - many roads in the village do not have pavements. Cars are parked everywhere across junctions etc. following recent over-development, resulting in congestion and reversing vehicles (endangering pedestrians further). Any proposals put forward for the plan originally from landowners are green fields outside the village boundary. These, and any new development proposals in the pipeworks, should be rejected/not included in the plan because locations are not "well related to existing settlements in order to maximise opportunities for workers and visitors to access the site by active travel or public transport." Any development around Wrington could only result in increased car use, increased pollution, reduced safety for pedestrians for the reasons set out above.	

Name: Sustainable Pill & District **I.D:** 62862401

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Vision, Strategic Priorities and Sustainability Objectives	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	Unsure	Please note this comment has been placed below the 'Vision' section of the Local Plan, since there is no comment box below the Introduction section. It has also been uploaded as an attachment to ensure the reader can activate internet links. The introduction section to this Local Plan states on page 9 that: 'a consultation on additional sites (the Regulation 19 Additional Site Consultation) to meet the new housing requirement was undertaken in between 7 February and 21 March 2025 and as a result of this consultation a further package of housing sites has been incorporated into this Regulation 19 plan to meet the government's housing need figure for North Somerset'. The consultation included 5 additional sites with potential for 1,100 new homes around Pill. Following the consultation, Pill and Easton-in-Gordano was categorised as a 'Strategic Location' for large residential development. At time of submission of this comment, 2,302 residents from a total population of circa 4,900 (2021 census data) have signed a petition	In order to make the Local Plan legally compliant and sound, there should be a re-assessment of the of the five sites around Pill and Easton-in Gordano for housing development and their identification collectively as a Strategic Location. The submitted comments on behalf of Sustainable Pill and District demonstrate considerable lack of community engagement, which	Please see documents uploaded below.	Additional Sites Consultation - Consultation Statement (May 2025) Accessible.pdf Comments on Additional Sites consultation.docx 17.07.25 Report to committee.pdf

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					objecting to the imposition of excessive housing in the area and challenging the lack of adequate consultation with the community in Pill and Easton-in-Gordano in relation to the Additional Sites Consultation referred to above. The link to the online petition is here (please activate link from attached Word version of this comment). It was created by members of 'Sustainable Pill & District' (SPAD). All those who signed the petition have consented to comments on this Local Plan being made on their behalf by SPAD. Signatures have been obtained in-person, at local events such as the community market and at the Pill Resource Centre, as well as online. Lack of community engagement and failure to comply with Public Sector Equality Duty North Somerset Council’s Statement of Community Involvement 2019 (in Local Plan evidence base) states in ‘General Principles’ section: • We will target consultation to include people whom we consider would be most affected by any proposals or plans and where possible any known interest groups. • Involvement will be open to all. • We will take into account our duties under the Equality Act 2010 including the Public Sector Equality Duty and ensure information is accessible in the most appropriate format for everyone’s needs. It is submitted that North Somerset Council (NSC) failed to adhere to these General Principles in relation to the additional sites around Pill & Easton-in-Gordano. The Regulation 19 Additional Sites Consultation Statement May 2025 (attached) sets out on page 13 the consultation methods which were used and the number of responses. The consultation methods focussed on internet-based means of communication. The non-internet methods of communication comprised an article in the North Somerset Times newspaper, which is not delivered to residents’ homes in Pill and Easton-in-Gordano, and four public events (publicised via internet methods) which did not include events in Pill and Easton-in-Gordano or in Portishead. Guidance on consultations https://www.gov.uk/government/publications/consultation-principles-guidance and https://www.local.gov.uk/our-support/communications-and-community-engagement/resident-communications/understanding-views-2) emphasise that a "digital first" approach should not mean "digital only". Local Authorities must consider the diverse needs of their communities and ensure people without internet access, digital skills, or who prefer traditional methods are not excluded. Furthermore, a planning consultation could breach the Public Sector Equality Duty if the consultation process itself is not accessible or does not effectively reach individuals with protected characteristics, meaning their specific needs and concerns are not heard. It is clear that response volumes for the Additional Sites Consultation were markedly lower for Pill and Easton-in-Gordano (125 responses for 5 sites) than for comparable locations: Portishead: 689 responses for 5 sites, Long Ashton: 591 responses for 10 sites, Wrington: 484 responses for 5 sites, Nailsea and Backwell: 1,049 responses for 26 sites. When the response volume to this consultation from residents in Pill and	fails the test for Legal Compliance and falls well below the engagement with communities in the other Strategic Locations referred to in the Plan. The comments also make clear that significant weaknesses exit in the assessment of these sites and in the application of ‘exceptional circumstances’ to justify their release from the Green Belt for housing development. Furthermore, weaknesses in site-specific policies indicate insufficient time and consideration has been given to the policies for this Strategic Location, likely due to its late inclusion in the Plan. A pause in the process of approving this Plan is requested so that the Pill and Easton-in Gordano Strategic Location can be re-assessed, following adequate and effective engagement with the local community.		

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					Easton-in-Gordano is compared to the 2,302 responses to the subsequent petition, it is clear that the consultation response is not an accurate reflection of the views of the local community. The data displaying details of respondents contained in the Additional Sites Consultation Statement May 2025 (attached) shows that only 41 separate respondents made comments about the sites around Pill and Easton-in-Gordano. These comments are given equal weight in the subsequent analysis by North Somerset Council, and yet 5 of those responses are clearly identified as being from, or submitted on behalf of, developers with an interest in developing the sites, namely Catesby Estates, Waddeton Park Ltd, Strongvox Homes, Barrett Homes and Lands Improvement. At least 4 other respondents are not local residents, namely Backwell Parish Council, a residents Group for Station Close Backwell, The National Trust and The Environment Agency, which leaves only 32 respondents who could be local residents – a very low number in comparison to the 2,302 who have signed the petition. Following the Additional Sites Consultation, a Report to the Placemaking, Economy and Sustainable Communities Policy and Scrutiny Committee on 17th July 2025 (copy attached) included the statement in paragraph 3.24 that 'A workshop session with the parish council and local residents has been offered in July, and the outcomes of that workshop will feed into the emerging policy and site-specific requirements set out in Schedule 1 of the plan. Further engagement will continue over the coming months.' There was no workshop open to local residents and only minimal engagement with a couple of members of the SPAD group, which did not result in any changes to site-specific requirements in the Local Plan. The scale of potential change in Pill and Easton-in-Gordano (e.g., 600 homes at Pill Green alone, plus other sites making a total of 1,100 additional homes), the absence of a local event and the relatively small response volume, strongly indicates under-representation of local voices and a lack of proportionate engagement by North Somerset Council. This indicates that Local Plan has not been positively prepared, cannot be effective and is therefore Unsound. Further weight is given to this argument by the clear evidence that the petition, mentioned above, gained support through more diverse methods of engagement than those used by the Council, including in-person methods of engagement which reached a much larger proportion of local residents. It is submitted that the process of consultation for the Additional Site Consultation is not in accord with the general principles of the NSC 2019 Statement of Community Involvement and fails to meet the standards of the Public Sector Equality Duty. The Local Plan is therefore not Legally Compliant in respect of the inclusion of the Pill and Easton-in-Gordano as a Strategic Location.			
SP7: Green Belt	No	• Positively prepared • Justified • Effective • Consistent with national	No	Unsure	Please note this comment has also been uploaded as an attachment to enable the reader to activate internet links. This policy does not provide a clear and robust justification to override the strong presumption against inappropriate development in the Green Belt (section 153, National Planning Policy Framework 2024), in relation to the Strategic Location, Pill and Easton –in-Gordano and it is therefore Unsound. There are inconsistencies with the National Policy Planning Framework (NPPF) 2024 and within the Local Plan itself. There is also a	In order to make the Local Plan legally compliant and sound, there should be a re-assessment of the of the five sites around Pill and Easton-in Gordano for housing development and	Please see uploaded documents	Neighbourhood Plan complete.pdf Comments on Policy SP7.docx 18.06.2025 Report to NSC cabinet.pdf 25_P_1413_OUT-NATIONAL_HIGHWAYS_COMMENTS-3514484.pdf Short Guide to Additional Sites Consultation.pdf

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		policy			lack of Legal Compliance in relation to obligations to take into account the policies and proposals of the made Neighbourhood Plan for Pill and Easton-in-Gordano. Failure to examine all other reasonable alternatives The Local Plan and supporting evidence does not demonstrate that North Somerset Council has examined fully all other reasonable alternatives prior to deciding to release land at Pill and Easton-in Gordano from the Green Belt, contrary to the NPPF's exceptional circumstances tests (section 147 NPPF) and the Plan's own sustainable objective 1.3 (page 12) which states that NSC will 'promote the optimal use of land which supports regeneration, maximise re-use of previously developed (brownfield) land and protects the rural economy.' Whilst the Local Plan's own evidence base claims urban/brownfield and densification assessment sweeps and some town centre intensification (e.g., Portishead/Wyndham Way), it has not shown why further intensification and edge of town brownfield models could not meet more of the uplift before considering release of Green Belt land at Pill& Easton-in-Gordano. A more thorough evaluation of brownfield, urban intensification, and capacity redistribution appears to have been truncated by the changes to the NPPF in December 2024. A consultation on additional sites took place in February 2025 and promised that 'The use of brownfield sites and density assumptions will be reassessed' (see attached Local Plan Reg 19: Additional Sites Consultation, A Short Guide). In the Minutes of the NSC Report to Cabinet dated 18th June 2025 (attached) the reason given for the inclusion of a new strategic location around Easton-in-Gordano and Pill is stated to be: 'genuine sustainable travel opportunities. It is considered that this location accords with that principle, with the re-opening of the Portishead Pill-Bristol railway line coming forward in the near future, and opportunities for improved bus services and active travel connections into Bristol in addition to the existing provisions.' (Section 3.20 in attached copy Minutes) There is no mention in the Local Plan or evidence base that re-assessment of brownfield sites took place prior to the inclusion of this new strategic location. Furthermore, the Minutes of the NSC Report to Cabinet dated 18th June 2025 state in section 8.2: 'The risk of delays to the local plan process exposing the council to a risk of speculative development, unplanned growth and costly planning appeals is recorded as high in the corporate risk register. To mitigate this risk it is recommended to progress the plan as rapidly as possible.' It is submitted that the release from the Green Belt of the five sites around Pill and Easton-in-Gordano is a hastily formulated strategy, with over-reliance on the impact of a possible railway link, without thorough examination of reasonable alternatives and is therefore unjustified, making this section of the Local Plan Unsound. Weaknesses in assessment of Green Belt land There is insufficient evidence, in the Local Plan and evidence base, that all the key steps in Green Belt assessment, as outlined in Government guidance https://www.gov.uk/guidance/green-belt have been applied rigorously.	their identification collectively as a Strategic Location. The submitted comments on behalf of Sustainable Pill and District demonstrate considerable lack of community engagement, which fails the test for Legal Compliance and falls well below the engagement with communities in the other Strategic Locations referred to in the Plan. The comments also make clear that significant weaknesses exit in the assessment of these sites and in the application of 'exceptional circumstances' to justify their release from the Green Belt for housing development. Furthermore, weaknesses in site-specific policies indicate insufficient time and consideration has been given to the policies for this Strategic Location, likely due to its late inclusion in the Plan. A pause in the process of approving this Plan is requested so that the Pill and Easton-in Gordano Strategic Location can be re-assessed, following adequate and effective engagement with the local community.		

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					This guidance states that even where a site is judged to be grey belt, having first considered the application of NPPF Footnote 7 (see comment 1 below), and whether the site would fundamentally undermine the purposes of the remaining Green Belt across the plan area if released or developed, wider considerations are still relevant to the consideration of development proposals on the site. These would include determining whether potential development would not be inappropriate development in the Green Belt, as set out in paragraph 155 of the NPPF. That question would include consideration of whether a development is sustainably located (see comment 2 below), whether it would meet the 'Golden Rules' contributions (see comment 3 below), as set out Paragraphs 156-157 NPPF 2024. 1.Failure to take account of Footnote 7 protection A key step in the formulation of a Local Plan is to consider whether any sections of Green Belt land, being considered in the assessment as potential Grey Belt land, fall under one of the Footnote 7 NPPF 2024 protections (e.g. protected wildlife habitat sites). If these protections apply, the land cannot be Grey Belt and strong reasons exist to refuse development. The affected areas are: All five sites: Within consultation zones for the North Somerset & Mendip Bats Special Area of Conservation (SAC) for both Greater and Lesser Horseshoe Bats. This is shown on the NSC planning map https://n-somerset.gov.uk/my-services/planning-building-control/planning-map Pill Green - This site contains Ancient Woodland (an irreplaceable habitat) and its status is clearly marked both on the Natural England Inventory (https://naturalengland-defra.opendata.arcgis.com/datasets/ancient-woodland-england/explore?location=51.469515%2C-2.678230%2C13.97) and on the NSC planning map (https://map.n-somerset.gov.uk/dande.html) Land at Lodway Farm and Pill Green – both these sites are in flood risk areas (see further comments below re flood risks and evidence) Pill Green – this site includes Markham Brook. The River Avon and its network of tributaries, including Markham Brook, constitute an important ecological corridor. This corridor links the Severn Estuary European Marine Site—a designated Ramsar site, Special Protection Area, and Special Area of Conservation—with the broader Bristol region. Any development that interrupts this ecological connection or contributes to a decline in water quality could have adverse implications for habitat sites which are protected by Footnote 7. Lodway Farm – this site is adjacent to the Severn Estuary Site of Special Scientific Interest (SSSI) The summary in the Sustainability Appraisal (in Local Plan evidence base) acknowledges the significant areas of both statutory and non-statutory nature conservation sites and states that, 'due to the overall scale of development proposed in the Local Plan, adverse effects have inevitably been identified in relation to some of the SA objectives, in particular those relating to the landscape, biodiversity and cultural heritage. Some of these effects have the potential to be significant' Policy SP7 is not justified, and therefore Unsound, since there has been a			

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					failure to acknowledge that sections of the land contained within the 5 sites around Pill & Easton in Gordano are protected from release from the Green Belt. 2.Failure to demonstrate a sustainable location Local Plans should provide justification that Green Belt sites which may be released for development are sustainably located, in accordance with government Green Belt guidance https://www.gov.uk/guidance/green-belt Furthermore, Paragraph 110 NPPF states: 'Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.' The proposed development sites around Pill & Easton-in-Gordano have not been shown to be at a location that "is or can be made sustainable" in transport terms at the Local Plan stage. District wide and Pill specific modelling provides evidence of existing network saturation, unresolved Strategic Road Network (M5 J19) and reliance on aspirational and unfunded mitigation, including the viability of the proposed Portishead-Pill- Bristol railway link – the latter is cited as the main factor in Local Plan decision making in relation to Pill & Easton in Gordano - see Section 3.20 Minutes of the NSC Report to Cabinet 18.06.25 (copy attached) and Policy LP4 in Local Plan. However, analysis of predicted railway capacity reveals: • Trains are planned to operate hourly between Portishead via Pill to Bristol from mid 2027 • The trains are expected to have 3 carriages, with a total capacity of ~200 seats • Weekday AM peak passenger demand from Portishead is forecast to exceed capacity (in 2031) before accounting for the proposed developments (at around 255 passengers) (DCO transport assessment, Table 6.8 & Figure 6.5). This calculation is based on 35% of total of 729 Portishead passengers. The corresponding demand in Pill is expected to be 43 (35% of 123 (assessment, Table 6.8 & Figure 6.55) • The modelling approach used to derive these forecasts (MOIRA) has significantly underestimated demand in previous schemes (for example: Borders Railway beats forecast passenger levels by 22% - CILT(UK), Dartmoor Line: early impact evaluation (page 8)), which makes it more likely that Pill residents will be unable to travel by train during the AM peak times. • This approach has also been found to underestimates new trips generated by housing growth: otm-rail-demand-forecasting.pdf It is likely that the forecasts for rail demand have been underestimated, which makes it less likely that Pill residents will be able to use the train to commute. This means that any traffic reductions in Pill as a result of the new railway are likely to have been overestimated. Without the ability to travel by train, residents would be dependent on the bus services and car travel via A369 and the M5 Junction 19. There is overwhelming evidence that the impact of the housing developments will cause significantly increased congestion on M5 J19 and on the primary road network: M5 J19 (Strategic Road Network) • M5 J19 is very congested, with several junctions at or above capacity and with junctions close to J19, especially the Portbury junction and the A369 to St Georges Hill junction also at or near capacity. (Local Plan Transport Assessment: Portishead, Portbury & Junction 19) • The effect of the planned developments is to increase the utilisation of			

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					these junctions. (Local Plan Transport Assessment: Portishead, Portbury & Junction 19) • The mitigations to the increased congestion are to facilitate public transport by converting the A369 HOV to a bus lane and by remodelling the southbound off-ramp section of J19 (Local Plan Transport Assessment p71) • No detailed modelling of the proposed J19 redesign has been carried out, although it is acknowledged that "there will be increases in congestion on the circulatory of the roundabout, which has the potential for knock-on impacts" (Local Plan Transport Assessment para. 5.166) • The proposed redesign of J19 does not form part of funded schemes as part of RIS3 (National Highways planned schemes) to 2031. The impact of the developments on J19 is therefore likely to be unmitigated, with increased congestion which has not been adequately addressed by the Transport Assessment. Furthermore, National Highways has raised concerns about the impact of housing developments in this area. In relation to a proposed development at Court Hay, near the service station, (NSC planning ref 25/P/1413/OUT – copy attached), National Highways stated that further transport modelling is required to assess cumulative impacts on Junction 19. It is not clear from the Local Plan and evidence base that the required modelling or cumulative impact assessment has been carried out or that the Council has adequately co-operated with National Highways in addressing these concerns. A369 (Primary Road Network) • The A369 and the two junctions which serve Pill, St Georges Hill and Pill Road, are all predicted to become more congested as a result of the housing developments, and the conversion of the A369 HOV to a bus lane Local Plan Transport Assessment para. 4.63) • The North Somerset strategic transport model is particularly poorly validated along the A369 near Pill (appendix c). The model is noted as failing validation checks at both the Portbury and Beggar Bush Lane junctions which bound the section of the A369 serving Pill. In the worst case, the model underestimates traffic flow in these locations by 350 vehicles (observed=1044, modelled=694). This indicates that the modelled traffic flows around Pill are particularly poor and may well be underestimating the traffic flows into Pill (given that the discrepancy reduces from one side of Pill to the other). Given the scale of these errors, the model does not provide a sound basis for the assessment of the magnitude of any impact, or effectiveness of any mitigation around Pill. • The proposed change of the HOV lane to a bus lane is dependent on National Highways RIS3 due to the potential impact on J19. This improvement is judged as "hypothetical" by North Somerset and RIS3 has been delayed, which makes the delivery of this mitigation uncertain (appendix e) The shortfalls in the modelling, and uncertainties in the deliverability of proposed mitigations, make the assessment of the impact on the primary road network inadequate. Policy SP7 does not therefore provide justification of sustainability, contrary to Green Belt guidance and the NPPF, making this policy Unsound. This policy is also Unsound due to inconsistency with its own policy SP6 which states: ‘All Green Belt sites that have been identified are located in the most sustainable locations’ 3. Failure to meet ‘Golden Rules’ requirements Paragraph 151 NPPF states: ‘Where Green Belt land is released for			

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					development through plan preparation or review, the 'Golden Rules' in paragraph 156 below should apply'. The 'Golden Rules' requirements are set out in paragraphs 156-157 NPPF and state: In the absence of a pre-existing requirement for affordable housing, a 50% affordable housing contribution should apply by default' This requirement is confirmed in Strategic policy DP3 in the Local Plan which states: 'Developments will be expected to provide 50% affordable housing on land released from the Green Belt as set out in Policy SP7'. However, the Additional Sites Viability Addendum, Final Report, October 2025 (in Local Plan evidence base) Section 3.4 states that 'testing was undertaken at 50% affordable housing as requested by NSC. The results indicate poor viability across the values range thought to be typically relevant for the area (in terms of likely new build values) suggesting that a target of 50% affordable housing may be challenging unless higher values can be evidenced'. The conclusion section (Section 3.5) of the same report states: the results suggest that an affordable housing quantum of no more than 30% is likely to be viable at the Nailsea and Backwell strategic location and possibly up to 35% at SW Bristol and in Pill / Easton-in-Gordano.' Policy SP7 cannot therefore be justified in relation to compliance with the 'Golden Rules' and is therefore Unsound. Failure to exclude flood risk areas from potential development sites Flood risk acts as a major environmental constraint that heavily influences which Green Belt land is considered suitable for potential release and development. Paragraph 170 NPPF states: Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Two of the sites identified in policy SP7 – Land at Lodway Farm and Land at Pill Green – are in flood risk areas: - The Western part of the Lodway Farm site is in flood zone 3a tidal, with parts 3b fluvial - Markham Brook (within the Pill Green site) is culverted at certain points and connects to the tidal River Avon. The majority of the site is within Flood Zone 3a. A small area along the boundary also falls into the functional floodplain (Flood Zone 3b). Section 6.97 of the Sustainability Appraisal (included in evidence base) clearly states that Land at Lodway farm is at risk of flooding and that policy LP4 does not identify any mitigation. In addition, serious concerns have been raised in relation to surface water drainage from proposed development on the Land East of Gordano Services (also included as land to be released from Green Belt in SP7). Comments from the National Highways Agency in response to outline planning application 25/P/1413/OUT copy attached) included strong objections to the applicant's surface water proposals, which 'would have a detrimental impact on National Highways infrastructure'. Further comments state: 'we consider this matter is significant and is not capable of being addressed by planning condition'. Despite these areas of potential flooding having been identified (Section 6.1.8 North Somerset Strategic Flood Risk Assessment Level 1 2025 - in evidence base) no sequential testing of these areas has been carried out. Government guidance https://www.gov.uk/guidance/flood-risk-and-coastal-change is clear that local authorities should assess the risk to an area from flooding from all sources, now and in the future, taking account of			

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					the impacts of climate change, and to assess the cumulative impact that land use changes and development in the area will have on flood risk. It should be noted that Paragraph C.103 in the Sustainability Appraisal (in Local Plan evidence base) has identified Pill an area likely to experience increased flood risk in the future. The proposed development of 1,100 new dwellings at Pill will lead to a significant increase in impermeable surface area within the locality. This change will result in additional surface water runoff, which must be carefully managed to avoid elevating flood risk downstream, particularly within the shared River Avon catchment. Strategic policy SP7 refers to the entire sites being released from Green Belt and fails to provide sufficient evidence which would justify the inclusion of flood risk areas as potential development sites. It is inconsistent with the NPPF and government flood risk guidance and is therefore Unsound. Failure to protect Best and Most Versatile (BMV) Agricultural Land BMV land has greater protection in UK planning law than non-BMV land. This is reflected in the NPPF 2024 Chapter 15 (Conserving and enhancing the natural environment), specifically paragraphs 187 and 188. Footnote 65 NPPF states: 'Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.' Policy DP53 in the Local Plan recognises that BMV land should be protected 'from significant, inappropriate and unsustainable proposals' but goes on to state that 'this local plan does allocate some residential developments on land in higher quality grades where it has been considered that this is sustainable, appropriate and justified.' Four of the sites referred to in Policy SP7 have been identified in the BMV Land Background Paper October 2025 (in the Local Plan evidence base) as follows: Land at Lodway Farm – Grades 2 and 3 Land East of Gordano Services – Grades 1 and 2 Pill Green – Grade 2 Land at Pill Road – Grades 2 and 3 For all these sites, the BMV background paper states: 'Site allocated as part of Pill and Easton-in-Gordano strategic location. Loss of BMV land considered to be outweighed by other sustainability factors, such as the opportunity to secure significant levels of affordable housing, active and sustainable travel measures and other benefits as required by Local Plan policy LP4.' It is submitted that this is insufficient justification for the BMV land in the 4 sites listed above to be released from Green Belt land. Previous comments above demonstrate the lack of evidence for the delivery of affordable housing (Failure to meet 'Golden Rules' requirement) and sustainable travel (Failure to demonstrate a sustainable location) which make Policy SP7 unsound. The inclusion of BMV land in sites released from the Green Belt, for reasons already insufficiently justified, adds further weight to the argument that Policy SP7 is Unsound. Failures to take into account the policies and proposals of the Neighbourhood Plan North Somerset Council has a statutory duty (pursuant to S19(2)(a) of the Planning and Compulsory Purchase Act 2004 (as amended)) to have			

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					regard to the government's National Planning Practice Guidance (NPPG) when preparing a new local plan. Guidance in the NPPG (Paragraph: 006 Reference ID: 61-006-20190723) states that: 'Where a neighbourhood plan has been brought into force, the local planning authority should take its policies and proposals into account when preparing the local plan.' Furthermore, it is 'important for local plans to make appropriate reference to neighbourhood plan policies and proposals' https://www.gov.uk/guidance/plan-making The proposal in policy SP7 to release land from the Green Belt for the development of 1,000 homes around Pill and Easton-in Gordano fails to take account the recommendations of the Abbots Leigh, Ham Green, Pill and Easton-in-Gordano Neighbourhood Plan which was made by Full Council on 9 November 2021 and makes no reference to that plan. The Neighbourhood Plan concluded on page 13 (see attached plan) that a major housing development of up to 1,000 dwellings: 'not only runs counter to Green Belt and Landscape Quality policies, (North Somerset Council. Landscape Sensitivity Assessment, 2018 pp 45-47) but would threaten biodiversity and the ecological framework of the Area, would exacerbate peak hour traffic congestion and overload on both the A369 and the Pill Loop, would threaten environment and biodiversity, would create further pollution and would hinder attempts to address climate change. In short this scenario is both damaging and unsustainable. Whilst the Joint Spatial Plan is now redundant, it concluded that the Easton in Gordano/Pill corridor was 'a very constrained location in terms of transport, Green Belt, heritage, landscape and ecology'. Expansion of this scale would increase the number of households in Pill & Easton-in-Gordano by 50% and would radically damage the social patterns of community life.' Failure to take account of the above section of the Neighbourhood Plan in the formulation of Policy SP7, which provides justification for the development of 1,000 homes on Green Belt land around Pill and Easton-in Gordano, renders this policy both not Legally Compliant and Unsound.			
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	No	This comment has also been uploaded as an attachment to ensure the reader can activate internet links. This policy is included in the Local Plan following a decision by North Somerset Council in 2025 to identify Pill and Easton-in-Gordano as a Strategic Location for large residential development. It was not included in the earlier version of the Regulation 19 Local Plan, dated July 2024. It is therefore a late addition to the current version of the Local Plan and lacks detail in its content, in comparison to the corresponding policies for the other Strategic Locations, which have benefitted from more thorough preparation. Evidence is included in this comment to demonstrate that Policy LP4 is Unsound. The justification section in Policy LP4 states that 'Government reforms to the planning system (including a shift in policy with a more permissive approach to development in the Green Belt where exceptional circumstances can be evidenced and justified, which include where an authority cannot meet its identified housing need) have opened up opportunities for provision of housing at Pill and Easton-in-Gordano to meet the needs of existing and future residents' A detailed comment on the justification for the release of five sites at this location from Green Belt land has been submitted next to Policy SP7 and is also attached to this comment for ease of reference. It is submitted in	In order to make the Local Plan legally compliant and sound, there should be a re-assessment of the of the five sites around Pill and Easton-in Gordano for housing development and their identification collectively as a Strategic Location. The submitted comments on behalf of Sustainable Pill and District demonstrate considerable lack of community engagement, which fails the test for Legal Compliance and falls well below the	Please see uploaded documents	Comments on Additional Sites consultation.docx Comments on Policy SP7.docx 25_P_1413_OUT-NATIONAL_HIGHWAYS_COMMENTS-3514484.pdf Comments on Policy LP4.docx

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					that earlier comment that the release of the sites from the Green Belt is a hastily formulated strategy, with over-reliance on the impact of a possible railway link, without thorough examination of reasonable alternatives and is therefore unjustified, making Policy SP7 Unsound and, consequently, Policy LP4 is also Unsound. Also attached is a comment on the Additional Sites Consultation (Feb-March 2025) which has been inserted following the 'Vision' section of this Local Plan. That comment provides evidence of a lack of community engagement and failure to comply with the Public Sector Equality Duty. It is submitted that that the inclusion of this policy LP4 is based on a consultation which was not Legally Compliant and must therefore result in this policy being unjustified and therefore Unsound. It is submitted that Policy LP4 fails to satisfy the requirements of the 'Golden Rules' in paragraphs 156-157 NPPF 2024 in relation to improvements to local transport infrastructure (comment 1 below) and the requirement to provide 50% affordable housing (comment 2 below) 1.Failure to meet 'Golden Rules' requirement to improve local transport infrastructure Paragraph 156 (b) NPPF 2024 states that where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review, there should be 'necessary improvements to local or national infrastructure' Policy LP4 fails to address this effectively in relation to transport issues. There is reference to the future railway link and proposed implementation of active travel, but there are no strategies in place to deal with the resulting cumulative impact on traffic near this location. There is overwhelming evidence that the impact of the proposed housing development comprising 1,100 homes will cause increased congestion on J19 of the M5 and on the primary road network. An analysis of transport data is included in the comment on Policy SP7, but is repeated below for ease of reference: M5 J19 (Strategic Road Network) • M5 J19 is very congested, with several junctions at or above capacity and with junctions close to J19, especially the Portbury junction and the A369 to St Georges Hill junction also at or near capacity. (Local Plan Transport Assessment: Portishead, Portbury & Junction 19) • The effect of the planned developments is to increase the utilisation of these junctions. (Local Plan Transport Assessment: Portishead, Portbury & Junction 19) • The mitigations to the increased congestion are to facilitate public transport by converting the A369 HOV to a bus lane and by remodelling the southbound off-ramp section of J19 (Local Plan Transport Assessment p71) • No detailed modelling of the proposed J19 redesign has been carried out, although it is acknowledged that "there will be increases in congestion on the circulatory of the roundabout, which has the potential for knock-on impacts" (Local Plan Transport Assessment para. 5.166) • The proposed redesign of J19 does not form part of funded schemes as part of RIS3 (National Highways planned schemes) to 2031. The impact of the developments on J19 is therefore likely to be unmitigated, with increased congestion which has not been adequately addressed by the Transport Assessment. Furthermore, National Highways has raised concerns about the impact of	engagement with communities in the other Strategic Locations referred to in the Plan. The comments also make clear that significant weaknesses exit in the assessment of these sites and in the application of 'exceptional circumstances' to justify their release from the Green Belt for housing development. Furthermore, weaknesses in site-specific policies indicate insufficient time and consideration has been given to the policies for this Strategic Location, likely due to its late inclusion in the Plan. A pause in the process of approving this Plan is requested so that the Pill and Easton-in Gordano Strategic Location can be re-assessed, following adequate and effective engagement with the local community.		

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					housing developments in this area. In relation to a proposed development 'Land off Marsh Lane', (NSC planning ref 25/P/1413/OUT – copy attached), National Highways stated that further transport modelling is required to assess cumulative impacts on Junction 19. It is not clear from the Local Plan and evidence base that the required modelling or cumulative impact assessment has been carried out or that the Council has adequately co-operated with National Highways in addressing these concerns. A369 (Primary Road Network) • The A369 and the two junctions which serve Pill, St Georges Hill and Pill Road, are all predicted to become more congested as a result of the housing developments, and the conversion of the A369 HOV to a bus lane Local Plan Transport Assessment para. 4.63) • The North Somerset strategic transport model is particularly poorly validated along the A369 near Pill (appendix c). The model is noted as failing validation checks at both the Portbury and Beggar Bush Lane junctions which bound the section of the A369 serving Pill. In the worst case, the model underestimates traffic flow in these locations by 350 vehicles (observed=1044, modelled=694). This indicates that the modelled traffic flows around Pill are particularly poor and may well be underestimating the traffic flows into Pill (given that the discrepancy reduces from one side of Pill to the other). Given the scale of these errors, the model does not provide a sound basis for the assessment of the magnitude of any impact, or effectiveness of any mitigation around Pill. • The proposed change of the HOV lane to a bus lane is dependent on National Highways RIS3 due to the potential impact on J19. This improvement is judged as "hypothetical" by North Somerset and RIS3 has been delayed, which makes the delivery of this mitigation uncertain (appendix e) The shortfalls in the modelling, and uncertainties in the deliverability of proposed mitigations, make the assessment of the impact on the primary road network inadequate. Furthermore, the active travel plans in this policy include 'Provision of an active travel connection between the Pill Green and Land at Pill Road sites over Markham Brook'. A cycle bridge is proposed and is described in several of the consultation documents as crucial/essential. It should be noted that this area is designated as Ancient Woodland so any active travel proposals which could affect the ecology or nature of the site may be excluded by planning regulations which protect the Ancient Woodland, making this proposal ineffective. The evidence above indicates that Policy LP4 is Unsound due to failure to meet 'Golden Rules' requirement to improve local transport infrastructure. It follows that Policy LP4 is also Unsound due to inconsistency with Strategic Policy SP3 which states: 'Most of the development which takes place in these areas will be at the relatively more sustainable villages, but this must not be of a disproportionate scale which adversely impacts on the character of the settlement or leads to a significant increase in the number of car journeys' There is also inconsistency with Strategic Policy SP6 which states that development in villages and rural areas 'will not cause significant adverse impacts on local services and infrastructure, including cumulative impacts' thus providing a further reason that Policy LP4 is Unsound 2.Failure of compliance with 'Golden Rules' requirement of 50%			

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					affordable housing The ‘Golden Rules’ requirements are set out in paragraphs 156-157 NPPF and state: In the absence of a pre-existing requirement for affordable housing, a 50% affordable housing contribution should apply by default’ This requirement is confirmed in Strategic policy DP3 in the Local Plan which states: ‘Developments will be expected to provide 50% affordable housing on land released from the Green Belt as set out in Policy SP7’. However, the Additional Sites Viability Addendum, Final Report, October 2025 (in Local Plan evidence base) Section 3.4 states that ‘testing was undertaken at 50% affordable housing as requested by NSC. The results indicate poor viability across the values range thought to be typically relevant for the area (in terms of likely new build values) suggesting that a target of 50% affordable housing may be challenging unless higher values can be evidenced’. The conclusion section (Section 3.5) of the same report states: the results suggest that an affordable housing quantum of no more than 30% is likely to be viable at the Nailsea and Backwell strategic location and possibly up to 35% at SW Bristol and in Pill / Easton-in-Gordano.’ Policy LP4 cannot therefore be justified or effective in relation to compliance with the ‘Golden Rules’ and is therefore Unsound. Failure of compliance with Duty to Co-operate in relation to infrastructure Pill/Easton-in-Gordano is tied inherently to cross-boundary strategic transport (the A369 into Bristol), the Strategic Road Network (M5 J19), and the Portishead rail reopening. There is insufficient evidence (and no reference in Policy LP4) of statements of common ground, no recorded agreements with Bristol City Council, National Highways, or the rail scheme promoters setting out mitigation, funding and phasing for A369/ J19 and rail integration commensurate with the proposed scale. In the absence of such evidence, Policy LP4 does not demonstrate effective and ongoing joint working on these cross-boundary strategic matters. Insufficient evidence of compliance with the Duty to Co-operate makes this policy Unsound. Failure to provide strategies to offset environmental and ecological impacts The National Policy Planning Framework (NPPF) requires Local Plans to take full account of environmental impacts and to avoid/mitigate adverse effects, including Habitats Regulations Assessments (HRA). The proposed development sites around Pill lie within consultation zones for the North Somerset & Mendip Bats Special Area of Conservation (SAC) in relation to both Greater and Lesser Horseshoe bats, with proximity to the Severn Estuary Site of Special Scientific Interest (SSSI). Details of protected species and habitats can be found in the Wild Service Ecology Review. https://pillanddistrictplan.org/environment-and-landscape/wild-service-ecology-review/ This forms part of the evidence base for the Neighbourhood Plan made by Full Council on 9 November 2021. Where sites are adjacent to or affect SSSI, SAC or other habitats sites, or form important wildlife corridors, development proposals must avoid significant harm, apply buffers and secure measurable net gains for biodiversity. In addition, two of the sites which comprise part of the LP4 Strategic			

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					Location – Land at Lodway Farm and Land at Pill Green – are in flood risk areas: - The Western part of the Lodway Farm site is in flood zone 3a tidal, with parts 3b fluvial - Markham Brook (within the Pill Green site) is culverted at certain points and connects to the tidal River Avon. The majority of the site is within Flood Zone 3a. A small area along the boundary also falls into the functional floodplain (Flood Zone 3b). Section 6.97 of the Sustainability Appraisal (included in evidence base) clearly states that Land at Lodway farm is at risk of flooding and that policy LP4 does not identify any mitigation. In addition, serious concerns have been raised in relation to surface water drainage from proposed development on the Land East of Gordano Services (also included as land to be released from Green Belt in SP7). Comments from the National Highways Agency in response to outline planning application 25/P/1413/OUT copy attached) included strong objections to the applicant's surface water proposals, which 'would have a detrimental impact on National Highways infrastructure'. Further comments state: 'we consider this matter is significant and is not capable of being addressed by planning condition'. Despite the clear need for mitigation, Policy LP4 fails to provide any strategies to avoid/mitigate adverse effects on the environment or wildlife habitats or in relation to flood risk. In comparison: Policy LP1 (Strategic Location, Wolvershill) states that proposals for development must deliver 'ecological, habitat and environmental enhancement, particularly in relation to horseshoe bats' and 'effective management and treatment of surface water, controlling run-off into surrounding watercourses and integrating into the green infrastructure network.' Policy LP2 (Strategic Location, Woodspring) and Policy LP3 (Strategic Location, Nailsea & Backwell) both include the following wording: 'A new Nature Park is required to form part of any proposals for development within Woodspring……connectivity between any Nature Park locations and important roost sites for bats will be a key consideration in ensuring that important flight corridors are retained and not impacted by development proposals. Policy LP2 also states that 'any proposals to accommodate development within areas of higher flood risk will require a sequential test assessment and must in any event demonstrate that the development would be safe over its lifetime without increasing flood risk elsewhere. The sequential test and exceptions test should be undertaken in accordance with Policy DP9' It is submitted that Policy LP4 has been hastily formulated, following the decision to identify Pill and Easton-in Gordano as a Strategic Location. It has weaknesses in content and compares poorly to the corresponding policies for the other Strategic Locations. Policy LP4 fails to meet the needs of the location with regard to environmental and ecological issues and is inconsistent with the other policies in the Local Plan relating to Strategic Locations. This policy is therefore Unsound.			

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Land at Lodway Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	No	Please note this comment has also been uploaded to ensure the reader can activate internet links. Land at Lodway Farm Plan inconsistencies in relation to flood risk This section fails to reference any strategies or policies which deal with Flood Risk (Policy DP9) and Sustainable Drainage (DP10) and, unlike the other sites within Strategic Locations in the Local Plan, there is no strategy for dealing with flood risk in the related 'LP' policy, which is LP4. Please see comments on policy LP4 (attached here for ease of reference) in relation to flood risk and surface water drainage at Lodway Farm. This inconsistency with the principles of Policies DP9 and DP10 makes this section of the plan ineffective and it is Unsound Plan inconsistencies in relation to protection of wildlife habitats There is no reference to any strategies or policies which deal with protection of habitats for the wildlife living on this site, including Red Data species (animals classified on the IUCN Red List as being at high risk of extinction) and a nationally important population of common toads that have been carefully monitored for 20 years and live and move within the fields before crossing to their breeding pond on the far side of the motorway access/bicycle path. There is therefore inconsistency with the following policies: SP11 (Historic & Natural Environment), DP35 (Nature Conservation) DP36 (Biodiversity Net Gain) and the protection of wildlife on this site is not covered elsewhere in the Local Plan. This inconsistency with the principles of Policies SP11, DP35 and DP36 makes this section of the plan ineffective and it is Unsound. Plan inconsistencies in relation to land in proximity to a Site of Special Scientific Interest (SSSI) This land is in close proximity to the Severn Estuary Site of Special Scientific Interest (SSSI) and as such should be protected from development by Strategic Policy DP35 which states: 'Development within or in proximity to a Site of Special Scientific Interest (SSSI) or National Nature Reserve that is likely to have a direct or indirect adverse effect on its biodiversity or geological interest will not normally be permitted.' There is no reference to the application of Policy DP35 in this section of the Local Plan (and none in the associated policy LP4) which demonstrates an inconsistency, making this section of the Local Plan Unsound. Failure to comply with Duty to Co-operate in relation to use of land by MetroWest project Lodway Farm Fields are to be used as a depot site for the reconstruction of the Portishead to Bristol line. In mitigation, Metrowest have agreed to restore the fields to their greenbelt status (a legal requirement) once the work is completed (this could be 2028 or later). Though no timescale has been given, it is likely to involve professional environmental surveyors checking that the restoration has worked and animals that have been removed are returned to the site and have started breeding again - that could be 2-3 years on top of the construction phase.	In order to make the Local Plan legally compliant and sound, there should be a re-assessment of the of the five sites around Pill and Easton-in Gordano for housing development and their identification collectively as a Strategic Location. The submitted comments on behalf of Sustainable Pill and District demonstrate considerable lack of community engagement, which fails the test for Legal Compliance and falls well below the engagement with communities in the other Strategic Locations referred to in the Plan. The comments also make clear that significant weaknesses exit in the assessment of these sites and in the application of 'exceptional circumstances' to justify their release from the Green Belt for housing development. Furthermore, weaknesses in site-specific policies indicate insufficient time and consideration has been given to the policies for this Strategic Location, likely due to its late inclusion in the Plan. A pause in the process of approving this Plan is requested		Comments on Schedule 1, Page 276.docx Comments on Policy LP4.docx

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					There is no recognition of this legal requirement in this section (and none in Policy LP4) or of any communication with MetroWest, which indicates a failure of the Duty to Co-operate, making this section of the Local Plan Unsound.	so that the Pill and Easton-in Gordano Strategic Location can be re-assessed, following adequate and effective engagement with the local community.		
Land east of Gordano Services	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	No	Please note this comment has also been uploaded as an attachment, to ensure the reader can activate internet links Land East of Gordano Services Plan inconsistencies in relation to protection of wildlife habitats There is no reference to any strategies or policies which deal with protection of habitats for the wildlife living on this site. This land is within consultation zones for the North Somerset & Mendip Bats Special Area of Conservation (SAC) for both Greater and Lesser Horseshoe Bats. This is shown on the NSC planning map https://n-somerset.gov.uk/my-services/planning-building-control/planning-map There is therefore inconsistency with the following policies: SP11 (Historic & Natural Environment), DP35 (Nature Conservation) DP36 (Biodiversity Net Gain) and the protection of wildlife on this site is not covered elsewhere in the Local Plan. This inconsistency with the principles of Policies SP11, DP35 and DP36 makes this section of the plan ineffective and it is Unsound. Failure to comply with Duty to Co-operate in relation to National Highways Concerns were raised by National Highways regarding development on this land (see NSC planning portal, ref 25/P/1413/OUT – copy attached). The National Highways report stated that transport modelling is required to assess the cumulative impact of housing developments on Junction 19 of M5. In the same report, National Highways included strong objections to the applicant's surface water proposals, which 'would have a detrimental impact on National Highways infrastructure'. Further comments state: 'we consider this matter is significant and is not capable of being addressed by planning condition'. This section makes no reference to any required modelling of the impact of housing developments on congestion at Junction 19, or concerns about surface water drainage, as a result of co-operation with National Highways and there is no reference to this elsewhere in the Local Plan. This indicates a failure of the Duty to Co-operate, making this section of the Local Plan Unsound.	In order to make the Local Plan legally compliant and sound, there should be a re-assessment of the of the five sites around Pill and Easton-in Gordano for housing development and their identification collectively as a Strategic Location. The submitted comments on behalf of Sustainable Pill and District demonstrate considerable lack of community engagement, which fails the test for Legal Compliance and falls well below the engagement with communities in the other Strategic Locations referred to in the Plan. The comments also make clear that significant weaknesses exit in the assessment of these sites and in the application of 'exceptional circumstances' to justify their release from the Green Belt for housing development. Furthermore, weaknesses in site-specific policies indicate insufficient time and consideration has	Please see uploaded documents	25_P_1413_OUT-NATIONAL_HIGHWAYS_COMMENTS-3514484.pdf Comments on Schedule 1, Page 276.docx

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						been given to the policies for this Strategic Location, likely due to its late inclusion in the Plan. A pause in the process of approving this Plan is requested so that the Pill and Easton-in Gordano Strategic Location can be re-assessed, following adequate and effective engagement with the local community.		
Pill Green	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	No	Please note this comment has also been uploaded as an attachment, to ensure the reader can access internet links. Pill Green Plan inconsistencies in relation to flood risk Markham Brook (within the Pill Green site) is culverted at certain points and connects to the tidal River Avon. The majority of the site is within Flood Zone 3a. A small area along the boundary also falls into the functional floodplain (Flood Zone 3b). Whilst this section of the plan recognises some mitigations are necessary to prevent flooding, it is not consistent with principles of Policies DP9 (Flood risk) and DP10 (Sustainable drainage) since it fails to address the wider implications of future flood risk for the village of Pill. The increased speed of water run-off from all the roofs and surfaced areas of a housing development of 600 homes will have a dramatic effect on the brook itself and the woodland habitat it flows through. As shown on the NSC planning map (with flood risk and surface water ticked), the drains from the Markham fields on the SW side of the woodland merge with Markham brook close to the fire station in the centre of the village. There will be an increased flood risk in the village below. There is no reference to mitigations dealing with risk in this section of the Local Plan (and none elsewhere in the Plan), contrary to the principles set out in Policies DP9 and DP10. This section of the Local Plan is therefore ineffective and Unsound. Plan inconsistencies in relation to protection of wildlife habitats and Ancient Woodland There is no reference to any strategies or policies which deal with protection of habitats for the wildlife living on this site. This land is within consultation zones for the North Somerset & Mendip Bats Special Area of Conservation (SAC) for both Greater and Lesser Horseshoe Bats. This is shown on the NSC planning map https://n-somerset.gov.uk/my-services/planning-building-control/planning-map Markham Farm fields have notable wildlife species present, including Red Data species (animals classified on the IUCN Red List as being at high risk of extinction) such as linnet, lapwing and skylarks that live there year round and breed on the fields. The old hedgerows of Markham Farm fields possess very high species counts, encouraging masses of butterflies,	In order to make the Local Plan legally compliant and sound, there should be a re-assessment of the of the five sites around Pill and Easton-in Gordano for housing development and their identification collectively as a Strategic Location. The submitted comments on behalf of Sustainable Pill and District demonstrate considerable lack of community engagement, which fails the test for Legal Compliance and falls well below the engagement with communities in the other Strategic Locations referred to in the Plan. The comments also make clear that significant weaknesses exit in the assessment of these sites and in the application of ‘exceptional circumstances’ to justify their release from the Green Belt		25_P_1413_OUT-NATIONAL_HIGHWAYS_COMMENTS-3514484.pdf Comments on Schedule 1, Page 276.docx Comments on Policy LP4.docx

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					crickets, multiple species of insect pollinators and many species of wild flowers. This site also includes Ancient Woodland, clearly marked both on the Natural England Inventory (https://naturalengland-defra.opendata.arcgis.com/datasets/ancient-woodland-england/explore?location=51.469515%2C-2.678230%2C13.97) and on the NSC planning map (https://map.n-somerset.gov.uk/dande.html) The National Planning Policy Framework 2024 states in paragraph 193c (page 56): "development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists" https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf) Not only should there be a minimum of 15 metre buffer zone from the edge of the woodland (and in this case the site qualifies for considerably more buffer zone), but there should be fencing or other obstructions to any public access. The lack of sufficient protection for wildlife and Ancient Woodland in this section of the Local Plan demonstrates inconsistency with the following policies: SP11 (Historic & Natural Environment), DP35 (Nature Conservation) DP36 (Biodiversity Net Gain) and the protection of wildlife and Ancient Woodland on this site is not covered elsewhere in the Local Plan. This inconsistency makes this section of the plan ineffective and it is Unsound. Failure to comply with Duty to Co-operate in relation to National Highways and Neighbouring Local Authority It is likely that the bulk of all traffic generated by 600 new homes on this site would pass straight onto the A369 going into Bristol or to Junction 19 of the M5 motorway. These would require controlled measures to allow traffic to exit the site, as well as pedestrian crossings to allow new residents to access buses. It is evident from evidence from transport data set out in the comment on Policy LP4 - attached) that there is significant congestion on the A369, which meets with Winterstoke Road and the Cumberland Basin in Bristol. This section of the plan provides no indication of co-operation with National Highways or with Bristol City Council to provide solutions to traffic congestion which will result from the development of 600 homes on this site. This indicates a failure of the Duty to Co-operate, making this section of the Local Plan Unsound.	for housing development. Furthermore, weaknesses in site-specific policies indicate insufficient time and consideration has been given to the policies for this Strategic Location, likely due to its late inclusion in the Plan. A pause in the process of approving this Plan is requested so that the Pill and Easton-in Gordano Strategic Location can be re-assessed, following adequate and effective engagement with the local community.		
Land at Pill Road	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Please note this comment has also been uploaded as an attachment to ensure the reader can activate internet links. Land at Pill Road Plan inconsistencies in relation to flood risk Markham Brook (within the Land at Pill Road site) is culverted at certain points and connects to the tidal River Avon. The majority of the site is within Flood Zone 3a. A small area along the boundary also falls into the functional floodplain (Flood Zone 3b). Whilst this section of the plan recognises some mitigations are necessary to prevent flooding, it is not consistent with principles of Policies DP9 (Flood risk) and DP10 (Sustainable drainage) since it fails to address the	In order to make the Local Plan legally compliant and sound, there should be a re-assessment of the of the five sites around Pill and Easton-in Gordano for housing development and their identification collectively as a Strategic Location. The submitted	Please see uploaded documents	Comments on Schedule 1, Page 276.docx

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					wider implications of future flood risk for the village of Pill. The increased speed of water run-off from all the roofs and surfaced areas of a housing development of 600 homes will have a dramatic effect on the brook itself and the woodland habitat it flows through. As shown on the NSC planning map (with flood risk and surface water ticked), the drains from the Markham fields on the SW side of the woodland merge with Markham brook close to the fire station in the centre of the village. There will be an increased flood risk in the village below. There is no reference to mitigations dealing with risk in this section of the Local Plan (and none elsewhere in the Plan), contrary to the principles set out in Policies DP9 and DP10. This section of the Local Plan is therefore ineffective and Unsound. Plan inconsistencies in relation to protection of wildlife habitats and Ancient Woodland There is no reference to any strategies or policies which deal with protection of habitats for the wildlife living on this site. This land is within consultation zones for the North Somerset & Mendip Bats Special Area of Conservation (SAC) for both Greater and Lesser Horseshoe Bats. This is shown on the NSC planning map https://n-somerset.gov.uk/my-services/planning-building-control/planning-map Markham Farm fields have notable wildlife species present, including Red Data species (animals classified on the IUCN Red List as being at high risk of extinction) such as linnet, lapwing and skylarks that live there year round and breed on the fields. The old hedgerows of Markham Farm fields possess very high species counts, encouraging masses of butterflies, crickets, multiple species of insect pollinators and many species of wild flowers. This site also includes Ancient Woodland, clearly marked both on the Natural England Inventory (https://naturalengland-defra.opendata.arcgis.com/datasets/ancient-woodland-england/explore?location=51.469515%2C-2.678230%2C13.97) and on the NSC planning map (https://map.n-somerset.gov.uk/dande.html) The National Planning Police Framework 2024 states in paragraph 193c (page 56): "development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists" https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf) Not only should there be a minimum of 15 metre buffer zone from the edge of the woodland (and in this case the site qualifies for considerably more buffer zone), but there should be fencing or other obstructions to any public access. The lack of sufficient protection for wildlife and Ancient Woodland in this section of the Local Plan demonstrates inconsistency with the following policies: SP11 (Historic & Natural Environment), DP35 (Nature Conservation) DP36 (Biodiversity Net Gain) and the protection of wildlife and Ancient Woodland on this site is not covered elsewhere in the Local Plan. This inconsistency makes this section of the plan ineffective and it is Unsound.	comments on behalf of Sustainable Pill and District demonstrate considerable lack of community engagement, which fails the test for Legal Compliance and falls well below the engagement with communities in the other Strategic Locations referred to in the Plan. The comments also make clear that significant weaknesses exit in the assessment of these sites and in the application of 'exceptional circumstances' to justify their release from the Green Belt for housing development. Furthermore, weaknesses in site-specific policies indicate insufficient time and consideration has been given to the policies for this Strategic Location, likely due to its late inclusion in the Plan. A pause in the process of approving this Plan is requested so that the Pill and Easton-in Gordano Strategic Location can be re-assessed, following adequate and effective engagement with the local community.		

Name: Sustainable Pill and District **I.D:** 63873345

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Policy LP4: Strategic location: Pill and Easton-in-Gordano					On behalf of the residents of Pill, Ham Green, Easton-in-Gordano and the surrounding area, I would like to present you with the petition created by Sustainable Pill and District (SPAD) with regards to public concern into the NSC Local Plan. The petition is titled 'Protect our community - object to excessive house building on Green Belt around Pill!'. Those who signed the petition were advised: By signing and sharing this petition, you are: Objecting to excessive house building around our Village Challenging the lack of adequate initial consultation by NSC Standing up for our community Showing NSC the strength of feeling in the Village about this SPAD advised that at the closure of the consultation period 2,218 people had signed the online petition and a further 115 pen and ink signatures had been gathered.			

Name: Sylvia Morris **I.D:** 62716257

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Land at Tower Farm					Having attended the recent Portishead Town Councils meeting which outlined the proposed development scheme near Weston Bigwood. I was completely shocked that this plan could possibly be considered. This area is of crucial importance and is an ancient Iron Age site. The rare plants are of the utmost significance and the wild life too. The Red Kites and Peregrines are very rare and need protecting. Weston Bigwood is a necessary habitat to maintain this balance. Green Belt Land should never be considered for development and in particular Weston Bigwood. There are Brown Field sites around Wyndham Way that are appropriate- this to me would meet the government's quota. Other issues are the access roads. This area has issues already and is very difficult to drive through, due to the school traffic!!! Parking is absolutely impossible at time. Buses have difficulty in driving through the heavy traffic. It's totally illogical to even consider this plan. Having lived in Portishead for over 45 years I'm devastated about this proposal. Please consider the future of this important site for future generations.			
Black Rock, north of Clevedon Road					Having attended the recent Portishead Town Councils meeting which outlined the proposed development scheme near Weston Bigwood. I was completely shocked that this plan could possibly be considered. This area is of crucial importance and is an ancient Iron Age site. The rare plants are of the utmost significance and the wild life too. The Red Kites and Peregrines are very rare and need protecting. Weston Bigwood is a necessary habitat to maintain this balance. Green Belt Land should never be considered for development and in particular Weston Bigwood. There are Brown Field sites around Wyndham Way that are appropriate- this to me would meet the government's quota. Other issues are the access roads. This area has issues already and is very difficult to drive through, due to the school traffic!!! Parking is absolutely impossible at time. Buses have difficulty in driving through the heavy traffic. It's totally illogical to even consider this plan. Having lived in Portishead for over 45 years I'm devastated about this proposal. Please consider the future of this important site for future generations.			

Name: T Crane **I.D:** 58629377

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Vision, Strategic Priorities and Sustainability Objectives	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	NOT SOUND: The vision rightly recognises that sustainable development should balance economic, social and environmental objectives, and the sustainability objectives cover important themes such as access to jobs, re-use of brownfield land, affordable housing, community cohesion and environmental protection. However, the way the vision is expressed for North Somerset does not reflect the diversity of the district's communities or the realities on the ground. In its current form it risks setting a "one-size-fits-all" agenda that is inconsistent with real-life conditions. Lack of recognition of local distinctiveness: North Somerset is not homogeneous. One part of Weston-super-Mare ranks among the five most deprived areas in the country according to government statistics, while communities such as Backwell, Wraxall, Failand, Clevedon and Nailsea are comparatively affluent. The district includes vibrant coastal towns, historic market towns, commuter villages and rural hamlets. A single overarching vision that treats these very different places as if they face the same issues overlooks their unique needs and opportunities. "Breathing new life into existing towns" is mis-directed – The vision talks about revitalising existing towns. Many towns, including Portishead and Clevedon, are already successful, attractive and economically vibrant. They need support to sustain and enhance that success – for example, through targeted investment, infrastructure improvements and policies that encourage business growth – rather than wholesale residential expansion that could undermine their character, such as thos eplanned for Nailsea and Backwell. No clear link between vision and evidence : The Sustainability Appraisal objectives include ensuring a range of job opportunities, promoting the optimal use of land (especially brownfield), delivering affordable housing and protecting biodiversity. Yet the vision underpinning the plan seems to prioritise large-scale housing allocations in places like Nailsea and Backwell without a parallel strategy for economic development, regeneration of deprived areas or protection of environmentally sensitive land. This disconnect makes it difficult to see how the strategic priorities will achieve the stated sustainability objectives.	Suggested improvements Tailor the vision to recognise the distinct identities and challenges of North Somerset's settlements. It should set differentiated priorities for deprived urban areas, coastal towns, rural villages and commuter settlements. For example, regeneration and skills investment should be a priority in deprived parts of Weston-super-Mare, while transport improvements and protection of green spaces are critical for towns and villages like Nailsea, Backwell and Wraxall. Acknowledge existing success stories and set out how the plan will support them through incentives for business investment, town-centre enhancement and public realm improvements, rather than implying they need to be "re-invigorated" through large housing allocations. Explicitly link strategic priorities to the Sustainability Appraisal objectives: demonstrate how each objective (e.g. delivering accessible jobs, reducing car dependency, conserving heritage and biodiversity) will be met in different parts of the district, and ensure housing growth is balanced with economic strategy and infrastructure provision.		
Strategic Priorities	No	• Justified • Effective • Consistent with national policy	Unsure	Unsure	The list of strategic priorities is so broad and inclusive that it fails to function as a set of priorities. By attempting to cover every possible objective, it does not provide a clear sense of what will actually guide decisions during the plan period. In addition, the priorities assume a level of homogeneity across North Somerset that does not exist. Too many "priorities" dilute focus. The list reads like a comprehensive checklist of aspirations rather than a hierarchy of priorities. A strategy cannot prioritise everything; it must identify the most critical issues for the district during the plan period. Without a sharper focus, it will be difficult for decision-makers, developers and communities to understand	Suggestions for improvement Reduce the list to a concise set of genuinely strategic priorities (e.g. regenerating deprived areas, meeting housing need where it can be sustainably accommodated, supporting a strong local economy, and protecting environmental assets) and clearly explain how these will be delivered. Distinguish priorities spatially. Set tailored priorities for Weston-super-Mare (regeneration and skills), for rural villages (protecting landscape and limiting unsustainable growth), for commuter settlements like Nailsea/Backwell (infrastructure-led development) and for successful towns like Portishead and Clevedon (supporting investment and services). Align each priority with measurable outcomes and identify which		

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					which objectives take precedence when trade-offs are inevitable. Lack of place-specific nuance. As noted in my comments on the vision, North Somerset encompasses very different communities: deprived neighbourhoods in Weston-super-Mare, historic market towns like Clevedon, seaside resorts, rural villages and commuter settlements such as Backwell and Wraxall. A single list of generic priorities does not reflect these differences. For example, “breathing new life into existing towns” may be appropriate for parts of Weston but not for already vibrant towns like Portishead and Clevedon, which need support for continued investment rather than wholesale reinvention. Similarly, priorities around affordable housing and economic opportunity will vary between deprived and affluent areas. Conflicting aims: Some priorities pull in different directions (for instance, maximising housing delivery versus conserving sensitive landscapes and biodiversity). Without clear sequencing or spatial focus, it is unclear how conflicts will be resolved. The Sustainability Appraisal objectives include providing accessible jobs, re-using brownfield land and protecting the environment. The strategic priorities should explain how the council will balance these objectives in different locations.	policies and allocations in the plan will deliver them. This will help to ensure that the plan is effective, justified and aligned with its own sustainability objectives. Overall, a shorter, more place-specific and outcome-focused set of strategic priorities would make the plan clearer, more coherent and more capable of addressing the diverse needs of North Somerset’s communities.		
SP3: Spatial strategy	No • Positively prepared • Justified • Effective • Consistent with national policy		Unsure	Unsure	The spatial strategy is not sound because it concentrates a disproportionate share of the district’s housing growth at Nailsea and Backwell without demonstrating that the area’s transport network can cope. The plan has not assessed the cumulative impact of 3 500–3 707 new dwellings on the three constrained road routes serving the towns or provided firm proposals to address those constraints. Reasoned justification: Physical pinch points: Nailsea is served by only three access routes; Station Road under the low, single-file railway bridge; the B 3130 Clevedon Road at Tickenham Hill; and the B 3130 Bristol Road through Wraxall. All three have pinch points where opposing traffic cannot pass. These routes already experience severe queuing at peak times; adding thousands of homes will dramatically increase traffic on roads that cannot be widened. Lack of economic growth: Nailsea is becoming a dormitory town for Bristol, Bath and London because there are no significant commercial or industrial incentives for business in the plan. Without local jobs, residents will commute out, increasing car use. This undermines SP3’s objective of locating growth where it can be sustainably accommodated and conflicts with national policy requiring plans to balance homes and jobs. Rail constraints: Nailsea and Backwell station lacks step-free access to the southbound platform and has limited parking and interchange facilities. There is no commitment in the plan to improve rail capacity or accessibility before the housing is delivered. The Portishead branch line re-opening will not directly relieve Nailsea’s congestion.	Reduce the scale of housing allocated to Nailsea and Backwell within SP3 until specific, funded improvements to road and rail infrastructure are identified. Re-direct growth to locations with better transport links and greater capacity to absorb the proposed increase in resident population. Include an infrastructure phasing plan requiring upgrades to Station Road (railway bridge), the B 3130 pinch points and accessibility at Nailsea & Backwell station before substantial housing growth occur.		

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SP3: Spatial strategy	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The spatial strategy is not sound because it proposes significant housing growth at Nailsea and Backwell despite severe transport constraints and known flood risks in the area. SP 3 justifies Green-Belt release on the basis of “exceptional circumstances”, yet the same plan acknowledges (through DP 9: Flood risk) that many of the green-belt sites around Nailsea/Backwell are subject to flooding. This contradiction undermines the plan’s justification for allocating 3 500–3 707 dwellings to this strategic location. Reasoned justification: Transport infrastructure constraints: Nailsea has only three access routes (Station Road under the low railway bridge; B 3130 Clevedon Road via Tickenham Hill; and B 3130 Bristol Road through Wraxall). Each has pinch points where vehicles cannot pass simultaneously and is already congested at peak times. Adding thousands of new dwellings without committed highway improvements or enhanced public transport will exacerbate congestion, increase air pollution and reduce road safety. Nailsea & Backwell railway station lacks step-free access to the southbound platform and has limited capacity. There is no indication how these constraints will be addressed. Flood-risk contradiction: DP 9 (Flood risk) requires development to avoid flood-risk areas and incorporate sustainable drainage. Parts of Nailsea and Backwell have experienced flooding in the past five years. Areas north of Nailsea near Jacklands Lake and Moorend Spout and low-lying land around Backwell (close to the Land Yeo/rhyne system) are particularly prone to surface-water and fluvial flooding. Yet SP 3 proposes to release these Green-Belt areas for housing on the basis that there are “exceptional circumstances”. The NPPF states that Green-Belt boundaries should be altered only where exceptional circumstances are fully evidenced and justified; flood risk does not constitute an exceptional circumstance for releasing sites that are themselves prone to flooding. Using green-belt land that functions as a natural floodplain risks exacerbating downstream flooding and undermines the plan’s environmental objectives. Unsound justification: SP 3 favours large green-field allocations at Nailsea and Backwell, but it does not demonstrate that growth cannot be accommodated elsewhere on brownfield or less constrained land. Nor does it provide a sequential test to steer development away from flood-risk zones, as required by national policy. This makes the strategy unjustified and ineffective.	Reassess the spatial strategy: Reduce the housing allocation for Nailsea and Backwell and reconsider alternative locations that are less constrained by transport and flood risk. Apply a sequential test to avoid allocating land in Flood Zones 2 and 3 or areas with recent surface-water flooding. Retain flood-plain Green Belt: Do not release Green-Belt land that serves as functional floodplain (e.g. around Jacklands Lake and Moorend Spout). These areas should be protected for flood storage and biodiversity. Phase development with infrastructure: Require that any remaining housing growth at Nailsea/Backwell be phased so that critical transport infrastructure (e.g. a new road crossing of the railway, junction improvements at Tickenham Hill and Wraxall, enhanced bus services, step-free access and parking at the station) is delivered before new dwellings. Contributions should be secured via S106 agreements or Community Infrastructure Levy. Strengthen flood-risk mitigation: Mandate comprehensive site-specific flood-risk assessments and sustainable drainage systems for all allocations. These should demonstrate no increase in flood risk on- or off-site and include measures such as attenuation ponds, green roofs, permeable paving and restoration of natural watercourses. Require long-term management of rhynes and water courses. By addressing transport and flood-risk issues head-on and avoiding the contradictory justification for Green-Belt release, the plan can better align with the NPPF’s requirements for soundness and sustainable development.		
SP7: Green Belt	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I do not consider the proposed release of Green-Belt land at Nailsea and Backwell to be sound, because the council has not demonstrated exceptional circumstances. There is no evidence that all non-Green-Belt options have been exhausted, nor that the sites are deliverable without causing serious harm. The proposal conflicts with DP 9 (flood risk) by allocating land that is susceptible to flooding. The plan fails the “justified” and “consistent with national policy” tests of soundness, as the NPPF requires that			

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					Green-Belt boundaries are altered only where exceptional circumstances are fully evidenced and that sustainable alternatives have been considered. Insufficient exploration of alternatives: The plan allocates around 3 500–3 707 dwellings to the Nailsea/ Backwell strategic location, but there is little evidence that the council has exhausted other options such as redeveloping brownfield sites, intensifying existing settlements or dispersing growth more evenly across the district. There are empty shops and underused land in other towns (e.g. Portishead, Weston-super-Mare) and opportunities to increase densities on previously developed land. The presence of general housing need does not constitute an “exceptional circumstance” when alternatives exist. Environmental and flood-risk value of the Green Belt: The areas proposed for release around Nailsea (north of the town near Jacklands Lake and Moorend Spout) and Backwell include low-lying farmland and watercourses that act as functional floodplains. DP 9 (Flood risk) requires development to avoid flood-risk areas, yet the plan would sacrifice Green-Belt land that floods regularly. This not only contradicts DP 9 but also undermines the role of the Green Belt in safeguarding the countryside from encroachment and preserving natural assets. Releasing flood-prone Green-Belt land cannot be justified as “exceptional”; it would exacerbate flood risk and reduce the district’s resilience to climate change. Harm to settlement separation and landscape character: One purpose of the Bristol–Bath Green Belt is to prevent neighbouring towns from merging. The proposed housing at East Backwell would significantly extend Backwell eastwards towards Nailsea; combined with the large allocations on Nailsea’s edge, this risks coalescence and loss of the distinctive identity of both settlements. The plan’s own consultation statement records “strong opposition to large-scale development in Backwell” and notes that an extra 1 000 homes at East Backwell would more than double the village’s size. Such a transformation would erode the openness and permanence that the Green Belt is meant to protect. Lack of infrastructure to support Green-Belt release: Even if exceptional circumstances were demonstrated, SP 7 requires that any released land can accommodate sustainable development. The transport network serving Nailsea and Backwell is already constrained (single-lane bridges, narrow lanes and congested junctions), and there are no firm commitments to provide new road or rail capacity. Without infrastructure, development on Green-Belt land would be car-dependent and contrary to national and local policies to reduce carbon emissions and promote active travel. Precedent and proportionality: Releasing Green-Belt land for thousands of dwellings sets a powerful precedent for further encroachment. The scale of the proposed allocations (nearly 4 000 homes) is disproportionate to the size of Backwell and Nailsea and the ability of local services and the environment to absorb growth. The Council			

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					has not demonstrated why smaller-scale, infill or brownfield opportunities across multiple settlements cannot meet the housing requirement without sacrificing the Green Belt.			
SP8: Housing	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I do not consider SP 8 to be sound for Nailsea & Backwell. The policy allocates 3 500 dwellings (plus 228 windfall) to this “strategic growth location” but that designation is undefined in national policy and relies on earlier strategic policies in the list (SP 3 and SP 7) that are themselves unsound. North Somerset Council has not shown exceptional circumstances to justify Green-Belt release, nor has it provided evidence that road, rail and bus infrastructure can support the proposed scale of development. Flood-risk and environmental constraints further undermine deliverability. Reasoned justification: Undefined “strategic growth location”: SP 8 introduces the concept of a “strategic growth location” for Nailsea/Backwell but does not define it or explain why it is appropriate. The NPPF does not recognise such a designation, and using it to justify large-scale housing is unjustified. Dependence on unsound policies: SP 8’s housing numbers derive from SP 3 (Spatial strategy) and SP 7 (Green Belt), which I have objected to separately. SP 3 concentrates growth at Nailsea/Backwell despite severe transport and flood-risk constraints, while SP 7 proposes Green-Belt release without demonstrating exceptional circumstances. Because the underlying policies are flawed, the housing distribution is not positively prepared or justified. Infrastructure deficits: Nailsea and Backwell are served by only three road routes, each with physical pinch points (Station Road’s single-file rail bridge, narrow sections on the B 3130 via Tickenham Hill and through Wraxall). SP 8 does not ensure that these constraints will be resolved before housing is delivered. Bus services to Bristol and Bath are infrequent, untimely and unreliable; the railway station lacks step-free access to the southbound platform. Trains to Bath/London are unrelaible, lack adequate passenger capacity and not frequent enough. Without clear commitments to road and rail improvements, a housing-led strategy is not effective. Environmental and flood-risk constraints: Proposed housing sites include Green-Belt land north of Nailsea and east of Backwell that suffers from surface-water and fluvial flooding. DP 9 (Flood risk) requires development to avoid flood-risk areas, yet SP 8 allocates those very areas for housing. There is also no strategy for mitigating the loss of productive farmland or biodiversity. Lack of economic balance: Allocating 3500 homes without commensurate employment or retail provision will turn Nailsea into a dormitory town. There are empty commercial units in the town centre, (or they are occupied only by charity shops) and the plan proposes only 6.1 ha of employment land which will not compensate for the loss of existing business space that has been/is planned to be converted to dwellings in recent years. This conflicts with the NPPF’s requirement to promote	Rebalance housing distribution: Reduce the housing allocation for Nailsea/Backwell and redistribute growth to locations with better transport links, available brownfield land and fewer environmental constraints (e.g., Weston-super-Mare, Clevedon, Portishead). Define and justify strategic growth locations: If the council uses this concept, set clear criteria (e.g., infrastructure capacity, absence of flood risk and Green-Belt constraints, scope for mixed-use development) and assess each location against them. Otherwise remove the term and revert to NPPF terminology. Link housing to infrastructure delivery: Require that major road improvements (e.g. resolving pinch points on Station Road and the B 3130), step-free access and parking at Nailsea & Backwell station, and enhanced bus services are provided before significant housing is occupied. Include a phasing schedule tying housing completions to specific infrastructure milestones. Avoid flood-risk areas: Apply the sequential test mandated by the NPPF to steer development away from flood-prone Green-Belt land around Jacklands Lake and Moorend Spout. Incorporate comprehensive flood-mitigation measures for any remaining sites. Promote economic growth alongside housing: Increase employment allocations within existing settlement boundaries (e.g. reuse vacant commercial units in Nailsea town centre) and plan for mixed-use development, co-working and light industrial uses, rather than relying on greenfield employment sites that reduce the Green Belt.		

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					sustainable, mixed-use communities.			
SP10: Transport	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	While SP 10 aspires to reduce car dependency and promote sustainable travel, it is unsound in relation to Nailsea and Backwell. The policy assumes that thousands of new dwellings can be delivered before resolving critical transport infrastructure problems, yet it does not set binding conditions or timelines. As drafted, SP 10 will not “discourage the overall number of car trips”; instead, it will inevitably increase car use because residents will have no practical alternative. The policy also fails to apply other relevant transport policies; LP 11 (safeguarded infrastructure), DP 14 (Highway safety), DP 15–DP 18 (Active and sustainable transport, active travel routes, public-transport accessibility, travel plans) and DP 19 (Parking), to the specific circumstances of Nailsea and Backwell. The unique geography (three constrained roads, flood-prone lowlands, protected habitats and a substandard railway station) means that many of these policies cannot be met by developers, and thus the plan is irrational and ineffective. Reasoned justification (integrating LP 11, DP 14–DP 20 and local context): SP 10 will not reduce car trips; it will increase them: The policy lists measures such as bus-priority improvements, active-travel routes and a strategic rail crossing, but there is no requirement that these be delivered before housing. Building 3500+ dwellings first will inevitably generate thousands of additional car journeys on Station Road and the B 3130 because residents will commute to Bristol, Bath and further afield. Without functioning rail, bus or walking/cycling alternatives, car use will rise, directly contradicting the policy’s aim to “discourage the overall number of car trips”. DP 14 (Highway safety, traffic and provision of infrastructure) requires that development should not prejudice highway safety or cause severe residual cumulative impacts. Allowing housing before infrastructure upgrades clearly fails this test. The constrained road network already struggles, and additional traffic will worsen pollution, congestion and accident risks. DP 15–DP 18 set out requirements for active and sustainable travel, active travel routes, public-transport accessibility and travel plans. In Nailsea and Backwell, these are largely aspirational because there is nowhere for residents to walk or cycle to (workplaces are elsewhere, retail is limited) and public transport is infrequent. Travel plans alone will not make up for the structural absence of local jobs and services. Unique geographical constraints make policy compliance unrealistic. Constrained road network: Nailsea is accessed only via three routes with fixed pinch points. Widening or bypassing these is physically challenging and expensive. SP 10 and LP 3 recognise the “strategic measures” needed to alleviate traffic but offer no deliverable solutions for Nailsea. DP 14’s safety requirements cannot be met under current conditions, and DP 16’s	Revisit the Vision and strategic approach: Acknowledge that the “one-size-fits-all” vision does not work for all settlements. Tailor the vision and strategic priorities to reflect the unique characteristics and constraints of Nailsea and Backwell. Commit to tailoring policies to local circumstances. This includes recognising that Nailsea and Backwell cannot accommodate a large proportion of the district’s housing growth without first resolving fundamental infrastructure problems. Require infrastructure to be delivered before housing: State unequivocally that development cannot proceed until key transport schemes (identified through LP 11) are funded, consented and programmed for early delivery. Tie housing occupations to these infrastructure milestones via planning obligations or conditions. Update LP 11 and Schedule 7: Include Nailsea-specific infrastructure (i.e the rail crossing, highway widening or bypass schemes for Station Road and the B 3130, and station accessibility works) as formal allocations or safeguarded routes. Without such designation, these improvements will not attract funding or protect corridors from piecemeal development. Embed DP 14’s highway-safety requirements into SP10: Require developers to demonstrate, through independent Road Safety Audits, that their proposals will not exacerbate existing hazards at pinch points and junctions. If cumulative impacts are severe, scale back or refuse developments until solutions are in place. Recognise that the unique geography of Nailsea’s roads may make compliance impossible for schemes of the size proposed. Align DP 15 - DP 18 with local realities: Where active-travel improvements (DP 16) or travel plans (DP 18) are proposed, require them to be evidence-based and deliverable. For example, cycle routes should connect Nailsea and Backwell residents to actual employment, retail and education destinations within the town. If those destinations do not exist, require mixed-use development to provide them. Ensure that public-transport improvements (DP 17) include accessible, step-free routes and bus shelters designed for people with disabilities. Ensure that active-travel measures, public-transport improvements and travel plans are realistic and linked to local destinations. Reconsider the employment land strategy: Focus employment provision within Nailsea town centre or accessible locations rather than on greenfield peripheries. encourage investment and thus employment into the town centre or within walking distance of homes, rather than on greenfield peripheries. Provide incentives for SMEs, co-working hubs and creative industries to occupy vacant town-centre units. Address parking comprehensively (DP 19):Before approving major development, require a holistic parking strategy that: Assesses existing public and private parking capacity; Provides additional public parking and EV charging where necessary; Implements controlled parking zones to prevent pavement parking and protect pedestrian safety; Incorporates inclusive design, recognising the needs of people with		

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					active-travel improvements (e.g. Festival Way extension) will be counter-productive if they reduce carriageway width and further delay buses, delivery vehicles and emergency services. Flood risk: The area's propensity for flooding (e.g. near Jacklands Lake and Moorend Spout) affects roads, rights of way and proposed active-travel routes. Even modest surface-water flooding renders cycle paths and footways unusable, undermining DP 16. Locating development on flood-prone green-belt land contradicts DP 9 (Flood risk) and will require expensive mitigation, diverting funds from transport improvements. Environmental and ecological constraints: The Nailsea Moors and surrounding countryside contain Sites of Special Scientific Interest (SSSIs) and important bat habitats. LP 3 requires a Nature Park and bat flight corridors, but these constraints limit where new roads or rail crossings can go and restrict lighting, width and use of active-travel routes. This raises costs and complexity, making it unlikely that transport policies can be delivered. Railway station deficiencies: Nailsea & Backwell station has steep stairs to the southbound platform and no step-free access. This is contrary to the Public Sector Equality Duty, which requires public services to be accessible to people with disabilities. Until the station is made compliant, encouraging rail use discriminates against people who cannot use the stairs. The plan's failure to prioritise station upgrades before housing growth undermines both SP 10 and DP 17 (Public transport accessibility). One-size-fits-all vision fails local realities: The overarching Vision and Strategic Priorities adopt a uniform approach across North Somerset. Yet Nailsea's geography, socio-economic profile and environmental constraints differ substantially from other towns. Imposing a generic transport policy without adapting it to local conditions results in irrational and undeliverable requirements. For instance, policies that assume retrofitting of bus lanes or cycle highways ignore the narrow, historic road network in Wraxall and Tickenham. Parking pressures and DP 19: DP 19 (Parking) states that adequate parking for motor vehicles and cycles must be provided and managed. In Nailsea, public car parking is already severely limited. The loss of a large town-centre car park to private use and the recent implementation of car parking charges has exacerbated the situation; on-street parking frequently encroaches onto pavements, obstructs visibility at junctions and creates hazards for pedestrians and cyclists. New residential development in Nailsea and Backwell will add to this pressure unless the plan delivers new parking capacity. Restricting parking to force modal shift is unrealistic in a town with poor public-transport options. Residents will simply park on side streets, increasing congestion and undermining DP 14's safety aims. Moreover, insufficient parking provision	disabilities; Includes enforcement mechanisms to prevent overspill onto narrow roads. Recognise that restricting parking without viable alternatives increases congestion and harms health and safety. Incorporate equalities and health-impact assessments: Require that transport and development proposals include Public Sector Equality Duty assessments to ensure that people with disabilities can access rail and bus services. Include health-impact assessments that consider how increased traffic, air pollution and stress could affect residents, especially in a town already lacking adequate healthcare infrastructure.		

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					discriminates against people with mobility impairments who cannot rely on walking or cycling. Misalignment between employment provision and transport objectives: SP 10 promotes active travel and reduced car use, but LP 3 proposes 6.1 ha of employment land on greenfield/green-belt sites at the edges of Nailsea and Backwell. Locating jobs outside the town centre forces workers to travel by car or bus to peripheral business parks, increasing traffic on constrained roads. Meanwhile, existing commercial premises in the town centre have been converted to housing, further reducing local employment opportunities. This spatial mismatch contravenes the NPPF's aim of integrating land use and transport, and it negates the potential effectiveness of DP 16 and DP 17. Cumulative policy conflict: Taken together, SP 10, LP 11 and DP 14–DP 20 create a comprehensive framework for safe, sustainable transport. However, the Local Plan fails to apply this framework coherently at Nailsea and Backwell. Instead of phasing development behind infrastructure delivery, the plan front-loads housing and leaves critical transport schemes unfunded. This is irrational and inconsistent with both national policy and the council's own evidence base.			
SP11: Historic and natural environment	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	Unsure	I support the intent of SP 11 to protect and enhance heritage assets, landscapes and biodiversity, but the Local Plan's proposals for Nailsea and Backwell contradict this policy rendering it unsound. The plan would release Green-Belt land and allocate development on flood-prone, ecologically rich areas (including land adjacent to a Site of Special Scientific Interest), causing irreversible harm to habitats and landscape character. The proposed "Nature Park" and bat-mitigation measure amount to after-the-fact compensation rather than avoiding harm. Consequently, the plan fails to meet statutory obligations under the National Planning Policy Framework (NPPF), the Habitats Regulations and the council's own sustainability objectives. Reasoned justification: Conflict with NPPF and statutory duties: The NPPF requires plans to conserve and enhance the natural environment and to avoid significant harm to biodiversity and designated sites. It also sets out a mitigation hierarchy: avoid, then mitigate, then compensate. SP 11 echoes these principles by stating that development should protect habitats and secure net biodiversity gains. The Local Plan proposes to allocate about 3 500 dwellings on land north of Nailsea and east of Backwell that currently forms part of the Green Belt and includes low-lying meadows, rhynes and wildlife corridors. Some of this land is adjacent to a Site of Special Scientific Interest (SSSI) and supports protected bat species. Developing these areas would destroy mature habitats and disrupt ecological networks. The policy's proposed mitigation of a new Nature Park and contributions to bat-habitat provision does not respect the	Avoid development on ecologically sensitive and flood-prone land: Amend LP 3 and SP 3 to remove allocations on land adjacent to the SSSI, floodplains and key wildlife corridors. Retain Green-Belt boundaries around Jacklands Lake, Moorend Spout and Backwell Lake. Direct growth to brownfield sites and less sensitive areas. Strengthen the mitigation hierarchy: Require proposals to demonstrate how they have avoided harm to habitats and species before considering mitigation or compensation. Only if avoidance is demonstrably impossible should off-site compensation (such as a Nature Park) be considered, and it must deliver measurable biodiversity net gain. Comprehensive ecological assessment: Mandate site-specific ecological impact assessments that cover protected species (bats, birds, badgers, amphibians), habitats (rhynes, wetlands, hedgerows) and cumulative effects. Require these assessments to inform site boundaries and design, ensuring that important habitats are retained and enhanced. Commit to net biodiversity gain and habitat connectivity: SP 11 should specify a minimum percentage for biodiversity net gain (e.g. 10% in line with Environment Act requirements) and ensure that development maintains and strengthens habitat corridors. The proposed Nature Park should be delivered early and connected to existing habitats, not as a late compensatory measure. Integrate flood-management with ecological objectives: Require developments to incorporate natural flood-management solutions, such as protecting and restoring wetlands, creating attenuation ponds and retaining rhynes—that provide ecological benefits and reduce downstream flood risk. Mandate all planning applications to prove that new housing does not increase flood risk elsewhere.		

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					mitigation hierarchy. Creating a new park after the destruction of existing habitats cannot replace the complexity and ecological value of the original environment. This approach is inconsistent with the NPPF, which requires harm to be avoided in the first place, and with the council's sustainability objective to "protect and where possible enhance biodiversity". Flood risk and environmental harm: SP 11 should ensure that development avoids areas at risk of flooding and protects natural floodplains. Yet the plan proposes housing on land around Jacklands Lake, Moorend Spout and Backwell Lake, which have experienced flooding in recent years. DP 9 (Flood risk) requires development to avoid flood-risk areas and incorporate sustainable drainage, but allocating flood-prone Green-Belt land directly contradicts this. Converting natural floodplains to housing increases downstream flood risk and reduces biodiversity. The proposed idea of wetland on Nailsea Moors is welcome, but it will not offset the loss of existing wetlands and rhynes that would be built over. Green-Belt and landscape character: One of the five purposes of the Green Belt is to assist in safeguarding the countryside from encroachment and to preserve the setting and special character of historic towns. SP 11 emphasises protecting landscapes and their setting. The plan's release of Green-Belt land for development at Nailsea and Backwell undermines these purposes. It would erode the openness of the countryside, create coalescence between settlements, and harm the landscape character of the Nailsea Moors and Backwell hills. The "Golden Rules" cited in LP 3 are not exceptional circumstances; they are generic requirements (affordable housing, infrastructure, green space) that should apply to any development. They do not justify losing Green-Belt land that provides ecosystem services and cultural value. Inadequate protection for protected species and habitats: The plan acknowledges that contributions to a Nature Park are needed to offset impacts on bats, but it does not ensure that existing flight corridors and roosting sites will be maintained. Lighting, noise and fragmentation from new roads and housing will disturb bat populations. Similarly, no specific measures are described to protect other protected species, such as birds, amphibians and invertebrates, or to ensure the continuity of hedgerows and rhynes that support biodiversity. Cumulative impacts and lack of assessment: SP 11 requires consideration of cumulative impacts on the historic and natural environment. The Local Plan has not provided a comprehensive cumulative assessment of how the combined developments at Nailsea, Backwell, Woodspring and Wolvershill will affect ecological networks, flood risk and landscape character. Without such assessment, the policy cannot be considered justified or effective	Protect landscape character: Include landscape-sensitivity studies in the evidence base and use them to guide the scale and design of development. Preserve long-distance views and the separation between Nailsea, Backwell and surrounding villages.		
Policy LP3: Strategic location: Nailsea and	No	• Positively prepared	Unsure	Unsure	LP 3 sets out site-specific requirements for delivering around 3 500 dwellings in Nailsea and Backwell, including measures to alleviate traffic congestion, improve active travel, enhance bus and rail facilities, provide 6.1 ha of employment land and build	Make infrastructure a precondition: Amend LP 3 to state that no housing development shall commence until specific infrastructure measures are completed, including:		

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Backwell		• Justified • Effective • Consistent with national policy			three primary schools. While it acknowledges existing “pinch points” on Station Road and at Backwell crossroads, the policy does not require that those constraints be resolved before housing is built; instead it asks for a phasing strategy without specifying that development must follow infrastructure delivery. It also proposes active-travel links and a Festival Way extension without ensuring that residents will have local jobs or services to walk or cycle to. In addition, the employment land is on greenfield/Green-Belt land despite the loss of town-centre commercial premises to housing. Overall, LP 3 is not sound because it is not realistically deliverable, fails to protect the Green Belt and flood-plain, and does not ensure infrastructure precedes housing. Reasoned justification: Phasing and infrastructure: LP 3 states that housing proposals must contribute to infrastructure and provide a phasing strategy but does not require that housing be contingent on infrastructure completion. The list of measures (traffic alleviation at Station Road and Backwell crossroads; bus-priority improvements; station access upgrades; mode-shift initiatives; Festival Way extension; three new primary schools) is extensive and expensive. There is no evidence that these measures are funded or deliverable within the plan period, nor that they will be provided before people move in. It also completely overlooks the two major traffic bottlenecks on the B3130 either side of Nailsea. Without enforceable conditions linking occupancy to infrastructure delivery, congestion and service pressures will worsen. Pinch points and road capacity: The policy identifies the need for a “strategic rail crossing” and measures to discourage traffic from using Station Road, but it does not commit to constructing such a crossing or specify its route and funding. Likewise, improvements at Backwell crossroads and along the A 370 corridor are vague. There are no considerations about the B3130. Given that all three access routes into Nailsea have physical constraints (narrow bridges, tight village pinch points), phasing strategies alone will not create capacity. Housing growth should not proceed until a deliverable solution is secured. Active travel versus employment realities: LP 3 promotes active-travel links (Youngwood Lane, Festival Way extension) and measures to reduce car dependency. However, there are few local employment opportunities because large parts of the town centre have been converted from commercial to residential use. The 6.1 ha of new employment land is proposed on greenfield/Green-Belt sites outside the existing urban area, which undermines the plan’s commitment to reuse brownfield land and protect the Green Belt. Without a robust economic strategy and better public transport, active-travel improvements will not significantly reduce car use; residents will continue to commute by car to Bristol, Bath or further afield. Flood-risk contradiction: The policy proposes housing on land north of Nailsea and east of Backwell that is prone to flooding, yet the same plan (through DP 9) warns against developing in	A new road/rail crossing or equivalent solution to remove the Station Road pinch point; Capacity improvements at Backwell crossroads and along the B 3130 and A 370 corridors; Step-free access and expanded parking/bus interchange at Nailsea & Backwell station; Commitments from bus operators to increase frequency and extend services to Bristol and Bath; Incentivise investment in business, industry, commerce and retail. The phasing strategy should tie housing occupations directly to these milestones. Re-evaluate site allocations: Remove or reduce housing allocations on flood-prone Green-Belt land near Jacklands Lake and Moorend Spout. Prioritise brownfield sites and infill within the existing urban area. Avoid bat roosts and bat corridors at all costs. The specialist bat survey clearly states that any disruption to habitats will damage the bat population. Locate employment within the town: Replace the 6.1 ha greenfield employment allocation with a strategy to improve the offerings in Nailsea town centre: retain and repurpose vacant commercial units; encourage small businesses, co-working and creative industries; and provide grant or tax incentives to attract employers. Integrate employment land with residential sites to reduce travel distances and support active-travel objectives. Strengthen active-travel and public-transport commitments: Require the Festival Way extension and other active-travel links to be delivered early, but only as part of a broader package that includes improved bus services and accessible rail facilities. Provide secure funding for these measures. By incorporating these modifications, LP 3 would be more consistent with national policy, better aligned with evidence on transport and flood-risk constraints, and more likely to deliver sustainable, well-serviced communities.		

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					flood-risk areas. Creating a new wetland on Nailsea Moors is welcome, but it does not mitigate flood risk on all allocated sites. Moreover, releasing flood-plain Green-Belt land contradicts SP 7's requirement for exceptional circumstances. Irrational allocation of employment land: LP 3 allocates 6.1 ha of new employment land on greenfield/Green-Belt sites while failing to maximise employment opportunities within the existing town centre. Given the loss of commercial space to housing and the presence of vacant units, this approach is irrational and inconsistent with the NPPF's "town centre first" principle.			
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	LP 3 proposes to expand Nailsea and Backwell by around 3 500 dwellings and 6.1 ha of employment land requiring the release of Green-Belt land. It sets out "Golden Rules" (50% affordable housing, infrastructure improvements and new green spaces) and lists a package of measures to address transport, education, leisure and ecology. LP 3 is not sound because the policy is predicated on unsound assumptions: the scale and phasing of development do not reflect local constraints; the transport package is unfunded and unproven; the Green-Belt release is not justified by exceptional circumstances; the affordable-housing target may be unviable; and the proposed employment land undermines the green belt and does not compensate for losses in the town centre. LP 3 therefore fails the tests of being positively prepared, justified, effective and consistent with national policy. Reasoned justification Over-reliance on unproven transport mitigation: LP 3 acknowledges that development "will require a strategic and coordinated approach to mitigation, particularly the provision of a package of new transport infrastructure". However, none of the listed measures (strategic rail crossing, Station Road/Backwell crossroads relief, bus-priority improvements, active-travel enhancements, Festival Way extension) are committed or funded. There is no timeline or guarantee that they will be delivered before housing occupancy. Without these improvements, the three constrained routes into Nailsea (Station Road, B 3130 via Tickenham Hill and Wraxall) will remain bottlenecks, making the development unsustainable and contrary to DP 14 (Highway safety). The policy's reliance on a phasing strategy is vague; it does not stipulate that infrastructure must be in place before homes are built, only that a strategy must be provided. Failure to discourage car trips: SP 10's objective of reducing car dependency will not be achieved under LP 3. The plan would add thousands of residents to a town with limited local employment and services. Active-travel links and bus-priority lanes are commendable but will be of little practical use when most residents still commute to Bristol, Bath or beyond. The proposed improvements to the A 370 bus corridor and interchange facilities are aspirational and do not alleviate the issues caused by the influx of residents into Nailsea; there is no commitment from bus operators to increase service frequency, indeed bus services to and from	Scale back housing and incentivise employment: Reduce the number of dwellings allocated to Nailsea and Backwell to reflect infrastructure and environmental constraints. Consider alternative locations with better transport links or more brownfield capacity. Limit employment land to brownfield sites and existing vacant premises within or adjacent to the town centre. Infrastructure-first phasing: Strengthen the phasing strategy so that no significant housing development can commence until specific transport infrastructure (rail/road crossing, A 370 and B 3130 upgrades, station accessibility improvements) is funded, consented and programmed. Include binding triggers in Section 106 agreements. Reassess Green-Belt release: Avoid development on flood-prone or ecologically sensitive Green-Belt land. Retain Green-Belt boundaries around Jacklands Lake, Moorend Spout and Backwell Lake, and seek alternative, less ecologically sensitive sites, prioritising previously developed land. Review the viability of the Golden Rules: Require developers to provide evidence that delivering 50% affordable housing alongside substantial infrastructure obligations is viable. If viability cannot be demonstrated, adjust requirements, reduce housing numbers, or refuse planning permission. Integrate employment and services: Revise the employment strategy to support investment in Nailsea town centre (including but not limited to Crown Glass shopping centre), encourage re-use of vacant commercial units for co-working and light industrial uses, and phase employment land ahead of housing. This will reduce commuting distances and make active travel meaningful. Safeguard sites for schools and community facilities: Identify and allocate specific sites for the three primary schools and other community infrastructure in Schedule 1. Secure funding and timing commitments to ensure they are delivered in step with housing. Ensure ecological mitigation and flood management: LP 3 proposes contributions toward a new Nature Park and bat-habitat provision as compensation for the ecological impacts of developing Green-Belt land around Nailsea and Backwell. While mitigation and enhancement are important, the NPPF requires that harm to designated sites is avoided in the first instance. The areas earmarked for housing around Nailsea include low-lying meadows and rhynes that act as natural floodplains and support rich flora and fauna,		

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					Nailsea have recently been reduced. As a result, the policy will increase rather than discourage the number of car trips, contrary to the plan's vision for sustainable transport. Green-Belt release without exceptional circumstances: LP 3 requires release of land from the Bristol and Bath Green Belt to the north of Nailsea and east of Backwell. The policy cites the NPPF "Golden Rules"—50% affordable housing, infrastructure improvements, and new public green spaces—as justification. However, the NPPF states that Green-Belt boundaries should be altered only in exceptional circumstances when all other options have been exhausted. The council has not demonstrated that brownfield opportunities and higher-density development elsewhere (e.g. Weston-super-Mare, Portishead, Clevedon, Winscombe, Sandford, Long Ashton) cannot meet housing need. Furthermore, some of the land proposed for release is flood-prone (Jacklands Lake, Moorend Spout) and provides important ecological functions. Flood risk and environmental value are not exceptional circumstances; they are reasons to retain Green-Belt protection. Releasing flood-plain Green-Belt land conflicts with DP 9 (Flood risk) and SP 7 (Green Belt). Golden-Rules requirements may be unviable: The policy requires 50% affordable housing on each site (as per DP 43) and delivery of transport, recreation, leisure, health and environmental infrastructure. This high affordable-housing percentage, combined with expensive infrastructure obligations (road/rail crossings, schools, leisure facilities, nature park, wetland), may make schemes financially unviable. If developers argue for reduced contributions on viability grounds, the Golden Rules will not be met, undermining the rationale for Green-Belt release. The plan should evidence viability for each allocation. Employment land in the wrong place: LP 3 proposes around 6.1 ha of new employment land "to the east of Backwell and north of Nailsea" and states that new business developments should prioritise light industrial and office space. Locating employment on greenfield/Green-Belt land at the edge of the settlements, away from the town centre, contradicts DP 19's parking policies and SP 10's goal of reducing car trips. Workers would have to drive to peripheral business parks, increasing traffic on the constrained road network. Meanwhile, Nailsea's town centre has empty commercial units that could be repurposed and has recently approved the redesignation of commercial premises as residential with the result that significant sq footage of commercial office space has been lost forever.. The policy should instead prioritise employment within the existing urban area, aligned with mixed-use development. Schools and community infrastructure: LP 3 requires three new 420-place primary schools (plus contributions to secondary, Post-16, family-centre and SEND provision). While this acknowledges the need for education provision and infrastructure, there is no certainty over sites or funding. The policy expects one school to be provided on the Grove Farm scheme, with two more to the east of Backwell and	including protected bat species and a nearby SSSI. Building over these habitats would permanently damage them and increase flood risk. Creating a new nature park afterwards cannot replace the complexity and maturity of the existing ecosystem; it amounts to "offsetting" destruction rather than preventing it. A more sustainable and logical approach is to leave the existing rich natural environment intact and steer development to less sensitive locations. In this case, the best mitigation is avoidance: do not allocate flood-prone and ecologically valuable Green-Belt land for development. Tailor policies to local context: Revisit the Vision and strategic approach to acknowledge that Nailsea and Backwell cannot accommodate such a large share of growth. Policies should be adapted to local conditions rather than applying a standard growth model.		

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					south of Nailsea, but it does not safeguard sites or state who will deliver them. If school provision lags behind housing, families will need to travel elsewhere, increasing car journeys and undermining sustainable-transport aims. Leisure, ecology and wetland measures: Contributions to leisure facilities, a new Nature Park and a wetland on Nailsea Moors are positive but may dilute funding needed for transport. The Nature Park is intended to offset impacts on bat habitats, yet the large-scale development will still intrude on flight corridors and the foraging areas of protected species. The policy should ensure that ecological mitigation is secured before development commences and that it does not substitute for avoiding harm. One-size-fits-all approach and irrationality: The broader Vision and Strategic Priorities adopt a “one-size-fits-all” approach, assuming that the same growth model can be applied across North Somerset. Nailsea’s unique geography, flood-risk profile, constrained road network, protected ecology and limited town-centre services mean that the generic growth template is irrational here. By imposing large housing numbers and peripheral employment sites without resolving these constraints, LP 3 fails to demonstrate a rational basis for its strategy.			

Name: T Lamont-Smith **I.D:** 28492993

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Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	No	There has already been a ridiculously large increase in the number of houses in Backwell that the village is ill equipped to deal with. The proposed road is a complete fantasy as it will be underwater for parts of the year, and the crossing of the railway line will simply be prohibitively expensive to ever happen. There is no analysis of what would be required. There is no budget to build a crossing. Any road would likely face sustained public protests that would delay the delivery and increase costs of the road building. There is already a deficit in school places, health services, dentistry etc. The sheer volume of additional growth is completely unsustainable, and actually undeliverable in any realistic timeframe.			

Name: T Lynch **I.D:** 62827201

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Policy LP3: Strategic location: Nailsea and Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with	Unsure	Unsure	The proposed housing developments around Nailsea and Backwell are unsound. There are no plans for expansion of health provision. The present roads to and from Nailsea and Backwell are already vastly overstretched with considerable congestion and the proposed development will cause	The need for Backwell station to be compliant with the equality act 2010 will be far greater. I don't see any improvements for this in the planning proposals. There should not be any building on grade 1 agricultural land	The need for Backwell station to be compliant with the equality act 2010 will be far greater. I don't see any improvements for this in the planning proposals.	

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		national policy			further congestion on the already narrow roads. There has been no reliable planning for extra schools. The new developments will cause the loss of grade 1 agricultural land and the loss of a wildlife corridor. The loss of habitats for wildlife is vital for continuing the stability and the health of the ecosystem and these proposals will further erode wildlife habitats.			

Name: T Madge **I.D:** 62863233

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Grove Farm	No		Unsure	Unsure	I am writing to formally object to the proposed plan for an additional 1,000 new homes in the village of Backwell. This proposal is fundamentally flawed, unsustainable, and would cause irreparable harm to our community, infrastructure, and environment. The scale of this development is grossly disproportionate. It is unjustifiable that Backwell, a village, is being allocated a higher growth percentage (7% of the district's total) than established towns like Clevedon (2%). This approach is not strategic growth; it is the destabilisation of a community. Critical Lack of Infrastructure The existing infrastructure is already under immense strain and is incapable of supporting the current population, let alone thousands of new residents. • Services: There is already a deficit in school places, and the plan includes no tangible investment in health or leisure facilities to cope with such a dramatic population increase. • Transport: The existing A370 already suffers from significant congestion, particularly when a diversion is put in place from other key roads such as the M5. The railway station itself is not fit for purpose as a modern transport hub, lacking accessibility for those with mobility issues or families with young children. • Funding: The Infrastructure Delivery Plan is devoid of proper analysis, costings, or funding guarantees for the road and other essential services. The entire proposal rests on unfunded and undeliverable promises. Irreversible Environmental Damage The proposal directly contradicts national policy and would cause permanent environmental destruction. • Loss of Prime Agricultural Land: The development is planned on Grade 1 Agricultural Land, which is currently used for food production. This land is our best and most versatile, and only 7% of it remains in all of North Somerset. Government policy explicitly states we must protect such land to safeguard national food security. This plan recklessly ignores that directive. • Destruction of Wildlife Habitats: This development would destroy	While I have submitted a formal objection to the specific housing proposals for Backwell, I am writing separately to offer constructive suggestions for improving the Local Plan as a whole. A successful Local Plan should not be measured simply by the number of houses built, but by the quality, resilience, and sustainability of the communities it creates for generations to come. I believe the current draft of the plan is fundamentally flawed because it is housing-led, developer-focused, and places a disproportionate burden on village communities while sacrificing irreplaceable natural assets. I urge the council to re-evaluate its strategy and adopt a more responsible, forward-thinking approach built on the following four core principles: 1. Adopt a 'Brownfield First and Fair Share' Policy Instead of allocating development on vital greenfield and agricultural sites, the plan must mandate the prioritisation of all available previously developed land (brownfield sites) across the entire district. This approach revitalises town centres, utilises existing infrastructure, and protects our vital countryside and food security. This must be coupled with a "Fair Share" distribution model, where housing targets are allocated equitably across the district's towns and larger settlements based on their size, services, and brownfield capacity. This would end the unsustainable practice of overburdening individual villages. 2. Transition to an 'Infrastructure-Led' Development Model The current 'housing-led' approach, where homes are built with a vague promise that services will follow, must be reversed. The plan should stipulate that no large-scale development can be approved until fully-funded, legally-binding commitments for all essential infrastructure are in place.		

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					invaluable wildlife habitats, including foraging grounds for the rare Lesser and Greater Horseshoe Bats from the protected Brockley Maternity Roost (SSSI). In one of the most nature-depleted countries in the world, proceeding with such a destructive plan is unconscionable. Fundamentally Flawed Planning It threatens to overwhelm our services, destroy protected land and wildlife habitats, all without a sound or funded plan. I urge the council to reject this proposal in its entirety and protect the village of Backwell from this destructive overdevelopment.	This includes confirmed investment and timelines for new school places, GP surgeries, road improvements, and public transport services. This guarantees that growth is sustainable from day one and prevents the creation of isolated, underserved communities that place an impossible strain on existing public services. 3. Mandate Genuine Environmental Protection and Net Gain The plan must move beyond simple mitigation and actively enhance our natural environment. This should be achieved by: Formally protecting all Grade 1 and 2 agricultural land from development, citing national food security. Mandating a minimum 10% Biodiversity Net Gain for all new developments, forcing developers to leave our environment in a better state than they found it. Enforcing a strict ban on building on known floodplains, while investing in natural flood management schemes to protect the wider community. 4. Commit to Evidence-Based and Community-Led Planning To restore public trust and create a plan that works for everyone, the process must be transparent and collaborative. The council should commission independent, publicly available studies on housing need, traffic impact, and environmental capacity before sites are allocated. Furthermore, the process should move beyond simple consultation to active collaboration, using workshops and citizen panels to co-design the future of local areas. This ensures that development meets genuine local needs and gains community support. These principles are interconnected and form the basis of a truly sustainable development plan. By embracing this forward-thinking approach, the council can create a plan that not only meets housing needs but also strengthens our communities, protects our environment, and enhances our district for all its residents.		
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I am writing to formally object to the proposed plan for an additional 1,000 new homes in the village of Backwell. This proposal is fundamentally flawed, unsustainable, and would cause irreparable harm to our community, infrastructure, and environment. The scale of this development is grossly disproportionate. Backwell has already absorbed an approval for 800 new houses, representing a 40% increase to the village. The addition of another 1,000 homes constitutes severe overdevelopment. It is unjustifiable that Backwell, a village, is being allocated a higher growth percentage (7% of the district's total) than established towns like Clevedon (2%). This approach is not strategic growth; it is the destabilisation of a community. Critical Lack of Infrastructure The existing infrastructure is already under immense strain and is incapable of supporting the current population, let alone thousands of new residents.	While I have submitted a formal objection to the specific housing proposals for Backwell, I am writing separately to offer constructive suggestions for improving the Local Plan as a whole. A successful Local Plan should not be measured simply by the number of houses built, but by the quality, resilience, and sustainability of the communities it creates for generations to come. I believe the current draft of the plan is fundamentally flawed because it is housing-led, developer-focused, and places a disproportionate burden on village communities while sacrificing irreplaceable natural assets. I urge the council to re-evaluate its strategy and adopt a		

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					• Services: There is already a deficit in school places, and the plan includes no tangible investment in health or leisure facilities to cope with such a dramatic population increase. • Transport: The proposed new road will not alleviate congestion on key routes like Station Road. Furthermore, engineering a road across the railway line would be prohibitively expensive and is likely unfeasible. The railway station itself is not fit for purpose as a modern transport hub, lacking accessibility for those with mobility issues or families with young children. • Funding: The Infrastructure Delivery Plan is devoid of proper analysis, costings, or funding guarantees for the road and other essential services. The entire proposal rests on unfunded and undeliverable promises. Irreversible Environmental Damage The proposal directly contradicts national policy and would cause permanent environmental destruction. • Loss of Prime Agricultural Land: The development is planned on Grade 1 Agricultural Land, which is currently used for food production. This land is our best and most versatile, and only 7% of it remains in all of North Somerset. Government policy explicitly states we must protect such land to safeguard national food security. This plan recklessly ignores that directive. • Destruction of Wildlife Habitats: This development would destroy invaluable wildlife habitats, including foraging grounds for the rare Lesser and Greater Horseshoe Bats from the protected Brockley Maternity Roost (SSSI). In one of the most nature-depleted countries in the world, proceeding with such a destructive plan is unconscionable. Fundamentally Flawed Planning The proposal lacks the basic analysis required for a plan of this magnitude. There is no needs or viability analysis for 1,000 extra homes, nor is there any assessment of the impact on social cohesion. Furthermore, the plan creates a paradox regarding affordable housing: meeting the 50% requirement on Greenbelt land would reduce the developer's financial contributions needed for the very infrastructure this community desperately lacks. In summary, this plan is unsustainable, undeliverable, and dangerous. It threatens to overwhelm our services, destroy protected land and wildlife habitats, and increase flood risk, all without a sound or funded plan. I urge the council to reject this proposal in its entirety and protect the village of Backwell from this destructive overdevelopment.	more responsible, forward-thinking approach built on the following four core principles: 1. Adopt a 'Brownfield First and Fair Share' Policy Instead of allocating development on vital greenfield and agricultural sites, the plan must mandate the prioritisation of all available previously developed land (brownfield sites) across the entire district. This approach revitalises town centres, utilises existing infrastructure, and protects our vital countryside and food security. This must be coupled with a "Fair Share" distribution model, where housing targets are allocated equitably across the district's towns and larger settlements based on their size, services, and brownfield capacity. This would end the unsustainable practice of overburdening individual villages. 2. Transition to an 'Infrastructure-Led' Development Model The current 'housing-led' approach, where homes are built with a vague promise that services will follow, must be reversed. The plan should stipulate that no large-scale development can be approved until fully-funded, legally-binding commitments for all essential infrastructure are in place. This includes confirmed investment and timelines for new school places, GP surgeries, road improvements, and public transport services. This guarantees that growth is sustainable from day one and prevents the creation of isolated, underserved communities that place an impossible strain on existing public services. 3. Mandate Genuine Environmental Protection and Net Gain The plan must move beyond simple mitigation and actively enhance our natural environment. This should be achieved by: Formally protecting all Grade 1 and 2 agricultural land from development, citing national food security. Mandating a minimum 10% Biodiversity Net Gain for all new developments, forcing developers to leave our environment in a better state than they found it. Enforcing a strict ban on building on known floodplains, while investing in natural flood management schemes to protect the wider community. 4. Commit to Evidence-Based and Community-Led Planning To restore public trust and create a plan that works for everyone, the process must be transparent and collaborative. The council should commission independent, publicly available studies on housing need, traffic impact, and environmental capacity before sites are allocated. Furthermore, the process should move beyond simple consultation to active collaboration, using workshops and citizen panels to co-design the future of local areas. This ensures that development meets genuine local needs and gains community support. These principles are interconnected and form the basis of a		

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						truly sustainable development plan. By embracing this forward-thinking approach, the council can create a plan that not only meets housing needs but also strengthens our communities, protects our environment, and enhances our district for all its residents.		

Name: T Morley **I.D:** 39167969

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Land east of Backwell	No	• Justified • Consistent with national policy	No	No	East of Backwell site is Grade 1 agricultural land of which North Somerset only has 7 remaining. It is national policy not to build on Green Belt/quality agricultural land. I strongly oppose the 'East of Backwell' site in this Local Plan, especially given it is intended to be for 900 houses. Of course, I appreciate that there is a large number of housing being allocated for North Somerset and it has constraints for where to build. However, I feel that this site is not one that should be built on. I am concerned that this site is particularly unsuitable due to its classification as Grade 1 agricultural land – considered to be the best quality soil for agriculture and high crop yield. As there is only 7% of Grade 1 agricultural land remaining in North Somerset (as per the Agricultural Land Classification Map) I think that it would be a travesty to build on such prime quality land and its loss would be a detriment to food security, as well as being a popular area for walking. Indeed, the land has been consistently used over the years for crop grazing and appears to regularly have successful harvests. Land for farming appears to be reducing nationally due to development, and thus the very best and most versatile farmland should be kept for food security and to keep British farming going. In addition, the sheer number of houses suggested in this plan raises concern. We have seen expansion through new housing developments in Backwell already through the Colliers Gardens development and the new sites currently under construction off Rodney Road and Farleigh Fields. There has not been new infrastructure or services to compensate for this population increase. We know that Backwell will expand further due to the approved Grove Farm development, which would lead to a hugely disproportionate surge in population should this site also go ahead. A village of Backwell's size, with the services it currently has, will not be able to accommodate such growth – the schools would oversubscribe, and the GP and dentist services locally would struggle. I appreciate that nine hundred houses being taken off this plan would mean needing to allocate them elsewhere, but I feel that the above points, most notably the land quality, mean it should not be built East of Backwell.	The East of Backwell site should be removed from the plan.		

Name: T Nguyen **I.D:** 58586721

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	North Somerset Council (NSC) has not adequately considered the following matters in bringing forward these allocations: Reasonable alternatives: There appears to be insufficient assessment of alternative brownfield and/or less sensitive greenfield sites with materially lower ecological impacts, both within Portishead and across North Somerset. Optimising brownfield capacity: The opportunity to increase housing density on the proposed brownfield sites does not appear to have been fully explored. A robust "brownfield-first and optimise" approach could remove the need to allocate Tower Farm and Black Rock. Strategic ecological function: The strategic role of these sites in safeguarding the wider ecological network — including the protection of Weston Big Wood (SSSI) and the Gordano Valley green corridor — has not been properly evidenced or weighed in the site selection process. Green Belt purpose and history: Both areas were added to the Green Belt in the late 1980s, reflecting their high ecological value and contribution to the Green Belt's purposes. This context appears underplayed in the justification			

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					for release. Policy tests for Green Belt change: National policy permits Green Belt alterations only in exceptional circumstances. On the evidence presented, such circumstances have not been clearly demonstrated through a proportionate assessment of need, alternatives, and harm. In addition: Access constraints: Neither site appears capable of providing safe, suitable, and deliverable access without unacceptable impacts. Transport impacts and plan soundness: The likely cumulative transport effects are significant and, as presented, would be difficult to reconcile with national policy and the plan soundness tests. Without a clearer mitigation strategy and evidence base, these allocations risk being unsound on transport and deliverability grounds. Taken together, the above points suggest that the case for allocating Tower Farm and Black Rock has not been robustly made, particularly given the sensitivity of these Green Belt and ecologically strategic locations.			
Black Rock, north of Clevedon Road	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	North Somerset Council (NSC) has not adequately considered the following matters in bringing forward these allocations: Reasonable alternatives: There appears to be insufficient assessment of alternative brownfield and/or less sensitive greenfield sites with materially lower ecological impacts, both within Portishead and across North Somerset. Optimising brownfield capacity: The opportunity to increase housing density on the proposed brownfield sites does not appear to have been fully explored. A robust “brownfield-first and optimise” approach could remove the need to allocate Tower Farm and Black Rock. Strategic ecological function: The strategic role of these sites in safeguarding the wider ecological network — including the protection of Weston Big Wood (SSSI) and the Gordano Valley green corridor — has not been properly evidenced or weighed in the site selection process. Green Belt purpose and history: Both areas were added to the Green Belt in the late 1980s, reflecting their high ecological value and contribution to the Green Belt’s purposes. This context appears underplayed in the justification for release. Policy tests for Green Belt change: National policy permits Green Belt alterations only in exceptional circumstances. On the evidence presented, such circumstances have not been clearly demonstrated through a proportionate assessment of need, alternatives, and harm. In addition: Access constraints: Neither site appears capable of providing safe, suitable, and deliverable access without unacceptable impacts. Transport impacts and plan soundness: The likely cumulative transport effects are significant and, as presented, would be difficult to reconcile with national policy and the plan soundness tests. Without a clearer mitigation strategy and evidence base, these allocations risk being unsound on transport and deliverability grounds. Taken together, the above points suggest that the case for allocating Tower Farm and Black Rock has not been robustly made, particularly given the sensitivity of these Green Belt and ecologically strategic locations.			

Name: T Stock **I.D:** 28910369

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP10: Transport	No	• Justified • Effective	No	No	Climate change is a money making scam run by our establishment against the people to make us poorer and restrict of freedoms.	Stop all of your so called traffic calming measures, remove any furniture you've installed in the carriageways to block traffic from using that side of the carriageway, stop all future bus lanes that stop all other legally documented vehicles from using that carriageway, for instance the likes of Long Aston Bypass, bus lanes must only be allowed for a limited time of the day, a short time for the morning rush hour and again in the evening rush hour, also motorcycles must be allowed the use of bus lanes at all times. 20mph speed limits to be scrapped everywhere except for around schools at opening and closing times. Stop cyclists from using roads where there are cycle ways in the same area. Stop all future development of your illegal Low Traffic areas that stop vehicles from using roads, you are acting against the wishes of the majority of people that need to get from point A to point B in the shortest and safest way possible (reread the above comment of your so called traffic calming measures above). You're obviously operating an anti car and anti freedom of movement policy for the population where buses and even cyclists have rights of way over the people that are and have paid for the road infrastructure. You must reverse and remove your speed bumps and dangerous structures put up in the carriageways. You clearly need to be reminded you work for us and not the other way round especially when you ideas go against the public. Here's one that's make no sense whatsoever, Wansbrough Road obstructions in the carriageway to stop car's and people safety going about their business.	I disagree as the U.K. is now a two tier police state where unelected anti British people are actively going against the people.	

Name: T Walker **I.D:** 62865985

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	• Justified	Yes	Yes	The development of tower farm and black rock are not appropriate sites. They are both green belt sites and have been designated as such since the late 1980s due to their much ecological value. National planning policy only allows for de-designation in exceptional circumstances. These circumstances have not been demonstrated. Weston big wood is a SSSI and these developments will undoubtedly negatively affect the site through the course of the development and the change to the drainage characteristics of the site. In addition, there is far from adequate transport infrastructure planning to support the increased population of the are once the development was complete.			
Black Rock, north of Clevedon Road	No	• Justified	Yes	Yes	The development of tower farm and black rock are not appropriate sites. They are both green belt sites and have been designated as such since the late 1980s due to their much ecological value. National planning policy only allows for de-designation in exceptional circumstances. These circumstances have not been demonstrated. Weston big wood is a SSSI and these developments will undoubtedly negatively affect the site through the course of the development and the change to the drainage characteristics of the site. In addition, there is far from adequate transport infrastructure planning to support the increased population of the are once the development was complete.			

Name: Tabitha Lazell **I.D:** 62786337

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively	Unsure	Unsure	Backwell already has approval for 800 new homes, which is a 40% increase in the size of the village. Adding even more would amount to serious overdevelopment. The proposed road wouldn't properly help Nailsea's traffic issues or ease congestion on Station Road, Backwell			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
		prepared • Justified • Effective • Consistent with national policy			Common, or Chapel Hill. Trying to take the road under or over the railway would be extremely costly and may not even be realistically achievable. Even with the existing housing growth, we already have a shortage of school places and no new investment in healthcare or leisure facilities. Our current infrastructure simply can't cope with another 1,000 homes. Backwell has been allocated more housing than any other village in North Somerset, and a higher growth percentage than some towns. It's expected to take 7% of the district's entire housing allocation, compared with Clevedon's 2%. No needs assessment or viability study has been provided to justify building another 1,000 homes. Backwell isn't an employment centre, and most people here commute elsewhere for work. There has been no assessment of how this level of growth would affect social cohesion in the village. The land in question is Grade 1 Agricultural Land used for crops and grazing, and only 7% of this high-quality farmland remains in North Somerset. Government policy clearly states that we must protect the best and most versatile land to safeguard food security, yet these proposals go directly against that principle. The development would destroy important wildlife habitats and further damage biodiversity in a country that is already among the most nature-depleted in the world. The plans put the Brockley Maternity Roost and the SSSI at risk, where rare Lesser and Greater Horseshoe Bats rely on the surrounding land for feeding. The Infrastructure Delivery Plan contains no meaningful analysis, no proper costings, and no confirmed funding for the proposed road or supporting services. Backwell Common and nearby areas are already prone to flooding, which more housing would only make worse. The designation of this area as a strategic growth location raises serious concerns: loss of Green Belt and high-quality farmland, increased flood risk, changes to the area's character, and major doubts over whether the road can be funded or built in time to support the housing. Backwell Lake (the reservoir) and the surrounding fields—where the road and housing are planned—sit on a floodplain that floods regularly. Government policy requires 50% affordable housing on Green Belt land, but this significantly reduces the amount developers can contribute to essential infrastructure. The scale and speed of growth being proposed, along with the investment needed for infrastructure and services, is destabilising, unrealistic, and unsustainable. The train station is nowhere near adequate as a transport hub. It's not accessible for people with mobility issues and is very difficult for anyone travelling with young children.			

Name: Tamsin hockett **I.D:** 62831649

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell already has 800 new houses approved, a 40% increase for the village. These additional numbers would lead to complete overdevelopment. The proposed road would not effectively serve Nailsea's traffic or relieve congestion on Station Road, Backwell Common, or Chapel Hill. Engineering the road under or over the railway would be highly expensive. Despite the proposed increase, there is a deficit in school places and no investment in health services or leisure facilities. The lack of infrastructure and services cannot support another 1,000 houses. Backwell is allocated a higher number of houses than any other village in North Somerset, and even a higher growth percentage than towns. Backwell is expected to take 7% of the district's housing allocation, compared to Clevedon's 2%. There is no needs or viability analysis for an extra 1,000 houses. Backwell is not an employment hub, most residents commute No social cohesion impact assessment has been provided. The loss of Grade 1 Agricultural Land currently used for food crops and grazing is unacceptable. There is only 7% of this high-quality land left in the whole of North Somerset. Government policy states that "we must protect our best and most versatile land" to safeguard food security. The proposals contradict this policy and undermine food security. The Development would destroy valuable wildlife habitats and further harm biodiversity in one of the world's most nature-depleted countries. The proposals threaten the Brockley Maternity Roost and SSSI, with rare Lesser and Greater Horseshoe Bats relying on the land for food.			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					The Infrastructure Delivery Plan lacks analysis and costings, and there are no funding guarantees for the new road or services. Backwell Common and surrounding areas are prone to flooding, which would be aggravated by more housing. Concerns regarding the strategic growth location designation include the impact on the area's character, the loss of Greenbelt and high-quality agricultural land, the risk of flooding, and uncertainty over whether the road can be funded and delivered on time to support the proposed housing. Backwell Lake (Reservoir) and adjacent fields, where the new roads and housing is planned and are on a floodplain, which floods regularly. The sheer volume of growth with the required investment infrastructure and services over such a short period is destabilising, unsustainable and undeliverable. The railway station is not fit for purpose as a transport hub; it remains inaccessible for people with mobility issues and presents serious challenges when travelling with young children.			

Name: Tarmac Trading **I.D:** 29254593

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP12: Minerals	Yes		Yes	Yes			Tarmac Trading Limited believe that the Local Plan is Legally Compliant, Sound and has met the Duty to Cooperate with regard to the minerals related policies in the Plan, namely policies SP12, LP16, LP17, LP18, DP30 and DP31. The policies meet the legal requirements in terms of minerals by virtue of identifying sufficient potential construction aggregate resources during, and at the end of the Plan period and also in the safeguarding of working sites, ancillary operations and appropriate mineral resources. The minerals policies are sound as they have been positively prepared and are consistent with national policy in terms of allocations and safeguarding. The Duty to Cooperate has been met in the provision of crushed rock between North Somerset and South Gloucestershire.	
Policy LP16: Preferred Area for mineral working – land at Hyatts Wood Farm, south of Stancombe Quarry	Yes		Yes	Yes			Tarmac Trading Limited believe that the Local Plan is Legally Compliant, Sound and has met the Duty to Cooperate with regard to the minerals related policies in the Plan, namely policies SP12, LP16, LP17, LP18, DP30 and DP31. The policies meet the legal requirements in terms of minerals by virtue of identifying sufficient potential construction aggregate resources during, and at the end of the Plan period and also in the safeguarding of working sites, ancillary operations and appropriate mineral resources. The minerals policies are sound as they have been positively prepared and are consistent with national policy in terms of allocations and safeguarding. The Duty to Cooperate has been met in the provision of crushed rock between North Somerset and South Gloucestershire. Attached to the email is the Local Plan Pre-submission Representation Form Part A and Part B for each of the minerals policies.	
Policy LP17: Preferred Area of search for minerals working – land at Downside Farm, south of Freemans Quarry	Yes		Yes	Yes				
Policy LP18: Minerals Safeguarding Area for carboniferious limestone	Yes		Yes	Yes			Tarmac Trading Limited believe that the Local Plan is Legally Compliant, Sound and has met the Duty to Cooperate with regard to the minerals related policies in the Plan, namely policies SP12, LP16, LP17, LP18, DP30 and DP31.	

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
							The policies meet the legal requirements in terms of minerals by virtue of identifying sufficient potential construction aggregate resources during, and at the end of the Plan period and also in the safeguarding of working sites, ancillary operations and appropriate mineral resources. The minerals policies are sound as they have been positively prepared and are consistent with national policy in terms of allocations and safeguarding. The Duty to Cooperate has been met in the provision of crushed rock between North Somerset and South Gloucestershire.	
Policy DP30: Control of non-mineral development	Yes		Yes	Yes			This email is sent by Steve Lamb of Quarryplan (GB) Limited acting as agent for Tarmac Trading Limited, the operators of Stancombe Quarry, Stancombe Lane, Flax Bourton, Bristol, BS48 3QD. The email is in response to the current consultation exercise on the Pre-Submission version of the Local Plan. Tarmac Trading Limited believe that the Local Plan is Legally Compliant, Sound and has met the Duty to Cooperate with regard to the minerals related policies in the Plan, namely policies SP12, LP16, LP17, LP18, DP30 and DP31. The policies meet the legal requirements in terms of minerals by virtue of identifying sufficient potential construction aggregate resources during, and at the end of the Plan period and also in the safeguarding of working sites, ancillary operations and appropriate mineral resources. The minerals policies are sound as they have been positively prepared and are consistent with national policy in terms of allocations and safeguarding. The Duty to Cooperate has been met in the provision of crushed rock between North Somerset and South Gloucestershire. Attached to this email is the Local Plan Pre-Submission Representation Form Part A and Part B for each of the minerals policies.	
Policy DP31: Mineral working exploration, extraction and processing	Yes		Yes	Yes			This email is sent by Steve Lamb of Quarryplan (GB) Limited acting as agent for Tarmac Trading Limited, the operators of Stancombe Quarry, Stancombe Lane, Flax Bourton, Bristol, BS48 3QD. The email is in response to the current consultation exercise on the Pre-Submission version of the Local Plan. Tarmac Trading Limited believe that the Local Plan is Legally Compliant, Sound and has met the Duty to Cooperate with regard to the minerals related policies in the Plan, namely policies SP12, LP16, LP17, LP18, DP30 and DP31. The policies meet the legal requirements in terms of minerals by virtue of identifying sufficient potential construction aggregate resources during, and at the end of the Plan period and also in the safeguarding of working sites, ancillary operations and appropriate mineral resources. The minerals policies are sound as they have been positively prepared and are consistent with national policy in terms of allocations and safeguarding. The Duty to Cooperate has been met in the provision of crushed rock between North Somerset and South Gloucestershire. Attached to this email is the Local Plan Pre-Submission Representation Form Part A and Part B for each of the minerals policies.	

Name: Tatjana Arutyunova **I.D:** 58556033

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I strongly oppose the proposed development because it represents unsustainable overdevelopment that Backwell is simply not equipped to absorb. The village has already been allocated a disproportionately high level of housing growth compared with other areas in North Somerset, including nearby towns. Adding a further 1,000 homes would place excessive pressure on a community that has already seen a significant increase in approved housing. There is no credible evidence to show that this scale of growth is needed or viable. No needs assessment, viability study, or social cohesion impact assessment has been provided, and the Infrastructure Delivery Plan lacks clear analysis, costings, or guaranteed funding. Without certainty that roads, schools, healthcare, and other essential services can be delivered on time, the proposals are fundamentally undeliverable. Backwell already faces serious infrastructure shortfalls. School places are limited, health services are overstretched, and there has been no corresponding investment in leisure or community facilities. As Backwell is not an employment hub, most residents commute, meaning additional housing would worsen congestion rather than reduce it. The proposed new road would not effectively relieve existing traffic problems and would be extremely costly and potentially unfeasible due to the railway crossing. The plan would also cause significant environmental harm. It would result in the loss of Grade 1 agricultural land, which is among the most fertile and scarce in North Somerset, directly contradicting national policy to protect the best and most versatile land for food security. Wildlife habitats would be destroyed, biodiversity would be further degraded, and protected sites—including the Brockley Maternity Roost and SSSI—would be put at risk, threatening rare bat species that depend on the land for feeding. Flooding is another major concern. Backwell Common, the reservoir, and surrounding fields are already prone to regular flooding, and further development on floodplain land would significantly increase flood risk both locally and downstream. This creates long-term safety, environmental, and financial risks. The proposals would also fundamentally alter the character of the area, leading to the loss of Green Belt land and undermining the rural nature of Backwell. The sheer pace and scale of growth, without the necessary infrastructure and services in place, would be destabilising and unsustainable. Finally, the railway station is not suitable to function as a major transport hub. It remains inaccessible for people with mobility issues and presents practical difficulties for parents with young children, meaning the development would not deliver the promised transport benefits. Taken together, these issues demonstrate that the plan is overambitious, poorly evidenced, environmentally damaging, and unsustainable, and should not proceed.	This area is completely unsuitable for development and Backwell would not be able to cope with such a massive scale of development, given the other locations are already under construction		

Name: Taylor Wimpey (Elsbert Drive) **I.D:** 62888897

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Colliter's Way, Long Ashton	Yes		Yes	Unsure			These representations relate only to Taylor Wimpey's land interests at Land West of Elsbert Drive, Bristol (the "site"), and follow on from earlier representations made to the Preferred Options Plan, published in 2022 and the previous Reg. 19 consultation, published in 2023. The Site and Surroundings:	Elsbert Drive, Bristol - Appendix B - Land Ownership and Authority Plan.pdf

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
							The site comprises approximately 3.6 hectares of land to the west and north west of Elsbert Drive on the south western edge of Bristol. It is currently used for grazing / equestrian with vehicle / pedestrian access from the south west corner of Elsbert Drive. The site sits outside of but directly adjacent to the administrative area of NSC, falling within Bristol City Council's (BCC) administrative area. A Site Plan is submitted at Appendix A. The site is within the Green Belt, however, it is not subject to any other designations. It does not fall within or directly adjacent to a conservation area and it does not contain any listed buildings. None of the land is identified as falling within Flood Zone 2 or 3. Taylor Wimpey have been promoting the site for release from the Green Belt as a residential allocation dating back to 2016, and the site is the subject of a draft allocation for circa 150 dwellings as part of draft Policy DS11 (Development Allocations – South West Bristol) within the emerging Bristol Local Plan. A Statement of Common Ground (SoCG) between BCC, NSC and Taylor Wimpey has been signed as part of the Examination process, relating to matters of access and deliverability. The site is now the subject of a live outline planning application (BCC ref. 25/14175/P) for up to 100 dwellings. Turning to the current NSC consultation document, land to the west and north of the site in NSC's administrative area is under the control of Barratt Homes and Wring. Collectively known as 'Land north of Colliter's Way', the consultation document, across draft Policy LP9 (Extent of the Green Belt) and Schedule 1 (Large Sites for Residential Development), proposes to remove the land from the Green Belt and allocate it for circa 215 dwellings. A plan showing the approximate extent of the land ownerships and administrative boundaries is attached at Appendix B. The "site requirements" of the allocation, as listed in Schedule 1 of the consultation document are: • "No vehicular access off Colliters Way. • Active travel links to all local roads and public rights of way. • Active travel provision improvements to link into local facilities. • To coordinate development including the design, master planning, approach to vehicular access and delivery across the entire allocation, including that part proposed for residential development on adjoining land off Elsbert Drive within the Bristol City Council administrative area, to facilitate a comprehensive development with land in Bristol City. • Development must follow a heritage and landscape-led masterplan which preserves key views from heritage assets, taking account of recommendations in the Historic Environment Assessment (HEA). • Landscaped rural buffer required at edge of site to mitigate impact upon the wider borrowed landscape of Ashton Court and screen the development from wider viewpoints. • The design and layout must reflect the rural edge location and its historic character, with building heights not exceeding three storeys to minimise any impacts on wider landscape views and with the layout respecting key views out of the development such as to Ashton Court and St Michael Church in Dundry. • Design to incorporate features from the character of the local surrounding architecture and the non-designated heritage assets in the southwest corner of the site. A green landscape buffer will be required in this corner to protect the wider setting of these assets, as shown in the HEA." Comments to Consultation Document The purpose of these representations is two-fold. Firstly, setting administrative boundaries aside, Taylor Wimpey wish to reiterate their support for the principle of the release of Green Belt land on the south western edge of Bristol as a means of facilitating housing development to meet the housing need of the West of England. As set out in representations previously submitted to the Joint Spatial Plan, emerging BCC policy and emerging NSC policy, Taylor Wimpey believe that exceptional circumstances exist to merit Green Belt release, with land in this location making limited contribution to the purposes of the Green Belt, in what is a highly sustainable and accessible location for residential development. Secondly, Taylor Wimpey wish to comment on selected "site requirements" of the proposed Land north of Colliter's	Elsbert Drive, Bristol -Representations - Redacted.pdf Elsbert Drive, Bristol - Appendix A - Site Plan.pdf Elsbert Drive, Bristol - Appendix C - Access Technical Note.pdf

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							Way allocation. 1. “No vehicular access off Colliters Way.” Taylor Wimpey support this principle. As part of bringing their site forward, Taylor Wimpey are proposing an upgraded vehicular access from Elsbert Drive (highway) into their land. A note prepared by TPA (see Appendix C), which has also been the subject of secondary peer review from SLR, confirms that this would be an appropriate access point for servicing the site in isolation, or as a primary access serving the BCC and NSC draft allocations. As part of previous representations to the emerging BCC and NSC Local Plans and as part of their live outline planning application, Taylor Wimpey have committed to safeguarding land for access to the proposed NSC allocation, such that no vehicular access off Colliter’s Way is required. 2. “To coordinate development including the design, master planning, approach to vehicular access and delivery across the entire allocation, including that part proposed for residential development on adjoining land off Elsbert Drive within the Bristol City Council administrative area, to facilitate a comprehensive development with land in Bristol City.” Both emerging Plans’ allocations make reference to a need for cross boundary coordination. Although it may be subject to further changes, the current wording of the BCC allocation states “Development at Elsbert Drive should have regard to a detailed cross-boundary development framework or master plan prepared in consultation with the local community which addresses the layout and form of development, access and the relationship with surrounding areas.” It is important to note that neither of the emerging Plans requires or even infers that the process of coordination needs to be a formal one or indeed that it should be a Council-led exercise. Even if it did, this would not now be practical given that the BCC Plan is much further progressed than the NSC one, and Taylor Wimpey have now submitted an outline planning application. As a means of satisfying the draft Policy requirement, prior to the submission of their outline planning application, Taylor Wimpey produced a cross boundary framework masterplan for their land and the emerging draft allocation in North Somerset. This has had regard to masterplanning undertaken by Barratt and Wring, as well as feedback from Natural England and other consultees. Taylor Wimpey have also undertaken public consultation. Within the SoCG produced for Elsbert Drive, Taylor Wimpey confirm that they are “in control of all land necessary to bring their land forward” and BCC confirmed that Elsbert Drive “is suitable to come forward independently and/or in advance of adjacent development in North Somerset, as ‘Land adjacent to Elsbert Drive’ allocation is not reliant on land within North Somerset to be deliverable.” Within the same statement NSC confirmed that “the NSC allocation is not dependent upon the Bristol site coming forward, and vice versa”.	

Name: Taylor Wimpey (Land at Grove Farm and Burnt House Farm, Backwell) **I.D:** 62926081

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP1: Sustainable Development	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes			Our client supports the broad objectives set out in policy SP1 as positive indicators of sustainability and aspirational considerations for a broad range of development types. We are supportive of the use of the term ‘should’ in the policy’s opening wording, recognising that in some circumstances it may not be realistic to satisfy every point and that a balanced judgement will be required in every case	R002v4 NSLP Reg19 Reps TW Nov25.pdf
SP2: Climate Change	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes		Our client supports the general themes cited within policy SP2 but has significant concerns that certain expectations – such as the achieving of carbon net zero in all new buildings – are realistic or reasonable in the context of an electrical grid still in the process of decarbonisation. While the policy’s objectives are laudable, the measures and standards set out must be introduced in a proportionate manner to ensure the pursuit of the highest standards does not unduly delay or disrupt the delivery of the housing and other growth the area requires. This policy should therefore be modified to reflect the reality and establish suitable parameters so that development can be assessed at a reasonable point in time to ensure the promotion of climate change resilience and minimising adverse environmental impacts of development.		R002v4 NSLP Reg19 Reps TW Nov25.pdf
SP2: Climate Change	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes		Our client supports the general themes cited within policy SP2 but has significant concerns that certain expectations – such as the achieving of carbon net zero in all new buildings – are realistic or reasonable in the context of an electrical grid still in the process of decarbonisation. While the policy’s objectives are laudable, the measures and standards set out must be introduced in a proportionate manner to ensure the pursuit of the highest standards does not unduly delay or disrupt the delivery of the housing and other growth the area requires. This policy should therefore be modified to reflect the reality and establish suitable parameters so that development can be assessed at a reasonable point in time to ensure the promotion of climate change resilience and minimising adverse environmental impacts of development.		
SP3: Spatial strategy	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes		Our client is supportive of the broad spatial strategy outlined at policy SP3, in particular the presumption that residential development should be focused on those areas that are the most sustainably located in relation to employment, services and transport, including taking account of likely future scenarios. This does not however presuppose that residential development in other locations may not be suitable, based on the facts of each case		R002v4 NSLP Reg19 Reps TW Nov25.pdf

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP3: Spatial strategy	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes			Our client is supportive of the broad spatial strategy outlined at policy SP3, in particular the presumption that residential development should be focused on those areas that are the most sustainably located in relation to employment, services and transport, including taking account of likely future scenarios. This does not however presuppose that residential development in other locations may not be suitable, based on the facts of each case.	R002v4 NSLP Reg19 Reps TW Nov25.pdf
SP4: Placemaking	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes		Our client is broadly supportive of the general principles of good placemaking outlined within this policy, which are clear and which align with current national policy. The presumption that community consultation is undertaken for major development proposals is generally sound in principle, however the wording of this part of the policy should be amended to reflect that in certain circumstances widespread consultation may be disproportionate to the development proposal in question. The policy should entertain flexibility in this respect. We are concerned that the final component of the policy, relating to design review, is imprecise and leaves considerable uncertainty as to the circumstances in which design review will be expected or required. While recognising the role performed by the design review process, and the value it can add, as in the case of Grove Farm/Burnt House Farm, there should be no binding requirement on applicants to undertake this exercise and it instead remain at their own discretion, based on the circumstances of the case. A modification in this respect would continue to promote design review while ensuring that panels continue to ensure they offer value to applicants and the wider planning process, rather than becoming a further procedural formality whose usefulness may be diminished as a consequence.		R002v4 NSLP Reg19 Reps TW Nov25.pdf
SP7: Green Belt	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes		We would observe that this policy is broadly consistent with national policy in most respects, and does not seek to alter or extend the finite list of purposes of the Green Belt, which occupies a significant proportion of the North Somerset Authority area. Our client would however highlight that this policy seeks to extend this already sizeable swathe of the Bristol and Bath Green Belt around the western edges of Nailsea and Backwell, ostensibly 'to maintain the separation of Nailsea and Backwell and prevent further encroachment into the countryside'. National policy makes clear that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. In this instance, the rationale given essentially reiterates the stated purposes of the Green Belt without clear justification for particular circumstances. As both Nailsea and Backwell are subject of site allocations that would enable a new, rationalised and appropriately landscaped outer edge of both settlements adjoining the land proposed for extension as Green Belt, this additional policy designation is		R002v4 NSLP Reg19 Reps TW Nov25.pdf

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
						considered excessive and, in practice, overly protective against a perceived threat that may not exist. We would therefore recommend that this aspect of the policy is omitted		
SP8: Housing	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes			Our client is supportive of this policy, which inter alia recognises the inherent sustainability of Nailsea and Backwell through their identification for the second highest share of development (15%, behind only Weston-super-Mare as the area's principal settlement) as a suitable location for development at a strategic scale. We agree that the Council will be reliant on a mix of urban extensions, smaller urban sites, new strategic development locations such as Banwell and Woodspring, together with generally smaller village and rural sites to create a diversified and resilient source of housing that provides the varied accommodation required across North Somerset	R002v4 NSLP Reg19 Reps TW Nov25.pdf
SP11: Historic and natural environment	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes		We would observe that this policy captures a broad range of objectives, including landscape, heritage, ecology, green and blue infrastructure together with settlement identity and strategic gaps. In respect of the latter, it is noted that this is, in its own terms, 'strategic' in nature and, like the Green Belt, not for the purposes of highlighting or assessing landscape or other character or quality; it is simply a tool for resisting development. This should therefore be omitted from the policy as it unduly conflates specific characteristics with spatial planning initiatives. It is noted that the policy seeks to 'protect the best and most versatile agricultural land' and this objective is supported as consistent with national planning policy. It would not be reasonable or appropriate to go beyond this in terms of unduly restricting development in areas of higher agricultural quality, however, given the need to balance the objective of protecting BMV land with securing the right development in the right places, with associated technical requirements		R002v4 NSLP Reg19 Reps TW Nov25.pdf
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes			Our client welcomes the reinstatement of Policy LP3 and the selection of Nailsea and Backwell as a strategic focus for development, given the significant challenges presented in terms of satisfying the need for new homes and the inherent sustainability of both settlements in terms of local employment, services and transport. Notably, the policy highlights, inter alia, the desirability of promoting active travel, including the extension of the Festival Way cycleway, the provision of both land and funding for new education facilities, other leisure facilities and the delivery of green infrastructure including mitigation and enhancement for protected species.	R002v4 NSLP Reg19 Reps TW Nov25.pdf
Grove Farm	No	• Positively prepared • Justified • Effective	Yes	Yes			Having regard to Schedule 1, it is noted that the estimated capacity of the component identified as 'Grove Farm, Backwell', correlating to our client's interest at Grove Farm and Burnt House Farm is, at 515no. dwellings, the same as that of the application for Outline	R002v4 NSLP Reg19 Reps TW Nov25.pdf

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
		• Consistent with national policy					planning permission subject of a resolution for approval and to be issued shortly upon completion of the legal Agreement. This is therefore a realistic and evidenced figure, having regard to the submission material, which shows how an efficient layout may be achieved while delivering significant amounts of public open space, strategic landscaping, ecological mitigation, sustainable drainage and supporting infrastructure.	

Name: Taylor Wimpey (Woodspring) **I.D:** 63005121

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SP7: Green Belt	No	• Consistent with national policy	Yes	Yes	Summary of Representation • Taylor Wimpey supports the release of land from the Green Belt in North Somerset, agreeing that exceptional circumstances exist due to insufficient non-Green Belt land to meet local housing needs, making such release necessary, justified, and sustainable. • The main objection is to the blanket application of the 'Golden Rules' for Green Belt development as these should not automatically apply to allocated sites, as strict requirements could threaten development viability. • Amended wording for Policy SP7 is proposed to align with national policy. This representation has been submitted by Savills on behalf of Taylor Wimpey. Taylor Wimpey has significant land interests in North Somerset including a majority control of the land proposed for release of land from the Green Belt and allocation as a Strategic Location at Woodspring. Taylor Wimpey strongly support the conclusion that exceptional circumstances exist which support the release of land from the Green Belt in North Somerset. Our detailed explanation for this is contained in Section B of our representations to Policy LP2. In summary, there is insufficient suitably and sustainably located non-Green Belt land to meet the development needs of the authority area. Releasing land from the Green Belt will therefore enable the Council to meet it's housing needs in full on land which is justified, developable and sustainable. The only objection we have to Policy SP7 is the blanket reference to the 'Golden Rules'. The 'Golden Rules' should certainly apply to any non-allocated sites which come forward once the Local Plan has been adopted, however, for allocated sites which are inherently therefore known and understood at this stage, it is important to have regard to the requirements of the policy in determining the extent to which the Golden Rules apply. There may, for example, be instances where the cumulative requirements of policy placed on a proposed allocation could have such a negative impact on development viability that it would render a site undeliverable. To understand how this should operate it is helpful to highlight the relevant paragraphs from the Framework. Paragraphs 67 and 68 of the Framework state that: "As part of the 'Golden Rules' for Green Belt development set out in paragraphs 156-157 of this Framework, a specific affordable housing requirement (or requirements) should be set for major development involving the provision of housing, either on land which is proposed to be released from the Green Belt or which may be permitted on land within	Proposed Revised Policy Wording New residential development will only be permitted on land released from the Green Belt, as defined on the Policies Map, where it is demonstrated how the development meets the 'Golden Rules' as set out in the NPPF, unless this would make the development of these sites unviable (when tested in accordance with national planning practice guidance on viability).		SP7.pdf

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					the Green Belt. This requirement should: a) be set at a higher level than that which would otherwise apply to land which is not within or proposed to be released from the Green Belt; and b) require at least 50% of the housing to be affordable, unless this would make the development of these sites unviable (when tested in accordance with national planning practice guidance on viability). The affordable housing requirement for land within or released from the Green Belt may be set as a single rate or be set at differential rates, subject to the criteria above." [emphasis added]. Paragraph 156, which sets out the 'Golden Rules', then confirms that the affordable housing provision should be consistent with the policy plan where that policy has been produced in accordance with Paragraphs 67-68 of the Framework. It is not therefore the case that all land released from the Green Belt through the plan-making process must deliver 50% affordable housing. The viability testing of emerging allocations is crucial and, where necessary and appropriate, differential rates for sites should be set to respond to the evidence on viability. We therefore propose a change to that paragraph of the policy which brings it into line with the Framework; a change which is necessary for soundness in order to ensure consistency with national policy. Proposed Revised Policy Wording New residential development will only be permitted on land released from the Green Belt, as defined on the Policies Map, where it is demonstrated how the development meets the 'Golden Rules' as set out in the NPPF, unless this would make the development of these sites unviable (when tested in accordance with national planning practice guidance on viability).			
Policy LP2: Strategic location: Woodspring (south west of Bristol)	No	• Effective	Yes	Yes	Summary of Representation • Woodspring is a justified, deliverable, and sustainable location for strategic development which would deliver a number of significant public benefits. • Taylor Wimpey supports the allocation in principle but seeks amendments to policy wording to ensure soundness and deliverability. • The Sustainability Appraisal (SA), Spatial Strategy, Site Selection and Capacity Paper, and Green Belt Background Paper, which collectively endorse Woodspring as a justified location. • Woodspring is deliverable and developable strategic location. • Woodspring is sustainable strategic location when the 'policy on' proposals for the site are assessed against the objectives of the Sustainability Appraisal. • The Council's Green Belt Review provides clear justification for releasing Woodspring from the Green Belt due to exceptional circumstances. • Despite the in principle support, Taylor Wimpey has objections to the following elements of Policy LP2: - Affordable Housing: Careful consideration needs to be given to the viability of development alongside the comprehensive package of infrastructure sought. - Comprehensive Development: Taylor Wimpey supports comprehensive masterplanning but objects to requiring all parties to "agree" the masterplan, as this could create a veto	Please see attachment for full details and marked up copy of proposed amendments to Policy LP2.		LP2.pdf

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					and delay delivery. A more flexible approach is proposed. - Employment Land: Taylor Wimpey objects to the requirement for 10 ha of employment land, due to the lack of evidence and potential conflict with housing delivery priorities. - Education: Taylor Wimpey supports on-site provision but objects to specifying the number of schools in policy; a needs-based, flexible approach should be preferred instead. - Open Space: Taylor Wimpey supports open space provision but requests policy specify community use agreements for school sports facilities. - Heritage: Objects to policy wording that seeks to “avoid all harm” to heritage assets, proposing alignment with national policy that allows for “less than substantial harm” to be weighed against public benefits. - Gypsy and Traveller Accommodation: Objects to the requirement for 18 pitches on-site, arguing the need is better met at existing sites and that alternative locations have been dismissed without sound justification. • Changes are proposed to the draft Policy which address each of the objections. Please see attachment for full representations and proposed modifications.			
Policy DP44: Gypsies, Travellers and Travelling Showpeople.	No	• Justified	Yes	Yes	Summary of Representation - Taylor Wimpey objects to Policy DP44’s requirement for 18 on-site pitches for Gypsies, Travellers, and Travelling Showpeople at the Woodspring Strategic Allocation, on the basis this is not justified. - Alternative sites put forward through the ‘Call for Sites’ which are closer to where the need arises were dismissed without sound reason. - The Local Plan should allocate additional sites put forward through the ‘Call for Sites’ and remove the Woodspring on-site provision requirement. This representation has been submitted by Savills on behalf of Taylor Wimpey. Taylor Wimpey has significant land interests in North Somerset including a majority control of the land proposed for release of land from the Green Belt and allocation as a Strategic Location at Woodspring. Whilst Taylor Wimpey support the principle of the allocation, there are policies of the Local Plan which are not supported and not considered to be sound. One such policy is DP44. In our representation to Policy LP2 we explain why we do not consider that the distribution of the Gypsies, Travellers and Travelling Showpeople (GTTS) pitch provision proposed for North Somerset is sound. Our principal objection is that the requirement for 18 pitches on-site is not justified and that the need is better met close to existing sites on alternative land that has been dismissed without sound justification. In so doing a detailed critique of the evidence base including the Gypsies, Travellers and Travelling Show People Background Paper (October 2025) (GTTSBP) and 'Call for Sites' (2023) process is provided* (see attached document LP2). This leads to the conclusion that the authority appears to have included a requirement for the two large strategic locations to incorporate significant gypsy and traveller pitch provision on site without any regard to the appropriateness of the locations or whether they will meet the identified need. And so doing, it has disregarded land opportunities put forward through the call for sites process for unjustified and spurious reasons. The evidence presented in the GTTSBP is quite clear about the location of the need and	Proposed Revised Policy Wording Specific changes are not proposed to this policy as we consider that the further assessment work is required by the Council to evaluation and allocate the most suitable. The changes required in order to make the policy sound are: • the allocation of additional sites put forward through the ‘Call for Sites’ to meet the identified need for GTTS pitch provision; • the deletion or adaptation of the third paragraph to remove reference to the provision of sites as part of the delivery within the Woodspring Strategic Location.		DP44.pdf LP2.pdf

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					demonstrates that deliverable sites have been put forward in the locations where the need exists. Rather than shoehorn the provision of gypsy and traveller accommodation into a wider strategic allocation, the alternative locations put forward for this use should be allocated to meet the need. We do not repeat this case in full here but it is necessary for consistency to also propose revised wording for Policy DP44 and Schedule 8 of the Local Plan Accordingly. Proposed Revised Policy Wording Specific changes are not proposed to this policy as we consider that the further assessment work is required by the Council to evaluation and allocate the most suitable. The changes required in order to make the policy sound are: • the allocation of additional sites put forward through the ‘Call for Sites’ to meet the identified need for GTTS pitch provision; • the deletion or adaptation of the third paragraph to remove reference to the provision of sites as part of the delivery within the Woodspring Strategic Location. *critique of the evidence base including the Gypsies, Travellers and Travelling Show People Background Paper (October 2025) (GTTSBP) and 'Call for Sites' (2023) is provided below - from paragraphs 85-97 in attached document LP2 (see attached document for emphasis added): • The policy requires the provision of a minimum of 18 gypsy and traveller pitches within the site or their provision offsite in a form which is financially supported by the development. • The evidence base which purports to support this requirement is contained in the Gypsies, Travellers and Travelling Show People Background Paper (October 2025) (GTTSBP). This Paper explains how the level of need has been calculated and the decisions which have been taken in determining how this need will be accommodated. • Our principal objections are twofold: - First, contrary to the evidence of the GTTSBP, there simply seems to be an assumption that the proposed strategic allocations at Wolvershill and Woodspring are appropriate and desirable locations for gypsy and traveller pitches; and - Second, a number of the site options put forward by landowners to accommodate that need and which are well located according to the GTTSBP have been dismissed for no sound reason. Whether Woodspring is a suitable location for Gypsy and traveller accommodation: The GTTSBP states very clearly at paragraph 4.5 that: - "The provision of gypsy and traveller sites should be in locations which are going to meet the identified need. A large proportion of current and future need arises from the existing Moreland Park site located off the A370 between Congresbury and Hewish. The owner of this site, through the pitch delivery assessment, has indicated that they would be able to expand the existing site onto land to the north to accommodate some of the need arising from the existing site. Additionally, the owners of the existing site at Heathfield Park (which is adjacent to Moreland Park) indicated that they could accommodate the need arriving from this site by expanding to the west." [emphasis added] • The advice in the GTTSBP regarding the location of future pitches is unambiguous and yet it appears to have been disregarded in the emerging policies of the Local			

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					Plan. •The existing sites at Heathfield Park and Moreland Park are some distance from the edge of Bristol and the strategic allocation at Woodspring. Furthermore, since the existing sites are where the need arises, it appears to make eminent sense to expand these sites in order to meet future need rather than identify an entirely new and unconnected location for gypsy and traveller pitch provision. Alternative Locations: • Appendix 2 of the GTTSBP contains a schedule which assesses the proposed sites put forward for gypsy and traveller accommodation through the 2023 'call for sites' process. These are sites on which the landowners are proactively seeking to secure an allocation for new pitches to meet the identified need and which it is reasonable to assume are therefore deliverable should an allocation be forthcoming. • The reasons given in the assessment for dismissing a number of those sites put forward are not sound and robust. For example, the site referred to as 'Land adjacent to Heathfield Park, Hewish' is adjacent to the existing Moorland Park site and therefore in precisely the most appropriate location to meet need according to the GTTSBP, however, it has been dismissed on the basis that the site is “too large” to be considered suitable. Even if it was reasonable conclude that a site was “too large”, then there is no justification offered for not proposing the allocation of part of the site as opposed to the whole area put forward. • Notwithstanding, part of this land was the subject of a recent planning application (24/P/0143/FUL) for 10 pitches. Whilst the application was refused by the planning committee, this was contrary to the advice of officers who had recommended approval. The application material submitted demonstrates that at least part of this site is therefore suitable for the intended use. • A further site referred to as Badgers Path Stables, Currells Lane, Felton was promoted for 27 pitches and again the assessment of the site concluded that this was “too large” to be considered suitable. Once again, no consideration has been given to whether a part of the site would be appropriate, if indeed 27 pitches is inherently objectionable simply due to its scale. • In addition to the sites assessed, there has been a further planning application submitted for a site known as ‘Land Opposite and to the East of the Full Quant, off Bristol Road, Hewish’. This is not one of the sites which was put forward through the call for sites process but bearing in mind the relatively recent application it would have made sense to incorporate it into the assessment. Whilst the application was rejected by the Council, this was again contrary to the advice of officers who had recommended that the application be approved. Conclusion • In conclusion, the authority appears to have included a requirement for the two large strategic locations to incorporate significant gypsy and traveller pitch provision on site without any regard to the appropriateness of the locations or whether they will meet the identified need. And so doing, it has disregarded land opportunities put forward through the call for sites process for unjustified and spurious reasons. • The evidence presented in the GTTSBP is quite clear about the location of the need and demonstrates that deliverable sites have been put forward in the locations where the need exists. Rather than shoehorn the provision of gypsy and traveller accommodation into a wider strategic allocation, the alternative locations put forward for this use should be allocated to meet the need.			

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Policy DP52: Protection of open space and recreation	No	• Effective	Yes	Yes	These representations have been prepared and submitted by Savills on behalf of Taylor Wimpey. Taylor Wimpey support the overarching intent of Policy DP52 that aims to protect open spaces and recreational land from development unless it can be demonstrated that the space is surplus to requirements, replaced by equivalent or better provision, or the development delivers alternative recreational benefits that outweigh the loss. However, the policy as currently drafted lacks clarity regarding its scope and application. To ensure internal consistency within the Local Plan, draft Policy DP52 should explicitly state that it applies only to non-allocated sites. Without this clarification, Policy DP52 conflicts with site-specific allocation policies including Policy LP2 for Woodspring (a part of which is currently Woodspring Golf Course), which has been tested and justified through the plan-making process. A simple amendment to Policy DP52 could be made so that its protection does not apply to sites allocated for development in the Local Plan. This can be achieved by adding an explicit exemption clause in Policy DP52 wording: ‘This policy applies to all existing open spaces and recreational areas unless they are specifically allocated for development within this Local Plan.’ By incorporating the proposed exemption into draft Policy DP52, the policy would eliminate any direct conflict with strategic allocations, such as Woodspring. This amendment provides clarity and ensures that the policy does not compromise the delivery of allocated development sites, while continuing to fulfil its overarching purpose of safeguarding non-allocated open spaces and recreational land.	A simple amendment to Policy DP52 could be made so that its protection does not apply to sites allocated for development in the Local Plan. This can be achieved by adding an explicit exemption clause in Policy DP52 wording: ‘This policy applies to all existing open spaces and recreational areas unless they are specifically allocated for development within this Local Plan.’		DP52.pdf

Name: Taylor Wimpey (Youngwood Lane, Nailsea) **I.D:** 21579777

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP1: Sustainable Development	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes			Policy SP1: Sustainable Development Our client supports the broad objectives set out in policy SP1 as positive indicators of sustainability and aspirational considerations for a broad range of development types. We are supportive of the use of the term ‘should’ in the policy’s opening wording, recognising that in some circumstances it may not be realistic to satisfy every point and that a balanced judgement will be required in every case	R002v4_NSLP_Reg19_TWBristol.Dec25.pdf
SP2: Climate Change	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	Policy SP2: Climate Change Our client supports the general themes cited within policy SP2 but has significant concerns that certain expectations – such as the achieving of carbon net zero in all new buildings – are realistic or reasonable in the context of an electrical grid still in the process of decarbonisation. While the policy’s objectives are laudable, the measures and standards set out must	This policy should be modified to reflect the reality and establish suitable parameters so that development can be assessed at a reasonable point in time to ensure the promotion of climate change resilience and minimising adverse environmental impacts of development.		R002v4_NSLP_Reg19_TWBristol.Dec25.pdf

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					be introduced in a proportionate manner to ensure the pursuit of the highest standards does not unduly delay or disrupt the delivery of the housing and other growth the area requires. This policy should therefore be modified to reflect the reality and establish suitable parameters so that development can be assessed at a reasonable point in time to ensure the promotion of climate change resilience and minimising adverse environmental impacts of development.			
SP3: Spatial strategy	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes			Policy SP3: Spatial Strategy Our client is supportive of the broad spatial strategy outlined at policy SP3, in particular the presumption that residential development should be focused on those areas such as Nailsea that are the most sustainably located in relation to employment, services and transport, including taking account of likely future scenarios. This does not, however, presuppose that residential development in other locations may not be suitable, based on the facts of each case, noting in particular the need for smaller settlements to remain viable and vital places to live.	R002v4_NSLP_Reg19_TWBristol.Dec25.pdf
SP4: Placemaking	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	Our client is broadly supportive of the general principles of good placemaking outlined within this policy, which are clear and which align with current national policy. The presumption that community consultation is undertaken for major development proposals is generally sound in principle, however the wording of this part of the policy should be amended to reflect that in certain circumstances widespread consultation may be disproportionate to the development proposal in question. The policy should entertain flexibility in this respect. We are concerned that the final component of the policy, relating to design review, is imprecise and leaves considerable uncertainty as to the circumstances in which design review will be expected or required. While recognising the role performed by the design review process, and the value it can add, there should be no binding requirement on applicants to undertake this exercise and it instead remain at their own discretion, based on the circumstances of the case. For instance,	While recognising the role performed by the design review process, and the value it can add, there should be no binding requirement on applicants to undertake this exercise and it instead remain at their own discretion, based on the circumstances of the case. For instance, where a site forms a logical extension of a successful recent development this may serve as a template without the need for further external design intervention. A modification in this respect would continue to promote design review while ensuring that panels continue to ensure they offer value to applicants and the wider planning process, rather than becoming a further procedural formality whose usefulness may be diminished as a consequence.		R002v4_NSLP_Reg19_TWBristol.Dec25.pdf

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					where a site forms a logical extension of a successful recent development this may serve as a template without the need for further external design intervention. A modification in this respect would continue to promote design review while ensuring that panels continue to ensure they offer value to applicants and the wider planning process, rather than becoming a further procedural formality whose usefulness may be diminished as a consequence.			
SP5: Towns	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes			Our client is supportive of this policy, which reflects the proposed settlement hierarchy and the presumption that the greatest levels of growth should be focused on the most sustainable settlements alongside the strategic new allocations. In particular, our client notes Nailsea's identification as one of the four main towns and agrees that its inherent sustainability is such that it should be a significant target for growth over the plan period. The associated policy should therefore positively receive all opportunities for new homes to be provided at such locations, where accessibility to jobs, transport and services is greatest. If adopted, it is recommended that this policy carries a presumption that settlement boundaries shall be frequently and routinely reviewed to ensure alignment development commitments and other changes 'on the ground' to ensure they remain up to date.	R002v4_NSLP_Reg19_TWBristol.Dec25.pdf
SP6: Villages and rural areas	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	This policy as currently drafted strictly controls the distribution of housing at villages, limiting this to land within settlement boundaries save for in exceptional circumstances, and in this respect the policy differs considerably from its adopted equivalent, CS32. The success of this policy from a strategic perspective therefore depends heavily on ensuring that larger allocations at the principal settlements within the authority area are sufficient, effective and deliverable, so that new homes will come forward promptly over the plan period.			R002v4_NSLP_Reg19_TWBristol.Dec25.pdf
SP7: Green Belt	No	• Positively prepared	Yes	Yes	Policy SP7: Green Belt Our client is supportive of the Council's willingness to meaningfully review Green Belt release in general given its varying	As both Nailsea and Backwell are subject of site allocations that would enable a new, rationalised and appropriately		R002v4_NSLP_Reg19_TWBristol.Dec25.pdf

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		• Justified • Effective • Consistent with national policy			quality and the acute need for new homes, and of the general proposition of additional Green Belt release to achieve a sufficient supply of new homes in line with the national standard method and in the most sustainable locations. The proposed extension of the Green Belt around Nailsea and Backwell is, however, in our client's view unjustified. Our client would highlight that this policy seeks to extend this already sizeable swathe of the Bristol and Bath Green Belt around the western edges of Nailsea and Backwell, ostensibly 'to maintain the separation of Nailsea and Backwell and prevent further encroachment into the countryside'. National policy makes clear that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. In this instance, the rationale given essentially reiterates the stated purposes of the Green Belt without clear justification for particular circumstances. As both Nailsea and Backwell are subject of site allocations that would enable a new, rationalised and appropriately landscaped outer edge of both settlements adjoining the land proposed for extension as Green Belt, this additional policy designation is considered excessive and, in practice, overly protective against a perceived threat that may not exist. We would therefore recommend that this aspect of the policy is omitted.	landscaped outer edge of both settlements adjoining the land proposed for extension as Green Belt, this additional policy designation is considered excessive and, in practice, overly protective against a perceived threat that may not exist. We would therefore recommend that this aspect of the policy is omitted.		
SP8: Housing	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes			Policy SP8: Housing Our client is supportive of this policy, which inter alia recognises the inherent sustainability of Nailsea through its identification in the second tier of settlements, behind only Weston⛛super-Mare as the area's principal settlement, as a suitable location for development at a strategic scale. It is essential, in our view, that such strategic development locations are identified in order that housing, together with necessary supporting infrastructure, can be submitted promptly and at scale given the considerable need within the authority area. Targeting the most sustainable locations, where infrastructure such as rail	R002v4_NSLP_Reg19_TWBristol.Dec25.pdf

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							connections are already in situ, offers the optimal means of expediting delivery and building on the vitality and viability of existing communities. Notwithstanding, we agree that the Council will be reliant on a mix of urban extensions, smaller urban sites, new strategic development locations such as Nailsea and Backwell, together with generally smaller village and rural sites to create a diversified and resilient source of housing that provides the varied accommodation required across North Somerset. Alongside this strategy, it is critical that the Local Plan supports the bringing forward of urban land where available, maximising the efficient use of land for new homes given the challenges for securing a sufficient supply of housing.given the challenges for securing a sufficient supply of housing. urban land where available, maximising the efficient use of land for new homes given the challenges for securing a sufficient supply of housing.	
SP11: Historic and natural environment	No	• Positively prepared • Justified • Effective • Consistent with national policy			Policy SP11: Historic and Natural Environment We would observe that this policy captures a broad range of objectives, including landscape, heritage, ecology, green and blue infrastructure together with settlement identity and strategic gaps. In respect of the latter, it is noted that this is, in its own terms, 'strategic' in nature and, like the Green Belt, not for the purposes of highlighting or assessing landscape or other character or quality; it is simply a tool for resisting development. This should therefore be omitted from the policy as it unduly conflates specific characteristics with spatial planning initiatives. It is noted that the policy seeks to 'protect the best and most versatile agricultural land' and this objective is supported as consistent with national planning policy. It would not be reasonable or appropriate to go beyond this in terms of unduly restricting development in areas of higher agricultural quality, however, given the need to balance the objective of protecting BMV land with securing the right development in the right places, with associated technical requirements.	Strategic gaps are 'strategic' in nature and, like the Green Belt, not for the purposes of highlighting or assessing landscape or other character or quality; it is simply a tool for resisting development. This should therefore be omitted from the policy as it unduly conflates specific characteristics with spatial planning initiatives.		R002v4_NSLP_Reg19_TWBristol.Dec25.pdf

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Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes			Policy LP3: Strategic Location: Nailsea and Backwell Our client welcomes the effective reinstatement of Policy LP3 and the identification of Nailsea and Backwell as a strategic focus for development, given the significant challenges presented in terms of satisfying the need for new homes and the inherent sustainability of both settlements in terms of local employment, services and transport. The inclusion of our client's land at Youngwood Lane, Nailsea, is complementary to the strategic level of growth already underway southwest of the settlement, forming a logical and integrated extension of the Netherton Wood Lane development to the west and consolidating the urban envelope within appropriately defined parameters and coordinated supporting infrastructure	R002v4_NSLP_Reg19_TWBristol.Dec25.pdf
Policy LP5: Housing, employment and mixed use allocations							Policy LP5: Housing and Employment Allocations Our client is supportive of the identification of sites able to accommodate 10 no. or more dwellings as allocations under the emerging plan. With tightly drawn settlement boundaries, it is considered unlikely that a great number of 'windfall' sites of any larger size will be found.	R002v4_NSLP_Reg19_TWBristol.Dec25.pdf
Policy LP7: Settlement boundaries							Policy LP7: Settlement Boundaries Our client supports the principle of draft policy LP7 insomuch as it provides clarity the development will be deemed acceptable as a matter of principle within the settlement boundaries. Mindful that such boundaries are generally tightly drawn, however, the policy however does reimpress the importance of ensuring a sufficient supply of deliverable housing allocations across the plan period to ensure the authority meets and exceeds the minimum number of new homes required.	R002v4_NSLP_Reg19_TWBristol.Dec25.pdf
Policy LP9: Extent of the Green Belt							Policy LP9: Extent of the Green Belt Our client is supportive in principle of the Council's timely review and the proposed release of land from the Green Belt elsewhere in the authority	R002v4_NSLP_Reg19_TWBristol.Dec25.pdf

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							area, in order to facilitate residential development. Much of this land represents ‘Grey Belt’ and in any event does not contribute strongly to any of the five purposes of Green Belt designation, such that it should not remain part of the Green Belt in any case.	
Policy DP6: Net zero construction	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	Policy DP6: Net Zero Construction In our client’s previous representations on the Regulation 19 draft policies, it was identified that the proposed approach was contrary to national policy. The Council has not provided any additional evidence since the last consultation to demonstrate exceptional circumstances justifying that this policy is appropriate for inclusion in the draft Local Plan. Therefore, it remains unfeasible to include the policy without further supporting evidence. The Written Ministerial Statement Planning: Local Energy Efficiency Standards - 13th December 2023 informed councils that the government expects examiners to reject local plans that go beyond current national policy and legislative provisions. This has recently been tested in the Court of Appeal, which concluded that local authorities may set higher requirements exceptionally, subject to there being strong justification for such. Thus, there is an implicit evidential bar for doing so. In this instance, there is no clear evidence demonstrating that requirements in excess of the Building Regulations, which establish the standards that central government deems appropriate with respect, inter alia, to energy efficiency and domestic renewable technologies, are reasonably justified. While our client supports in principle the achievement of high levels of energy efficiency and the use of renewables, it is important real-world considerations including ensuring that development remains viable, having regard to other factors in this respect, and the impact on housing supply and affordability remains in accordance with the National Planning Policy Framework. This should be taken into consideration by the Council regarding this specific need,	Modification: The policy should contain flexibility to positively receive proposals that improve upon them, but not require new development ordinarily to go beyond the standards set out in the Building Regulations.		R002v4_NSLP_Reg19_TWBristol.Dec25.pdf

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					which, without substantive evidence otherwise, should not seek to push local standards beyond those established through Building Regulations. Modification: The policy should contain flexibility to positively receive proposals that improve upon them, but not require new development ordinarily to go beyond the standards set out in the Building Regulations.			
Policy DP8: Efficient use of land	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	Policy DP8: Efficient use of land This policy is unsound as it is not justified or effective. In previous representations on the Regulation 19 draft policy, which also proposed a minimum density of 40 dwellings per hectare, concerns were raised that this approach conflicts with national policy. While the policy states that density should respect and complement the character of the surrounding area, there is limited scope to achieve this given local character, market demand, and site constraints of individual sites across North Somerset.	Modifications: Greater flexibility is needed within the policy to ensure future developments are built at a density appropriate to local character, site constraints, and market requirements.		R002v4_NSLP_Reg19_TWBristol.Dec25.pdf
Policy DP9: Flood risk	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	Policy DP9: Flood Risk The policy is unsound as it is not justified, positively prepared or consistent with national policy. While our client is supportive of policy that seeks to protect new and existing development from increased probability and severity of flooding, presently this policy presumes in respect of the sequential test that this exercise should inform any proposals to develop land within areas of increased flood risk, regardless of whether that development can demonstrably be made safe in technical terms. This does not align with the September 2025 amendments to the PPG which advise, inter alia, that: “In applying paragraph 175 a proportionate approach should be taken. Where a site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the	Modification: The policy must be brought up-to-date to reflect national planning practice guidance with respect to technical flood risk information in the matter of sequential testing. Flexibility to be provided to allow for innovation and enable developments to respond to specific site characteristics, but also to ensure that new schemes are compliant with national policy supported by the appropriate evidence. The mandatory requirement for self-build units within major schemes should be deleted.		R002v4_NSLP_Reg19_TWBristol.Dec25.pdf

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					lifetime of the development (therefore addressing the risks identified e.g. by Environment Agency flood risk mapping), without increasing flood risk elsewhere, then the sequential test need not be applied." Therefore, the policy is inconsistent with national guidance and unduly restricts opportunities for additional homes in some of the most sustainable locations, regardless of the capacity to ensure these are safe in terms of flood risk and will not exacerbate such risk elsewhere.			
Policy DP36: Biodiversity Net Gain	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	Policy DP36: Biodiversity Net Gain The policy complies with the current legal requirements prescribing the need to deliver a minimum of 10% biodiversity net gain on or off-site. It should however be noted that this is expected to be shortly subject to modification at a legislative level, potentially to widen the range of exceptions particularly to support the delivery of small schemes. It is noted that the draft policy conforms to National Planning Policy Guidance (NPPG) at Paragraph: 006 Reference ID: 74-006-20240214, which confirms that plan-makers should not seek a higher percentage than the statutory 10% for BNG on an area wide or site wide basis unless justified and considering viability and implementation. Our client is supportive of the draft policy's consistency with legal requirements for 10% and agrees with the Council that it would be inappropriate to seek a level of gain higher than this figure, although many developments will exceed it in any event.	Modification: The policy should be tailpieced to account for any subsequent changes in legislation to ensure alignment with legal requirements as they may change over time.		R002v4_NSLP_Reg19_TWBristol.Dec25.pdf
Policy DP43: Affordable housing (including rural exception schemes)	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	Policy DP43: Affordable Housing and Rural Exception Schemes This policy is unsound as it is not effective and unjustified The Council published an addendum to the viability report, which forms part of the Local Plan evidence base, in October 2025. The report concludes in respect of the Nailsea and Backwell Strategic Location that "With 35% affordable housing tested, it is only the upper end of the typical values range that indicates relatively viable scope with viability indicated to	The 2023 viability report acknowledges that affordable housing on greenfield sites could be achievable. However, as supported by the above findings, it also notes that policy should allow a degree of flexibility to assess viability on a case-by-case basis. The current policy wording does not provide for this, however. Modification: The policy needs to be adjusted to accurately reflect what has been produced in the viability report.		R002v4_NSLP_Reg19_TWBristol.Dec25.pdf

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					become more marginal to poor when relying on values towards the mid to lower range.” The 2023 viability report acknowledges that affordable housing on greenfield sites could be achievable. However, as supported by the above findings, it also notes that policy should allow a degree of flexibility to assess viability on a case-by-case basis. The current policy wording does not provide for this, however. While the importance of affordable housing in major developments to deliver a sustainable mix of homes is recognised, the proposed policy conflicts with national guidance, is ineffective because it risks undermining overall housing delivery and reducing the number of affordable homes provided, and does not reflect the principles of positive planning. Modification: The policy needs to be adjusted to accurately reflect what has been produced in the viability report.			
Policy DP45: Residential space standards	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	Policy DP45: Residential Space Standards Our client understands the importance of new development being designed to ensure that residents are comfortable and do not hinder their amenity. The emerging plan states that, when applying the Nationally Described Space Standards (NDSS), all rooms that have the capacity to serve as a bedroom should comply with the standard. This is not a requirement set out in the NDSS and would fundamentally impact how residential developments are designed. It could lead to a greater land take to accommodate the additional space required, which in turn may reduce the number of units delivered on site and create conflicts with draft policy DP8 regarding the efficient use of land. Moreover, it must be acknowledged that patterns in the use of domestic space change over time; for instance, pre-Covid demand for dedicated home office space was much lower than it is now, and the policy should therefore acknowledge that internal layouts and spaces will reflect market demand at a point in time and should not be constrained by the status quo at the point of plan adoption.	Modification: the policy requires more flexibility to ensure that proposals can deliver innovative design, but the policy is not supported by any evidence that would indicate that there is a need/reason for this policy. Lastly, the policy is not compliant with national policy.		R002v4_NSLP_Reg19_TWBristol.Dec25.pdf

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Policy DP46: Housing Type and Mix	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	Policy DP46: Housing Type and Mix This policy is unsound as it will not be effective. Our client supports the delivery of diverse, high-quality development. However, the policy's reliance on a specific Housing Needs Assessment—a document often updated after the Local Plan is adopted—could restrict proposals coming forward later in the plan period. It is essential that developments delivered in the later stages can respond to market conditions and the evolving needs of the local community. While our client does not object to any individual criterion, the policy must provide sufficient flexibility to ensure it remains applicable to all sites and schemes. The policy also references accessible housing to align with current Building Regulations. However, this requirement is not adequately justified within the Council's evidence base and runs contrary to the presumption that, in terms of mix, development should be informed by local assessment. Greater flexibility should be incorporated, allowing proposals to be assessed on a site-by-site basis, including the removal of the minimum threshold. This policy requires proposals for major developments to include the level of self-build or custom-build housing identified on the register at the time of application, representing a significant increase from current expectations, albeit with no clarity on how much or how this should be facilitated. The expectation for additional self-build units is neither clear, evidenced nor justified, and it does not address any necessary compliance with national policy. No evidence supports the inclusion of this higher standard. Furthermore, the updated viability assessment provides no additional information confirming that this policy would avoid adverse impacts on viability and, the delivery of new residential settlements. Finally, there is no evidence to suggest that this element of the policy will make a	Modification: Flexibility to be provided to allow for innovation and enable developments to respond to specific site characteristics, but also to ensure that new schemes are compliant with national policy supported by the appropriate evidence. The mandatory requirement for self-build units within major schemes should be deleted.		R002v4_NSLP_Reg19_TWBristol.Dec25.pdf

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					meaningful contribution to housing delivery.			
Policy DP53: Best and most versatile land	No	• Positively prepared • Justified • Effective • Consistent with national policy	Yes	Yes	Policy DP53: Best and Most Versatile Land The policy is unsound as it is not justified, positively prepared or consistent with national policy. The policy as presented places an effective moratorium upon development within Best and Most Versatile (BMV) agricultural land, with only very limited exceptions. This would appear to significantly constrain the permissively framed rural exceptions site policy DP43 to only Grade 3a and below land, which may therefore preclude rural exception sites from being delivered adjoining some rural settlements. It would also likely constrain the delivery of commercial scale renewable energy, where their locations are often defined by grid connection opportunities contrary to the plan's wider ambitions towards net zero. The policy refers to "significant, inappropriate and unsustainable" proposals, which it then defines without setting out criteria relating to scale. This is contrary to the guidance presented by Natural England only countenances losses of BMV land of over 20ha as 'significant', but the policy as drafted sets no such threshold. Moreover, the policy fails to balance the assessment of the value of BMV land as prescribed in the NPPF with other locational considerations both at a strategic level (i.e. directing development to the most sustainable locations) and within a site layout; prioritising domestic gardens on areas of higher agricultural quality will in practice have no significant bearing on food production or security. The policy overall overrepresents considerations of BMV land and should be amended.	Modification: Policy DP53 should be modified to include criteria reflecting 'significant' scale of BMV loss as over 20ha in accordance with Natural England guidance.		R002v4_NSLP_Reg19_TWBristol.Dec25.pdf
Policy DP64: Adoption of open space and green infrastructure	No	• Effective			Policy DP64: Adoption of open space and green infrastructure The policy is unsound because it is not effective. Our client supports the integration of	Modifications: There needs to be further guidance provided in the policy which details how a residential-led management structure is justified to manage the open space and guidance on how one can be formed which		R002v4_NSLP_Reg19_TWBristol.Dec25.pdf

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					green infrastructure and open space in future development to ensure ecological and landscape mitigation is appropriately incorporated. The proposed wording reflects standard practice for all developments our client promotes, including the provision of open space that is accessible to all. Typically, such spaces are managed by a management company agreed between the Council and the applicant at the outline stage through a Section 106 agreement. This approach ensures proper long-term maintenance and is common practice, so it would be appropriate to reference this in the policy. Instead, the proposed requirement for a resident-led management structure lacks sufficient detail and guidance. Clear procedures and qualified personnel would need to be in place to ensure the development is maintained effectively. Modifications: There needs to be further guidance provided in the policy which details how a residential-led management structure is justified to manage the open space and guidance on how one can be formed which would follow the same maintenance procedures.	would follow the same maintenance procedures.		
Land south of Nailsea							Support inclusion of land in our client's control at Youngwood Lane, (partly comprising SHLAA site HE20591 together with additional land) as part of a larger housing allocation at Youngwood Lane, Nailsea. It can be demonstrated that allocation can come forward promptly and in a properly coordinated manner to deliver a substantial number of market and affordable homes, supporting infrastructure and public facilities in a highly sustainable location, contributing to the vitality and viability of this existing settlement. The Council's SA states that the site performs poorly in three key areas that considerably undervalue the site. This in part relates to its Agricultural Land Classification grading, which while accepted as Grade 1 and 2 land pertains mostly to an existing farm complex and yard not utilised for	R002v4_NSLP_Reg19_TWBristol.Dec25.pdf

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							agricultural production. The remaining cropped land is relatively limited in scope and would therefore not result in significant harm to agricultural production. In addition, the landscape sensitivity status of the site significantly overvalues this when considering the live development/permission close by and wider allocation that is not allowed for within the sensitivity assessment. In this context the site is visually contained and would have only a ‘minor negative’ impact upon landscape by virtue of its greenfield status.	

Name: Terri Mazur **I.D:** 60404705

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Trendlewood Way	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I consider the Local Plan to be unsound in its current form for the following reasons: Failure to Select the Most Sustainable Sites The sites allocated do not represent the most sustainable development locations. They carry disproportionate environmental, heritage and flooding impacts and do not best meet identified housing needs. More appropriate and sustainable alternatives exist elsewhere in North Somerset, yet these have not been adequately considered. Failure to Properly Consider Flood Risk The Council has not adequately considered the flood risks associated with development in Nailsea and Backwell—particularly at land west of Nailsea (Poplar Farm), land east of Backwell, land south of Nailsea, and the proposed road infrastructure serving these sites. Consequently, Policy LP3 is unsound. Non-Compliance with Walkable-Neighbourhood and Accessibility Principles The housing allocations in Nailsea are all located far beyond the 800-metre walkable-neighbourhood standard. They do not prioritise access to services, facilities or employment opportunities, contrary to the Plan’s stated objectives. Furthermore, the Plan provides no strategy for improving job provision within Nailsea. Overreliance on a Railway Station Acknowledged as Inadequate Although the Plan relies heavily on the presence of the railway station, it simultaneously recognises substantial deficiencies—lack of step-free access, insufficient shelters, unsafe routes and limited cycle parking—yet proposes no solutions. The station is also situated outside any realistic active-travel catchment, and cycling access is further constrained by the accident black spot at Buckland Batch. Lack of Evidence for Transport Mitigation and Infrastructure Delivery Nailsea’s ability to accommodate additional development sustainably is already restricted by existing transport infrastructure. The Plan provides no evidence for the design, funding or deliverability of the proposed “strategic rail link.” Even if feasible, it would not be delivered in advance of development, meaning it cannot be relied upon as mitigation. This renders the proposals unsound. Use of Vague, Aspirational Commitments Instead of Defined Measures	The allocation of land South of Long Ashton would almost entirely compensate for the deletion of the Nailsea and Backwell strategic location for development. The site lies adjacent to the £400 million approved EPIC employment campus and would have excellent transport links. Feels like a no-brainer…. In addition, efforts should be focused on identifying deliverable mitigation schemes along the B3130 and B3128 corridor that are essential to safeguarding travel into and out of Nailsea for current residents.		

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					Across the proposals for Nailsea and Backwell, the Plan relies on broad, aspirational statements with no specific schemes, timelines, costings or responsible bodies identified. This lack of clarity is unacceptable given the significant risks posed to current and future residents and fails to meet the tests of soundness.			

Name: Terry Bees **I.D:** 50341345

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Objection to the Proposed Development in Backwell I’m writing to object to the scale of development proposed for Backwell in the Regulation 19 Local Plan. Backwell already has around 800 new homes approved, which is a very large increase for a village of this size. Adding another 1,000 homes on top of this feels unreasonable. The local area simply doesn’t have the capacity to absorb this level of growth without serious consequences. There are already well-known gaps in school places, GP access and other essential services. None of these have been addressed, and there is no clear plan or secured funding to put the right infrastructure in place. Without this, the development risks overloading services that are already under pressure. The transport proposals don’t appear to solve the existing issues on Station Road, Backwell Common or Chapel Hill. A new road would be costly, disruptive and might not ease congestion in the way the plan suggests. Backwell’s railway station also isn’t set up to function as a transport hub. It remains difficult to access, especially for those with mobility needs or people travelling with children. I’m also concerned about the environmental impact. The sites include Grade 1 agricultural land, which is some of the most productive land in North Somerset. National policy is clear that we should protect our best and most versatile land. The area is home to valuable habitats and protected species, including Lesser and Greater Horseshoe Bats. Developing on a floodplain and in areas that already flood, such as around Backwell Lake, increases risk to both the environment and future residents. The scale of housing proposed for Backwell is out of proportion when compared with other areas in the district. Backwell would take a higher share of housing growth than any other village, despite not being an employment centre. Most residents already commute elsewhere, so this level of development would increase traffic rather than support local jobs or facilities. Government policy requires 50% affordable housing on Greenbelt land. While this seems positive at first glance, it reduces the contributions developers make towards infrastructure. This makes it even less likely that the roads, schools, healthcare and public services needed will actually be delivered. Overall, the plan concentrates too much growth into a small village in a short time, without credible solutions for transport, flooding, environmental protection or community services. As it stands, the proposals are unsustainable and do not meet the needs of current or future residents. I ask that North Somerset Council reconsider the scale and location of development in Backwell and adopt a strategy that is more in line with local capacity, environmental responsibilities and the long-term wellbeing of the community.			

Name: Tessa Reece **I.D:** 62772801

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Wolvershill (north of Banwell)					Re: Elborough/ Locking/ Banwell housing development site. I am writing in support of the comments made by Hutton Parish and local residents in opposition to the proposed housing development in the Elborough area. I agree that the Elborough area is not suitable for a housing development. The main concerns raised were the loss of green land, the removal of the strategic gap between Locking and Elborough parishes, deficiencies in infrastructure; lack of facilities such as school places and already stretched services (Doctors, public transport), the narrow roads that are not wide enough for increased traffic, public opinion not supporting the proposals for new housing in Elborough and the major issue of sustainability. I live in Banwell and would like to share my concerns with you; • New houses means additional people putting more pressure on already stretched services. For example: it has been very difficult to register with an NHS dentist in North Somerset. I had severe tooth ache and the NHS dentist I was registered with went Private . I called 111 and was advised to take paracetamol and to wash my mouth out with salt water. I was in so much pain I had to pay for private dental care. Not everyone can afford this. It's also not easy to get an appointment with a GP and A&E is often extremely busy. Weston General A & E has been closed overnight for several years. When I had a medical emergency I had to travel all the way to Bristol. More demand for medical assistance in an emergency would surely put lives at risk when the system is struggling as it is. More people living in the area would lead. to services being stretched even further. • The existing road network from Banwell to Weston General Hospital is not suitable for supporting a new housing development. The existing road network cannot support additional demand which the new development would bring. I have frequent hospital appointments and it already takes twice as long as it should in a car because of road closures and congestion from the construction of the new bypass. Getting to and from hospital from my home is very stressful, there is always a lot of traffic on the narrow country lanes past the proposed development site and the longer main road route is blocked with traffic from temporary traffic lights and road closures. More traffic in the direction of the hospital could affect Ambulances and other emergency services. • The main road from Banwell (A38) to Weston town centre is often flooded. There is clearly a drainage issue that could get worse with more houses using the drainage and sewage systems. • Flash flooding during heavy rainfall makes the A38 like a river and can be very challenging to drive through. I worry that a development in the Elborough area would make this problem even worse with the run off from the farmland next to Elborough farm finding its way along more impermeable surfaces and increasing the risk of further and more frequent flooding. • The road network in and around Banwell is not suitable for heavy construction vehicles. The lanes near the proposed site in the Elborough area are very narrow and trying to pass large construction vehicles would be very difficult and dangerous • Building new houses will increase traffic and cause more mayhem on the roads. The new proposals would add to the traffic issues because more people mean more cars and more people driving to work during rush hour. Increased traffic is a major concern of mine because the current road systems are already struggling, with traffic in and around Banwell ever increasing as it is without the pressure of more cars and construction vehicles from a new development site in the area. • Building the Bypass has already had a huge impact on residents in Banwell with road closures and temporary traffic lights causing traffic jams for miles. Construction of the bypass has made getting in and out of Banwell, travelling into Weston town centre or accessing the motorway a nightmare. The Bypass is likely to remove traffic from the A38 but may not solve the huge issue of congestion through Banwell. It could simply shift traffic problems to places in and around Banwell and past the proposed development site. Construction on the Bypass is already causing huge traffic jams and could ultimately worsen the traffic in Banwell. More houses means more people and increased traffic and is bound to have a negative impact on an already heavily congested area. It would make sense to put planning applications for new developments in and around Banwell on hold until the Bypass is completed in 2027. • As a local resident living in Banwell I worry that new houses will change the character of the place I call home. I fear that Banwell will no longer be the pretty little village it is known for being and if more housing developments are built Banwell could lose its identity and look very different in ten years time. With new housing developments popping up all over the area Banwell could easily lose it's appeal to tourists and less visitors to the area throughout the summer months will have a detrimental affect on local businesses. • The loss of this green belt land will be devastating. Development on the proposed site would ruin the current environment and impact on the wildlife living in the area. Building will destroy the habitats of bats, hedgehogs and other protected species and the deer would run away and live somewhere else. Many creatures would die with their homes destroyed. • I agree that green belt land on the edge of Bristol should be considered in the first instance due to its sustainable location and proximity to jobs and services in Bristol and that other locations should be explored before looking at sites on the edge of villages in North Somerset. • Noise from construction will affect wildlife in the area and disturb local residents.			

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					• We should protect the historical character of Banwell and keep the strategic gap between the Locking and Elborough Parishes. Development within a strategic gap is usually restricted to only essential use such as agriculture so that the gap is preserved. It is important that we keep the parishes separate. There was strong opposition to Banwell being Identified as a strategic growth location. Banwell is a beautiful semi-rural area with some great walks over stunning green belt land. Banwell is surrounded by beautiful countryside. I understand that protecting it needs to be carefully balanced with the need for more affordable housing. The people who believe new housing should be distributed around the towns and villages in North Somerset (so every place took 'their share') should consider the part that Banwell has already played with the new developments along Wolvershill Road. I believe that Banwell has done enough and already sacrificed more than enough of its green belt land for new houses and the controversial bypass. I am strongly against the new development proposals and believe new houses in the Elborough area would have a very detrimental impact on Banwell and its residents including myself. Please consider the issues I have raised and my opposing views when submitting the pre-submission.			

Name: The Bristol Port Company **I.D:** 10208161

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SP7: Green Belt	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	1. Overview The Bristol Port Company (BPC) is the statutory harbour authority and competent harbour authority for Bristol Port. Bristol Port comprises Avonmouth Docks and Royal Portbury Dock (RPD); RPD is within North Somerset Council's (NSC) administrative area. For over 20 years, NSC has failed to acknowledge or enable the requirement for RPD to grow and expand. The imperative for a change of policy and mindset, as evidenced below, could not be more compelling or coherent. Growth is the single unifying agenda of the UK Government, the West of England Mayoral Combined Authority (WEMCA) and NSC. The failure to release land within Shipway Farm from the Green Belt has blighted any financial benefit for NSC since the Port's privatisation in 1991. It will instantly deliver jobs, skills, investment and significant economic dividend, but not at the expense of the environment. On the contrary, it will support the renewable and low carbon sector and deliver environmental enhancements. Indeed, BPC's credentials of sympathetic, considerate and innovative development are often cited as an exemplar to other businesses both locally and nationally. BPC submits that, in respect of Policy SP7 (Green Belt), the North Somerset Local Plan 2041: Pre-submission Plan (Regulation 19) (the Local Plan) is not sound on the basis that it is not positively prepared, justified, effective, or consistent with national policy. Further, BPC does not consider that the Local Plan is legally compliant nor has it been prepared in accordance with the Duty to Cooperate. 2. The Local Plan is not positively prepared Bristol Port is one of the largest UK commercial ports. It is a multimodal transport hub providing import, export and transit facilities for a wide range of cargo, with links by sea, road and rail between national and international destinations. For Bristol Port, and RPD specifically, to continue to play a significant role in the local, regional and national economy, it is essential that Policy SP7, and the Local Plan more broadly, fully support this strategically important transport infrastructure asset and employment site by providing a positive policy framework that is designed to meet RPD's needs over the plan period and fully realise the economic benefits of the Port for North Somerset and beyond. Central to Bristol Port's development needs over the period of the Local Plan is a requirement to bring forward land at RPD to accommodate additional facilities for transit storage, which are a fundamental need for all ports. BPC has identified land known as 'Shipway Farm', which is located immediately to the west of RPD, as being the most appropriate option to meet this requirement. Shipway Farm is	BPC requests that Policy SP7 and the Policies Map are amended to release land within Shipway Farm from the Green Belt. The following wording should be added to Policy SP7: "Land at Royal Portbury Dock will be released from the Green Belt to meet the development needs of Bristol Port over the plan period."		Green Belt statement.pdf North Somerset Local Plan Pre-submission Plan - Representation form Part B - SP7.pdf

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					located within the Green Belt and it is essential, therefore, that land within this site released from the Green Belt in order to ensure that the Local Plan provides a positive policy framework to guide development related to the Port. The Executive Summary to the Green Belt and Grey Belt Summary Position Statement appended to this representation identifies the Shipway Farm site. Policy SP7 of the Local Plan concerns the Green Belt. BPC notes that whilst changes to Green Belt boundaries are proposed in some locations across the plan area, no such provision is made for a change to the Green Belt in the vicinity of RPD. BPC maintains its position that this is a serious deficiency which renders the Local Plan unsound. The National Planning Policy Framework (December 2024) (NPPF) (paragraph 145) sets out that Green Belt boundaries should only be amended in 'exceptional circumstances'. BPC submits that there are several 'exceptional circumstances' which justify the removal of land within Shipway Farm from the Green Belt; they include: 1. National policy support for ports infrastructure. 2. The economic importance of Bristol Port. 3. The need for additional transit storage capacity at RPD. 4. The lack of alternative sites to accommodate the Port's needs outwith the Green Belt. 5. The social, economic and environmental benefits of removing land within Shipway Farm from the Green Belt. Each 'exceptional circumstance' is considered in-turn in full detail in the attached response. Given the clear 'exceptional circumstances' outlined above, BPC is disappointed that Policy SP7 does not make any provision for meeting the established development needs of RPD over the plan period by removing land within Shipway Farm from the Green Belt. In not proactively meeting the development needs of RPD, it is considered that Policy SP7 falls considerably short of meeting national planning policy objectives which seek to deliver economic growth and additional port capacity (as detailed in respect of Exception Circumstance 1 above). It is also: • in conflict with the Local Plan's own stated strategic priorities to increase the number and range of job opportunities across the district and deliver essential new strategic transport infrastructure; • not aligned with Policy SP1 (Sustainable Development), which sets out that new development should (inter alia) "support the delivery of opportunities for economic growth and job creation at accessible locations"; • inconsistent with Policy SP10 (Transport), which details that the improvement of strategic transport facilities including RPD will be supported; and • not aligned with national, regional and local economic strategy. Grey belt Having established that 'exceptional circumstances' exist for the release of land within Shipway Farm from the Green Belt and that no alternatives sites, including on previously developed land, are available, the NPPF (at paragraph 148) directs plan makers to consider grey belt. Annex 2 of the NPPF defines grey belt as "land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development". The supporting text to Policy LP14 (Royal Portbury Dock) justifies the retention of the Green Belt in the vicinity of RPD on the basis that "The remaining Green Belt land located between the port estate and Portishead is considered extremely sensitive in preventing coalescence and checking unrestricted urban sprawl". This conclusion is based on the Stage 1 Strategic Green Belt Assessment (October 2025) (SGBA). The SGBA identifies large parcels of land for the purposes of the assessment. Shipway Farm is located within Parcel P-007. Parcel P-007 sits between RPD and Portishead and extends up to Portbury Wharf on the edge of the Severn Estuary to the north and into the Gordano Valley to the south. The			

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					assessment concludes that Parcel P-007 makes an overall strong contribution to the five purposes of the Green Belt established in the NPPF and identifies the parcel as being one of three broad parcels that are 'fundamentally important' areas of Green Belt. On this basis, the assessment concludes that Parcel P-007 should not be included in an 'area of search' for potential grey belt. BPC does not consider that the SGBA provides sufficiently detailed evidence on grey belt matters to justify the retention of the Green Belt in the vicinity of RPD. A Green Belt and Grey Belt Summary Position Statement has been prepared by The Landmark Practice and its Executive Summary is appended to this representation (BPC would be happy to provide the full Position Statement to NSC upon request). It identifies a number of important shortcomings with respect to the SGBA which render it unsound for the purposes of identifying land within the grey belt. In particular, these shortcomings include a recognised need for a more granular assessment to determine the presence of grey belt within the strategic parcels adopted for the purposes of the SGBA. To remedy these shortcomings, and provide robust evidence to inform the Local Plan, the Green Belt and Grey Belt Summary Position Statement presents a finer grained assessment of land within Shipway Farm, following the NPPF and National Planning Practice Guidance (NPPG) and mirroring NSC's Stage 2 Green Belt Assessment methodology. This finer grained assessment concludes that: • land within Shipway Farm (as identified in the Summary Position Statement and shown in the Executive Summary) does not make a strong contribution to Green Belt purposes (a), (b) and (d); • there are no areas or assets of importance (as defined in footnote 7 of the NPPF, other than Green Belt) that would potentially provide a strong reason for refusing or restricting the commercial development of the site; • release of the land from the Green Belt would not 'fundamentally undermine' the five Green Belt purposes (taken together) of the remaining Green Belt when considered across the area of the Local Plan. The Summary Position Statement also identifies that alternative, clearly defined, defensible edges using physical features that are readily recognisable and likely to be permanent, are available to re-define the Green Belt boundary around Shipway Farm, in line with paragraph 149 of the NPPF. Furthermore, the assessment also identifies ways in which the impact of removing land within Shipway Farm from the Green Belt can be offset through improvements to the environmental quality and accessibility of remaining Green Belt land in the vicinity, in accordance with paragraph 151 of the NPPF. Overall, the finer grain assessment identifies that land within Shipway Farm is grey belt land with strategic potential for Green Belt release. Accordingly, it is BPC's position that land within Shipway Farm (as identified in the Summary Position Statement) is grey belt and should be released from the Green Belt for the 'exceptional circumstances' outlined above. Conclusion Paragraph 36(a) of the NPPF sets out that, for local plans to be positively prepared, they must provide "a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development". By inadequately assessing Shipway Farm from a grey belt perspective and not removing land from the Green Belt to accommodate the needs of RPD over the plan period, the Local Plan does not provide a positive planning framework in respect of RPD and has not been prepared in accordance with paragraphs 85 to 87 and 111 of the NPPF. Overall, it is BPC's view that Policy SP7 has not, therefore, been positively prepared. 3. The Local Plan is not justified BPC considers that the approach adopted in Policy SP7 (of not removing land from the Green Belt to meet the future needs of RPD) does not represent an appropriate strategy for guiding future development at RPD, considering reasonable alternatives and available evidence. On this matter, BPC notes that the supporting text to Policy LP14 states:			

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					"The Replacement Local Plan and Core Strategy considered port expansion issues and land was removed from the Green Belt and safeguarded for future port use, subject to demonstrating need and other detailed requirements. Further opportunities have been reviewed but no further Green Belt amendment is proposed. The remaining Green Belt land located between the port estate and Portishead is considered extremely sensitive in preventing coalescence and checking unrestricted urban sprawl". The position taken in the Local Plan is not consistent with that indicated by NSC in previous iterations of the emerging Local Plan (prior to the publication of the Preferred Options consultation document): • The Local Plan Issues and Options Document (September 2018) stated: "The accessibility and growth of international and regional gateways is linked with economic growth and delivering an improved transport system will be key to unlocking that growth". • The Local Plan Issues and Options Document expressly identified RPD as a strategic employment location in North Somerset. • The Local Plan Issues and Options Document stated: "At the Port, the focus will be on ensuring the most efficient use of the existing port area, but also considering any opportunities to support business growth associated with the Port. The latter could include making allowances for additional land supply in and around Portishead to meet demand for high growth businesses including those linked to port activities. If there are specific additional needs associated with the Port, the Local Plan process will need to consider the land use implications and future aspirations of the Port over the plan period." • The Local Plan Challenges and Choices Part 1: Challenges for the Future consultation document (July 2020) expressly stated that the Local Plan will need to "address the requirements of the Port and Airport considering their wider economic role, and the jobs and benefits they generate". NSC's position is surprising given that BPC expressly requested that land within Shipway Farm be removed from the Green Belt in its earlier responses to the Local Plan Preferred Options consultation document and the Autumn 2023 Pre-submission Local Plan (Regulation 19) consultation. NSC, in its pre-application advice to BPC (dated 17 September 2020, case reference 91484 20/P/0575/PR3) in relation to Shipway Farm, actually advised BPC that "[w]e would strongly encourage you to participate in the plan making process, where your proposals [to develop Shipway Farm] can be presented in the context of the long-term growth strategy for the wider Port estate allowing NSC to comprehensively work with you to ensure long-term growth ambitions are thoroughly examined". Despite this, NSC does not appear to have considered BPC's request, nor has it robustly considered any opportunities involving the future growth of RPD. This contrasts sharply with the approach taken by NSC in the former Replacement Local Plan where land (Court House Farm) was removed from the Green Belt and safeguarded for future port-related use. In coming to its conclusion that "Further opportunities have been reviewed but no further Green Belt amendment is proposed", it is unclear what opportunities NSC is alluding to. Whilst options relating to the release of Green Belt land and grey belt at broad locations across the plan area have been assessed by NSC, there is no detailed assessment of the Green Belt in the vicinity of RPD (see Section 2) nor is there any indication of opportunities relating specifically to RPD having been identified, considered and reviewed by NSC within the Local Plan, its supporting evidence (beyond the North Somerset Employment Land Evidence Report which actually identifies the potential requirement for the release of land from the Green Belt to facilitate the expansion of RPD) or the accompanying Sustainability Appraisal (SA) Report (October 2025) (see also Section 6 of this response). Indeed, NSC has not prepared an up-to-date evidence base on this matter despite engagement by BPC with senior officers and councillors on several occasions when the Port held meetings and site visits and on each occasion noted the Port's development needs. BPC expressed this same concern at the Preferred Options stage and, subsequently, at the Autumn 2023 Pre-submission Local Plan stage. It has seemingly gone unheard and BPC maintains that this is a significant deficiency which renders the plan 'unsound'. Further, as demonstrated in Section 2, the SGBA on which decisions relating to the extent of the Green Belt in the vicinity of RPD have been based, does not provide the necessary finer grained assessment to support the position taken in the Local Plan.			

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					BPC would direct NSC to the serious concerns expressed by Inspectors which led (in part) to the withdrawal of the West of England Joint Spatial Plan (November 2017) (JSP). The withdrawn JSP identified Bristol Port (alongside Bristol Airport) as a key strategic infrastructure employment location (Policy 4); however, further to representations received from BPC and other parties on the emerging plan, Inspectors, in their letter dated 11 September 2019, advised at paragraph 32: “However, whilst policy 4 states that the Port and Airport (along with the other key strategic employment locations) will ensure the continued economic growth of the West of England, there is no clear indication of how this should be achieved or what it means in terms of the allocation of land”. At paragraph 33 of their letter, the Inspectors continued: “The Councils explained to us that it would be for the local plans to consider the case for the allocation of land (and, if necessary, the removal of land from the Green Belt) to provide for growth at the strategic employment locations. However, it is a stated aim of the JSP to identify the amount of employment land needed and the most appropriate spatial strategy for this growth. Moreover, the Port and Airport are of fundamental and strategic importance to the whole of the West of England and, consequently, any growth at them would also be likely to have implications for the wider employment strategy for the area. In this context we anticipate it very likely that we would ultimately conclude that it is not a justified and effective approach for the plan to delegate, to a subsequent local plan, decisions on the nature, scale and location of growth at the Port and Airport and the existence or otherwise of exceptional circumstances to remove land from the Green Belt in connection with this. Consequently, we envisage it very likely that we would conclude that, for the plan to be sound in respect of the Port and Airport strategic employment locations, decisions on these matters should be addressed in the JSP. It is also the case that a considerable amount of work would be likely to be necessary to prepare the evidence to make justified decisions about the approach to take”. It is BPC’s view that the Local Plan is similarly flawed. There is no clear evidence that NSC has robustly considered the case for the expansion of RPD, which is surprising given the accepted strategic importance of the Port, national policy and BPC’s representations on the Local Plan to-date; it is also in clear contrast to the views expressed by NSC during the examination into the JSP where its representative stated (at the hearing on 09 July 2019) that “yes, there is potential which needs to be assessed at…the port…in terms of intensification and potentially expansion and you're right certainly in North Somerset {sic] the Royal Portbury Dock…that would involve expansion into the Green Belt”. Paragraph 36(b) of the NPPF sets out that, for local plans to be justified, they must provide “an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence”. NSC has unequivocally failed to take into account all the evidence in determining the policy approach in respect of RPD, it has not undertaken a detailed assessment of Shipway Farm and has not identified and robustly assessed options relating to the future growth of the Port. In fact, the adopted policy approach does not reflect the findings of the evidence base which has identified a potential need to release land in the Green Belt to enable the growth of RPD. On this basis, BPC submits that Policy SP7 is not ‘justified’. 4. The Local Plan is not effective As set out in Section 2 above, Policy SP7 does not provide a robust, positive framework for the delivery of development to meet the future needs of RPD over the plan period. In consequence, BPC considers that the Local Plan is not deliverable. NSC has not worked jointly with BPC to ensure that the Local Plan makes appropriate provision for the development needs of RPD over the plan period. Whilst a Consultation Statement in respect of the Autumn 2023 Pre-submission Local Plan consultation has been prepared, BPC cannot find any evidence of how NSC has considered and responded to BPC’s representations. This is contrary to the NPPF which states (at paragraph 111) that: “Planning policies should…provide for any large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy.” It also runs contrary to paragraphs 86 and 87, which make clear that planning policies should meet anticipated sectoral needs over the plan period to support economic growth.			

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					Paragraph 36(c) of the NPPF sets out that, for local plans to be 'effective', they must be "deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground". In not removing land from the Green Belt to accommodate port-related development, the Local Plan fails to make appropriate provision for RPD. This undermines the deliverability of the plan and NSC has not adequately engaged with BPC, nor responded to their appeals for development land to satisfy the demands of this key strategic infrastructure asset. On this basis, BPC submits that Policy SP7 is not 'effective'. 5. The Local Plan is not consistent with national policy As set out in Section 2 (in respect of Exceptional Circumstance 1), the UK Government's economic policy and nationally planning policies identify the need to deliver infrastructure, including in respect of ports, to support its objectives for economic growth. In accordance with this policy, it is essential that the Local Plan positively responds to the development needs of RPD. In not identifying grey belt and releasing land from the Green Belt to meet the development needs of RPD over the plan period, Policy SP7 of the Local Plan fails to make such positive provision. In this regard, it is BPC's view that, for the reasons outlined in Sections 2 to 4 above, the Local Plan is not in accordance with NPPF policy relating to Green Belts, economic growth and transport or the Ports NPS. Additionally, the current Local Plan approach will likely constrain renewable and low carbon energy development at RPD and the wider Port estate at Avonmouth Dock which is contrary to the Government's climate change commitments and national, regional and local objectives for the green economy. Paragraph 36(d) of the NPPF sets out that, for local plans to be consistent with national policy, they must enable "the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant". Based on the foregoing, BPC does not consider that the Local Plan is consistent with national policy relating to Green Belts, economic development, transport infrastructure or ports. 6. The Local Plan is not legally compliant SA undertaken as part of the local plan preparation process must satisfy the requirements of The Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations). Schedule 2 of the SEA Regulations requires that Environmental Reports (and, therefore, SA Reports prepared in respect of local plans) include "An outline of the reasons for selecting the alternatives dealt with". Part 4 (Regulation 16), meanwhile, requires information is provided relating to (inter alia) "the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with". The requirements of the SEA Regulations are reflected in the NPPG. The NPPG (018 Reference ID: 11-018-20140306, March 2014) states that a local plan SA "needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted". Consistent with case law on SA, the NPPG goes on to state that SA reports should (inter alia) "outline the reasons the alternatives were selected, and identify, describe and evaluate their likely significant effects on environmental, economic and social factors using the evidence base (employing the same level of detail for each alternative option)" and "provide conclusions on the reasons the rejected options are not being taken forward and the reasons for selecting the preferred approach in light of the alternatives". Contrary to the legal requirements of the SEA Regulations, NSC does not appear to have adequately identified and assessed reasonable alternatives relating to the future growth of RPD. The SA Report dated October 2025 has assessed the effects of Policy SP7; however, there is no consideration of options to extend the Port beyond its current boundary, including options involving the release of land from the Green Belt. The lack of assessment of reasonable alternatives in this regard is despite: • the Issues and Options Document expressly acknowledging the need to review options to meet the development needs of RPD over the plan period; • three of the four spatial strategy options considered in the subsequent North Somerset Local Plan: Challenges and Choices Part 2 – Choices for the Future consultation document (November 2020) explicitly noting that they present an opportunity "to explore potential new employment provision" at RPD;			

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					• BPC having consistently identified in its representations that removal of land within Shipway Farm from the Green Belt is critical to meeting RPD's development needs over the plan period; • NSC's pre-application advice to BPC, as summarised in Section 3; • the comments made by NSC's own representative at the examination into the JSP, as summarised in Section 3; • concerns expressed by Inspectors in respect of the withdrawn JSP, as summarised in Section 3; • the change to national planning policy to introduce grey belt; • national, regional and local economic policy objectives, summarised in Section 2; and • the requirements of the NPPF and policy contained in the Ports NPS, summarised in Section 2. Overall, BPC does not consider that the Local Plan has been prepared in accordance with the SEA Regulations as it has failed to consider reasonable alternatives relating to RPD. On this basis, the Local Plan is not legally compliant. 7. The Local Plan does not comply with the Duty to Cooperate Paragraph 25 of the NPPF sets out that local planning authorities "should collaborate to identify the relevant strategic matters which they need to address in their plans. They should also engage with their local communities and relevant bodies including…infrastructure providers". Paragraph 20 details that strategic issues where co-operation might be appropriate include transport infrastructure. Whilst BPC is not a 'prescribed body' within the meaning given in The Town and Country Planning (Local Planning) (England) Regulations 2012, owing to the strategic importance of RPD, BPC is strongly of the view that it should be an 'additional body' for the purposes of the preparation of the Local Plan and the Duty to Cooperate. Presently, NSC has not sought to meaningfully and formally engage with RPD on this basis. This is despite: • the strategic importance of Bristol Port in transport and economic terms having been clearly established; • the Challenges for the Future consultation document expressly recognising the wider economic role of RPD; • Policy SP10 (Transport) of the Pre-submission Local Plan identifying RPD as a strategic transport facility; • the Government's economic and planning policies identifying the strategic importance of infrastructure provision; • the strategic importance of RPD having been recognised in local and regional economic strategy; • BPC's representations on the previous iterations of the Local Plan; • the findings of the North Somerset Employment Evidence Report and its recommendation that NSC, Bristol Port Ltd, WEMCA and UK Government work together proactively; and • NSC expressly encouraging BPC to work with it on matters relating to the long term development needs for RPD. For the reasons set out above, BPC does not consider that the Local Plan has been prepared in accordance with the Duty to Cooperate. PLEASE SEE ATTACHMENTS FOR FULL RESPONSE AND STATEMENT ON GREEN BELT			
Policy LP9: Extent of the Green Belt	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	The Bristol Port Company (BPC) is the statutory harbour authority and competent harbour authority for Bristol Port. Bristol Port comprises Avonmouth Docks and Royal Portbury Dock (RPD); RPD is within North Somerset Council's (NSC) administrative area. For over 20 years, NSC has failed to acknowledge or enable the requirement for RPD to grow and expand. The imperative for a change of policy and mindset, as evidenced below, could not be more compelling or coherent. Growth is the single unifying agenda of the UK Government, the West of England Mayoral Combined Authority (WEMCA) and NSC. The failure to release land within Shipway Farm from the Green Belt has blighted any financial benefit for NSC since the Port's privatisation in 1991. It will instantly deliver jobs, skills, investment and significant economic dividend, but not at the expense of the environment. On the contrary, it will	BPC requests that Policy LP9 and the Policies Map are amended to release land within Shipway Farm from the Green Belt. The following wording should be added to Policy LP9: "Land at Royal Portbury Dock will be released from the Green Belt as defined on the Policies Map"		Green Belt statement.pdf North Somerset Local Plan Pre-submission Plan - Representation form Part B - LP9.pdf

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					support the renewable and low carbon sector and deliver environmental enhancements. Indeed, BPC's credentials of sympathetic, considerate and innovative development are often cited as an exemplar to other businesses both locally and nationally. BPC submits that, in respect of Policy LP9 (Extent of the Green Belt), the North Somerset Local Plan 2041: Pre-submission Plan (Regulation 19) (the Local Plan) is not sound on the basis that it is not positively prepared, justified, effective, or consistent with national policy. Further, BPC does not consider that the Local Plan is legally compliant nor has it been prepared in accordance with the Duty to Cooperate. 2. The Local Plan is not positively prepared: Bristol Port is one of the largest UK commercial ports. It is a multimodal transport hub providing import, export and transit facilities for a wide range of cargo, with links by sea, road and rail between national and international destinations. For Bristol Port, and RPD specifically, to continue to play a significant role in the local, regional and national economy, it is essential that Policy LP9, and the Local Plan more broadly, fully support this strategically important transport infrastructure asset and employment site by providing a positive policy framework that is designed to meet RPD's needs over the plan period and fully realise the economic benefits of the Port for North Somerset and beyond. Central to Bristol Port's development needs over the period of the Local Plan is a requirement to bring forward land at RPD to accommodate additional facilities for transit storage, which are a fundamental need for all ports. BPC has identified land known as 'Shipway Farm', which is located immediately to the west of RPD, as being the most appropriate option to meet this requirement. Shipway Farm is located within the Green Belt and it is essential, therefore, that land within this site released from the Green Belt in order to ensure that the Local Plan provides a positive policy framework to guide development related to the Port. The Executive Summary to the Green Belt and Grey Belt Summary Position Statement appended to this representation identifies the Shipway Farm site. Policy LP9 of the Local Plan concerns the Green Belt. BPC notes that whilst changes to Green Belt boundaries are proposed in some locations across the plan area, no such provision is made for a change to the Green Belt in the vicinity of RPD. BPC maintains its position that this is a serious deficiency which renders the Local Plan unsound. The National Planning Policy Framework (December 2024) (NPPF) (paragraph 145) sets out that Green Belt boundaries should only be amended in 'exceptional circumstances'. BPC submits that there are several 'exceptional circumstances' which justify the removal of land within Shipway Farm from the Green Belt; they include: 1. National policy support for ports infrastructure. 2. The economic importance of Bristol Port. 3. The need for additional transit storage capacity at RPD. 4. The lack of alternative sites to accommodate the Port's needs outwith the Green Belt. 5. The social, economic and environmental benefits of removing land within Shipway Farm from the Green Belt. Each 'exceptional circumstance' is considered in-turn below. Exceptional Circumstance 1: National policy support for ports infrastructure: The UK Government's economic policy objectives underpin the need for investment in infrastructure, including ports. The Plan for Change (December 2024) sets out the UK Government's programme across six missions for renewal. 'Kickstart Economic Growth' is the primary mission and the Government's objective is to raise standards in every part of the UK. This mission is underpinned by seven pillars including investment, infrastructure and planning. Supporting the Plan for Change, the UK Government's Modern Industrial Strategy (June 2025) emphasises the importance of infrastructure, including transport, to UK economic growth and prosperity, stating "Infrastructure provides the foundations high-growth sectors need to innovate, grow, and compete			

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					globally…Businesses rely on transport infrastructure to move their products and access talent". In this context, UK Infrastructure: A 10 Year Strategy (June 2025) sets out the Government's long-term plan for economic, housing and social infrastructure to drive economic development and unlock growth across the regions. Recognising the critical role of infrastructure to UK economic prosperity, at paragraphs 1.1 to 1.2 the Strategy states: "High quality infrastructure boosts growth and plays a vital role in delivering higher living standards. Investment in infrastructure will improve transport and digital connectivity, which supports productivity and efficiency improvements…it will boost supply chains and create good jobs for British workers…". The Strategy emphasises the importance of Ports for supporting growth specifically, stating at paragraph 3.31 that: "Ports play a critical role in the UK's economy, handling around 95% of all import and export tonnage, and acting as hubs for regional growth and employment. The UK's ports sector is largely privately owned and operated, with the government's role primarily to ensure that the policy and regulatory environment supports efficient operation and investment, and to provide targeted support for connectivity and decarbonisation where there are clear public benefits." The Government's planning policies are intrinsically linked to these wider economic objectives. Paragraph 85 of the NPPF states that "Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential." At paragraph 86, the NPPF stipulates that planning policies should: • "set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to the national industrial strategy and any relevant Local Industrial Strategies and other local policies for economic development and regeneration"; • "set criteria, and identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period; • "seek to address potential barriers to investment, such as inadequate infrastructure…" and • "pay particular regard to facilitating development to meet the needs of a modern economy, including by identifying suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure, freight and logistics". At paragraph 87, the NPPF goes on to state that planning policies "should recognise and address the specific locational requirements of different sectors. This includes making provision for: … b) storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation; and c) the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience." In terms of transport, paragraph 111 of the NPPF requires that planning policies "provide for any large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy". National policy statements (NPSs) provide the primary basis for decision making on development consent order (DCO) applications for nationally significant infrastructure projects (NSIPs) under the Planning Act 2008. However, NPSs are capable of being a material planning consideration in respect of applications that fall under the Town and Country Planning Act 1990. In consequence, BPC considers that the Ports NPS provides important context for the Local Plan and is a relevant consideration in respect of Policy LP9. The Ports NPS (January 2012) recognises the critical importance of ports to the UK economy, including in respect of freight movements and in delivering wider economic benefits. In this context, paragraph 3.4.16 states that the Government "believes that there is a compelling need for substantial additional port capacity over the next 20–30 years, to be met by a combination of development already consented and development for which applications have yet to be received. Excluding the possibility of			

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					providing additional capacity for the movement of goods and commodities through new port development would be to accept limits on economic growth and on the price, choice and availability of goods imported into the UK and available to consumers. It would also limit the local and regional economic benefits that new developments might bring. Such an outcome would be strongly against the public interest". The economic importance of ports and need for additional capacity is reaffirmed in the Government's proposal for a revised Ports NPS (June 2025). The revised NPS sets out, at paragraph 2.2.2, that it is the Government's policy to "encourage sustainable port development to enable long-term forecast growth in volumes of imports and exports by sea with a competitive and efficient port industry capable of meeting the needs of importers and exporters cost effectively and in a timely manner, thus contributing to long-term economic growth and prosperity". Paragraph 2.3.12, meanwhile, states: "It is Government Policy to encourage capacity to be provided at a wide range of facilities and locations, to provide the flexibility to match the changing demands of the market, possibly with traffic moving from existing ports to new facilities generating surplus capacity". Consistent with the designated NPS, paragraphs 2.3.30 to 2.3.31 conclude: "The Government believes that there is a compelling need for substantial additional port capacity over the next 30 years, to be met by a combination of development already consented and development for which applications have yet to be received. To exclude the possibility of providing additional capacity for the movement of goods and commodities through new port development would be to accept avoidable limits on economic growth and on the price, choice and availability of goods imported into the UK and available to consumers. It would also limit the local and regional economic benefits that new developments might bring. Such an outcome would be strongly against the public interest." Removal of land within Shipway Farm from the Green Belt will ensure that the Local Plan responds both positively and directly to the need for transport infrastructure investment and additional port capacity specifically, as established in the Government's economic policy and the Ports NPS. In accordance with the NPPF, it will also ensure that the Local Plan meets the specific needs of RPD, creating the conditions in which BPC can invest, expand and adapt so that the Port is able to fully support economic growth and employment generation in North Somerset and the wider South West region. Conversely, constraining the Port will be contrary to national economic and planning policy. Exceptional Circumstance 2: The economic importance of Bristol Port: Bristol Port is a strategically important national infrastructure asset and international gateway. It is also a fundamentally important economic contributor and major employer, with the Port estate contributing £1.29 billion to UK Gross Domestic roduct (GDP) and supporting over 21,000 jobs. Much of these economic benefits are retained in the regional economy; the Port contributes more than half (£761million GDP) to the South West's whole economy and 12,910 workers to its total employment. The Port's workforce is also highly productive, with labour productivity of more than double the South West average. Since privatisation in 1991, the Port has benefitted from £600 million of investment and the total tonnage of freight passing through it has increased by 93% (whilst overall tonnage of seaborne freights has fallen). The economic importance of Bristol Port is recognised in the Pre-submission Local Plan with Policy SP10 supporting RPD as a strategic transport facility. It is also reflected in regional and local economic strategies. RPD is within the Severn Estuary Growth Zone, as identified in the West of England Growth Strategy. The Strategy states that, as well as the existing strengths in freight and logistics, "Severn Estuary offers major investment opportunities in clean energy sectors. The Severn Estuary will be at the core of our national clean energy transition". Bristol Port is a key location within the Severn Estuary Growth Zone. It is identified as a 'strategic enabler' that is "supporting the movement of high-value and oversized components to global markets". Bristol Port is highlighted as key to supporting advanced manufacturing and clean energy industries, two of the West of England priority growth sectors. The North Somerset Economic Growth Plan 2025 to 2035, meanwhile, refers to RPD as a significant infrastructure asset, crucial to the regional economy and a key driver of the green and blue economies in North Somerset.			

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					Exceptional Circumstance 3: The need for additional transit storage capacity at RPD: Significant volumes of cargo are imported and exported using Bristol Port's facilities annually. The motor vehicle trade generates around a quarter (of the gross value of the Port's business (30% of revenue), with almost all of RPD's existing car storage capacity committed for use by a wide range of major car manufacturers. A significant proportion of these vehicles are carried on deep sea vessels whose characteristics (especially beam, or width) mean that they can only be accommodated at RPD, which has a much bigger lock than Avonmouth Docks. Vehicles are imported in large consignments and so, in order to accommodate them upon arrival, a significant area of secure transit storage is required at the Port. The way in which the import motor vehicle supply chain works means that vehicles cannot be driven out of the Port as soon as they arrive. Instead, they are moved to transit storage areas within the Port before being prepared for distribution to motor dealerships. The combined impact of the large consignments and preparation time is that the dwell time of imported vehicles is greater than exported vehicles which, in turn, increases the need for space. Consolidation within the automotive industry means that manufacturers need very large areas of transit storage in order to be able to achieve their own economies of scale, so that their vehicles can be priced competitively to attract UK consumers. As at July 2022, there was circa 188 hectares (ha) of car transit storage plots at RPD, of which approximately 162 ha was used for imports, providing capacity for transit storage of around 77,500 imported vehicles. In recent years, additional capacity has largely been provided by the development of safeguarded land adjoining RPD at the Court House Farm site; in May 2023, NSC approved the development of the remaining parcel of safeguarded land at Court House Farm (22/P/1770/FUL). Construction was completed in Spring 2025 and the circa 3 ha of vehicle storage is now fully utilised. More recently, a small parcel of Port land adjacent to RPD, formerly the Sheephouse Park caravan site, became available and was developed to provide just under 1 ha of additional storage capacity in October 2025 (NSC planning reference 25/P/1174/FUL). Further temporary capacity has been provided in the Bulk terminal since the handling of coal ceased, together with small-scale alterations and expansions of existing car plots within RPD to maximise storage capacity for imported cars. Since the construction of Court House Farm, however, gains in vehicle storage space have been countered to some extent by losses as a result of demands for further open storage areas and warehousing for the breakbulk and container trades, which by necessity have been accommodated on land that was previously used for car storage. In 2021, the construction of a new Border Control Post to address HM Government requirements for the inspection of certain imports from the European Union, post BREXIT, and the required expansion of container storage facilities at the RPD container terminal, resulted in the loss of over 6 ha of car storage. More recently, the ongoing construction of a new steel warehouse and liquid fertiliser terminal in RPD has resulted in the further loss of more than 3 ha of vehicle storage capacity. Allied to this, there is expected to be further reductions in capacity in the future if Bristol Port is to support the renewable and low carbon sector. The UK Government has set an ambitious target to achieve net zero greenhouse gas emissions by 2050. The targets set by the UK Governments for renewable energy production can only be met through the sustainable development of supply chain port infrastructure to support the development of offshore renewable energy generation. In this context, the West of England Growth Strategy outlines six actions to unlock growth, one of these being, 'Making the West of England the home for green jobs and green growth'. Supporting Bristol Port "to attract investment in the development of Floating Offshore Wind", is the first way that WEMCA identifies to contribute to achieving this action. The Bristol Wind Terminal has the potential to unlock 4.5GW of new renewable energy capacity, which could power more than four million homes. The Bristol Wind Terminal development will play an integral part of the wider Bristol Energy Transition Hub at the Port, which aims to be a critical component for supporting the rollout of sustainable and clean energy sources. This includes supporting new sustainable aviation fuel (SAF) facilities, new small modular reactor (SMR) developments, carbon capture utilisation and storage (CCUS), green and other hydrogen production/			

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					storage and acting as the muster port for EDF's Hinkley and Sizewell projects. As a result of this essential development, there will be a displacement of activity from how BPC currently utilise this land as car storage and distribution. For example, BPC has agreements in place with Sizewell C that will see a large proportion of the Avonmouth Docks estate taken for special projects. The economic opportunities in the green economy associated with RPD are reflected in Policy LP14 and the North Somerset Employment Land Evidence Report (June 2025). Indeed, the Employment Land Evidence Report states that realising these opportunities "will require some rationalisation of the existing estate, and potentially some small release of green belt sites if this aids this process and is considered appropriate in planning terms. NSC, Bristol Port Ltd, WECA and UK Government could work together proactively to realise this opportunity which would provide nationally significant levels and types of jobs". Alongside the loss of car storage space, there has also been an increase in demand for additional transit storage capacity at RPD. This increase in demand is driven by a number of factors, including: • the UK's departure from the European Union (EU) meaning that, due to the complexities and costs of clearing both EU and UK customs, cars are now shipped directly to Bristol (as opposed to shipping via the EU) and stored on port land prior to onward distribution to UK customers; • an increase in the production of cars in China for the UK market and the associated trend towards larger car vessels; • shipping routes and volumes into RPD increasing due to: (i) the reduction in traditional European manufactures who predominantly import into the UK on the east coast and south coast of the UK; and (ii) the reduction in UK exports due to factory closures (Stellantis, Luton); • unprecedented demand for Electric Vehicles (EVs), with increasing sales driven by the Government's net zero commitments, rising petrol/diesel prices and changing consumer attitudes in response to growing concerns about climate change (a full transition to EV imports is anticipated by 2035 as the sale of new petrol and diesel cars is proposed to be phased out); and • more transit import vehicles being stored at the port of entry rather than in the dealership network due to post-covid changes to car manufacturers' business models (whereby direct sales to customers are growing and the traditional use of car showrooms is declining correspondingly). The increasing demand for storage space has created sustained pressure on BPC to maximise the use of operational land within the Port estate. BPC has made considerable efforts to meet these demands by increasing operational efficiency, maximising the use of existing storage areas and promoting flexible storage solutions for customers. Indeed, over the last twenty years, BPC has maximised the use of its existing land for transit storage of motor vehicles; the Port now has the proven capability of storing around 85,000 vehicles on the same 188 ha footprint where historically around 77,000 vehicles were stored. This increased utilisation and operational efficiency has been achieved by BPC through improved compound design and active management of both manufacturers and terminal operators with a focus on improved space utilisation and reduced vehicle storage time. However, further gains are now challenging to achieve, BPC has no controlled land available to handle increased volumes and RPD is at capacity. Allied to this, the maximisation of storage space has included utilising ever increasing areas of Avonmouth, many of which have only been made available through BPC development and investment. However, a large proportion of this land is being utilised on a temporary basis and will need to be released back to schemes such as Sizewell and Bristol Wind Terminal, once they come on line over the next few years. Further, Avonmouth is only suitable for smaller short sea vessels so most of the vehicles in storage are received in RPD and transferred to Avonmouth as overflow storage, creating additional vehicle movements. The ability for more storage in RPD would reduce the need to transfer vehicles by road thereby reducing traffic loading on the road links from Portbury to Avonmouth, and improving the sustainability of operations. In this regard, BPC currently has customers requesting additional storage capacity far in excess of RPD's storage capability. To fulfil these requests, and to counter the future net loss from Avonmouth, BPC would need to a considerable area of land. In this context, the ability to develop land within Shipway Farm will mitigate some of these losses and support the future automotive proposition at Bristol Port. Inability to fulfil all of these requests will result in lost customers/business. As set out in respect of Exceptional Circumstance 4 below, there is no further, available space within the existing RPD site (and wider Port) to meet the demand for additional transit storage capacity.			

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					Allied to this, BPC is not able to utilise land within the Port, which is not owned, or under the control of, BPC. This is because land controlled by the Port means it can be readily adapted and used by BPC with complete flexibility in order to accommodate any cargo that the Port may be asked to handle. BPC must be able to exercise its judgement to decide how, when and where development to provide additional transit storage needs to take place, as recognised by the Ports NPS, which states: • at paragraph 3.3.1, that “Government seeks to … allow judgments about when and where new developments might be proposed to be made on the basis of commercial factors by the port industry or port developers operating within a free market environment”. • at paragraph 3.4.1, that “The total need for port infrastructure depends not only on overall demand for port capacity but also on the need to retain the flexibility that ensures that port capacity is located where it is required, including in response to any changes in inland distribution networks and ship call patterns that may occur, and on the need to ensure effective competition and resilience in port operations …” • at paragraph 3.4.12, that “Port development must be responsive to changing commercial demands, and the Government considers that the market is the best mechanism for getting this right, with developers bringing forward applications for port developments where they consider them to be commercially viable.” More land is, therefore, urgently required at RPD for transit storage. However, BPC has not identified any suitable options for accommodating this demand within the wider Bristol Port site, at RPD, outwith the Green Belt or on previously developed land within the Green Belt (this is discussed further below in respect of Exceptional Circumstance 4). In consequence, land within Shipway Farm must be released from the Green Belt to provide the necessary capacity at RPD. Should the Local Plan not meet the development needs of RPD over the plan period by releasing land within Shipway Farm from the Green Belt, there will be insufficient land available to handle customer cargoes and the Port's ability to operate efficiently will be significantly compromised. In turn, the Port’s crucial role in the global supply chain will be significantly impaired, its contribution to the UK, regional and local economy will be diminished, employment will not be sustained and, because customers' supply chain costs will be increased, they will ultimately be directly and adversely affected by having to pay more for goods. Indeed, such a situation is foreshadowed at paragraph 3.4.16 of the Ports NPS, which states: “Excluding the possibility of providing additional capacity for the movement of goods and commodities through new port development would be to accept limits on economic growth and on the price, choice and availability of goods imported into the UK and available to consumers. It would also limit the local and regional economic benefits that new developments might bring. Such an outcome would be strongly against the public interest.” Constraining the growth of the Port would also be likely to limit its ability to meet demands associated with the renewable and low carbon sector. The increasing demand for storage space, if unmet, will mean that less land can be made available within the Port estate for such uses. This runs contrary to the Government’s climate change commitments and national, regional and local economic objectives for green economic growth. It poses an unacceptable risk that essential renewable/low carbon energy related development is not brought forward and that the economic benefits this delivers is lost to other regions or countries. Exceptional Circumstance 4: The lack of alternative sites to accommodate the Port’s needs outwith the Green Belt: The Port's location is fixed and its facilities represent a major investment; it cannot just relocate in order to expand. This fact was expressly recognised by NSC during the examination into the now withdrawn West of England Joint Spatial Plan (JSP). In discussions relating to the expansion of the Port at the examination, Inspectors (at a hearing on 09 July 2019) asked about the potential release of land from the Green Belt and NSC’s representative stated that the Port "can't expand anywhere other than the port...it is a bit different from when you are considering housing or employment which have a choice of locations". As highlighted in respect of Exceptional Circumstance 3, land within the Port is tightly constrained by existing uses and the Port infrastructure is already developed to, and is operating at, capacity. In this context, BPC has not identified any onsite options for accommodating the requirement for additional transit storage space. BPC has considered an alternative of constructing multi-storey car parks for imported vehicles; however, analysis has demonstrated that the development costs would be			

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					uneconomic and multi-storeys would be inflexible (i.e. incapable of accepting cargo other than motor vehicles). BPC has also not identified any suitable, alternative sites outwith the Green Belt or on previously developed land within the Green Belt to provide the additional capacity RPD requires over the plan period. The last (and only) site safeguarded by NSC for port development was at Court House Farm. As much of this land as possible (either side of Marsh Lane) has now been developed and is fully utilised, further to it being released from the Green Belt through the former Replacement Local Plan (March 2007). As noted above, NSC approved the development of remaining parcel of safeguarded land at Court House Farm (to the east of Marsh Lane) in May 2023 (22/P/1770/FUL). Construction on this site was completed in Spring 2025, providing circa 3 ha of required storage capacity to support the motor vehicle trade. Other land on the periphery of RPD is constrained environmentally or due to complications of crossing the Metrowest railway line. As recognised in Policy LP14 of the Local Plan, the Port has over 100 ha of environmental corridors and green spaces, much of which are designated as local wildlife sites, with a wide variety of protected species. They are managed and monitored in accordance with BPC's Ecological Management Plan to ensure that these diverse natural habitats are not only protected, but that biodiversity in the Port is enhanced. This network of wildlife corridors and wetland areas also provide an essential role in sustainable drainage, carbon storage, and parts are within Flood Zones 2 and 3. Therefore, it would be inappropriate to identify these vital and interconnected spaces for wildlife as an alternative site for development. Other BPC owned non-operational land adjacent to RPD, meanwhile, is located within the Green Belt, protected under international, national, and/or local environmental designations, and forms part of the flood plain (Flood Zone 3). In contrast, the land within Shipway Farm has no statutory or non-statutory environmental designations within the site and is not located within Flood Zone 3. Exceptional Circumstance 5: The social, economic and environmental benefits of removing land within Shipway Farm site from the Green Belt: Releasing land within Shipway Farm from the Green Belt will deliver a number of important socio-economic and environmental benefits: • Socio-economic benefits - development of land within Shipway Farm will: o enable RPD to handle increasing volumes and different types of cargo and thus facilitate growth; o deliver superior economic benefit to the local, regional and national economy; o preserve Bristol Port's role as a recognised major employer and create new job opportunities, providing benefits to local communities; o enable BPC to continue to meet customer needs, and specifically support the operation of the motor vehicle trade (based largely in RPD); o support the potential for community-led renewable energy projects where appropriate; and o promote Bristol Port as a hub for sustainability, delivering essential projects and infrastructure to support the region's net zero energy transition and the creation of green jobs (as detailed in respect of Exceptional Circumstance 3). • Environmental benefits - development of land within Shipway Farm has the potential to: o deliver environmental enhancements including a net gain in biodiversity; o accommodate renewable and low carbon energy infrastructure; o provide landscape enhancements and strengthen Green Belt boundaries; o provide a new footpath route connection and amenity gathering/pausing/ picnic/seating space associated with the recently installed 'England Coast Path', footpath LA15/15/10 and the Portbury Wharf Nature Reserve path, with the opportunity to establish a new circular countryside link; o deliver additional offsite improvements to environmental quality and access in other parts of the Green Belt controlled by the Port estate. Given the clear 'exceptional circumstances' outlined above, BPC is disappointed that Policy LP9 does not make any provision for meeting the established development needs of RPD over the plan period by removing land within Shipway Farm from the Green Belt. In not proactively meeting the development needs of RPD, it is considered that Policy LP9 falls			

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					considerably short of meeting national planning policy objectives which seek to deliver economic growth and additional port capacity (as detailed in respect of Exception Circumstance 1 above). It is also: • in conflict with the Local Plan's own stated strategic priorities to increase the number and range of job opportunities across the district and deliver essential new strategic transport infrastructure; • not aligned with Policy SP1 (Sustainable Development), which sets out that new development should (inter alia) "support the delivery of opportunities for economic growth and job creation at accessible locations"; • inconsistent with Policy SP10 (Transport), which details that the improvement of strategic transport facilities including RPD will be supported; and • not aligned with national, regional and local economic strategy. Grey belt: Having established that 'exceptional circumstances' exist for the release of land within Shipway Farm from the Green Belt and that no alternatives sites, including on previously developed land, are available, the NPPF (at paragraph 148) directs plan makers to consider grey belt. Annex 2 of the NPPF defines grey belt as "land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development". The supporting text to Policy LP14 (Royal Portbury Dock) justifies the retention of the Green Belt in the vicinity of RPD on the basis that "The remaining Green Belt land located between the port estate and Portishead is considered extremely sensitive in preventing coalescence and checking unrestricted urban sprawl". This conclusion is based on the Stage 1 Strategic Green Belt Assessment (October 2025) (SGBA). The SGBA identifies large parcels of land for the purposes of the assessment. Shipway Farm is located within Parcel P-007. Parcel P-007 sits between RPD and Portishead and extends up to Portbury Wharf on the edge of the Severn Estuary to the north and into the Gordano Valley to the south. The assessment concludes that Parcel P-007 makes an overall strong contribution to the five purposes of the Green Belt established in the NPPF and identifies the parcel as being one of three broad parcels that are 'fundamentally important' areas of Green Belt. On this basis, the assessment concludes that Parcel P-007 should not be included in an 'area of search' for potential grey belt. BPC does not consider that the SGBA provides sufficiently detailed evidence on grey belt matters to justify the retention of the Green Belt in the vicinity of RPD. A Green Belt and Grey Belt Summary Position Statement has been prepared by The Landmark Practice and its Executive Summary is appended to this representation (BPC would be happy to provide the full Position Statement to NSC upon request). It identifies a number of important shortcomings with respect to the SGBA which render it unsound for the purposes of identifying land within the grey belt. In particular, these shortcomings include a recognised need for a more granular assessment to determine the presence of grey belt within the strategic parcels adopted for the purposes of the SGBA. To remedy these shortcomings, and provide robust evidence to inform the Local Plan, the Green Belt and Grey Belt Summary Position Statement presents a finer grained assessment of land within Shipway Farm, following the NPPF and National Planning Practice Guidance (NPPG) and mirroring NSC's Stage 2 Green Belt Assessment methodology. This finer grained assessment concludes that: • land within Shipway Farm (as identified in the Summary Position Statement and shown in the Executive Summary) does not make a strong contribution to Green Belt purposes (a), (b) and (d); • there are no areas or assets of importance (as defined in footnote 7 of the NPPF, other than Green Belt) that would potentially provide a strong reason for refusing or restricting the commercial development of the site; • release of the land from the Green Belt would not 'fundamentally undermine' the five Green Belt purposes (taken together) of the remaining Green Belt when considered across the area of the Local Plan.			

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					The Summary Position Statement also identifies that alternative, clearly defined, defensible edges using physical features that are readily recognisable and likely to be permanent, are available to re-define the Green Belt boundary around Shipway Farm, in line with paragraph 149 of the NPPF. Furthermore, the assessment also identifies ways in which the impact of removing land within Shipway Farm from the Green Belt can be offset through improvements to the environmental quality and accessibility of remaining Green Belt land in the vicinity, in accordance with paragraph 151 of the NPPF. Overall, the finer grain assessment identifies that land within Shipway Farm is grey belt land with strategic potential for Green Belt release. Accordingly, it is BPC's position that land within Shipway Farm (as identified in the Summary Position Statement) is grey belt and should be released from the Green Belt for the 'exceptional circumstances' outlined above. Conclusion Paragraph 36(a) of the NPPF sets out that, for local plans to be positively prepared, they must provide "a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development". By inadequately assessing Shipway Farm from a grey belt perspective and not removing land from the Green Belt to accommodate the needs of RPD over the plan period, the Local Plan does not provide a positive planning framework in respect of RPD and has not been prepared in accordance with paragraphs 85 to 87 and 111 of the NPPF. Overall, it is BPC's view that Policy LP9 has not, therefore, been positively prepared. 3. The Local Plan is not justified: BPC considers that the approach adopted in Policy LP9 (of not removing land from the Green Belt to meet the future needs of RPD) does not represent an appropriate strategy for guiding future development at RPD, considering reasonable alternatives and available evidence. On this matter, BPC notes that the supporting text to Policy LP14 states: "The Replacement Local Plan and Core Strategy considered port expansion issues and land was removed from the Green Belt and safeguarded for future port use, subject to demonstrating need and other detailed requirements. Further opportunities have been reviewed but no further Green Belt amendment is proposed. The remaining Green Belt land located between the port estate and Portishead is considered extremely sensitive in preventing coalescence and checking unrestricted urban sprawl". The position taken in the Local Plan is not consistent with that indicated by NSC in previous iterations of the emerging Local Plan (prior to the publication of the Preferred Options consultation document): • The Local Plan Issues and Options Document (September 2018) stated: "The accessibility and growth of international and regional gateways is linked with economic growth and delivering an improved transport system will be key to unlocking that growth". • The Local Plan Issues and Options Document expressly identified RPD as a strategic employment location in North Somerset. • The Local Plan Issues and Options Document stated: "At the Port, the focus will be on ensuring the most efficient use of the existing port area, but also considering any opportunities to support business growth associated with the Port. The latter could include making allowances for additional land supply in and around Portishead to meet demand for high growth businesses including those linked to port activities. If there are specific additional needs associated with the Port, the Local Plan process will need to consider the land use implications and future aspirations of the Port over the plan period." • The Local Plan Challenges and Choices Part 1: Challenges for the Future consultation document (July 2020) expressly stated that the Local Plan will need to "address the requirements of the Port and Airport considering their wider economic role, and the jobs and benefits they generate". NSC's position is surprising given that BPC expressly requested that land within Shipway Farm be removed from the Green Belt in its earlier responses to the Local Plan Preferred Options consultation			

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					document and the Autumn 2023 Pre-submission Local Plan (Regulation 19) consultation. NSC, in its pre-application advice to BPC (dated 17 September 2020, case reference 91484 20/P/0575/PR3) in relation to Shipway Farm, actually advised BPC that "[w]e would strongly encourage you to participate in the plan making process, where your proposals [to develop Shipway Farm] can be presented in the context of the long term growth strategy for the wider Port estate allowing NSC to comprehensively work with you to ensure long-term growth ambitions are thoroughly examined". Despite this, NSC does not appear to have considered BPC's request, nor has it robustly considered any opportunities involving the future growth of RPD. This contrasts sharply with the approach taken by NSC in the former Replacement Local Plan where land (Court House Farm) was removed from the Green Belt and safeguarded for future port-related use. In coming to its conclusion that "Further opportunities have been reviewed but no further Green Belt amendment is proposed", it is unclear what opportunities NSC is alluding to. Whilst options relating to the release of Green Belt land and grey belt at broad locations across the plan area have been assessed by NSC, there is no detailed assessment of the Green Belt in the vicinity of RPD (see Section 2) nor is there any indication of opportunities relating specifically to RPD having been identified, considered and reviewed by NSC within the Local Plan, its supporting evidence (beyond the North Somerset Employment Land Evidence Report which actually identifies the potential requirement for the release of land from the Green Belt to facilitate the expansion of RPD) or the accompanying Sustainability Appraisal (SA) Report (October 2025) (see also Section 6 of this response). Indeed, NSC has not prepared an up-to-date evidence base on this matter despite engagement by BPC with senior officers and councillors on several occasions when the Port held meetings and site visits and on each occasion noted the Port's development needs. BPC expressed this same concern at the Preferred Options stage and, subsequently, at the Autumn 2023 Pre-submission Local Plan stage. It has seemingly gone unheard and BPC maintains that this is a significant deficiency which renders the plan 'unsound'. Further, as demonstrated in Section 2, the SGBA on which decisions relating to the extent of the Green Belt in the vicinity of RPD have been based, does not provide the necessary finer grained assessment to support the position taken in the Local Plan. BPC would direct NSC to the serious concerns expressed by Inspectors which led (in part) to the withdrawal of the West of England Joint Spatial Plan (November 2017) (JSP). The withdrawn JSP identified Bristol Port (alongside Bristol Airport) as a key strategic infrastructure employment location (Policy 4); however, further to representations received from BPC and other parties on the emerging plan, Inspectors, in their letter dated 11 September 2019, advised at paragraph 32: "However, whilst policy 4 states that the Port and Airport (along with the other key strategic employment locations) will ensure the continued economic growth of the West of England, there is no clear indication of how this should be achieved or what it means in terms of the allocation of land". At paragraph 33 of their letter, the Inspectors continued: "The Councils explained to us that it would be for the local plans to consider the case for the allocation of land (and, if necessary, the removal of land from the Green Belt) to provide for growth at the strategic employment locations. However, it is a stated aim of the JSP to identify the amount of employment land needed and the most appropriate spatial strategy for this growth. Moreover, the Port and Airport are of fundamental and strategic importance to the whole of the West of England and, consequently, any growth at them would also be likely to have implications for the wider employment strategy for the area. In this context we anticipate it very likely that we would ultimately conclude that it is not a justified and effective approach for the plan to delegate, to a subsequent local plan, decisions on the nature, scale and location of growth at the Port and Airport and the existence or otherwise of exceptional circumstances to remove land from the Green Belt in connection with this. Consequently, we envisage it very likely that we would conclude that, for the plan to be sound in respect of the Port and Airport strategic employment locations, decisions on these matters should be addressed in the JSP. It is also the case that a considerable amount of work would be likely to be necessary to prepare the evidence to make justified decisions about the approach to take". It is BPC's view that the Local Plan is similarly flawed. There is no clear evidence that NSC has robustly considered the case for the expansion of RPD, which is surprising given the accepted strategic importance of the Port, national policy and BPC's representations on the Local Plan to-date; it is also in clear contrast to the views expressed by NSC during the examination into the JSP where			

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					its representative stated (at the hearing on 09 July 2019) that “yes, there is potential which needs to be assessed at...the port...in terms of intensification and potentially expansion and you're right certainly in North Somerset {sic] the Royal Portbury Dock...that would involve expansion into the Green Belt”. Paragraph 36(b) of the NPPF sets out that, for local plans to be justified, they must provide “an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence”. NSC has unequivocally failed to take into account all the evidence in determining the policy approach in respect of RPD, it has not undertaken a detailed assessment of Shipway Farm and has not identified and robustly assessed options relating to the future growth of the Port. In fact, the adopted policy approach does not reflect the findings of the evidence base which has identified a potential need to release land in the Green Belt to enable the growth of RPD. On this basis, BPC submits that Policy LP9 is not ‘justified’. See attached document for the remainder of the representation regarding why the Local Plan is not effective, not consistent with national policy, not legally compliant and doesn't comply with the duty to co-operate.			
Policy LP14: Royal Portbury Dock	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	1. Overview: The Bristol Port Company (BPC) is the statutory harbour authority and competent harbour authority for Bristol Port. Bristol Port comprises Avonmouth Docks and Royal Portbury Dock (RPD); RPD is within North Somerset Council’s (NSC) administrative area. For over 20 years, NSC has failed to acknowledge or enable the requirement for RPD to grow and expand. The imperative for a change of policy and mindset, as evidenced below, could not be more compelling or coherent. Growth is the single unifying agenda of the UK Government, the West of England Mayoral Combined Authority (WEMCA) and NSC. The failure to release land within Shipway Farm from the Green Belt has blighted any financial benefit for NSC since the Port’s privatisation in 1991. It will instantly deliver jobs, skills, investment and significant economic dividend, but not at the expense of the environment. On the contrary, it will support the renewable and low carbon sector and deliver environmental enhancements. Indeed, BPC’s credentials of sympathetic, considerate and innovative development are often cited as an exemplar to other businesses both locally and nationally. BPC submits that, in respect of Policy LP14 (Royal Portbury Dock), the North Somerset Local Plan 2041: Pre-submission Plan (Regulation 19) (the Local Plan) is not sound on the basis that it is not positively prepared, justified, effective, or consistent with national policy. Further, BPC does not consider that the Local Plan is legally compliant nor has it been prepared in accordance with the Duty to Cooperate. 2. The Local Plan is not positively prepared: Bristol Port is one of the largest UK commercial ports. It is a multimodal transport hub providing import, export and transit facilities for a wide range of cargo, with links by sea, road and rail between national and international destinations. Bristol Port is a strategically important national infrastructure asset and international gateway. It is also a fundamentally important economic contributor and major employer, with the Port estate contributing £1.29 billion to UK Gross Domestic Product (GDP) and supporting over 21,000 jobs. Much of these economic benefits are retained in the regional economy; the Port contributes more than half (£761million GDP) to the South West’s whole economy and 12,910 workers to its total employment. The Port’s workforce is also highly productive, with labour productivity of more than double the South West average. Since privatisation in 1991, the Port has benefitted from £600 million of investment and the total tonnage of freight passing through it has increased by 93% (whilst overall tonnage of seaborne freights has fallen). Any measurement of its contribution to employment must reflect workers	BPC requests that Policy LP14 be revised to make appropriate, positive provision for the long-term development needs of RPD by including the following statement: “Land within Shipway Farm will be removed from the Green Belt and safeguarded for development for port uses. Where need is demonstrated, development will be permitted subject to satisfactory environmental safeguards.” Linked to the above, BPC considers that the Local Plan vision and strategic priorities should include express reference to the strategic role of RPD as a transport infrastructure asset and employment location and, in this context, to the need to meet its development needs over the plan period to secure economic benefits for North Somerset and the wider South West region, deliver green jobs and facilitate the transition to net zero. Related to this, it is BPC’s view that RPD should be expressly identified as a strategic employment location on the Policies Map, within LP14 and also within Policy SP3 (Spatial Strategy) and Policy SP9 (Employment). BPC considers that the following additional changes to Policy LP14 should be made (additional		Green Belt statement.pdf Representation form Part B - LP14.pdf

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					employed in the wider upward, or downward, supply chain (handling cargo which has passed through the Port), as well as the Port's own direct employees. The economic importance of Bristol Port is recognised in the Pre-submission Local Plan with Policy SP10 supporting RPD as a strategic transport facility. It is also reflected in regional and local economic strategies. RPD is within the Severn Estuary Growth Zone, as identified in the West of England Growth Strategy. The Strategy states that, as well as the existing strengths in freight and logistics, "Severn Estuary offers major investment opportunities in clean energy sectors. The Severn Estuary will be at the core of our national clean energy transition". Bristol Port is a key location within the Severn Estuary Growth Zone. It is identified as a 'strategic enabler' that is "supporting the movement of high-value and oversized components to global markets". Bristol Port is highlighted as key to supporting advanced manufacturing and clean energy industries, two of the West of England priority growth sectors. The West of England Growth Strategy outlines six actions to unlock growth, one of these being, 'Making the West of England the home for green jobs and green growth'. Supporting Bristol Port "to attract investment in the development of Floating Offshore Wind", is the first way that WEMCA identifies to contribute to achieving this action. The Bristol Wind Terminal has the potential to unlock 4.5GW of new renewable energy capacity, which could power more than four million homes. The Bristol Wind Terminal development will play an integral part of the wider Bristol Energy Transition Hub at the Port, which aims to be a critical component for supporting the rollout of sustainable and clean energy sources. This includes supporting new sustainable aviation fuel (SAF) facilities, new small modular reactor (SMR) developments, carbon capture utilisation and storage (CCUS), green and other hydrogen production/storage and acting as the muster port for EDF's Hinkley and Sizewell projects. As a result of this essential development, there will be a displacement of activity from how BPC currently utilise this land as car storage and distribution. The North Somerset Economic Growth Plan 2025 to 2035, meanwhile, refers to RPD as a significant infrastructure asset, crucial to the regional economy and a key driver of the green and blue economies in North Somerset. For Bristol Port, and RPD specifically, to continue to play a significant role in the local, regional and national economy, it is essential that Policy LP14, and the Local Plan more broadly, fully support this strategically important transport infrastructure asset and employment site by providing a positive policy framework that is designed to meet RPD's needs over the plan period and fully realise the economic benefits of the Port for North Somerset and beyond. As presently drafted, Policy LP14, its supporting text and the Local Plan vision and strategic priorities fail to do this. Instead, they focus on the constraints to the growth of RPD and do not give equal consideration to the opportunities that expansion of the Port could secure for North Somerset's economy and its communities. Central to Bristol Port's development needs over the period of the Local Plan is a requirement to bring forward land at RPD to accommodate additional facilities for transit storage, which are a fundamental need for all ports. Meeting this need will: • enable RPD to handle increasing volumes and different types of cargo and thus facilitate growth; • deliver superior economic benefit to the local, regional and national economy; • preserve Bristol Port's role as a recognised major employer and create new job opportunities, providing benefits to local communities; • enable BPC to continue to meet customer needs, and specifically support the operation of the motor vehicle trade (based largely in RPD); • support the potential for community-led renewable energy projects where appropriate; and • promote Bristol Port as a hub for sustainability, delivering essential projects and infrastructure to support the region's net zero energy transition and the creation of green jobs (as detailed within BPC's representations in respect of Policy SP7 and Policy LP9). BPC is completing a full analysis of options for accommodating the need for additional transit storage facilities, both within the existing Port site, at locations outwith the Green Belt and adjacent to the Port within the Green Belt. This emerging analysis (which is summarised in BPC's responses to Policy SP7: Green Belt and Policy LP9: Extent of the Green Belt) has robustly demonstrated that land known	proposed wording is underlined and text which should be removed is struck through): SEE ATTACHED DOCUMENT FOR PROPOSED CHANGES		

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					as ‘Shipway Farm’, which is located immediately to the west of RPD, is the most appropriate location for accommodating this requirement. In order to meet the needs of RPD over the plan period, it is therefore essential that land within Shipway Farm is removed from the Green Belt to facilitate port-related development. In this context, BPC is extremely disappointed that Policy LP14 does not make any provision for meeting the established development needs of RPD over the plan period by removing land within Shipway Farm from the Green Belt. On this matter, the supporting text to the policy states: “The Replacement Local Plan and Core Strategy considered port expansion issues and land was removed from the Green Belt and safeguarded for future port use, subject to demonstrating need and other detailed requirements. Further opportunities have been reviewed but no further Green Belt amendment is proposed. The remaining Green Belt land located between the port estate and Portishead is considered extremely sensitive in preventing coalescence and checking unrestricted urban sprawl”. The position taken in the Local Plan is not consistent with that indicated by NSC in previous iterations of the emerging Local Plan (prior to the publication of the Preferred Options consultation document): • The Local Plan Issues and Options Document (September 2018) stated: “The accessibility and growth of international and regional gateways is linked with economic growth and delivering an improved transport system will be key to unlocking that growth”. • The Local Plan Issues and Options Document expressly identified RPD as a strategic employment location in North Somerset. • The Local Plan Issues and Options Document stated: “At the Port, the focus will be on ensuring the most efficient use of the existing port area, but also considering any opportunities to support business growth associated with the Port. The latter could include making allowances for additional land supply in and around Portishead to meet demand for high growth businesses including those linked to port activities. If there are specific additional needs associated with the Port, the Local Plan process will need to consider the land use implications and future aspirations of the Port over the plan period.” • The Local Plan Challenges and Choices Part 1: Challenges for the Future consultation document (July 2020) expressly stated that the Local Plan will need to “address the requirements of the Port and Airport considering their wider economic role, and the jobs and benefits they generate”. NSC’s position is all the more surprising given that BPC expressly requested that land within Shipway Farm be removed from the Green Belt in its earlier responses to the Local Plan Preferred Options consultation document and the Autumnn Pre-submission Local Plan (Regulation 19) consultation. In this context, NSC, in its pre-application advice to BPC (dated 17 September 2020, case reference 91484 20/P/0575/PR3) in relation to Shipway Farm, advised BPC that "[w]e would strongly encourage you to participate in the plan making process, where your proposals [to develop Shipway Farm] can be presented in the context of the long-term growth strategy for the wider Port estate allowing NSC to comprehensively work with you to ensure long-term growth ambitions are thoroughly examined". Despite this, NSC does not appear to have considered BPC’s request nor has it robustly considered any opportunities involving the future growth of RPD. This contrasts sharply with the approach taken by NSC in the former Replacement Local Plan (March 2007) where land (Court House Farm) was removed from the Green Belt and safeguarded for future port-related use. Further, whilst Policy LP14 supports “development which helps to deliver net zero and wider sustainability goals and promotes Royal Portbury Dock as a hub for sustainability as well as green jobs”, this objective is not supported by the release of land from the Green Belt at Shipway Farm, which is necessary to accommodate storage capacity displaced by renewable/low carbon related development (see also BPC’s representations in respect of Policy SP7 and Policy LP9). In this context, constraining the growth of RPD poses an unacceptable risk that essential renewable/low carbon energy related development is not brought forward and that the economic benefits this delivers is lost to other regions or countries. Turning to the specific wording of Policy LP14 and its supporting text, BPC has the following comments: • Policy LP14 states “The development of facilities and infrastructure which contribute to sustainable			

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					improvements to operational efficiency and its role as a strategic employment location, transport infrastructure asset and international gateway will be supported…". BPC does not consider that it is the role of NSC to consider the operational efficiency of RPD. This is not a planning matter but one for BPC, as the competent and statutory harbour authority, to manage. • Policy LP14 states that development at RPD will be supported provided that "The proposed development is for a port-related use" or "helps to deliver net zero and wider sustainability goals and promotes Royal Portbury Dock as a hub for sustainability as well as green jobs". Whilst the addition of reference to green jobs is welcomed, BPC maintains that this wording is overly prescriptive. It prohibits non port-related uses which may benefit from being located at RPD. Whilst many non port-related uses could in theory be located outside of RPD, it may be preferential for certain types of development to be sited within RPD for a wide range of reasons such as operational efficiency, sustainability, clustering and reduction of vehicles movements. This includes employment-related development. • Policy LP14 states that development will be supported provided that: "Benefits to the local economy and community are maximised; Opportunities for renewable energy generation are maximised including the production of green hydrogen; and national and locally important species and habitats are retained and enhanced". BPC considers that these requirements are overly constraining and alternative wording is suggested below. • The supporting text to Policy LP14 states "The remaining gap is also considered to be highly sensitive in terms of ecology. The area includes a network of wildlife corridors and a nature conservation area (Vole City), which protect a range of habitats. The Bristol Port Company manages and monitors these green areas for a variety of wildlife (including great crested newts, water vole, breeding birds, owls, and wildfowl and wading birds) in accordance with their Ecological Management Plan". This statement is confusing the Green Belt between the Port and Portishead with the Port's wildlife areas. A suggested amendment is provided below. Paragraph 36(a) of the National Planning Policy Framework (NPPF) sets out that, for local plans to be positively prepared, they must provide "a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development". The Local Plan does not provide a positive planning framework in respect of RPD and BPC has clearly established a need for the Local Plan to accommodate additional development needs which Policy LP14 fails to do. Overall, it is BPC's view that Policy LP14 has not, therefore, been positively prepared. 3. The Local Plan is not justified: For the reasons set out in Section 2 above, BPC does not consider that Policy LP14 represents an appropriate strategy for guiding the future development of RPD. The Issues and Options Document acknowledged the potential need to provide additional land to meet the development needs of RPD over the plan period. BPC has consistently set out in its representations that there is a need to expand RPD at Shipway Farm. However, NSC detail in the supporting text to Policy LP14 that "Further opportunities have been reviewed but no further Green Belt amendment is proposed" without any supporting evidence. It is unclear what opportunities NSC is referring to. Whilst options relating to the release of Green Belt land at broad locations across the plan area have been assessed, this assessment does not provide a sufficiently robust and detailed basis for consideration of grey belt within Shipway Farm (see BPC's representations in respect of Policy SP7 and LP9 for additional information on this matter). Further, there is no indication of any opportunities relating specifically to RPD having been identified, considered and reviewed by NSC within the Local Plan, its supporting evidence (beyond the North Somerset Employment Land Evidence Report which actually identifies the potential requirement for the release of land from the Green Belt to facilitate the expansion of RPD) or the accompanying Sustainability Appraisal (SA) Report (October 2025). Indeed, NSC has not prepared an up-to-date evidence base on this matter, despite engagement by Port staff with senior officers and councillors involving meetings and site visits and explanations of the Port's requirement for more space. . BPC expressed this same concern at the Preferred Options stage and, subsequently, at the Autumn 2023 Pre-submission Local Plan (Regulation 19) stage and it maintains that this is a significant deficiency which renders the plan 'unsound'.			

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					BPC would direct NSC to the serious concerns expressed by Inspectors which led (in part) to the withdrawal of the West of England Joint Spatial Plan (November 2017) (JSP). The withdrawn JSP identified Bristol Port (alongside Bristol Airport) as a key strategic infrastructure employment location (Policy 4); however, further to representations received from BPC and other parties on the emerging plan, Inspectors, in their letter dated 11 September 2019, advised at paragraph 32: “However, whilst policy 4 states that the Port and Airport (along with the other key strategic employment locations) will ensure the continued economic growth of the West of England, there is no clear indication of how this should be achieved or what it means in terms of the allocation of land”. At paragraph 33 of their letter, the Inspectors continued: “The Councils explained to us that it would be for the local plans to consider the case for the allocation of land (and, if necessary, the removal of land from the Green Belt) to provide for growth at the strategic employment locations. However, it is a stated aim of the JSP to identify the amount of employment land needed and the most appropriate spatial strategy for this growth. Moreover, the Port and Airport are of fundamental and strategic importance to the whole of the West of England and, consequently, any growth at them would also be likely to have implications for the wider employment strategy for the area. In this context we anticipate it very likely that we would ultimately conclude that it is not a justified and effective approach for the plan to delegate, to a subsequent local plan, decisions on the nature, scale and location of growth at the Port and Airport and the existence or otherwise of exceptional circumstances to remove land from the Green Belt in connection with this. Consequently, we envisage it very likely that we would conclude that, for the plan to be sound in respect of the Port and Airport strategic employment locations, decisions on these matters should be addressed in the JSP. It is also the case that a considerable amount of work would be likely to be necessary to prepare the evidence to make justified decisions about the approach to take”. It is BPC’s view that the Local Plan is similarly flawed. There is no clear evidence that NSC has robustly considered the case for the expansion of RPD, which is surprising given the accepted strategic importance of the Port, national policy and BPC’s representations on the Local Plan to date; it is also in clear contrast to the views expressed by NSC during the examination into the JSP. In discussions relating to the expansion of the Port at the examination, Inspectors (at a hearing on 09 July 2019) asked about the potential release of land from the Green Belt and NSC’s representative stated that “yes, there is potential which needs to be assessed at....the port.....in terms of intensification and potentially expansion and you're right certainly in North Somerset {sic] the Royal Portbury Dock.....that would involve expansion into the Green Belt”. The same representative also acknowledged that the Port “can't expand anywhere other than the port...it is a bit different from when you are considering housing or employment which have a choice of locations”. In the absence of evidenced decision making from NSC considering the case for expansion at Shipway Farm, BPC consider that the Local Plan is not justified. 4. The Local Plan is not effective: As set out in Section 2 above, Policy LP14 does not provide a robust, positive framework for the delivery of development to meet the future needs of RPD over the plan period. In consequence, BPC considers that the Local Plan is not deliverable. NSC has not worked jointly with BPC to ensure that the Local Plan makes appropriate provision for the development needs of RPD over the plan period. Whilst a Consultation Statement in respect of the Autumn 2023 Pre-submission Local Plan consultation has been prepared, BPC cannot find any evidence of how NSC has considered and responded to BPC’s representations. This is contrary to the NPPF which states (at paragraph 111) that: “Planning policies should…provide for any large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy.” It also runs contrary to paragraphs 86 and 87, which make clear that planning policies should meet anticipated sectoral needs over the plan period to support economic growth. Paragraph 36(c) of the NPPF sets out that, for local plans to be ‘effective’, they must be “deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground”. The			

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					Local Plan fails to make appropriate provision for RPD which undermines the deliverability of the plan and NSC has not adequately engaged with BPC to determine the development needs associated with this key strategic infrastructure asset. On this basis, BPC submits that Policy LP14 is not 'effective'. 5. The Local Plan is not consistent with national policy: The UK Government's economic policy objectives underpin the need for investment in infrastructure, including ports. The Plan for Change (December 2024) sets out the UK Government's programme across six missions for renewal. 'Kickstart Economic Growth' is the primary mission and the Government's objective is to raise standards in every part of the UK. This mission is underpinned by seven pillars including investment, infrastructure and planning. Supporting the Plan for Change, the UK Government's Modern Industrial Strategy (June 2025) emphasises the importance of infrastructure, including transport, to UK economic growth and prosperity, stating "Infrastructure provides the foundations high-growth sectors need to innovate, grow, and compete globally…Businesses rely on transport infrastructure to move their products and access talent". In this context, the UK Infrastructure: A 10 Year Strategy (June 2025) sets out the Government's long-term plan for economic, housing and social infrastructure to drive economic development and unlock growth across the regions. Recognising the critical role of infrastructure to UK economic prosperity, at paragraphs 1.1 to 1.2 the Strategy states: "High quality infrastructure boosts growth and plays a vital role in delivering higher living standards. Investment in infrastructure will improve transport and digital connectivity, which supports productivity and efficiency improvements…it will boost supply chains and create good jobs for British workers…". The Strategy emphasises the importance of Ports for supporting growth specifically, stating at paragraph 3.31 that: "Ports play a critical role in the UK's economy, handling around 95% of all import and export tonnage, and acting as hubs for regional growth and employment. The UK's ports sector is largely privately owned and operated, with the government's role primarily to ensure that the policy and regulatory environment supports efficient operation and investment, and to provide targeted support for connectivity and decarbonisation where there are clear public benefits." The Government's planning policies are intrinsically linked to these wider economic objectives. Paragraph 85 of the NPPF states that "Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential." At paragraph 86, the NPPF stipulates that planning policies should: • "set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to the national industrial strategy and any relevant Local Industrial Strategies and other local policies for economic development and regeneration"; • "set criteria, and identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period; • "seek to address potential barriers to investment, such as inadequate infrastructure…" and • "pay particular regard to facilitating development to meet the needs of a modern economy, including by identifying suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure, freight and logistics". At paragraph 87, the NPPF goes on to state that planning policies "should recognise and address the specific locational requirements of different sectors. This includes making provision for: … b) storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation; and c) the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience." In terms of transport, paragraph 111 of the NPPF requires that planning policies "provide for any			

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					large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy". National policy statements (NPSs) provide the primary basis for decision making on development consent order (DCO) applications for nationally significant infrastructure projects (NSIPs) under the Planning Act 2008. However, NPSs are capable of being a material planning consideration in respect of applications that fall under the Town and Country Planning Act 1990. In consequence, BPC considers that the Ports NPS provides important context for the Local Plan and is a relevant consideration in respect of Policy LP9. The Ports NPS (January 2012) recognises the critical importance of ports to the UK economy, including in respect of freight movements and in delivering wider economic benefits. In this context, paragraph 3.4.16 states that the Government "believes that there is a compelling need for substantial additional port capacity over the next 20–30 years, to be met by a combination of development already consented and development for which applications have yet to be received. Excluding the possibility of providing additional capacity for the movement of goods and commodities through new port development would be to accept limits on economic growth and on the price, choice and availability of goods imported into the UK and available to consumers. It would also limit the local and regional economic benefits that new developments might bring. Such an outcome would be strongly against the public interest". The economic importance of ports and need for additional capacity is reaffirmed in the Government's proposal for a revised Ports NPS (June 2025). The revised NPS sets out, at paragraph 2.2.2, that it is the Government's policy to "encourage sustainable port development to enable long-term forecast growth in volumes of imports and exports by sea with a competitive and efficient port industry capable of meeting the needs of importers and exporters cost effectively and in a timely manner, thus contributing to long-term economic growth and prosperity". Paragraph 2.3.12, meanwhile, states: "It is Government Policy to encourage capacity to be provided at a wide range of facilities and locations, to provide the flexibility to match the changing demands of the market, possibly with traffic moving from existing ports to new facilities generating surplus capacity". Consistent with the designated NPS, paragraphs 2.3.30 to 2.3.31 conclude: "The Government believes that there is a compelling need for substantial additional port capacity over the next 30 years, to be met by a combination of development already consented and development for which applications have yet to be received. To exclude the possibility of providing additional capacity for the movement of goods and commodities through new port development would be to accept avoidable limits on economic growth and on the price, choice and availability of goods imported into the UK and available to consumers. It would also limit the local and regional economic benefits that new developments might bring. Such an outcome would be strongly against the public interest." In accordance with the Government's economic objectives and national planning policies, it is essential that the Local Plan positively responds to the development needs of RPD. As presently drafted, however, Policy LP14 does not make such positive provision. Significantly, the Local Plan fails to: • provide necessary policy support to enable RPD to expand and adapt, which is contrary to paragraph 85 of the NPPF; • recognise the development needs of RPD, which is contrary to paragraph 87 of the NPPF; • support the expansion of RPD to enable it to contribute to the wider economy, which is contrary to paragraph 111 of the NPPF; • respond to the compelling need for additional port infrastructure, which is established in the Government's economic policies and the Ports NPS; and • recognise that the expansion of RPD can be brought forward in a sustainable manner. Additionally, the current Local Plan approach will likely constrain renewable and low carbon energy development at RPD and the wider Port estate at Avonmouth Dock. This is contrary to the Government's climate change commitments and policy and national, regional and local economic policy objectives for green growth.			

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					Paragraph 36(d) of the NPPF sets out that, for local plans to be consistent with national policy, they must enable “the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant”. Based on the foregoing, BPC does not consider that the Local Plan is consistent with national policy relating to economic development, transport infrastructure or ports. 6. The Local Plan is not legally compliant: SA undertaken as part of the local plan preparation process must satisfy the requirements of The Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations). Schedule 2 of the SEA Regulations requires that Environmental Reports (and, therefore, SA Reports prepared in respect of local plans) include “An outline of the reasons for selecting the alternatives dealt with”. Part 4 (Regulation 16), meanwhile, requires information is provided relating to (inter alia) “the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with”. The requirements of the SEA Regulations are reflected in the National Planning Practice Guidance (NPPG). The NPPG (018 Reference ID: 11-018-20140306, March 2014) states that a local plan SA “needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted”. Consistent with case law on SA, the NPPG goes on to state that SA reports should (inter alia) “outline the reasons the alternatives were selected, and identify, describe and evaluate their likely significant effects on environmental, economic and social factors using the evidence base (employing the same level of detail for each alternative option)” and “provide conclusions on the reasons the rejected options are not being taken forward and the reasons for selecting the preferred approach in light of the alternatives”. Contrary to the legal requirements of the SEA Regulations, NSC does not appear to have adequately identified and assessed reasonable alternatives relating to the future growth of RPD. The SA Report dated October 2025 has assessed the effects of Policy LP14; however, there is no consideration of options to extend the Port beyond its current boundary, including options involving the development of land within Shipway Farm. The assessment also significantly overstates the economic benefits of the policy as drafted. Significant economic growth and job creation at RPD depend on the ability to expand operational land, not just intensify existing uses. Without the ability to expand, the Port is forced to repurpose existing land, often at the expense of other trades, leading to operational inefficiencies and missed economic growth. The lack of additional land for motor vehicle storage directly limits the Port’s capacity to support supply chains and regional investment. The lack of assessment of reasonable alternatives is despite: • the Issues and Options Document expressly acknowledging the need to review options to meet the development needs of RPD over the plan period; • three of the four spatial strategy options considered in the subsequent North Somerset Local Plan: Challenges and Choices Part 2 – Choices for the Future consultation document (November 2020) explicitly noting that they present an opportunity “to explore potential new employment provision” at RPD; • BPC having consistently identified in its representations that removal of land within Shipway Farm from the Green Belt is critical to meeting RPD’s development needs over the plan period; • NSC’s pre-application advice to BPC, as summarised in Section 2; • the comments made by NSC’s own representative at the examination into the JSP, as summarised in Section 3; • concerns expressed by Inspectors in respect of the withdrawn JSP, as summarised in Section 3; • the change to national planning policy to introduce grey belt; • national, regional and local economic policy objectives, summarised in Section 2; and • the requirements of the NPPF and policy contained in the Ports NPS, summarised in Section 5. Overall, BPC does not consider that the Local Plan has been prepared in accordance with the SEA Regulations as it has failed to consider reasonable alternatives relating to RPD. On this basis, the			

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					Local Plan is not legally compliant. 7. The Local Plan does not comply with the Duty to Cooperate: Paragraph 25 of the NPPF sets out that local planning authorities “should collaborate to identify the relevant strategic matters which they need to address in their plans. They should also engage with their local communities and relevant bodies including…infrastructure providers”. Paragraph 20 details that strategic issues where co-operation might be appropriate include transport infrastructure. Whilst BPC is not a ‘prescribed body’ within the meaning given in The Town and Country Planning (Local Planning) (England) Regulations 2012, owing to the strategic importance of RPD, BPC is strongly of the view that it should be an ‘additional body’ for the purposes of the preparation of the Local Plan and the Duty to Cooperate. Presently, NSC has not sought to meaningfully and formally engage with RPD on this basis. This is despite: • the strategic importance of Bristol Port in transport and economic terms having been clearly established; • the Challenges for the Future consultation document expressly recognising the wider economic role of RPD; • Policy SP10 (Transport) of the Pre-submission Local Plan identifying RPD as a strategic transport facility; • the Government’s economic and planning policies identifying the strategic importance of infrastructure provision; • the strategic importance of RPD having been recognised in local and regional economic strategy; • BPC’s representations on the previous iterations of the Local Plan; and • NSC expressly encouraging BPC to work with it on matters relating to the long term development needs for RPD. For the reasons set out above, BPC does not consider that the Local Plan has been prepared in accordance with the Duty to Cooperate.			

Name: The Newcombe Estates Company Limited **I.D:** 27458753

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SP6: Villages and rural areas	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Yes	Yes	The government now requires 23,895 new homes within North Somerset between 2025-2040. This is an additional 8,161 dwellings above the figure within the previous Regulation 19 Local Plan (November 2023) of 15,734 dwellings. The Council acknowledged in the Spring 2025 consultation that to meet this requirement new homes will need to be located on Green Belt land. However, Policy SP6 and SP7 impose significant restrictions. Policy SP7 states that development within settlement boundaries is acceptable in principle, while SP6 limits development outside boundaries to replacement dwellings, conversions, rural worker housing, or redevelopment of previously developed land. This approach excludes sites on the edge of settlement boundaries, even where they are demonstrably sustainable. The justification within the supporting text for Policy SP6 states “development in the rural areas is relatively less sustainable given the absence of a range of services, facilities and job opportunities and the distances involved in travelling which will encourage car use.”.The supporting text states that rural areas are “relatively less sustainable” due to limited services and reliance on car travel. However, this overlooks the fact that many edge-of-boundary sites are not isolated rural locations but lie adjacent to established settlements with good access to services and transport. Two examples included in the Appendix, were previously submitted at the Regulation 19 stage and are located on the edge of settlement boundaries in sustainable locations.	The emerging Local Plan does not meet the tests of soundness set out in paragraph 36 of the NPPF. While the Council acknowledges the need for 23,895 new homes between 2025 and 2040 (an increase of over 8,000 dwellings from previous figures)it continues to impose restrictive policies (SP6 and SP7) that exclude sustainable sites on the edge of settlement boundaries. These sites, such as land east of Portbury and land east of Long Ashton, are well-related to Category A and B villages, offer good access to services and public transport, and could make a meaningful contribution to housing delivery. The failure to allocate these sites or provide evidence for their exclusion means the plan is not positively prepared, as it does not flexibly address housing needs or respond to the Council’s acknowledged shortfall in its five-year housing land supply. It is also not justified, given the lack of proportionate evidence and consideration of reasonable alternatives, nor is it effective, as over-reliance on a limited number of strategic sites introduces significant delivery risk. Finally, the plan is not consistent with national policy,		Pre Submission December 2025 Reps with appendices.pdf

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					One example is Land east of Portbury, which is within walking distance of schools, community facilities, shops, small businesses, and employment opportunities. The site also benefits from proximity to several bus stops providing connections to surrounding towns and villages. A similar case applies to the site referenced in Appendix B (Land east of Long Ashton).These representations were originally submitted during the Spring 2025 consultation to promote site allocation in response to the Council's request for "convincing reasons why sites in less sustainable areas should be considered." Both sites adjoin Category A and B villages (as classified under the Regulation 18 consultation) and were previously regarded as sustainable locations with access to public transport and infrastructure. Despite these detailed submissions, no explanation has been provided for their exclusion.Furthermore, the Council does not currently have a five-year housing land supply, with its latest position indicating only between 2.33 and 3.07 years supply. This significant shortfall demonstrates a need for flexibility within the Local Plan to identify sustainable sites beyond settlement boundaries and through site allocations. This omission undermines the plan's ability to meet housing needs flexibly and efficiently, meaning it is not positively prepared. Justified The plan must be based on proportionate evidence and consider reasonable alternatives. During Regulation 18, villages were categorised from Category A (most sustainable) to Category D (least sustainable). In Spring 2025, this classification was abandoned, and previously sustainable villages were downgraded to "less sustainable" without any published evidence or justification. Despite representations requesting allocation of sites adjacent to these settlements, the Council has provided no explanation for their exclusion. This failure to assess reasonable alternatives demonstrates that the plan is not justified.The Council's Spatial Strategy and Site Selection Paper (October 2025) identifies steps for assessing sites well related to towns and larger sustainable villages (under steps 3 and 4). The promoted sites including Land east of Portbury and Land east of Long Ashton meet this criteria and the Council should provide evidence of why they were discounted compared to other allocations. Effective Policy SP8 concentrates 88% of new housing in Weston-super-Mare, Wolvershill, Woodspring, Nailsea and Backwell, Pill and Easton-in-Gordano, Portishead, and Clevedon, leaving only 12% for villages and rural areas. By excluding edge-of-boundary sites, the plan removes flexibility to respond if strategic sites face delays or infrastructure challenges. This over-reliance on a small number of large allocations creates delivery risk and makes the plan ineffective. Consistent with National Policy Paragraph 11 of the NPPF requires plans to promote sustainable patterns of development and meet identified needs. The plan fails to demonstrate that sustainably located sites on the edge of settlement boundaries have been considered either within Policy or within the allocations. Paragraph 73 of the NPPF sets out the importance of small and medium sized sites can make an important contribution to meeting the housing requirements of an area. A number of small sites in sustainable locations will be located on the edge of settlement boundaries including those set out in the examples in the Appendix. In December 2024, the NPPF introduced grey belt land and stated that development in the Green Belt should not be regarded as inappropriate where grey belt land would be utilised. By excluding land on the edge of settlement boundaries this excludes a number of potential grey belt sites including the examples set out in Appendix. Overall, excluding sites on the edge of settlement boundaries conflicts with national policy and undermines the objective of delivering sustainable growth. The plan is therefore not consistent with national policy.	which requires sustainable patterns of development, the inclusion of small and medium-sized sites, and consideration of grey belt land. To ensure the Local Plan is sound, the Council should revisit its spatial strategy, provide transparent evidence for site selection, and allocate sustainable edge-of-boundary sites to deliver housing growth in line with national policy objectives.		

Name: The Theatres Trust **I.D:** 1020641

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Policy DP51: Protection of built community facilities	Yes		Yes	Yes	Although we are supportive of this policy, we consider the length of marketing period referred to should be increased from 6 months to 12 months. This gives consistency with the minimum period in many other plans to help 'guard against unnecessary loss' in line with paragraph 98 of the NPPF (2024). A six month period also makes it challenging for community groups to form and fundraise to enable them to bid for properties.	· Evidence is submitted that demonstrates, to the satisfaction of the Council, that attempts to rent/dispose of the property for community uses have failed. This must include evidence that the facility has been marketed for at least **TWELVE** months at normal market value for such uses. In addition, if the council considers it appropriate, a business plan shall be required identifying the extent and combination of usage and charges necessary to make the facility profitable; or		

Name: The Wring Family Trust **I.D:** 31084001

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Colliter's Way, Long Ashton	No	' Effective	Yes	Yes		The Trust particularly supports the requirement in the emerging North Somerset Local Plan that there can be "No vehicular access of Colliters Way". (page 309 of the Pre◈submission Plan). This position is entirely appropriate and, indeed, necessary in order to maintain the role and function of Colliters Way. However, the Trust is concerned that whilst the emerging Plan states where vehicular access should CANNOT be achieved off, it does not state where access CAN be achieved. In that regard, The Trust demonstrates in this representation that: a). Elsbert Drive is unsuitable as a vehicular access for the entire allocation; and b). An appropriate vehicular access can be delivered from the A38 Bridgwater Road Therefore, whilst fully supporting the entire allocation, the Trust strongly believes that stating that the vehicular access should be taken from the A38 Bridgwater Road would ensure that the Plan is positively prepared, effective and justified. As explained above, the Trust owns part of land identified in Schedule 1 (pages 309 and 310) of the Pre-submission Plan as "Land North Of Colliter's Way, Long Ashton". Specifically, the Trust owns land in the northern part of that allocation immediately adjoining the A38 Bridgwater Road as shown in the below figure. The Pre-submission Plan allocates this site for residential development giving an "indicative capacity" of 215 dwellings. This proposed allocation is fully accepted and, acknowledging that the true capacity of the site will be established through detailed master planning and the development management process, the use of an indicative" figure at this stage is also supported. Schedule 1 sets out a number of "Site Requirements" for the allocation as follows: "No vehicular access off Colliters Way. Active travel links to all local roads and public rights of way. Active travel provision improvements to link into local facilities. To coordinate development including the design, master planning, approach to vehicular access and delivery across the entire allocation, including that part proposed for residential development on adjoining land off Elsbert Drive within the Bristol City Council administrative area, to facilitate a comprehensive development with land in Bristol City. Development must follow a heritage and landscape-led masterplan which preserves key views from heritage assets, taking account of recommendations in the Historic Environment Assessment (HEA). Landscaped rural buffer required at edge of site to mitigate impact upon the wider borrowed landscape of Ashton Court and screen the development from wider viewpoints. The design and layout must reflect the rural edge location and its historic character, with building heights not exceeding three storeys to minimise any impacts on wider landscape views and with the layout respecting key views out of the development such as to Ashton Court and St Michael Church in Dundry. Design to incorporate features from the character of the local surrounding architecture and the non-designated heritage assets in the southwest corner of the site. A green landscape buffer will be required in this corner to protect the wider setting of these assets, as shown in the HEA. Design to incorporate features from the character of the local surrounding architecture and the non-designated heritage assets in the southwest corner of the site. A green landscape buffer will be required in this corner to protect the wider setting of these assets, as shown in the HEA." The Trust is pleased to support the site requirements and would comment specifically on some of the requirements as follows. "No vehicular access off Colliters Way" The Trust fully supports this requirement and commends the Local Planning Authority for consistently holding this position which is vital in ensuring that Colliter's Way continues to function as intended. Notwithstanding its support for not allowing access off Colliter's Way, the Trust believes that the	This representation on the Pre-Submission version North Somerset Local Plan 2021 has been prepared on behalf of The Wring Family Trust. The Trust owns part of land known in the Plan as "Land North Of Colliter's Way, Long Ashton". Specifically, the Trust owns land in the northern part of that allocation immediately adjoining the A38 Bridgwater Road as shown in the below figure. The Trust therefore supports the principal of the wider cross boundary allocation and can confirm that land in its	251211 20.0009 BPF obo WFT NS Reg 19 fv.pdf

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						site requirements would benefit greatly from definitively stating how vehicular access should be achieved for the allocation to further demonstrate its deliverability. At the time of writing, Taylor Wimpey has submitted an outline planning application (reference 25/14175/P) concerning part of the wider allocated area that is within Bristol. This is an outline application for "up to 100 dwellings" with all matters reserved except for access which is proposed off Elsbert Drive. The Trust has an in-principal objection to this application because it ignores the aspiration of both emerging Bristol and North Somerset Local Plans to achieve comprehensive development. More fundamentally, the Trust does not believe that Elsbert Drive is appropriate to deliver vehicular access for up to 100 dwellings. Accordingly, the Trust has submitted an objection to this application which is attached as Appendix 1 of this representation. That objection includes detailed comments on Highways and Transportation matters prepared by Neil Brant Consulting, a professional highway engineering and transport planning consultancy, which conclude that Elsbert Drive is not appropriate to serve the level of development proposed. It is fully recognised that North Somerset are not the determining authority for the Taylor Wimpy application, however, even if planning permission is granted by Bristol City it is clear from the Neil Brant Consulting report that Elsbert Drive is wholly inappropriate to deliver the wider allocation; that is to say the circa 215 dwellings in North Somerset. The Trust has commissioned work, through Neil Brant Consulting, to demonstrate that an appropriate vehicular access can be delivered from the A38 Bridgwater Road through its land to deliver the proposed allocation. Given that there is to be no access off Colliter's Way and the unsuitability of Elsbert Drive, this must be the favoured and only point of access and this should be stated in the Site Requirements set out in the emerging Local Plan. Doing so would ensure that Plan is positively prepared, effective and justified. Importantly, stating that the main vehicular access should be taken from the A38 Bridgwater Road would also be entirely consistent with the fourth "site requirement" which is: "To coordinate development including the design, master planning, approach to vehicular access and delivery across the entire allocation, including that part proposed for residential development on adjoining land off Elsbert Drive within the Bristol City Council administrative area, to facilitate a comprehensive development with land in Bristol City." Historic Environment Assessment (HEA) Several of the site requirements reference the HEA including in respect of the development adopting a heritage and landscape led approach to master planning and the provision of a green landscape buffer in the south west corner of the allocation to protect the setting of non-designated heritage assets. The Trust has reviewed the HEA (dated September 2025) within which the land north of Colliter's Way is referenced as site "HEA 2". The Trust broadly welcomes the findings of the HEA and fully supports the conclusion that the land in its ownership forms a significant part of area that is "Least Sensitive to Development" as set out in Figure 7 of that document In order to improve the soundness of the emerging North Somerset Local Plan 2041, the Wring Family Trust respectfully ask that a further "Site Requirement" is included in respect of Land North of Colliter's Way, Long Ashton as follows: "Site requirements: No vehicular access off Colliters Way. Principal vehicular access to be taken off the A38 Bridgwater Road. Active travel links to all local roads and public rights of way. Active travel provision improvements to link into local facilities. To coordinate development including the design, master planning, approach to vehicular access and delivery across the entire allocation, including that part proposed for residential development on adjoining land off Elsbert Drive within the Bristol City Council administrative area, to facilitate a comprehensive development with land in Bristol City...."	ownership is available, achievable and deliverable for development.	

Name: Thomas Davis **I.D:** 62687521

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Land east of Backwell	No	• Justified	Unsure	No	The proposed relief road is across flood plains so will need to be raised. A raised road will create more traffic noise to surrounding area. No sound banks for this road are proposed! Also there is no provision to improve station road through Nailsea. You will increase the traffic due to being anymore attractive route as the bottleneck at backwell station is removed but you move the problem onto Nailsea station road and the junction to High Street .	The proposed relief road is across flood plains so will need to be raised. A raised road will create more traffic noise to surrounding area. No sound banks for this road are proposed! Also there is no provision to improve station road through Nailsea. You will increase the traffic due to being anymore attractive route as the bottleneck at backwell station is removed but you move the problem onto Nailsea station road and the junction to High Street		

Name: Thomas Jackson **I.D:** 39313345

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP7: Green Belt	No	• Positively prepared • Justified • Effective	Unsure	Unsure	I do not believe that this plan has been prepared with due consideration for the communities impacted and the total destruction to the environment to meet an arbitrary target from central government that makes no reference to the direct need of North Somerset communities and or the availability of available employment. I do not believe it adequately addresses the infrastructure needs going from already overstretched community infrastructure to in some cases an almost 100% in population	I do not believe any green belt site should be considered unless the land is considered unfit for farming purposes or a clear flood plane and there is already adjacent infrastructure that could be modified with limited impact.		
Grove Farm	No	• Positively prepared • Justified • Effective	Unsure	Unsure	I do not believe this plan to be sound. The areas that are proposed for development are grade 1 listed green belt. The area is close to flood zones and the village will be decimated as a result of this over development of the village. The existing infrastructure is already at full stretch and that is before the current developments finish any more than this will cause untold pressure. The total destruction of these important eco systems, habitats and green belt is not justified by the quick fix housing solutions being proposed that do not provide adequate affordable housing, with opportunities for local employment and only benefit the house builders share price.	I believe it needs to be reconsidered to move housing closer to employment and existing infrastructure. This should be done on an environmentally focused way prioritising the use of brown field or low yield agricultural land close to existing large conurbations. Where possible we should be looking to improve and strengthen existing infrastructure that can support this scale of growth.		

Name: Tickenham Parish Council **I.D:** 8668193

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP10: Transport	No	• Positively prepared • Justified • Effective	Unsure	No	There are no proposals to substitute or improve the road infrastructure that currently serves Tickenham despite the increase in traffic that would inevitably emanate from the proposed approximately 4,000 house developments in Nailsea and Backwell. Tickenham is currently served by the B3130, B3128, The Causeway, Washingpound Lane and Church Lane. The B3130 is a sub standard road that runs through part of Tickenham. Substandard means: a pinch point where HGVs/buses cannot pass each other, a pinch point where HGVs/buses struggle to pass each other, 3 x 90degree bends, inadequate road width below accepted national standards, lack of footpaths and narrow footpaths below accepted national standards, 145 houses directly access onto a length of the B3130 less than 1.5miles long. Tickenham school children walking to school are forced to walk on narrow footpaths with traffic thundering by within inches. The Causeway, Washingpound Lane and Church Lane are rural lanes and although proposed to be classified as Rural Quiet Lanes there are no proposals in the transport section of the Infrastructure Delivery Plan to provide any works to improve them or reduce traffic onto them, and North Somerset Council have warned that any improvements are highly susceptible to funding issues. The Local Plan needs to	Provide suitable transport infrastructure to cater for the proposed approximately 4,000 house developments in Nailsea and Backwell, in terms of: 1. the construction of a road link between Nailsea and Clevedon using existing and improved roads as shown on the plan attached to this response. 2. infrastructure improvements to The Causeway, Washingpound		NailseaTickenhamLink.pdf 250722EmailFROM EmilyMcDonaldCausewayMeeting.pdf

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					provide workable proposals and establish that funding will be available. All of the aforementioned roads will be subject to traffic flows above their capacity. Relating to the North Somerset Council duty to cooperate (which has been lacking), please see second attachment relating to an email from an officer of North Somerset Council, (22 July 2025),. Tickenham Parish Council wanted to have a meeting with North Somerset Council to discuss proposals to The Causeway. We were told they were too busy to talk to us. Sadly we were never sent further information and there are no further concrete proposals/details in the Local Plan.	Lane and Church Lane to make these routes more attractive to those travelling by active modes, and less attractive to general traffic.		
Policy LP3: Strategic location: Nailsea and Backwell	No	• Positively prepared • Justified • Effective	Unsure	No	The proposed developments in Nailsea and Backwell will produce additional traffic onto the B3130 andB3128. A proportion of this traffic will want to travel west to Clevedon and M5 Junction 20, and east to M5 Junction 19 or to Bristol. There is no amelioration planned for these routes. The B3130 and B3128 are already up to capacity. The B3130 is a sub standard road that runs through part of Tickenham. Substandard means: a pinch point where HGVs/uses cannot pass each other, a pinch point where HGVs/buses struggle to pass each other, 3 x 90 degree bends, inadequate road width below accepted national standards, lack of footpaths and narrow footpaths below accepted national standards, 145 houses directly access onto a length of the B3130 less than 1.5 miles long. Tickenham school children walking to school are forced to walk on narrow footpaths with traffic thundering by within inches. The Causeway, Washingpound Lane and Church Lane are rural lanes and although proposed to be classified as Rural Quiet Lanes there are no proposals in the transport section of the Infrastructure Delivery Plan to provide any works to improve them or reduce traffic onto them, and North Somerset Council have warned that any improvements are highly susceptible to funding issues. The Local Plan needs to establish that funding will be available. All of the aforementioned roads will be subject to traffic flows above their capacity. We have tried to liaise with North Somerset Council over the problems above. Relating to the North Somerset Council duty to cooperate (which has been lacking), please see second attachment relating to an email from an officer of North Somerset Council, (22 July 2025),. Tickenham Parish Council wanted to have a meeting with North Somerset Council to discuss proposals to The Causeway. We were told they were too busy to talk to us. Sadly we were never sent further information and there are no further concrete proposals/ details in the Local Plan.	Provide suitable transport infrastructure to cater for the proposed 4,000 house developments in Nailsea and Backwell, in terms of: 1. the construction of a road link between Nailsea and Clevedon using existing and improved roads as shown on the plan attached to this response. 2. infrastructure improvements to The Causeway, Washingpound Lane and Church Lane to make these routes more attractive to those travelling by active modes, and less attractive to general traffic.		250722EmailFROM EmilyMcDonaldCausewayMeeting.pdf NailseaTickenhamLink.pdf
Policy LP9: Extent of the Green Belt	No	• Positively prepared • Justified • Effective	Unsure	Unsure	1. Green belt assessment for Land north of Nailsea Tickenham Parish Council do not agree with the analysis undertaken by North Somerset Council on page 22 of their document: Stage 2 Green Belt Assessment. We consider that criteria (a), (b) and (c) should all be classified as strong and that this area of land should not be defined as grey belt. 2. Green belt assessment for the land off Pound Lane, Nailsea Tickenham Parish Council do not agree with the analysis undertaken by North Somerset Council on page 23 of their document: Stage 2 Green Belt Assessment. We consider that criteria (a), (b) and (c) should all be classified as strong and that this area of land should not be defined as grey belt.	The Local Plan should be amended so that the areas of land described as 1. Land North of Nailsea and 2. Land off Pound Lane, Nailsea which are analysed in the Stage 2 Green Belt Assessment as grey belt remain as green belt.		
Land at North West Nailsea	No	• Positively prepared • Justified • Effective	Unsure	Unsure	The proposed development will produce additional traffic onto the B3130 and B3128. A proportion of this traffic will want to travel west to Clevedon and M5 Junction 20, and east to M5 Junction 19 or to Bristol. There is no amelioration planned for these routes. The B3130 and B3128 are already up to capacity. The B3130 is a sub standard road that runs through part of Tickenham. Substandard means: a pinch point where HGVs/buses cannot pass each other, a pinch	Provide suitable transport infrastructure to cater for the proposed 4,000 house developments in Nailsea and Backwell, in terms of: the construction of a road link between Nailsea and		NailseaTickenhamLink.pdf

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					point where HGVs/buses struggle to pass each other, 3 x 90degree bends, inadequate road width below accepted national standards, lack of footpaths and narrow footpaths below accepted national standards, 145 houses directly access onto a length of the B3130 less than 1.5miles long. Tickenham school children walking to school are forced to walk on narrow footpaths with traffic thundering by within inches. The Causeway, Washingpound Lane and Church Lane are rural lanes and although proposed to be classified as Rural Quiet Lanes there are no proposals in the transport section of the Infrastructure Delivery Plan to provide any works to improve them or reduce traffic onto them, and North Somerset Council have warned that any improvements are highly susceptible to funding issues. The Local Plan needs to establish that funding will be available. All of the aforementioned roads will be subject to traffic flows above their capacity.	Clevedon using existing and improved roads as shown on the plan attached to this response. infrastructure improvements to The Causeway, Washingpound Lane and Church Lane to make these routes more attractive to those travelling by active modes, and less attractive to general traffic.		
West of Engine Lane								
Land north of Nailsea	No	• Positively prepared • Justified • Effective	Unsure	Unsure	The proposed development will produce additional traffic onto the B3130 and B3128 A proportion of this traffic will want to travel west to Clevedon and M5 Junction 20, and east to M5 Junction 19 and/or Bristol. There is no amelioration planned for these routes. The B3130 and B3128 are already up to capacity. The B3130 is a sub standard road that runs through part of Tickenham. Substandard means: a pinch point where HGVs/buses cannot pass each other, a pinch point where HGVs/buses struggle to pass each other, 3 x 90 degree bends, inadequate road width below accepted national standards, lack of footpaths and narrow footpaths below accepted national standards, 145 houses directly access onto a length of the B3130 less than 1.5miles long. Tickenham school children walking to school are forced to walk on narrow footpaths with traffic thundering by within inches. The area of the proposed development is prone to flooding. An attachment to this response shows the flooding that occurred in November 2025 at Jacklands Lake adjacent to the proposed development. The northern boundary of proposed development runs in part along the southern boundary of the Parish of Tickenham. The proposed development is on land that is currently classed as Green Belt. One of the purposes of Green Belt is to prevent urban sprawl and the merging of differing conurbations. The merging of Nailsea and Tickenham will happen if this development in the Green Belt is allowed to happen.	Provide suitable transport infrastructure to cater for the proposed 381 house development on land north of Nailsea, and the 3,728 houses proposed for construction in the Nailsea and Backwell, in terms of the construction of a road link between Nailsea and Clevedon using existing and improved roads as shown on the plan attached to this response. Do not build houses in flood zones. Do not build in Green Belt.		NailseaTickenhamLink.pdf JacklandsLakeFlooding.jpg
Land off Pound Lane, Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	No	The proposed development will produce additional traffic onto the B3130 and mB3128 A proportion of this traffic will want to travel to the west to Clevedon and M5 Junction 20, and east to M5 Junction 19 or to Bristol. There is no amelioration planned for these routes. The B3130 and B3128 are already up to capacity. The B3130 is a sub standard road that runs through part of Tickenham. Substandard means: a pinch point where 2 HGVs cannot pass each other, 3 x 90 degree bends, inadequate road width below accepted national standards, lack of footpaths and narrow footpaths below accepted national standards, 145 houses directly access onto a length of the B3130 less than 1.5miles long. Tickenham school children walking to school are forced to walk on narrow footpaths with traffic thundering by. The area of the proposed development is prone to flooding. An attachment to this response shows the flooding that occurred in November 2025 at Jacklands Lake adjacent to the proposed development. The northern boundary of proposed development runs adjacent to the southern boundary of the Parish of Tickenham. The proposed development is on land that is currently classed as Green Belt. One of the purposes of Green Belt is to prevent urban sprawl and the merging of differing conurbations. The merging of Nailsea and	Provide suitable transport infrastructure to cater for the proposed 381 house development on land north of Nailsea, and the 3,728 houses proposed for construction in the Nailsea and Backwell, in terms of the construction of a road link between Nailsea and Clevedon using existing and improved roads as shown on the plan attached to this response. Do not build houses in flood zones. Keep development away from Nature Reserves.		NailseaTickenhamLink.pdf JacklandsLakeFlooding.jpg

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					Tickenham will happen if this development in the Green Belt is allowed to happen. Pound Lane is currently a physical divide to the northern boundary of Nailsea. This proposed development breaches this physical divide and puts the development adjacent to the vitally important Moorend Spout Nature Reserve run by Nailsea Environment and Wildlife Trust. There is no mention of this vital resource in the site requirements for this site.			
Poplar Farm, Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective	Unsure	No	The proposed development will produce additional traffic onto the B3130 and B3128. A proportion of this traffic will want to travel west to Clevedon and M5 Junction 20, and east to M5 Junction 19 or to Bristol. There is no amelioration planned for these routes. The B3130 and B3128 are already up to capacity. The B3130 is a sub standard road that runs through part of Tickenham. Substandard means: a pinch point where HGVs/buses cannot pass each other, a pinch point where HGVs/buses struggle to pass each other, 3 x 90 degree bends, inadequate road width below accepted national standards, lack of footpaths and narrow footpaths below accepted national standards, 145 houses directly access onto a length of the B3130 less than 1.5miles long. Tickenham school children walking to school are forced to walk on narrow footpaths with traffic thundering by within inches. The Causeway, Washingpound Lane and Church Lane are rural lanes and although proposed to be classified as Rural Quiet Lanes there are no proposals in the transport section of the Infrastructure Delivery Plan to provide any works to improve them or reduce traffic onto them, and North Somerset Council have warned that any improvements are highly susceptible to funding issues. The Local Plan needs to establish that funding will be available. All of the aforementioned roads will be subject to traffic flows above their capacity.	Provide suitable transport infrastructure to cater for the proposed approximately 4,000 house developments in Nailsea and Backwell, in terms of: 1. the construction of a road link between Nailsea and Clevedon using existing and improved roads as shown on the plan attached to this response. 2. infrastructure improvements to The Causeway, Washingpound Lane and Church Lane to make these routes more attractive to those travelling by active modes, and less attractive to general traffic.		NailseaTickenhamLink.pdf
Land south of Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective	Unsure	No	The proposed development will produce additional traffic onto the B3130 and B3128. A proportion of this traffic will want to travel west to Clevedon and M5 Junction 20, and east to M5 Junction 19 or to Bristol. There is no amelioration planned for these routes. The B3130 and B3128 are already up to capacity. The B3130 is a sub standard road that runs through part of Tickenham. Substandard means: a pinch point where HGVs/buses cannot pass each other, a pinch point where HGVs/buses struggle to pass each other, 3 x 90 degree bends, inadequate road width below accepted national standards, lack of footpaths and narrow footpaths below accepted national standards, 145 houses directly access onto a length of the B3130 less than 1.5miles long. Tickenham school children walking to school are forced to walk on narrow footpaths with traffic thundering by within inches. The Causeway, Washingpound Lane and Church Lane are rural lanes and although proposed to be classified as Rural Quiet Lanes, there are no proposals in the transport section of the Infrastructure Delivery Plan to provide any works to improve them or reduce traffic onto them, and North Somerset Council have warned that any improvements are highly susceptible to funding issues. The Local Plan needs to establish that funding will be available. All of the aforementioned roads will be subject to traffic flows above their capacity.	Provide suitable transport infrastructure to cater for the proposed 4,000 house developments in Nailsea and Backwell, in terms of: 1. the construction of a road link between Nailsea and Clevedon using existing and improved roads as shown on the plan attached to this response. 2. infrastructure improvements to The Causeway, Washingpound Lane and Church Lane to make these routes more attractive to those travelling by active modes, and less attractive to general traffic.		NailseaTickenhamLink.pdf
Tickenham	Yes		No	No	Tickenham Parish Council have pointed out on previous versions of this document that only part of Tickenham will be inset within the settlement boundary. Over 100 dwellings within the parish of Tickenham will lie outside of the proposed settlement boundary and in the Green Belt. Tickenham Parish Council consider that the settlement boundary should not be	Change the wording. Tickenham should be replaced with Tickenham (part)	Tickenham Parish Council are satisfied with the	

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					amended to cater for the following proposed developments: Poplar Farm, Nailsea; Land off Pound Lane, Nailsea and Land north of Nailsea (map references d, e and f) as these proposed developments intrude into the Green Belt.		location of the settlement boundary for Tickenham.	

Name: Tickenham Road Action Group **I.D:** 27277889

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP11: Transport infrastructure, allocations and safeguarding	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	The following is a summary of the submission of the TRAG to this consultation. Please see the attached document for the full response. The Tickenham Road Action Group wishes to raise serious concerns about the soundness of the North Somerset Council Pre-Submission Local Plan 2041. Although we welcome the Local Plan as it will identify locations for housing development, we believe there are shortcomings in the analysis of traffic impacts and plans to support the increased housing numbers. 1. The Local Plan whilst considering the traffic impacts of the isolated additional housing developments mentioned in the Local Plan does not address overall traffic growth over the 15-year period of the Local Plan, nor provide a strategic view of how traffic will be routed through key transport routes in North Somerset. 2. The Local Plan does not address existing traffic issues in impacted villages and rural lanes/ roads which will be subject to a 40% proportional increase in traffic through the increased number of homes alone. 3. The Local Plan does not address the additional HGV and other commercial traffic on rural roads and villages that will be necessary to support the increased population size and improved/ expanded town centres. 3.1. Increasing the number of dwellings will increase the volume of HGV traffic to support the shopping centres and homes supporting the increased number of dwellings. 3.2. The HGV route through Tickenham and Stone-Edge-Batch is the only HGV route from the M5 to Nailsea. There is no route via the A370 to Nailsea. The current roads are not suitable for this traffic and do not have any capacity for any increase in HGV traffic volume. 4. Without significant mitigations, Active Travel policies will decrease road capacity in the villages of North Somerset due to lack of adequate cycle and pedestrian paths. 4.1. Residents of Tickenham are highly favourable to Active Travel policies and wish to participate in walking and cycling to local destinations avoiding unnecessary car use, however without adequate infrastructure (pavements and cycle lanes) this policy will reduce road capacity on Tickenham roads by slowing traffic. 4.2. Tickenham residents do not feel safe walking or cycling through the village due to the high traffic volumes. There are no suitable Active travel routes from Tickenham to the surrounding towns of Nailsea/Backwell and Clevedon or to the Nailsea and Backwell railway station. This lack of suitable routes is forcing residents to use their vehicles even when they wish to use Active travel means. 5. If public transport usage is not increased in line with the increase in homes (42% for Nailsea and Backwell), this will force more use of private vehicles to fill the public transport gap.	1) Provide a fully funded direct route from Nailsea to J5 of the M20 to support the traffic (including HGVs) of Nailsea and Backwell. The route via Nailsea Wall provides the most direct and least disruptive route. 2) Introduce significant traffic calming and speed limits (20mph) on The Causeway, Washing Pound Lane and Church Lane.		TRAG submission final.pdf

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					6. The Local Plan does not consider any mitigations to traffic issues on the roads and lanes of Tickenham, in particular the viability of a route from Nailsea directly to the M5 J20. The route for traffic between Nailsea/Backwell and the M5 would be via an improved Nailsea Wall route, considerably alleviating traffic issues on the roads and lanes through Tickenham. It is appreciated that improvements would need to be made to the existing roads, but this route would provide a direct connection between the M5 and Nailsea/Backwell to support existing and future traffic needs. 7. There is no local traffic mitigation included in the Local Plan for Clevedon Road (B3130) in Tickenham and Stone-Edge-Batch to enable safer pedestrian, wheeling and cycling use. 8. The Local Plan does not assess the volume of additional traffic on Tickenham roads/lanes from the introduction of the proposed Strategic Rail Crossing from East of Backwell to Station Road Nailsea. The review looked only at displacement of existing traffic. Introducing the Strategic Rail Crossing will encourage additional traffic from Bristol and the southern ring road (Colliters Way) to use this route for access to the M5 and vice-versa. 9. We do not agree with the assumption that the Strategic Rail Crossing will reduce traffic volumes on the Causeway or Stone-Edge-Batch. We agree that traffic using the route to/from Nailsea on Station Road will be attracted to use the Strategic Rail Crossing, but we fail to see how North-bound traffic to Clevedon/M5 from Nailsea or Backwell would use this new route. 10. The Local Plan proposes the introduction of Quiet Lanes for the Causeway, Church Lane and Washing Pound Lane which would make these routes more attractive for pedestrians, cyclists and horse riders, but does not assess the traffic impacts on the congested route (Stone-Edge-Batch) which would carry the displaced vehicle traffic. 11. The assumptions made for Active travel used to mitigate traffic volumes are without any evidence to support the offsets stated particularly in a semi-rural environment with dangerous roads such as Tickenham. Therefore, use of these assumptions is highly risky.			

Name: Tim Baines **I.D:** 62810561

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP3: Strategic location: Nailsea and Backwell	No	‣ Justified ‣ Effective	Unsure	Unsure		I am a resident of Flax Bourton and so not only am interested in the Nailsea and Backwell part of the plan, but I experience daily the chaotic shambles of the A370. The Council has already given approval to 800 new homes in the area, and you are now proposing another 1000, and yet with no guaranteed improvements to road capacity, schools, healthcare, doctors, community facilities. This is complete overdevelopment of a small village and town and will create far more problems than it solves. Look elsewhere, or tell the government where to get off with its crazy housing targets		
Grove Farm					I am a resident of Flax Bourton and so not only am interested in the Nailsea and Backwell part of the plan, but I experience daily the chaotic shambles of the A370. The Council has already given approval to 800 new homes in the area, and you are now proposing another 1000, and yet with no guaranteed improvements to road capacity, schools, healthcare, doctors, community facilities. This is complete overdevelopment of a small village and town and will create far more problems than it solves.			

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					Look elsewhere, or tell the government where to get off with its crazy housing targets			
Land east of Backwell		• Justified • Effective			I am a resident of Flax Bourton and so not only am interested in the Nailsea and Backwell part of the plan, but I experience daily the chaotic shambles of the A370. The Council has already given approval to 800 new homes in the area, and you are now proposing another 1000, and yet with no guaranteed improvements to road capacity, schools, healthcare, doctors, community facilities. This is complete overdevelopment of a small village and town and will create far more problems than it solves. Look elsewhere, or tell the government where to get off with its crazy housing targets			

Name: Tim Harland **I.D:** 21333377

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	Unsure	This land is WET, it is on a flood plain next to a surface water reservoir and sensitive ecology with otters and other wildlife. This is adjacent to the conservation area. Due to the floodplan the road would need to be on stilts and is unfeasible. The railway station poorly equipped and inaccessible, it is too far to work with a busy road with one narrow pavement so this development will be car dependent.	The EA are still very unhappy with the planning appreciation and have not agreed with the proposed mitigation - this site needs to be deleted and alternatives sought.		
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	No		I strongly object to the Local Plan as proposed by North Somerset Council for the semi-rural village of Backwell. It fails totally to support the wishes of the local population by encouraging massive housing developments which are completely unsustainable, disproportionate to what is currently provided for the well-being of the community, and fails to take into account the services and facilities that would be required to sustain the growth in population. Backwell already has 800 new houses approved, representing a 40% increase and it already raises concerns about over-development. The unsustainability of the Local Plan is perfectly exemplified by the proposed new road which is unlikely to either solve Nailsea traffic or free up local congestion. Its construction under or over the railway is likely to be expensive and impractical and a huge deterrent to such a proposal. Current facilities are already over-stretched. There is a shortage of school places, health services, and leisure facilities needed for the current population and a 40% addition of resident numbers is bound to lead to promises and expectations being broken and unfulfilled. This in itself will quite possibly result in social disaffection and unrest from both the new population and the residents who see their services and facilities unable to cope. Backwell faces a higher housing allocation than any other North Somerset village or town, yet no needs or viability analysis exists for another 1,000 houses. The area lacks local employment opportunities, meaning most residents commute, and no social cohesion impact assessment has been provided. Only 7% of Grade 1 Agricultural Land remains in North Somerset, and current proposals threaten this valuable resource. Government policy designed to protect top-quality land is being contradicted, risking food security. Watching the digging up and replacement of top	The current Local Plan is ill-suited to the needs of the area and North Somerset Council need to look again at what represents sustainable development in this area and how it can be serviced to provide the needs of the current population as well as people who will come and live here. NSC need to find alternative locations including brown fields sites and the urban model which was previously consulted upon.		

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					grade agricultural land for new housing while brown field sites owned by NSC are ignored is disheartening and irresponsible. The development also endangers wildlife habitats, diminishing biodiversity, while rare bats depending on land near Brockley Maternity Roost and SSSI are at risk. The pressure on our countryside is immense and the constant chipping away of the rural resource damages not only our wildlife but also our own health and mental well-being. We ignore this at our peril. Other concerns include loss of Greenbelt, increased flood risk, and uncertain infrastructure delivery. Infrastructure planning appears vague, lacking clear detail, costings, and funding guarantees. Increasing housing would likely worsen flooding in Backwell Common and surrounding areas, especially the area around Backwell Lake. Rapid growth without sufficient services is unsustainable. The railway station is inadequate and ill-suited as a transport hub. The platform cannot cope with the length of the trains making access onto the trains both difficult and dangerous, especially for those with mobility issues. With the exception of the A370 the roading around Backwell and Nailsea is suited to low levels of traffic only. The access across the levels between Clevedon and Backwell are useful to local traffic only. These will be badly damaged and blocked by the major housing developments proposed - a serious issue for those who live there or wish to visit. The current Local Plan is ill-suited to the needs of the area and North Somerset Council need to look again at what represents sustainable development in this area and how it can be serviced to provide the needs of the current population as well as people who will come and live here.			

Name: Tim Kilburn **I.D:** 50846369

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure				Save Backwell.pdf

Name: Tim Manther **I.D:** 62657377

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy DP14: Highway safety, traffic and provision of infrastructure associated with development	No	• Positively prepared • Effective	Unsure	Unsure	400 hundred houses to be built on the Tower Farm estate Portishead makes the current road layout completely inadequate. There is only one access route through the Downs on to Down Road with only one access route to the town centre along Avon way. A route that already becomes congested. Public transport does work but walking is not really an alternative mode of transport for many because Tower Farm is at the top of a steep hill.	To have an alternative access route built from Tower farm to the bottom of the hill.		

Name: Tim Scott **I.D:** 62692673

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	The land at Tower Farm NSC has not properly considered alternative brown/green field sites with much lower ecological impact in Portishead or across N Somerset. Opportunities have not been taken to increase housing density on proposed brown field sites which would remove the need to develop the existing green belt land at Tower Farm. The ecological importance of protecting Weston Big Wood (SSSI) which lies adjacent to the land at Tower Farm and the Gordano Valley green corridor beyond should be maintained. This area was added to the Green Belt in the late 1980s due to its high ecological value. National Planning Policy allows green belt changes only in EXCEPTIONAL circumstances; these have not been demonstrated. In addition a single access from The Downs to the Tower Farm site cannot provide safe or suitable access particularly bearing in mind the location of High Down Schools at the top of The Downs at the junction of Down Road which is already heavily congested at school drop off/pick up times. Adding a further 400 homes using this single access would severely exacerbate existing traffic problems. This would also affect the density of traffic in the surrounding roads and in Portishead. The land at Tower Farm is totally unsuitable for development and should be removed from the plan given its proximity to important ancient woodland (Weston Big Wood) the loss of which would be irreversible. The land should instead be retained as undeveloped green space managed to enhance biodiversity and provide sustainable public access. I do not support the North Somerset Local Plan 2041 for the Tower Farm location.			

Name: Tim Withers **I.D:** 62772961

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm					I am writing to register real concern about the proposed developments for the following reasons: The erosion of the green margins of Portishead, with impact on the mental health of children and adults A query over, planning for the longer term, so much development is needed; consider the falling rates of children on roll in N Somerset schools and fact that many schools are changing structure to accommodate this (ask Lighthouse Schools Partnership!) I don't feel alternative green and grey field alternatives have been properly considered Britain is already a nature-depleted country; adding to this is potentially disastrous. Once gone, green spaces are rarely returned to green, and never as they were The infrastructure of the town cannot accommodate further growth; Portishead has grown so much already - for example, it's secondary school is the second largest in the SW			
Black Rock, north of Clevedon Road					I am writing to register real concern about the proposed developments for the following reasons: The erosion of the green margins of Portishead, with impact on the mental health of children and adults A query over, planning for the longer term, so much development is needed; consider the falling rates of children on roll in N Somerset schools and fact that many schools are changing structure to accommodate this (ask Lighthouse Schools Partnership!) I don't feel alternative green and grey field alternatives have been properly considered			

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					Britain is already a nature-depleted country; adding to this is potentially disastrous. Once gone, green spaces are rarely returned to green, and never as they were The infrastructure of the town cannot accommodate further growth; Portishead has grown so much already - for example, it's secondary school is the second largest in the SW			

Name: Timothy Southwood **I.D:** 62848705

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Netcott's Meadow, north of Backwell Lake, west of Bucklands End, Nailsea	Unsure	• Effective	Unsure	Unsure	The documents provided are totally inappropriate. No one will spend a long time ploughing through a document that large . A summary would be more suitable . Also there is a major inaccuracy!, Necotts Meadow a former AWT reserve has been decimated by its now owner & is also totally inaccessible	Reduce numbers &. density of housing . Too many concentrated in such a small area . There are no community facilities planned . Extensions to drs surgeries will require funding ,new surgeries in these areas are non viable since numbers insufficient		

Name: Tina Jennings **I.D:** 39209121

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP2: Strategic location: Woodspring (south west of Bristol)	No	• Positively prepared • Justified • Effective	Unsure	No	North Somerset Has not fully taken into consideration. The expansion of Bristol airport It has not considered the joining of Withywoood to Dundry with no clear open space.There are four fields behind my house between Hiridge, Withywood and Dundry If these are built on there will no clear identification between North Somerset and Bristol The green space is valued by all especially by a deprived area's of South Bristol	The A38 around south Bristol is already over loaded with Air port expansion. If this is not looked at in depth before any house building. South Bristol will be grid locked		

Name: Tina Webber **I.D:** 38547905

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I object to the proposed building of almost 1000 houses to the east of Backwell, areas HE 203035, 202012, 208001, 202300. This development would be 'shoehorned' into an area between A370 and a railway line. At present this area of green belt is home to a variety of species of flora, insects, amphibians and mammals including deer and horseshoe bats which are considered rare. This proposal will have a huge impact on both habitats for wildlife and on biodiversity. This area is being used to grow crops and is an open country space which is accessed frequently by the local community. It has numerous rights of way within its borders. It is Grade 1 agricultural land of which there is only 7% remaining in North Somerset. Government policy states that , 'we must protect our best and most versatile land,' https://www.gov.uk/guidance/natural-environment, This proposal contradicts this policy. One of the main issues for me would be the proposed building of a major road going under or over the rail track and cutting a swathe through the countryside to join to Station Road near Backwell Lake. Surely the congestion caused by the increased number of vehicles using that road would be untenable. Traffic would be obliged to turn right onto Station Road then ultimately onto the High Street (B3130) in Nailsea. This junction is already congested and it's very difficult to turn right there at the best of times. Turning left from this new road would lead traffic under the railway bridge which is single rack and the amount of traffic using this route would cause serious congestion. This road would increase, not decrease congestion. There is little employment in Backwell and the majority of people need to travel to work, mostly by car. Whilst			

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					Nailsea/Backwell does have a railway station, this is not ‘fit for purpose’ and does not afford safety when travelling with young children or people with additional needs and is currently inaccessible for people who have physical disabilities. The proposed underpass or flyover would be phenomenally expensive and be a massive and lengthy piece of engineering. Presumably this money would need to come from Central Government and at this time, there are many other more worthy projects on which to spend millions of pounds of taxpayers’ money. It would need to be in place to ensure the A370 did not become completely congested by construction vehicles. This road is a major route and does not have the capacity to accommodate the extra traffic that up to a 1000 houses would bring, which would very likely be 1600 cars, as according to some sources, 60% of households in the Southwest have 2 vehicles. If this development were to go ahead with two points of access, I can’t imagine many drivers wishing to sit on Station Road, especially during ‘school run’ time, to wait to negotiate the junction to get on to the A370. I would be extremely concerned if the proposed new road were to include a junction to allow vehicles to turn east onto Backwell Common; to access either the road across the common or to Chapel Hill under the railway bridge. These two routes are predominately single track. Vehicular issues aside, there is the problem of the lack of infrastructure to support a housing development of this size. Backwell is considered a village and as such, has very few local amenities and residents need to travel to find large shops, entertainment etc. The GP surgery is already at capacity, as are the local schools. This proposal means that the village of Backwell will be expected to take 7% of the local housing allocation, whereas the town of Clevedon is allocated to take a mere 2%. Another issue that needs careful consideration is problems with flooding in the area. The land directly behind Chapel Hill and adjacent to the railway is continually sodden in the winter and after prolonged spells of rain throughout the rest of the year. This will be exacerbated by the construction of houses, tarmacked drives and roads. Considering that the change in our climate will bring wetter weather, surely this land is not suitable for housing in the longer term? Backwell has had 800 additional houses approved, which is already a 40% increase in the village. The addition of the houses proposed would lead to complete overdevelopment of a village that already has congested roads and little infrastructure to support its current residents.			

Name: Toby Thurlow **I.D:** 30664385

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP7: Green Belt	No	• Justified	Unsure	Unsure	Not Justified Analysis (Stage 2 Green Belt Assessment) provided in support of this document look at a number of possible parcels of Green Space around Portishead that could be released. Many are judged Weak, yet only two are judged suitable and it is not clear why they have been chosen over the others. In some cases, e.g. Blackrock the proposal to release (as per https://map.n-somerset.gov.uk/LocalPlan2041.html) is different than included in the assessment. This means that analysis is non-valid. Tower Farm and Blackrock both border Weston Big Wood, and SSSI and classified Ancient Woodland. Ancient Woodland has greater protections that normal Greenbelt land. "Guidance Ancient woodland, ancient trees and veteran trees: advice for making planning decisions" https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions Buffer zones are an important part of a woodland area - not just to reduce the interaction between 2 zones, but also provide ecological services to support the woodland environment. For instance, deer use open farmland during dusk and dawn for feeding, and then retreat to the denser woodland during the day. This surrounding greenbelt provides a wildlife corridor to the rest of the Gordano Valley. Building on these 2 parcels of land would impact >25% of the border of Weston Big Wood, and a very major proportion of the borders with open grassland and fields. These larger buffer zones, not just 15m, should be considered when evaluating development which may impact Ancient Woodland. This is considered in the Government Guidance under "Indirect Impacts". The key outcome from this Government Guidance is:- Avoid impacts, reduce (mitigate) impacts, and compensate as a last resort	Remove the parcels of Green Belt land around Portishead from the list to be cancelled.		

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					The analysis fails to consider all these impacts. Other references. Bentrup, G. (2008) 'Conservation Buffers—Design guidelines for buffers, corridors, and greenways', Gen. Tech. Rep. SRS–109. Asheville, NC: U.S. Department of Agriculture, Forest Service, Southern Research Station. 110 p., vol. 109 [Online]. DOI: 10.2737/SRS-GTR-109 (Accessed 11 July 2023). https://www.woodlandtrust.org.uk/media/43634/buffers-an-overview-factsheet.pdf https://www.woodlandtrust.org.uk/media/43635/buffer-design-factsheet.pdf Effective It is not clear that all suitable Brownfield sites have been sufficiently given weight to development.			
Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Not Justified The analysis for releasing this land from the green belt is not more compelling than other land not released. Almost all were rated medium or weak for impact. https://n-somerset.gov.uk/sites/default/files/2025-11/stage%202%20green%20belt%20assessment%20-%20October%202025.pdf Not Consistent with National Policy This is highly sensitive site that provides an open Grassland/Grade2/3a Farmland to circa 50% of the North Eastern section of Weston Bigwood. This land provides both a buffer to the impact of humans , and provides ecosystem services to the Woodland. Building on this land would have indirect impacts as laid out in the Government Guidance on Ancient woodland, ancient trees and veteran trees: advice for making planning decisions. https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions. Not Effective. There are insufficient proposals to protect the Eco-systems services provided by this land. Not Positively Prepared Proposals for local services (e.g. school, shops, health) to support the large number of dwellings are not developed enough. This would lead to an excessive pressure on the local services, causing new residents to drive further afield.			
Black Rock, north of Clevedon Road	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Not Justified The analysis for releasing this land from the green belt is not more compelling than other land not released. Almost all were rated medium or weak for impact. https://n-somerset.gov.uk/sites/default/files/2025-11/stage%202%20green%20belt%20assessment%20-%20October%202025.pdf Not Consistent with National Policy This land provides both a buffer to the impact of humans , and provides ecosystem services to the Woodland. Building on this land would have indirect impacts as laid out in the Government Guidance on Ancient woodland, ancient trees and veteran trees: advice for making planning decisions. https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions. Proposal to mitigate damage are suggested to be off site. This is at the bottom of the mitigations in the guidance. Nor other mitigations in line with teh guidance have been considered. The removal of this parcel would create a deeper 'finger' of development into the remaining greenbelt. This is inconsistent with the policy around determining the impact of removal. Not Effective			

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					There are insufficient proposals to protect the Eco-systems services provided by this land. In addition the analysis, and developer proposals considered a larger parcel of land than that contained in this plan. This means that this analysis is now void. Not Positively Prepared Proposals for local services (e.g. school, shops, health) to support the large number of dwellings are not developed enough. This would lead to an excessive pressure on the local services, causing new residents to drive further afield.			

Name: Tom Curtis **I.D:** 50876097

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Grove Farm	No	‣ Positively prepared ‣ Justified ‣ Effective	No	No	This is just another joke of a document. Im just disappointed in all involved. Please do better. Not enough nature protection. Looking after farmland amd managing it properly sgould be paramount alongside building at a sensible pace. Backwells proposed population increase is not sustainable with infrastructure currently there and estimated to occur with over 1000 homes (same type). History dictates this. I love the roads to nowhere wirhon it. These will not solve issues just add due to increase in traffic. It does not solve local housing market. We dont need more executive homes. Bungalows and lower income homes at a lower pace would be suitable to allow a market to function. With more land to create significant nature pathways through backwell to truely provide improved natural ecosystems and living enviroment. The number homes is stupid. These need to have a higher affordability ratio. Stop pandering to central government. Get some imner strength....please. No i dont support this joke of a document.	As above. Nature Better buildings Less executive homes 50% affordable Allow smaller builders to bid. Read dont use ai.		

Name: Tom Hamilton-James **I.D:** 30658465

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Land at Tower Farm					I am a Portishead resident and I am horrified at your plans for housing at Tower Farm and Black Rock. Please record these comments as part of your formal consultation (although probably another tick box exercise and you will proceed and do what you want). NSC has not properly considered the following: There are alternative brownfield or greenfield sites with far lower ecological impact, both in Portishead and North Somerset. There are opportunities to increase housing density on proposed brownfield sites which could negate the need to develop Tower Farm and Black Rock.			

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					The areas of Tower Farm and Black Rock have strategic ecological importance in protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor. Both proposed areas were added to the Green Belt in the late 1980s due to their high ecological value. National planning policy allows Green Belt changes only in exceptional circumstances, and these have not been demonstrated. In addition, neither site can provide safe or suitable access. Also, development would create unacceptable transport impacts, failing national soundness tests. Your assertion that everyone would cycle everywhere or use electric bikes is laughable. The areas are used by walkers and is important green space for the local community. For all the above reasons, Tower Farm and Blackrock should be removed from the Local Plan.			
Black Rock, north of Clevedon Road					I am a Portishead resident and I am horrified at your plans for housing at Tower Farm and Black Rock. Please record these comments as part of your formal consultation (although probably another tick box exercise and you will proceed and do what you want). NSC has not properly considered the following: There are alternative brownfield or greenfield sites with far lower ecological impact, both in Portishead and North Somerset. There are opportunities to increase housing density on proposed brownfield sites which could negate the need to develop Tower Farm and Black Rock. The areas of Tower Farm and Black Rock have strategic ecological importance in protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor. Both proposed areas were added to the Green Belt in the late 1980s due to their high ecological value. National planning policy allows Green Belt changes only in exceptional circumstances, and these have not been demonstrated. In addition, neither site can provide safe or suitable access. Also, development would create unacceptable transport impacts, failing national soundness tests. Your assertion that everyone would cycle everywhere or use electric bikes is laughable. The areas are used by walkers and is important green space for the local community. For all the above reasons, Tower Farm and Blackrock should be removed from the Local Plan.			

Name: Tom Henley **I.D:** 58500417

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Grove	Yes		Yes	Yes			1. Introduction	

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Farm							I am writing to express my support for the allocation of land at Grove Farm within the North Somerset Local Plan 2041 (Regulation 19). I recognise the need to provide new homes, employment land and supporting infrastructure across the district, and I believe that Backwell represents one of the most appropriate and sustainable locations for delivering this growth. My position is based on a balanced assessment of the evidence, the landscape and ecological sensitivities of different locations, and the degree to which each proposed allocation aligns with the Plan's spatial strategy and Policy LP3. In my view, the Backwell allocations are sound, sustainable and far less environmentally harmful than the proposed allocations at Tower Farm and Black Rock, which lie immediately adjacent to Weston Big Wood—an ancient woodland and highly sensitive ecological asset. 2. Why Backwell Is a Suitable and Sustainable Growth Location Backwell is a small but well-connected settlement offering several advantages for planned, coordinated expansion: 2.1 Existing Strategic Transport Access Backwell sits directly on: * the A370, a major route linking Weston-super-Mare, Bristol, and the airport corridor * the Nailsea & Backwell Railway Station, a key rail node providing direct services to Bristol Temple Meads * routes to Bristol Airport * bus corridors connecting to high-frequency services This gives Backwell a level of transport resilience and connectivity that supports sustainable modal shift, particularly when combined with the active travel improvements and Cross Rail Link required by LP3. 2.2 Development on Flat, Lower-Sensitivity Agricultural Land The allocations at Grove Farm are situated	

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							on: * broadly flat land * agricultural fields surrounded by existing development on at least one or more sides * areas not adjacent to ancient woodland, SSSI, SNCI or irreplaceable habitats This contrasts sharply with Portishead's Tower Farm and Black Rock allocations, which directly border Weston Big Wood, an ancient woodland and SNCI, where any development—even with buffers—risks irreversible ecological fragmentation. 2.3 Capacity to Deliver Strategic Infrastructure Backwell's allocations are uniquely positioned to deliver: * the Cross Rail Link (a requirement of LP3) * new active travel connections * new primary schools * employment land, including light industrial and office space * enhanced access to the railway station These interventions serve both Backwell and Nailsea, helping address longstanding congestion issues at Backwell Crossroads and Station Road, and contributing to a cohesive transport strategy across the region. 3. Comparison With Tower Farm and Black Rock (Portishead) It is important to consider the relative environmental impact and policy alignment of the Backwell sites compared with other proposed allocations. 3.1 Proximity to Weston Big Wood – Severe Environmental Risk The Portishead allocations at Tower Farm and Black Rock directly abut Weston Big Wood, which is: * a Site of Special Scientific Interest (SSSI) * an ancient woodland, an irreplaceable habitat under the NPPF	

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							* a designated Site of Nature Conservation Interest (SNCI) * part of a wider ecological corridor across the Gordano Valley Any encroachment or buffer erosion at these locations risks permanent, adverse impacts on biodiversity, contrary to national policy requirements to protect ancient woodland and ancient/veteran trees. 3.2 Landform and Ecological Sensitivity By contrast: * Backwell's landscape is low-sensitivity farmland, highly suitable for strategic development * The Backwell allocations avoid protected ecological features * Ecological mitigation at Backwell is feasible and proportionate * Portishead's woodland-edge sites require extensive, high-risk ecological mitigation, likely reducing deliverability 3.3 Deliverability and Infrastructure Burden Backwell is already the intended location for strategic transport interventions (Cross Rail Link, active travel corridors, bus improvements), whereas Portishead's proposals face: * severe access constraints * ecological constraints * the need for significant new mitigation measures to offset harm In summary, Backwell offers a policy-aligned alternative with significantly lower environmental risk. 4. Support for the Allocation: Grove Farm (515 homes) Grove Farm is another well-selected site. I support this allocation for the following reasons: 4.1 Delivery of a New Primary School This is needed to support planned growth	

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							and is well located to serve both new and existing communities. 4.2 Active Travel Connectivity The plan requires high-quality routes linking: * Backwell Common → Festival Way * Nailsea & Backwell Station * Chelvey Road * Rushmore LaneThese connections reduce reliance on cars and integrate the site into the wider movement network. 4.3 Heritage-Sensitive Design and Layout The site requirements ensure that historic assets such as Chelvey Court and the Manor House retain their rural settings and key views. 4.4 Sustainable Drainage and Surface Water Management The site can incorporate the necessary flood mitigation through sequencing and layout, as set out in Schedule 1. 4.5 Reduced Local Environmental Impact The Grove Farm allocation does not threaten any ancient woodland, protected ecological sites or highly sensitive biodiversity features. Ecological mitigation, including measures for SAC bats, is achievable. 5. Alignment With Policy LP3 and the Local Plan Spatial Strategy Both Backwell allocations align strongly with Policy LP3 and the plan’s overarching sustainable development goals: * They support 3,500 homes across Nailsea and Backwell. * They enable infrastructure-led growth through the delivery of the Cross Rail Link. * They provide employment land, two new primary schools, and improved public transport access. * They enhance active travel routes district-wide. * They are consistent with the NPPF, particularly in relation to: * protecting ancient woodland * promoting sustainable transport * delivering affordable housing * coordinating growth with infrastructure	

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							6. Conclusion For all the reasons set out above, I believe the allocations at Grove Farm are the most appropriate, sustainable and deliverable housing locations identified in this Local Plan. They offer: * a lower environmental impact * a better alignment with infrastructure delivery * strategic transport improvements essential for the wider area * protection of highly sensitive ecological assets elsewhere * a contribution to balanced, well-connected communities I therefore strongly support the inclusion of these allocations within the Regulation 19 Local Plan and encourage North Somerset Council to retain them as key elements of its sustainable growth strategy.	
Land east of Backwell	Yes		Yes	Yes		1. Introduction I am writing to express my support for the allocation of Land East of Backwell within the North Somerset Local Plan 2041 (Regulation 19). I recognise the need to provide new homes, employment land and supporting infrastructure across the district, and I believe that Backwell represents one of the most appropriate and sustainable locations for delivering this growth. My position is based on a balanced assessment of the evidence, the landscape and ecological sensitivities of different locations, and the degree to which each proposed allocation aligns with the Plan's spatial strategy and Policy LP3. In my view, the Backwell allocations are sound, sustainable and far less environmentally harmful than the proposed allocations at Tower Farm and Black Rock, which lie immediately adjacent to Weston Big Wood—an ancient woodland and highly sensitive ecological asset. 2. Why Backwell Is a Suitable and Sustainable Growth Location Backwell is a small but well-connected settlement offering several advantages for planned, coordinated expansion:		

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						2.1 Existing Strategic Transport Access Backwell sits directly on: * the A370, a major route linking Weston-super-Mare, Bristol, and the airport corridor * the Nailsea & Backwell Railway Station, a key rail node providing direct services to Bristol Temple Meads * routes to Bristol Airport * bus corridors connecting to high-frequency services This gives Backwell a level of transport resilience and connectivity that supports sustainable modal shift, particularly when combined with the active travel improvements and Cross Rail Link required by LP3. 2.2 Development on Flat, Lower-Sensitivity Agricultural Land The allocations of Land East of Backwell are situated on: * broadly flat land * agricultural fields surrounded by existing development on at least one or more sides * areas not adjacent to ancient woodland, SSSI, SNCI or irreplaceable habitats This contrasts sharply with Portishead's Tower Farm and Black Rock allocations, which directly border Weston Big Wood, an ancient woodland and SNCI, where any development—even with buffers—risks irreversible ecological fragmentation. 2.3 Capacity to Deliver Strategic Infrastructure Backwell's allocations are uniquely positioned to deliver: * the Cross Rail Link (a requirement of LP3) * new active travel connections * new primary schools * employment land, including light industrial and office space * enhanced access to the railway station These interventions serve both Backwell and Nailsea, helping address longstanding congestion issues at Backwell Crossroads and Station Road, and contributing to a cohesive transport strategy across the region.		

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						3. Comparison With Tower Farm and Black Rock (Portishead) It is important to consider the relative environmental impact and policy alignment of the Backwell sites compared with other proposed allocations. 3.1 Proximity to Weston Big Wood – Severe Environmental Risk The Portishead allocations at Tower Farm and Black Rock directly abut Weston Big Wood, which is: * a Site of Special Scientific Interest (SSSI) * an ancient woodland, an irreplaceable habitat under the NPPF * a designated Site of Nature Conservation Interest (SNCI) * part of a wider ecological corridor across the Gordano Valley Any encroachment or buffer erosion at these locations risks permanent, adverse impacts on biodiversity, contrary to national policy requirements to protect ancient woodland and ancient/veteran trees. 3.2 Landform and Ecological Sensitivity By contrast: * Backwell’s landscape is low-sensitivity farmland, highly suitable for strategic development * The Backwell allocations avoid protected ecological features * Ecological mitigation at Backwell is feasible and proportionate * Portishead’s woodland-edge sites require extensive, high-risk ecological mitigation, likely reducing deliverability 3.3 Deliverability and Infrastructure Burden Backwell is already the intended location for strategic transport interventions (Cross Rail Link, active travel corridors, bus improvements), whereas Portishead’s proposals face: * severe access constraints * ecological constraints * the need for significant new mitigation measures to offset harm In summary, Backwell offers a policy-aligned alternative with significantly lower environmental risk.		

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						4. Support for the Allocation: Land East of Backwell (889 homes) Based on the evidence and the site requirements, I support the allocation of Land East of Backwell because: 4.1 It directly enables the Cross Rail Link The site is essential to delivering the new Cross Rail Link between Station Road and the A370. Without this allocation, the strategic transport package required by LP3 would be undeliverable. 4.2 Integration of Employment Land The identified 5 hectares of employment land provides a balanced mix of housing and jobs, supporting local economic resilience. 4.3 Strong Active Travel and Sustainable Transport Potential The site is close to Nailsea & Backwell Station, enabling realistic modal shift to rail travel for commuting. 4.4 Heritage-Led and Landscape-Led Masterplanning LP3 requires the site to respect the settings of conservation areas and historic farmsteads, which are fully achievable within the generous land parcel. 4.5 Coherence With Existing Urban Form The maps show that development here will form a logical extension to Backwell, avoiding sensitive landscapes and connecting safely with existing neighbourhoods. 5. Alignment With Policy LP3 and the Local Plan Spatial Strategy Both Backwell allocations align strongly with Policy LP3 and the plan’s overarching sustainable development goals: * They support 3,500 homes across Nailsea and Backwell. * They enable infrastructure-led growth through the delivery of the Cross Rail Link. * They provide employment land, two new primary schools, and improved public transport access.		

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						* They enhance active travel routes district-wide. * They are consistent with the NPPF, particularly in relation to: * protecting ancient woodland * promoting sustainable transport * delivering affordable housing * coordinating growth with infrastructure 6. Conclusion For all the reasons set out above, I believe the allocations at Land East of Backwell are the most appropriate, sustainable and deliverable housing locations identified in this Local Plan. They offer: * a lower environmental impact * a better alignment with infrastructure delivery * strategic transport improvements essential for the wider area * protection of highly sensitive ecological assets elsewhere * a contribution to balanced, well-connected communities I therefore strongly support the inclusion of these allocations within the Regulation 19 Local Plan and encourage North Somerset Council to retain them as key elements of its sustainable growth strategy.		
Land at Tower Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	The proposed allocation of Land at Tower Farm (≈ 400 homes) lies immediately beside Weston Big Wood — an ancient woodland and Site of Nature Conservation Interest (SNCI) managed by Woodland Trust and supported by Avon Wildlife Trust. The woodland forms part of the Gordano Valley ecological network and a nationally important habitat mosaic of open grassland, wetland and woodland. 1 – Not Justified There is no robust published alternatives assessment demonstrating that this sensitive site is the only or most appropriate option for growth. The loss of best and most versatile (BMV) farmland (Grade 2/3a by reference to the ALC dataset) and the risk of irreversible damage to the ancient woodland make this allocation unsuitable. 2 – Not Consistent with National Policy The allocation conflicts with the National Planning Policy Framework (NPPF) paragraphs 180–182, which require that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland) should be refused unless wholly exceptional reasons exist. The Council's reference to an "ecological buffer" is vague, unenforceable and insufficient to address indirect impacts such as root-zone damage, hydrological change or wildlife	No modification short of removing the allocation entirely would make this site appropriate. Given its direct adjacency to ancient woodland, its loss would be irreversible and cannot be mitigated sufficiently. The land should instead be retained as undeveloped green space, managed to enhance biodiversity and provide sustainable public access, in line with the Avon Wildlife Trust's 2030 Strategy and national "30 by 30" nature-recovery goals.	I do not support the plan for this location.	

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					disturbance. The Woodland Trust and Avon Wildlife Trust state that ancient woodland is irrecoverable once damaged. Moreover the Framework requires delivering biodiversity net gain, yet the allocation offers no clear mechanism for ensuring that outcome. 3 – Not Positively Prepared The location intensifies existing pressures in Portishead: schools, healthcare and transport infrastructure are already under strain (for example the A369 corridor). This peripheral site would likely increase private vehicle usage and pollution rather than support sustainable travel patterns, contrary to NPPF paragraphs 104–106. 4 – Not Effective Delivery depends on multiple unresolved dependencies: new school provision, bus service contributions, off-site biodiversity management, and upgrades to rights-of-way/ buffer zones. No phasing plan, funding mechanism or legal agreement is published to secure these. Without such mechanisms the allocation cannot be considered deliverable within the plan period (NPPF paragraph 35(c)). Landscape & Connectivity The farmland/woodland edge acts as a critical ecological and landscape transition zone. Development here would fragment habitat, diminish the Gordano Valley wildlife corridor and erode the rural fringe character. Even with a buffer the visual and ecological intrusion into the woodland and surrounding landscape would be significant. Drainage & Hydrology Construction and built development would alter surface-water run-off and soil compaction on the former farmland, potentially affecting the hydrological regime that sustains the adjacent ancient woodland. The risk of nutrient runoff, altered infiltration and woodland root zone damage is material. Cumulative Impact When considered alongside other allocations in the Portishead area (such as Black Rock north of Clevedon Road), the combined pressure on ecology, infrastructure and transport is significant and undermines the Council's commitments to nature recovery and sustainable growth.			
Land at Tower Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	The proposed allocation of Land at Tower Farm (≈ 400 homes) lies immediately beside Weston Big Wood — an ancient woodland and Site of Nature Conservation Interest (SNCI) managed by Woodland Trust and supported by Avon Wildlife Trust. The woodland forms part of the Gordano Valley ecological network and a nationally important habitat mosaic of open grassland, wetland and woodland. Not Justified There is no robust published alternatives assessment demonstrating that this sensitive site is the only or most appropriate option for growth. The loss of best and most			

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					versatile (BMV) farmland (Grade 2/3a by reference to the ALC dataset) and the risk of irreversible damage to the ancient woodland make this allocation unsuitable. Not Consistent with National Policy The allocation conflicts with the National Planning Policy Framework (NPPF) paragraphs 180–182, which require that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland) should be refused unless wholly exceptional reasons exist. The Council's reference to an "ecological buffer" is vague, unenforceable and insufficient to address indirect impacts such as root-zone damage, hydrological change or wildlife disturbance. The Woodland Trust and Avon Wildlife Trust state that ancient woodland is irrecoverable once damaged. Moreover the Framework requires delivering biodiversity net gain, yet the allocation offers no clear mechanism for ensuring that outcome. Not Positively Prepared The location intensifies existing pressures in Portishead: schools, healthcare and transport infrastructure are already under strain (for example the A369 corridor). This peripheral site would likely increase private vehicle usage and pollution rather than support sustainable travel patterns, contrary to NPPF paragraphs 104–106. Not Effective Delivery depends on multiple unresolved dependencies: new school provision, bus service contributions, off-site biodiversity management, and upgrades to rights-of-way/ buffer zones. No phasing plan, funding mechanism or legal agreement is published to secure these. Without such mechanisms the allocation cannot be considered deliverable within the plan period (NPPF paragraph 35(c)). Landscape & Connectivity The farmland/woodland edge acts as a critical ecological and landscape transition zone. Development here would fragment habitat, diminish the Gordano Valley wildlife corridor and erode the rural fringe character. Even with a buffer the visual and ecological intrusion into the woodland and surrounding landscape would be significant. Drainage & Hydrology Construction and built development would alter surface-water run-off and soil compaction on the former farmland, potentially affecting the hydrological regime that sustains the adjacent ancient woodland. The risk of nutrient runoff, altered infiltration and woodland root zone damage is material. Cumulative Impact			

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					When considered alongside other allocations in the Portishead area (such as Black Rock north of Clevedon Road), the combined pressure on ecology, infrastructure and transport is significant and undermines the Council's commitments to nature recovery and sustainable growth. No modification short of removing the allocation entirely would make this site appropriate. Given its direct adjacency to ancient woodland, its loss would be irreversible and cannot be mitigated sufficiently. The land should instead be retained as undeveloped green space, managed to enhance biodiversity and provide sustainable public access, in line with the Avon Wildlife Trust's 2030 Strategy and national "30 by 30" nature-recovery goals. The proposed allocation of Land at Tower Farm is unsound. It sits adjacent to Weston Big Wood — a high-value ancient woodland. Development would irreversibly damage habitats, fragment the Gordano Valley ecological network and undermine nature recovery ambitions. No mitigation or buffer can render this site suitable. The land should be managed as open countryside to support biodiversity, landscape quality and sustainable community use. I do not support this plan.			
Black Rock, north of Clevedon Road	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	Not Justified – Unsuitable location requiring off-site ecological mitigation The allocation of approximately 100 dwellings at Black Rock is not justified because the Council itself acknowledges that key environmental and ecological requirements cannot be met on-site, and must instead be located "off-site on land to the south-west". This approach directly conflicts with NPPF paragraph 180(a), which requires avoidance of impact before remediation or off-site compensation is considered. The need for offset land demonstrates the inherent unsuitability of the site for development. There is no published evidence of less sensitive alternative sites being considered and discounted. Not Consistent with National Policy – Failure to protect and enhance biodiversity The approach of relying on off-site mitigation and a "suitable ecological buffer" illustrates a reactive rather than preventative approach to biodiversity protection. NPPF paragraphs 180–182 require Local Plans to conserve habitats, prevent deterioration of irreplaceable habitat, and deliver net gains for biodiversity. The allocation fails this by offloading its ecological burden onto unspecified land, without securing long-term management or legal protection for compensatory habitats. It also conflicts with the Avon Wildlife Trust's 2030 Strategy, which emphasises restoration of 30 per cent of land for nature and enhancing landscape connectivity in the Gordano Valley. Not Positively Prepared – Unsustainable pattern of growth	No modification would make this allocation acceptable. The need for off-site mitigation and multiple infrastructure dependencies shows the site is environmentally and logistically unsuitable for housing. The allocation should be removed entirely from Schedule 1. Instead, the land should remain open countryside, contributing to biodiversity and landscape value, in line with the Avon Wildlife Trust's 2030 Strategy, Woodland Trust guidance and national biodiversity objectives.		

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					The site lies on the western approach to Portishead along Clevedon Road, where public transport is limited and local services are minimal. Residents would be heavily reliant on private vehicles to access schools, health care and employment. The fact that footways and new bus stop contributions are required underlines existing infrastructure inadequacy. This car-dependent pattern of development conflicts with the sustainable transport objectives of NPPF paragraphs 104–106. Not Effective – Unclear delivery and infrastructure dependencies The site depends on multiple off-site and third-party mitigations including ecological offset land, new footway construction, bus service contributions and delivery of a section of the Gordano Greenway. No clear funding mechanism, responsible delivery body, or phasing plan is identified in the Plan. Consequently, the allocation lacks deliverability and fails the effectiveness test under NPPF paragraph 35(c). Landscape & Setting The site lies within open countryside forming part of the rural setting of Portishead and the Gordano Valley. The expansion westwards into this part of the countryside would diminish the settlement edge, reduce landscape openness, and risk urbanising what should remain a transitional zone between town and countryside. Agriculture & Soils The farmland in question is likely to be of best and most versatile quality (Grade 2/3a) and its loss for housing is not justified when less sensitive land could be used. The Plan does not robustly demonstrate why this agricultural land must be released. Hydrology & Ecology Development on this edge farmland will affect surface-water drainage, soil compaction and wildlife connectivity into the adjoining woodlands and wetland systems associated with the Gordano Valley. The cumulative effect of development pressure in the area further stresses the existing fragile ecological network. Cumulative Impact Combined with the Tower Farm allocation and other nearby proposals, the Black Rock site would add to cumulative ecological, transport and infrastructure burdens around Portishead – contrary to the Council's stated nature-recovery and sustainable growth objectives. I do not support the plan for this location.			

Name: Tom Sadd **I.D:** 62815041

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Land at Tower Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	Dear sirs. I am writing to register my strong objection to the above planning proposal relating to land immediately adjacent to or affecting Weston Bigwood, a designated Ancient Woodland, Local Nature Reserve (LNR), and an important landscape feature within the Gordano Valley. This proposed development would result in significant environmental, ecological, landscape and community harm, contrary to both national planning policy (NPPF) and North Somerset's Core Strategy. Weston Bigwood is an irreplaceable habitat, with ecological value recognised by: - Its status as Ancient Woodland - Its designation as a Local Nature Reserve - Proximity to the wider Gordano Valley Sites of Nature Conservation Interest The National Planning Policy Framework (para 180c) states that development resulting in the loss or deterioration of ancient woodland should be refused, unless there are wholly exceptional reasons. The proposal would harm this protected habitat through: - Direct habitat loss, shading or fragmentation - Disturbance to protected species (bats, dormice, woodland birds) - Degradation of the woodland edge, which is a crucial ecological buffer These impacts cannot be meaningfully mitigated, and therefore the development conflicts with national policy. Weston Bigwood is a defining natural feature in North Somerset, forming part of the Green Belt and contributing to the landscape character of the Gordano valley. The development would: - Break up a continuous woodland corridor - Reduce the sense of openness central to Green Belt purposes - Introduce artificial lighting, noise, and built form into a tranquil environment This is at odds with Core Strategy policies CS4, CS5 and CS12, which require the protection of valued landscapes and natural assets. The woodland is heavily used for walking, recreation, wellbeing, and outdoor learning. Increased development pressure would: - Reduce accessible natural space - Introduce traffic and safety concerns on narrow rural lanes - Diminish the tranquillity that residents and visitors value The proposal therefore undermines the council's objectives relating to health, wellbeing, and public access to green space. The access roads around the site are narrow, steep and unsuitable for increased traffic flows, especially construction traffic. Issues include: - Limited passing points - Risk to pedestrians and cyclists - Exacerbation of existing congestion near Portbury and the M5 corridor The development would materially worsen these conditions, contrary to highway safety policies. Protecting mature woodland is one of the most effective local actions for carbon storage, heat mitigation, and ecosystem resilience. Removing or degrading this woodland edge conflicts with the council's commitments on: - Climate emergency response - Biodiversity net gain - Sustainable place-making			

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					Any claimed benefits of the development fall far short of the environmental loss. For the reasons set out above, the proposal is in conflict with the NPPF, North Somerset's Core Strategy, and established protections for ancient woodland and the Green Belt. The environmental harm is significant, irreversible, and unsupported by any exceptional justification. This is our home, Portishead has grown exponentially in the last 20 years, without thought for the infrastructure around it, impacting residents, the biodiversity, climate change and the quality of life. We regularly suffer appalling traffic issues, and we are a town that cannot support more housing. The proposed site is not near to, or supported by any amenities, and is entirely unsuitable. Regards, Tom Sadd There are no modifications, short of removing the allocation from the site entirely that will rectify the issues, the proposal is not sound and should not be approved. The land should instead be retained as undeveloped green space, managed to enhance biodiversity, and provide sustainable public access, in line with the Avon Wildlife Trust's 2030 strategy and "30 by 30" nature recovery goals. I do not, there is no sound, or legal reasoning where this proposal becomes workable. I object to the North Somerset Local Plan 2041 for the Tower Hill Farm Location. I object to it entirely and resolutely.			

Name: Tony Grg **I.D:** 62850625

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	◦ Positively prepared ◦ Justified ◦ Effective ◦ Consistent with national policy	Unsure	Unsure	This proposal appears to be a poor investment due to: • The infeasibility of constructing housing and access on the floodplain. • No apparent consideration for the lack of supporting local infrastructure and facilities. • It also violates government policy to secure food security through protection of already diminished Grade 1 agricultural land and threatens wildlife and biodiversity at a time when it needs to be protected. The following points should be considered in rejecting this application: Loss of Grade 1 Agricultural Land: • Building on this agricultural land violates government policy that states "we must protect our best and most versatile land" to ensure food security. • There is only 7% of the high-quality Grade 1 land left in North Somerset, so this should be protected. Lack of consideration for local support: • Local doctors o Surgeries and dentists are already overloaded with current residents. o It does not appear to have been adequately considered in this application. • Local schools o There is already a lack of school places. o There do not seem to be plans to increase this to support an 80% population growth, particularly with 'young families' potentially looking to move somewhere more affordable than Bristol. Employment • There is limited employment in Backwell, meaning workers need to commute to Bristol or other centres. • This will overload already congested roads, buses and train capacity.	• Enhancement and protection of Grade 1 agricultural land, green belt, wild areas, SSSI to protect and increase biodiversity rather than threatening it. • Adequate and logical flood protection to prevent development worsening this issue. • Far fewer houses. A fair distribution of growth amongst North Somerset towns, i.e. balance current growth in Backwell with growth in Clevedon and Portishead instead. • Increased doctor, dental, school, youth centre, leisure and sport facilities to meet the current needs and on-going developments in Backwell. • Suitable cycling and foot paths that are away from traffic. • Effective traffic calming and speed limit enforcement. • Safe crossing points along the A370. • Suitable access to the train station for those in wheelchairs, using prams or walking with small children. • Trains to run when scheduled and with sufficient carriages to meet demand. The current assumption of Nailsea and Backwell as a commuter or transport hub is flawed due to lack of capacity.		

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					Lack of truly affordable housing: • Local development does not appear to provide affordable housing, instead focusing on large 3-4 bed houses, fuelling the inability of people to get onto the 'housing ladder'. • There does not seem to be serious commitment in these plans to invest in the facilities required for young and low-income families. • There does not appear to be funding for youth centres, adequate playgrounds, sport and leisure facilities. Loss of habit for wildlife: • This development will lead to loss of biodiversity and wildlife habitats in what is one of the most wildlife depleted countries. The emphasis should be on saving green sites to protect and increase these valuable assets. • This development threatens protected sites, specifically the Brockley Maternity Roost and SSSI. • The land provides hunting and breeding grounds for rare animals, including lesser and greater horseshoe bats. Overloading already struggling infrastructure: • The train station is not suitable for a sharp increase in additional users: o South platform does not have step free accessibility for those in wheelchairs or using prams. o The small platforms are already crowded during rush-hour with the current level of commuters. o Trains are routinely cancelled or short of carriages, leading to overcrowding. Additional commuters would compound this problem. o The short platform makes boarding or disembarking long trains challenging in rush hour. o Station car park is often full, so would need significant enlargement, further encroaching upon fields and increasing the flood risk. • Roads are already congested and small lanes are used as rat runs. o Attempts to lower the speed limit, e.g. 30mph on A370 and 20mph on smaller roads, are not enforced. Additional traffic would increase the danger to walkers and cyclists, as well as increasing pollution. o Roads are subject to flooding, for example on the low-lying flood plain. This would take significant time and cost to rectify, causing additional disruption. o Cycling is extremely dangerous on the A370. There has been a lack of investment in practicable and safe cycle paths to connect to Festival Way. • Foot paths are inadequate along the A370 and non-existent on most adjoining roads. o Increased construction and commuter traffic would make walking and cycling on the roads more dangerous and polluted. • Local leisure facilities, such as the swimming pool are already under-invested in. Additional users would increase the burden. 'Proposed Road' across Backwell Common: • This lacks detail or a feasibility study. • It is unclear if it will be funded and complete in time to support the proposed development. • As the road crosses the floodplain and needs to cross the railway line it would be expected to be costly to proof against increased future flooding. The Chapel Hill railway underpass flooding has been severe in recent years (photos and press articles available online), often leading to traffic disruption. • There would be increase disruption on the A370 which is already extremely busy with fast cars during rush hour. It is also subject to significant queues during construction work, with drivers resorting to 'rat runs' and often driving in an 'antisocial manner'. • It does not appear from any plans that suitable traffic calming and enforcement			

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					have been considered. • There are no plans for separate cycle paths across this area. Local roads are already extremely dangerous for cycling on, particularly with small children. It is unclear how this would connect to Festival Way in a practicable manner. Flood Risk: • As low-lying land, the whole area is prone to flooding, making it a poor choice for housing. • Backwell Lake and adjacent fields are a floodplain, therefore flood regularly. Construction of the 'Proposed Road' and the housing development would be expected to exacerbate this through increased run off. Adequate flood protection would be expensive and time consuming. • Access will be limited during flooding, as shown through historical floods along the country lanes that would provide access to much of this new development. • Current development in Backwell has already led to increased flooding on the A370. It does not appear that there is storm drain capacity to deal with this, particularly as weather patterns worsen. • Flood defences and additional drainage would be costly, time consuming and disruptive to emplace, impacting upon nature and current residents. Loss of rural character and community: • Backwell's character is based upon a collection of villages surrounded by protected greenbelt and nature. • Backwell has already been subject to a 40% increase so has already played its part in providing new homes. • A further 1000 homes would be an 80% increase, which is disproportionate growth compared to other options such as Clevedon (6%) or Portishead (14%). • There has not been a social cohesion impact assessment provided.			

Name: Tony Harden **I.D:** 39374913

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SP1: Sustainable Development						Page 16 Policy SP1 is agreed with in principle but it should be clearer that lack of suitable and safe cycling facilities to rail stations and other key facilities like supermarkets, banks, dentists, GP surgeries and opticians should be required before development can be permitted. As a key example no further development in Wrington should be permitted until a safe and off road cycle route has been installed to the main shopping area/transport hub at Yatton.		comments on Local Plan.pdf
SP6: Villages and rural areas						Page 27 policy SP6 has a reference to development being supported where it contributes to local distinctiveness. This is supported but needs strengthening. On the recent successful planning application for 59 houses at Cox's Green Wrington we had a 6 month battle with the developer to get the house elevations changed from the brick originally proposed, to a mix of pastel painted render and a local stone appearance to match the village vernacular which has no brick. This change was ultimately agreed but it would be easier if policy SP6 includes reference as well to "the local historical building appearance, style and vernacular".		comments on Local Plan.pdf
SP7: Green Belt							Page 20 SP7 - the maintenance of the Green Belt boundary in the vicinity of Wrington is supported	comments on Local Plan.pdf
SP11: Historic						Page 42 policy SP11 sensible seeks the retention of existing trees. However parts of the area have		comments on

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and natural environment						been subject to the growth of invasive tree species such as holm oak which have a negative impact on biodiversity. Please can this policy be qualified by only seeking the retention of BRITISH NATIVE trees. Such an amendment would then make SP11 consistent with DP35		Local Plan.pdf
Policy LP11: Transport infrastructure, allocations and safeguarding							Page 80 LP11 is strongly supported in particular for the safeguarding of active travel rotes such as the Congresbury to Blagdon link. Opening this old route for cycles would have a massive positive impact on the local communities.	comments on Local Plan.pdf
Policy LP15: Local Green Space						Page 341 lists Local Green Space in Wrington. The policy for LGS is supported but: • The “Old Quarry off Wrington Hill” was renamed in 2023 by Wrington Parish Council as “Prestow Wood Nature Reserve”. Can this be corrected on the schedule please. Its boundary is incorrect and should be extended to also cover the triangular area as shown here: • The Recreation Ground in Wrington should surely be included as a piece of LGS		comments on Local Plan.pdf
Policy DP8: Efficient use of land						Page 131 Policy DP8 explanatory text implies all local centres are accessible locations and there should be a presumption in favour of higher density development there. Wrington is defined as a` Local centre on page 350 but it is not accessible having no safe cycle route to it, no rail station and virtually no bus service. The policy DP8 text should be clarified to make it clear that only in relevant Town/Local centres which have suitable access should development be allowed		comments on Local Plan.pdf
Policy DP9: Flood risk						Page 132 Policy DP9 should differentiate between land at risk of fluvial (river) and tidal (sea) flooding. The policy is supported for fluvial flood risk, however for tidal flooding where sea defences exist, development within the flood plain should be permitted. This is what happens in The Netherlands and our UK policy unnecessarily stops viable development in such areas in UK, particularly in North Somerset and Lincolnshire		comments on Local Plan.pdf
Policy DP34: Green infrastructure						Page 185 policy DP34 makes inadequate reference to solar panels. It is important that solar panels are placed on roofs to reduce the need for ground based panels which have a greater negative impact. This policy should more explicitly require the installation of solar panels on the roofs of new development		comments on Local Plan.pdf
Policy DP46: Housing Type and Mix						Page 218 Policy DP 46 seeks only to require accessible hoses (bungalows) to MP(3) standard where a development includes 10 or more houses. It is to be expected that perhaps 1000 houses will be built on small plots in settlements and villages over the plan period and few of these will be caught by this policy. Please can this policy be extended in someway to give preference that new housing near or with the centre of such villages (such as Wrington) with at grade footways to the local facilities should all be built to (MP3) standard to encourage more sustainable living in such communities for elderly people and thus release of larger properties back into the market for others		comments on Local Plan.pdf

Name: Tony Jones **I.D:** 62859809

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Land at Tower Farm	No	‣ Positively prepared ‣ Justified	No	No	I object to the inclusion of the Tower Farm / Portishead Down site in the Local Plan, as I do not believe its allocation is sound or appropriate. Portishead has already absorbed substantial development over recent years, yet the town centre has seen little improvement. There remain underused and previously developed sites within the town, including areas near Wyndham Way, that could			

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		‣ Effective ‣ Consistent with national policy			accommodate additional housing at higher density while also revitalising the centre. These options appear to have been overlooked in favour of developing open green belt land, despite the clear potential for brownfield regeneration. This undermines confidence that the chosen site represents the most suitable option available, making its inclusion unjust. The environmental consequences of developing this land are particularly concerning. The site forms part of a well-used natural area and lies adjacent to Weston Big Wood SSSI and within the wider Gordano Valley green corridor. Development here would permanently erode an important landscape and place additional pressure on sensitive habitats. References to mitigation through an “ecological buffer” lack sufficient detail and do not convincingly address indirect impacts such as changes to water movement, disturbance to wildlife, or long-term degradation of nearby woodland. No modifications could make the site suitable In practical terms, the site is poorly located for sustainable living. The steep hill severely limits walking and cycling for most people, and public transport provision is limited. As a result, future residents would be heavily reliant on private cars. Traffic congestion is already a serious issue in this area, particularly during school peak times, and additional housing would worsen an already difficult situation. For these reasons, I do not believe this allocation is appropriate and consider it should be removed from the Local Plan in favour of more sustainable and less harmful alternatives.			

Name: Tony Molony **I.D:** 62856385

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	1. Sustainability Appraisal Fails SEA directive - no assessment of brownfield alternatives to Pill Green. Reg 12 / 2024 brownfield register 2,800+ units ignored. 2. No duty to cooperate on Bristol’s unmet need. No statement on common ground; unilateral 1,100 dump in PIEG. 3. Green belt exceptional circumstances not evidenced (NPPF 147) Parcel identified HE 2015 as high performing agricultural land under plough this winter. No sequential test. 4. 44% population bomb on Pill and Easton-in-Gordano - Disproportionate and unjustified. (600 homes = 24% from one site alone. 5. No deliverable plan for A369, M5 J19, schools or drainage by 2041. Pill Green undeliverable = ineffective. Pill already floods after heavy rain. 6. Brownfield first policy ignored - 2,500 viable urban units still available (Weston, Portishead, Bristol fringe). 7. Pill Green breaches NPPF 159 - no sequential test for non green belt sites. Excellent sustainable transport links make urban / brownfield viable, which Pill does not have. 8. Request Independent verification of “exceptional circumstances” before any Pill Green consent. 9. Cap village growth at <5% per site. References: 1. 2017 JSP and previous local plan allocations. 2. NPPF 11 & 130 (f): plans must be deliverable and avoid “adverse impacts” on local character and services. 3. Inspector decisions:	Delete the Pill Green site (600 homes) and HE 2015 from the LP8 Schedule of Sites or amend policy LP8 as follows: “No development on Pill Green / HE2015 until exceptional circumstances are independently verified (NPPF para 147) and sequential testing confirms no viable non-green belt alternatives are available., prioritising sites in Weston-super-Mare, Portishead and Bristol fringe. Cap LP8 allocation across all sites; require full funding (via s106/CIL agreements) for flood defences to 1-in-1000 year standard +45% climate change allowance., A369 and M5 J19 capacity upgrades, with additional schools and GP places alongside associated additional communal infrastructure before granting outline permission. Insert new para 6.79: “Allocations must demonstrate no disproportionate impact on village populations, defined as <5% increase per site without evidenced need. Allocations in villages with a population under 10,000 must not result in a population increase of more than 5% from any single site unless exceptional circumstances are independently verified and full infrastructure delivery (transport, education, health, drainage) is secured up front via s106/CIL. Cumulative impacts across all sites within a settlement must not exceed 20% without a master planned, funded delivery strategy.”		

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					local plan examinations have found allocations causing >10% population increase to be unsound unless supported by exceptional infrastructure evidence, which is absent here.			

Name: Tony Prosser **I.D:** 39720577

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Being a resident of Backwell for over 20yrs., I believe this proposed “plan”, with all it’s lack of thought, on top of the already approved 800 odd houses to be built, (which in it’s self is a 40% increase in the housing of the “village”) is , in essence, totally at odds with the current Governments policy, “to protect our best & most versatile land” To add an additional 1000 odd more houses to these already approved numbers would be a total overdevelopment of Backwell. My reasons for these thoughts above are listed below. Infrastructure:- This proposal has a total lack infrastructure/services included; I.e. extra school places, health provision, leisure facilities, relief of the already considerable traffic congestion on the A370 & Station road for this huge proposed increase in population, to highlight just a few concerns. The vast majority of working age residents are not working in the village or surrounding area, they commute, by road & rail. Some 1000 odd new houses, would mean some 2000 more adults, and on a conservative estimate of just 1 child per household, 1000 children, not to mention the additional 500+ houses proposed to be built next to Backwell nature reserve, another 1500 increase in the population. An almost doubling of occupied housing with a huge increase in population with no “needs or viability analysis” conducted, or any form of “social cohesion impact assessment” provided or even apparently considered at this time! Shameful! The Infrastructure Delivery Plan, if it can be called that, has a total lack of costings & in depth analysis, with no funding guarantees for the new roads proposed! Is it a tunnel under the main south west railway line or a tunnel? Backwell Rail Station, is, I believe, at present totally unfit for purpose as a transport hub, and somewhat dilapidated, with, amongst other faults, no viable access for less-abled travellers with mobility issues, (I speak from personal experience), even now, let alone in the future with the inevitable increase in commuter traffic. Backwell has been targeted to “swallow” some 7% of the districts housing allocation, Clevedon, 2%, why? Environmental:- Has the flood plain been fully investigated in the proposed development, more housing in these areas would greatly exacerbate localised flooding, retention of water etc., how will/can that be mitigated? The agricultural land proposed to be built on in this development is classed as Grade 1, currently used for animal grazing & food production. This development again, flys in the face of the Government’s policy “to protect our best & most versatile land to safeguard food security”. With only approx. 7% of this type of land left in all of North Somerset, its approval would be a travesty! Local wildlife would be devastated; the Brockley local SSSI would be very negatively impacted, let alone totally depleting what’s left of the immensely valuable wildlife habitats which feed, & “house”, all that wildlife which enhances the biodiversity of the area. Where would the deer, badgers, fox’s, bats, birds etc., live, feed, breed? That’s not to mention the fact that we live in a country that is one of the most nature depleted on this planet. Will there be a “Green Belt” in years to come, with the Government requiring some 50% affordable housing to be built on Greenbelt Land? To conclude, I do not consider myself a “NIMBY”, I have little time left in this world; my objections to this proposal are for the protection & enhancement of the quality of life of future generations living here now, & in the future.			

Name: Trevor George Essex **I.D:** 50199169

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Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I object to the proposal to allocate the site for 582 houses on land in Nailsea next to Backwell Lake. The proposed link road will not effectively serve Nailsea traffic nor relieve congestion on Backwell Station Road as it will still be used for all westbound traffic. It is quite likely that traffic will increase significantly on the lanes around Nailsea and Backwell despite the traffic plan suggesting that these will become more cyclist/walker/equestrian friendly routes. The land proposed for new housing allocations is currently used as Grade 1 Agricultural Land for farming. If this land is developed then future generations will not be able to revert the land back to agricultural use. The loss of agricultural land will reduce the country's ability to be self sufficient in food production and more reliant on imports. This seems to be a wholly retrograde step given the environmental impact of transporting goods and food from abroad, and also given the political instability in the world. The loss of Greenbelt will impact on the area's character, wildlife, ecology and residents health and well being.			
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I object to the proposal to allocate sites in Backwell for a further 889 houses as well as a further 582 houses on land in Nailsea next to Backwell Lake. If these locations are accepted then this is in addition to 800 houses already approved for Backwell which represents a 40% increase for the village as well as major developments in Nailsea. If the allocations of the new housing target are accepted these will lead to a population growth of 80% in Backwell and 55% in Nailsea, both are wholly disproportionate to proposed allocations elsewhere in North Somerset and will result in the long term merger of the two communities. I cannot see any social cohesion impact assessment within the evidence documentation provided. The proposed link road will not effectively serve Nailsea traffic nor relieve congestion on Backwell Station Road as it will still be used for all westbound traffic. It is quite likely that traffic will increase significantly on the lanes around Nailsea and Backwell despite the traffic plan suggesting that these will become more cyclist/walker/equestrian friendly routes. Backwell in particular does not have an employment hub, and shops are very limited meaning new residents will travel by car to local shops in Nailsea thus increasing traffic. The land proposed for new housing allocations is currently used as Grade 1 Agricultural Land for farming. If this land is developed then future generations will not be able to revert the land back to agricultural use. The loss of agricultural land will reduce the country's ability to be self sufficient in food production and more reliant on imports. This seems to be a wholly retrograde step given the environmental impact of transporting goods and food from abroad, and also given the political instability in the world. The loss of Greenbelt will impact on the area's character, wildlife, ecology and residents health and well being. In summary I feel the scale of development proposed for Backwell in particular is wholly disproportionate and should not extend beyond the developments that already have approval. No further development should be allowed until existing approved schemes are completed and the impact of these can be fully understood.			

Name: Trevor Leake **I.D:** 51323617

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I have serious concerns for Backwell as a strategic growth location designation as this will have impact on the areas character, loss of greenbelt and high-quality agricultural land, risk of flooding, and lack of certainty over whether the road can be funded and delivered on time to support the proposed housing. The proposed development of 1000 houses will destroy grade 1 agricultural land (currently used for crops and grazing). There is only 7% of this high-quality land left in North Somerset. Government policy states that 'we must protect our best and most versatile land' to safeguard food security. The UK currently imports approximately 50% of the food it consumes. In the event of the Ukrainian war spreading this may force UK to be more self-sufficient. Building on such land is therefore very shortsighted. Backwell already has 800 new houses approved, which represents a 40% increase for the village. A further increase of 1000 houses is massive. Backwell has been allocated a higher number of houses than any other village in North Somerset. Backwell is expected to take 7% of the districts housing allocation compared say to Clevedon's 2%. The proposed road is speculation. Engineering it through the railway line would involve a tunnel or flyover which need to be designed and costed. The road route also appears to cross land owned by different parties. The scheme is therefore likely to be unaffordable. Backwell lacks the infrastructure to support another 1000 houses. The schools, health services and leisure facilities cannot			

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					absorb this. The infrastructure delivery plan lacks analysis and costing. There are also no funding guarantees for the new road or services. Backwell is not an employment hub as many people commute. Such an increase will further load the A370 which is currently congested at peak times, and also render Station Road impassable. This development would destroy valuable wildlife habitats and further harm biodiversity in what is a very nature depleted country. The Brockley Maternity Roost and SSSI, with rare Lesser and Greater Horseshoe bats rely on this land for their food. Backwell common and surrounding areas are prone to flooding, which will only be aggravated by a further 1000 houses. Backwell Lake (reservoir) and adjacent fields are currently on a flood plain which floods regularly. This is the chosen route for the new road. Government policy requires 50% affordable housing on Greenbelt land, but this reduces funds available for developers to contribute towards any infrastructure. The current railway station is not fit for purpose as a transport hub. It remains inaccessible for people with mobility problems and presents serious challenges when travelling with young children. A further 1000 houses will only further exacerbate the situation. Based on the above, I request that North Somerset Council reconsiders this scheme for the development of a further 1000 houses at Backwell. Trevor Leake C Eng FIMechE I cannot envisage any modifications that will make the North Somerset Local Plan 2041 for Backwell, legally compliant or sound. The development for 1000 houses destroys agricultural land. The proposed area is prone to flooding and the proposed relief road cannot be guaranteed (all as points raised above) I do not wish to support the soundness or legal compliance of the North Somerset Local Plan 2041.			

Name: Trevor Watts **I.D:** 62849953

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Vision, Strategic Priorities and Sustainability Objectives	No	• Justified • Effective	Unsure	No	The vision is laudable but the proposals for meeting the vision are wholly inconsuistent with the vision. Building on Green belt green field highest quality agricultural land surrounding Backwell is directly counter to the vision in multiple ways. To talk of building sustainable communities whilst taking away the means of providing food for the country as a whole makes no sense. Government policy is "to protect our best and most versatile land". This plan does the opposite. The scale of development proposed would destroy the current sense of community of Backwell - removing any sense of wellbeing through totally altering the character of the area.	Concentrating development in areas where low quality land or brown field sites are used for housing would allow high quality agricultural land to be retained for food production. Placing large scale development within or close to concentrations of employment would also be consistent with the vision to be environmentally responsible.		
Grove Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	The sacrifice of grade 1 agricultural land is utterly irresponsible and shortsighted. This is highlighted by the level of international instability we are living through at present. The infrastructure delivery plan has no solid substance in analysis or costings let alone commitment of funds to deliver it. The character of the area would be fundamentally altered by the level of proposed development and without investment in sound infrastructure and services (transport, education, medical and			

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					leisure facilities) the quality of life of the inhabitants would be drastically reduced - not enhanced as the planning vision requires.			

Name: University of Bristol **I.D:** 39076833

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SP3: Spatial strategy	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The University of Bristol's view is that the Local Plan is unsound and not legally compliant with regard to the Woodspring strategic development allocation (Policy LP2). The soundness of the plan in this regard is set out below. Positively Prepared: In accordance with the NPPF, positively prepared is defined as: "providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development." The NPPF is clear that, in calculating housing need under the standard method, this figure is to be treated as a minimum. Therefore, should there be suitable sites available to deliver housing over the local plan period, these should be supported notwithstanding the Council's position that is has reached its requisite 'target' under the standard method. Moreover, owing to the Council's most recent Housing Delivery Test measurement, it is appropriate that a 20% buffer is applied for the first five-years of the plan, in accordance with the NPPF. While stated as a minimum figure, we consider the quantum of housing planned for under Policy SP8 to be negative and insufficient. A number of suitable sites promoted through the local plan process have been unduly discounted by the Council and we consider this to be the antithesis of the plan being positively prepared. One such site comprises the University of Bristol's land south of Long Ashton (HE20139). The site lies adjacent to the settlement boundary, sustainably located in the context of Long Ashton and Bristol, comprising grey belt land which could/should comfortably be brought forward for development in the new local plan. The Council's Spatial Strategy, Site Selection and Capacity Paper (October 2025) identifies Long Ashton as a Category A village, which represents settlements "considered to be relatively sustainable in their own right with a range of easily accessible services and facilities and good public	The Council's overarching spatial strategy, housing numbers and allocation sites identified should be comprehensively reviewed and revisited as it is clear that. This requires review of suitable residential allocation sites omitted from the draft plan which are, in the first instance outside the Green Belt, and then sites which are agreed to be Grey Belt. We contend that the following sites owned by the University of Bristol represent suitable, available and viable development sites which would positively support sustainable growth over the plan period, including in the early years, and should be allocated for development in the new local plan: • Land at Stock Lane Farm, Langford – HE203031 • Land to the West of Wyndhurst Farm – HE20590 • Land south of Long Ashton – HE20139 The University supports Draft Policy LP19, albeit we consider that minor modifications to the policy wording should be made to acknowledge the sustainability of the location. As present, we consider the policy wording to present an overly negative position of the area which would conflict with the aspirations of the policy to support University development in this area.		NSLP_Pre_Submission_Plan_Representation_Form_Part_B_UOB_SP3.pdf

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					transport links to towns". It is very notable that despite its acknowledged sustainability credentials, and acknowledgement that Green Belt land is required to be released, Long Ashton has all but been ignored for any growth of scale over the plan period. Two small sites are identified within the existing settlement boundary to deliver 42 dwellings. We consider this to be highly irregular for such a sustainable settlement to be consistently overlooked by the Council for accommodating any real growth and raise significant concerns with the Spatial Strategy under Policy SP3 in this context. Planning for a mere 42 homes in Long Ashton to 2041 is not considered to be a positively prepared spatial strategy approach. Additional housing sites which have been consistently promoted to the Council by the University, and consistently overlooked through the emerging local plan process include land to the west of Wyndhurst Road (adjoining the Category A village of Churchill settlement boundary) (site: HE20590) and the nearby land at Stock Lane Farm, Langford (previously developed land) (site: HE203031). The Council's 'Duty to Co-operate Statement of Compliance Regulation 19 Stage' (October 2025) sets out that Bristol City Council (BCC) have requested for neighbouring authorities, including North Somerset Council, to accommodate its unmet housing need. The Council's Duty to Co-operate statement is clear that "North Somerset does not have capacity to meet some of Bristol's needs at this time". We do not agree with that position. We highlight the importance of North Somerset's position in the context of South Gloucestershire Council also making no provision in its Draft Local Plan (plan submitted for examination) to contribute towards Bristol's unmet need. Similarly, through its emerging local plan process, B&NES Council has made no commitment to contributing to Bristol's unmet need owing to it being heavily constrained and having to deal with its own significant housing requirement uplift (approximately double that before the new 2024 standard method). In this regard, it is noted that on 21 November 2025, the inspectors published their final post-hearing advice following examination of the new Bristol Local Plan. The inspectors have requested modifications to the plan from BCC to set out an increased housing need and clearly set out what the level of unmet housing need is. An extract from the inspectors' post-hearing advice is provided below, which reinforces the position that no agreement is in place between BCC and any neighbouring authority, including North Somerset, to accommodate the unmet need. The inspectors set out that they: "acknowledge that there is insufficient capacity to meet the Council's objectively assessed housing need, as calculated by the standard method. Nevertheless, we do not consider			

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					the figure of 34,650 dwellings over the Plan period to be positively prepared or justified. Given the significant shortfall in meeting overall needs, and the current lack of agreement between Bristol and any neighbouring authorities to provide assistance, we consider it imperative that the Council seeks to maximise housing delivery. Inherent uncertainties in housing delivery in the longer period do not justify setting a housing requirement substantially below the overall housing capacity figure identified at submission. The evidence submitted since the end of the hearing sessions has not persuaded us that a lower figure is justified." Therefore, it stands that BCC's significant unmet housing need will continue to go unmet with none of its neighbouring authorities committing to assist. We find this problematic with particular regard to North Somerset as we consider there to be appropriate scope for a greater number of housing sites to be identified in the new Local Plan and delivered through the course of the plan period. The Council's own additional sites consultation in February/March 2025 demonstrated that this was the case. The unmet need for Bristol is significant, cannot be ignored and requires to be addressed within the new North Somerset Local Plan. National guidance within the NPPF is clear that plans should ensure that, inter alia, unmet development needs from neighbouring areas are provided for to ensure effective strategic planning across local planning authority boundaries. It is clear from the Council's own work that North Somerset are in a strong position to be able to identify significant additional housing sites through allocations in the new local plan. This would positively overachieve the Council's housing need target and provide a meaningful contribution to the unmet need of BCC. Pursuant to the Council's emerging local plan process, it carried out consultation on potential additional housing sites to be included as draft allocations in the Reg 19 plan ('Consultation paper on additional sites for the Regulation 19 Plan', February 2025). That identified sites which the Council considered to be 'most suitable', such as that at Yanley Lane South West Bristol (HE20110) in addition to a raft of sites identified as having 'other potential', including sites now identified as draft allocations i.e. around Pill and Easton-in-Gordano and sites now omitted as draft allocations i.e. the University of Bristol's land south of Long Asthon (site: HE20139) and land to the west of Wyndhurst Road, Churchill (site: HE20590). The Council set out within that consultation that sites with 'other potential' comprised: "sites at the towns and larger, more sustainable villages consistent with the spatial strategy". [our emphasis] It stands that the Council rightfully identified suitable			

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					residential sites in sustainable locations pursuant to the 'other potential' sites in the 'Consultation paper on additional sites for the Regulation 19 Plan' (February 2025). However, such sites have been unduly disregarded at the Reg 19 plan stage and, in our view insofar as the University of Bristol's land south of Long Asthon (site: HE20139) and land to the west of Wyndhurst Road, Churchill (site: HE20590) wrongfully omitted. The latter lies outside the Green Belt and so should be preferred to the various sites proposed to be released from the Green Belt, as sought be national planning policy guidance. Site HE20139 and HE20590 are available now and deliverable to contribute towards significant positive growth within the plan period and should be supported for allocation. We consider that there is scope for additional appropriate housing sites to deliver over the plan period which are available, suitable and viable. In the Council's own words these disregarded sites are "consistent with the spatial strategy" and yet have been ignored. We contend this is the wrong approach, particularly in the context of the significant identified unmet need for Bristol. We therefore disagree with the Council's position that it cannot accommodate any of the unmet housing need from Bristol in North Somerset. In this context, the North Somerset Local Plan is not considered to be positively prepared, justified, effective or consistent with national policy. Justified: In accordance with the NPPF, to be justified this requires: "an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence." As set out above, it is considered that reasonable alternative sites for housing allocations have been unduly discounted by the Council, in conflict with the evidence base which should otherwise support its approach. Therefore, we do not consider that all draft housing allocations are sufficiently justified which goes to the soundness of the plan. Paragraph 148 of the NPPF is clear that where it is necessary to release Green Belt land for development, as is established and agreed in North Somerset, plans should give: "priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations." Prior to this, non Green Belt sites should be prioritised for allocation. In this regard, our client has consistently promoted its land south of Long Ashton and at Wyndhurst Farm (site: HE20590) and Stock Lane Farm (site: HE203031) at			

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					Churchill/Langford. However, the Council is not supporting a draft housing allocation on any of the three land parcels. We consider this to be contrary to NPPF paragraph 148 and is not a justified approach in plan making terms. Land at Stock Lane Farm, Langford – HE203031: The University's land at Stock Lane Farm comprises previously developed land, outside of the Green Belt. This is sustainably located in relation to Langford and Churchill and has been promoted for development with capacity for up to 64 dwellings. There is a realistic prospect that houses could be delivered on the site within five years. The site was previously identified as a 'less sustainable' site, wrongfully in our view, as part of the Council's Consultation paper on additional sites for the Regulation 19 Plan' (February 2025). The consultation ran to March 2025 to which representations were submitted by the University in relation to all three of its land parcels referenced. In this regard, the site is well related to the settlement and existing facilities and services in Churchill and Langford. Adjacent to the west of the University's land at Stock Lane Farm, planning permission ref: 23/P/0448/OUT was approved by the Council in March 2025 for a mixed-use development comprising up to 120 dwellings, new flexible employment, children's day nursery and café, along with associated car parking, landscaping, tree works, public open space and local equipped area for play, drainage infrastructure, access improvements and connections to the existing footpath network. We note the Council's also identified that land as a 'less sustainable' site in the previous consultation, while granted it planning permission, and now identifying it as a draft allocation. This outlines the inconstancy in the Council's approach to its housing sites in the new local plan. The presence of planning permission 23/P/0448/OUT only further supports development on the University's land adjacent at Stock Lane Farm (HE203031) which critically comprises previously developed land. In this context, the University's land is annotated red on the plan (see attachement) which comprises the adjacent approved development (and now draft allocation). The Council's decision to omit the University's land at Stock Lane farm is not justified in the context of Draft Policies SP3 and SP8. The site is sustainably located, outside of the Green Belt on previously developed land and adjacent to the Monaghan Mushrooms site (Draft Policy LP23), pursuant to planning permission 23/P/0448/OUT. Land to the West of Wyndhurst Farm – HE20590: The University's land west of Wyndhurst Farm Stock Lane Farm comprises greenfield land adjacent to the settlement boundary of Churchill. This is sustainably located and has been promoted for development with capacity for up to 90			

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					dwellings at a density of 29 dwellings per ha. There is a realistic prospect that houses could be delivered on the site within five years. The site was previously identified as a site with 'other potential' as part of the Council's Consultation paper on additional sites for the Regulation 19 Plan' (February 2025). The Council set out within that consultation that sites with 'other potential' comprised: "sites at the towns and larger, more sustainable villages consistent with the spatial strategy". [our emphasis] The Council's published 'North Somerset Strategic Housing Land Availability Assessment Main Report' (October 2025) further sets out that the site was considered by the Council to have "potential for further consideration". Notwithstanding this, the Council's published 'Spatial strategy, site selection and capacity paper' (October 2025) confirms that this site is not a proposed allocation in the draft Local Plan with commentary provided as follows: "The site is outside settlement boundary with a distinctive rural character providing a clearly defined separation between the area of Churchill centred around Bristol Road and Pudding Pie Lane, and the smaller settlement of Lower Langford to the east. Due to the impact on the landscape and potential impact on heritage assets, it is not considered appropriate to take this site forward as a housing allocation." We do not agree with the Council's assessment of the site and its position to omit this as a draft allocation. We note that pre-application discussions with the Council resulted in the suggestion to promote the site at that time through the local plan which has been comprehensively done and so it is disappointing to see this be omitted as a draft allocation. This is particularly the case given the extent of the Council's housing need which should, in the first instance be addressed by appropriate sites such as this outside of the Green Belt before seeking to remove land from the Green Belt. Development on the site would comfortably assimilate with the surrounding built form, providing sustainable development. It is notable that planning permission (ref: 22/P/2908/OUT) was approved in November 2024 for nine dwellings adjacent to the south of the site which only provides further support for development in this location. Different development options have been considered which would address all material considerations for the site, which include a scheme for 24 units and a scheme for up to 90 units in this regard, as illustrated below. The site is wholly sustainable with any associated impacts of development more than capable of being addressed with appropriate mitigation. In this regard, the Council's			

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					decision to omit the University's land is not justified in the context of Draft Policies SP3 and SP8. Land south of Long Ashton – HE20139: The University's land south of Long Ashton comprises land within the Green Belt, adjacent to the settlement boundary of Long Ashton. This is sustainably located and has been consistently promoted for a number of years to the emerging local plan, and previous WECA joint spatial plans for development with capacity for up to 1,500 dwellings. The site was previously identified as a site with 'other potential' as part of the Council's Consultation paper on additional sites for the Regulation 19 Plan' (February 2025). The Council's published 'North Somerset Strategic Housing Land Availability Assessment Main Report' (October 2025) further identifies that the site was considered by the Council to have "potential for further consideration". Notwithstanding this, the Council's published 'Spatial strategy, site selection and capacity paper' (October 2025) confirms that this site is not a proposed allocation in the draft Local Plan with commentary provided as follows: "Site not consistent with the spatial strategy as it is detached from the existing built-up area of Long Ashton." We do not agree with the Council's assessment of the site and its position to omit this as a draft allocation. It is clear that the site should accord with an appropriate spatial strategy which directs growth to the most sustainable locations. Therefore, the Council is not following this by omitting the University's land as an allocation. The site is well related to Long Ashton in addition to the city of Bristol. It appears that the Council have unduly set preference to directing growth to the neighbouring Yanley Lane/ Woodspring site (HE20110) (draft allocation for 3,500 dwellings under Policy LP2) at an early stage of the plan making process. This position has not shifted even as the evidence base has been developed which indicates to the contrary. Attention is turned to the Council's Sustainability Appraisal Report (October 2025). This sets out the findings of the assessment of potential allocation sites against the sustainability appraisal objectives. A summary is provided (see attached document) with comparison of our client's land south of Long Ashton, which has been discounted by the Council and the Yanley Lane South West Bristol land, which is proposed to be allocated for development by the Council in the Local Plan. This comparison is provided owing to the proximity and context of both sites, and similarity with regard to scope to provide strategic growth.			

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					This sets out the similarities in the Council's assessment of both sites which, when compared, identifies fewer negative effects of development on our client's land than that identified for allocation by the Council at Yanley Lane. The sustainability credentials of our client's land are clear and development of this land should be supported. The Council's Spatial Strategy, Site Selection and Capacity Paper (October 2025) provides commentary on the potential allocation sites. For our client's land south of Long Ashton (HE20139) this states that the site is not proposed for allocation and that the: "Site not consistent with the spatial strategy as it is detached from the existing built-up area of Long Ashton". Whereas for the Yanley Lane site (HE20110), this states that the site is proposed for allocation and that the: "Site [was] previously identified (in smaller form) in Regulation 18 plan". The fact that the Yanley Lane/Woodspring site was preferred by the Council at early stages of the plan, in advance of the supporting evidence base work being carried out, is not sufficient justification for it to be allocated. This is required to be justified and supported by the evidence base, which we do not consider it to be, in the context of the University's land south of Long Ashton. The Council's approach contradicts NPPF paragraph 148 in identifies sites to be removed from the Green Belt for development. The Council's 'Stage 2 Green Belt Assessment' (October 2025) identifies the land south of Long Ashton to make an overall weak contribution to the purposes of the Green Belt. Whereas, the Yanley Lane/ Woodspring site is determined to make a greater contribution, set at 'moderate' to the Green Belt purposes. This comparison is provided (see attached document), pursuant to the Council's Stage 2 Green Belt Assessment. In Green Belt terms, it is clear that the University's land south of Long Ashton makes less off a contribution to the Green Belt purposes than the Council's proposed allocation at Yanley Lane/Woodspring. Moreover, our client's land would wholly support sustainable patterns of development in the context of Long Asthon and Bristol, in accordance with NPPF paragraph 148. Further to this, as can be seen in the Green Belt assessment, the University's land makes a weak contribution to Green Belt purposes A, B and D. There are no relevant footnote 7 assets that would provide a strong reason for refusing or restricting development on the land. Therefore, this can be considered Grey Belt, subject to the specifics of the development proposal. The Council's Stage 2 Green Belt assessment agrees with this position however the Pre-Submission (Reg 19) version of the plan still determines not to allocate the land for development which			

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					we consider to not be justified. The NPPF is clear that Grey Belt land should be supported for directing development in new local plans (NPPF paragraph 148). In this context with the omission of our client's land for allocation, we dispute the Council's claim at page 30 of the Pre-Submission Plan (Reg 19) that: "A sequential approach to Green Belt release has been taken prioritising previously developed land, followed by grey belt sites and then other Green Belt locations". The omission of the University's land south of Long Ashton seemingly goes against the supporting evidence base and therefore we do not consider the approach to be justified, with particular regard to Draft Policies SP3, SP7, SP8 and LP2. The Council's overall spatial strategy and policies/ allocations to direct housing growth are required to be informed by the evidence base. Effective: In accordance with the NPPF, to be effective means to be: "deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground." As set out above, where we consider the plan to not have been positively prepared, the Council's 'Duty to Co-operate Statement of Compliance Regulation 19 Stage' (October 2025) sets out that BCC have requested for neighbouring authorities, including North Somerset Council, to accommodate its unmet housing need. The Council's Duty to Co-operate statement is clear that "North Somerset does not have capacity to meet some of Bristol's needs at this time". We do not agree with that position on account of suitable sites being omitted for development allocations, particularly where the Council has previously acknowledged the sites to have 'other potential' which, in the Council's words are "sites at the towns and larger, more sustainable villages consistent with the spatial strategy". This is particularly relevant to the University's land south of Long Ashton and at Stock Lane Farm and Wyndhurst Farm in Churchill/Langford which comprise either previously developed land outside the Green Belt, land outside the Green Belt adjacent to the Category A village settlement boundary for Churchill, or Grey Belt land adjacent to the Category A village settlement boundary for Long Ashton. While the Council's housing figure over the plan period (Draft Policy SP8) is prescribes as a minimum, this is a negative approach when considering that additional sites are readily available to deliver above this figure, and should be set out as such in policy. This strongly supports our position that North Somerset is fully capable of accommodating additional growth, thereby contributing towards the unmet need from BCC. However, the Council is			

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					unduly deciding not to do this – this is not effective plan making. Moreover, the NPPF is clear that planning policies should identify a supply of specific, deliverable sites for five years following the intended date of adoption, with an appropriate buffer. It is likely that some of the larger strategic development/urban extension areas identified for allocation in the plan will not begin to deliver homes within the first five years and so this means that greater flexibility and contingency is required to be built in to ensure housing delivery is forthcoming in the early years of the plan to meet the minimum requirements. Ensuring early delivery of housing early in the plan period is critical. Consistent with National Policy: In accordance with the NPPF, consistency with national policy should be adhered to: “enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.” For the reasons set out within these representations, it is considered that the Council’s Reg 19 Pre-Submission Plan is not consistent with national policy with particular regard to the guidance in the NPPF relating to failure under the duty corporate and the approach to accommodate none of BCC’s identified unmet housing need. The plan inadequately makes provision for insufficient housing in this context which is not justified owing to the evidence base supporting identification of additional land which could positively support housing growth over the plan period. Moreover, we consider the Council’s approach to identifying the draft housing allocation sites is flawed and inconsistent with national policy in overlooking suitable sustainable previously developed land and greenfield sites in the first instance ahead of Green Belt sites; and subsequently overlooking suitable sustainable Grey Belt sites which should be prioritised for development ahead of the remainder of the Green Belt. Conclusions: For the reasons set out above, we consider the plan to be unsound in its current form. Ultimately, the primary reason the plan is not considered to be sound is owing to the approach that the evidence base has followed the Council’s overall strategy; rather than the other way around. The evidence base should directly support the approach laid out in the plan and this is not the case. Notwithstanding this position, the University provides support for Draft Policy LP19 for the ‘University of Bristol site in Langford’ allocation. We welcome the recognition this policy provides for the significant educational and			

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					employment benefits made by the University of Bristol's campus in Langford to the local, and wider, area. The University of Bristol support the policy aims of LP19 which recognise the importance of the facility and support the new development opportunities that will enable the university to grow and accommodate necessary expansion in terms of student numbers and staff employment. We consider that Draft Policy LP19 in isolation is sound as this does not relate to the outstanding wider concerns raised which relate to housing in terms of housing growth quantum and spatial approach. Minor modifications are suggested to the wording of Draft Policy LP19, in so far as we consider this to present a negative picture of the existing sustainability credentials of the site. For users of the campus not based locally, this is readily accessible by non-car modes with regular bus services available. This includes the U2 service which the University provides free passes to students of the veterinary school to travel. Therefore, while this draft policy is strongly supported, we would support minor wording changes to the policy which acknowledge its sustainability. Further detail is hereby provided below and appended in relation to the University of Bristol's land at Stock Lane farm and Wyndhurst Farm in Churchill/Langford and land south of Long Ashton. Development on this land, with support from residential allocations should be provided in a new sound North Somerset Local Plan. Land at Stock Lane Farm, Langford – HE203031: Availability: Site HE203031 is in single ownership by the University of Bristol. The land has been identified as surplus to requirements, having previously been used in association with the University's Langford Veterinary Campus for research and academic studies. It is readily available now, able to make a meaningful contribution to the Council's five-year land supply. Suitability: Site HE203031 offers a suitable location for development of housing. There are no development constraints that would prevent allocation of the site for its early development for housing. The site is well related to a 'Category A' village (most sustainable) and so its allocation fits comfortably into the Council's emerging spatial strategy. The site is accessible by a choice of means of transport to local facilities, including employment opportunities, schools, shops and other services. 4 The site, comprising previously developed land, forms part of the existing built form along Stock Lane and is subject to no designations/constraints that would restrict redevelopment of the site for housing.			

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					Likely Economic Viability: There are no known extra-over costs associated with the development of this site nor any issues with utilities which would mean that it would be economically unviable. There is a realistic prospect that houses could be delivered on the site within five years. 4.7 The site has capacity for up to 64 dwellings, subject to detailed design and is available, suitable and economically viable. It should be allocated in the local plan to assist North Somerset providing a sufficient supply and mix of sites to meet their minimum required housing need. Land to the West of Wyndhurst Farm – HE20590: Availability: Site HE20590 is in single ownership by the University of Bristol. The land has been identified as surplus to requirements for some years. It is readily available now, able to make a meaningful contribution to the Council's five-year land supply. The site has consistently been promoted for allocation through the local plan process following the advice of the Council during a formal preapplication submission in 2020. Suitability: Site HE20950 offers a suitable location for development of housing. There are no development constraints that would prevent allocation of Site HE20590 for its early development for housing. The site lies adjoining a 'Category A' village (most sustainable) and so its allocation fits comfortably into the Council's emerging spatial strategy. The site is accessible by a choice of means of transport to local facilities, including employment opportunities, schools, shops and other services. The site lies abutting the settlement boundary of Churchill as proposed in the emerging local plan. It has no landscape, heritage or other designation. It is in Flood Zone 1 (low risk) and grade 3 agricultural land. Likely Economic Viability: There are no known extra-over costs associated with the development of this site nor any issues with utilities which would mean that it would be economically unviable. There is a realistic prospect that houses could be delivered on the site within five years. The site has capacity for circa for 90dwellings at a density of 29dwellings per hectare. An example of how the site might be developed for housing is provided below. Site HE20590 is available, suitable and economically viable and should be allocated in the local plan to assist North Somerset providing a sufficient supply and mix of sites to meet their minimum required housing need. Land south of Long Ashton – HE20139:			

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					Availability: The site is in single ownership by the University of Bristol. The land has been identified as surplus to requirements for some years. It is readily available now, able to make a significant contribution to the Council's housing need over the plan period. The site would form a natural extension to Long Asthon being contiguous with the existing settlement boundary of to the north and is physically contained between the A370 to the east/south and Wild Country Lane to the west. Allocation of the site for development, and its release from the Green Belt, is supported by NPPF paragraph 148 in that growth here will promote a sustainable pattern of development on Grey Belt land. This is a requirement of the NPPF. Notably, significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes as is the case for this site. Moreover, releasing land from the Green Belt for development are required to ensure that, inter alia, sustainable transport modes are prioritised, safe and suitable access can be achieved and any significant impacts from the development on the transport network, or on highway safety, can be cost effectively mitigated to an acceptable degree through a vison-led approach. The University's land south of Long Ashton fulfils all criteria with its strong relationship with the existing Long Ashton settlement and being in close proximity, and well connected to, Bristol. Suitability: The site offers a suitable location for development of housing on Grey Belt land. There are no development constraints that would prevent allocation of Site HE20139 for its development for housing. This conclusion is informed by a suite of past technical information on the site. The site lies adjoining a 'Category A' village (most sustainable) and so its allocation fits comfortably into the Council's stated spatial strategy. The site is accessible by a choice of means of transport to local facilities, including employment opportunities, schools, shops and other services. Likely Economic Viability: There are no known extra-over costs associated with the development of this site nor any issues with utilities which would mean that it would be economically unviable. There is a realistic prospect that houses could be delivered on the site over the plan period. The site is available, suitable and economically viable and should be allocated in the local plan to assist North Somerset providing a sufficient supply and mix of sites to meet their minimum required housing need. The proposal on the site is informed by the substantial of technical work which has been carried out to date.			

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					Key facets of a future development of this site could include: • Up to 1,500 dwellings, including a mix of tenures and affordable housing; • Potential to include a mix of non-residential uses; • New access onto the A370 • Cycle routes and public footpaths; • Green infrastructure, including public open space; • Biodiversity Net Gain. A plan demonstrating how development could be achieved on the site is provided in the attached document.			
SP7: Green Belt	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The University of Bristol's view is that the Local Plan is unsound and not legally compliant with regard to the Woodspring strategic development allocation (Policy LP2). The soundness of the plan in this regard is set out below. Positively Prepared: In accordance with the NPPF, positively prepared is defined as: "providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development." The NPPF is clear that, in calculating housing need under the standard method, this figure is to be treated as a minimum. Therefore, should there be suitable sites available to deliver housing over the local plan period, these should be supported notwithstanding the Council's position that is has reached its requisite 'target' under the standard method. Moreover, owing to the Council's most recent Housing Delivery Test measurement, it is appropriate that a 20% buffer is applied for the first five-years of the plan, in accordance with the NPPF. While stated as a minimum figure, we consider the quantum of housing planned for under Policy SP8 to be negative and insufficient. A number of suitable sites promoted through the local plan process have been unduly discounted by the Council and we consider this to be the antithesis of the plan being positively prepared. One such site comprises the University of Bristol's land south of Long Ashton (HE20139). The site lies adjacent to the settlement boundary, sustainably located in the context of Long Ashton and Bristol, comprising grey belt land which could/should comfortably be brought forward for development in the new local plan. The Council's Spatial Strategy, Site Selection and Capacity	The Council's overarching spatial strategy, housing numbers and allocation sites identified should be comprehensively reviewed and revisited as it is clear that. This requires review of suitable residential allocation sites omitted from the draft plan which are, in the first instance outside the Green Belt, and then sites which are agreed to be Grey Belt. We contend that the following sites owned by the University of Bristol represent suitable, available and viable development sites which would positively support sustainable growth over the plan period, including in the early years, and should be allocated for development in the new local plan: • Land at Stock Lane Farm, Langford – HE203031 • Land to the West of Wyndhurst Farm – HE20590 • Land south of Long Ashton – HE20139 The University supports Draft Policy LP19, albeit we consider that minor modifications to the policy wording should be made to acknowledge the sustainability of the location. As present, we consider the policy wording to present an overly negative position of the area which would conflict with the aspirations of the policy to support University development in this area.		NSLP_Pre_Submission_Plan_Representation_Form_Part_B_UOB_SP7.pdf

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					Paper (October 2025) identifies Long Ashton as a Category A village, which represents settlements “considered to be relatively sustainable in their own right with a range of easily accessible services and facilities and good public transport links to towns”. It is very notable that despite its acknowledged sustainability credentials, and acknowledgement that Green Belt land is required to be released, Long Ashton has all but been ignored for any growth of scale over the plan period. Two small sites are identified within the existing settlement boundary to deliver 42 dwellings. We consider this to be highly irregular for such a sustainable settlement to be consistently overlooked by the Council for accommodating any real growth and raise significant concerns with the Spatial Strategy under Policy SP3 in this context. Planning for a mere 42 homes in Long Ashton to 2041 is not considered to be a positively prepared spatial strategy approach. Additional housing sites which have been consistently promoted to the Council by the University, and consistently overlooked through the emerging local plan process include land to the west of Wyndhurst Road (adjoining the Category A village of Churchill settlement boundary) (site: HE20590) and the nearby land at Stock Lane Farm, Langford (previously developed land) (site: HE203031). The Council’s ‘Duty to Co-operate Statement of Compliance Regulation 19 Stage’ (October 2025) sets out that Bristol City Council (BCC) have requested for neighbouring authorities, including North Somerset Council, to accommodate its unmet housing need. The Council’s Duty to Co-operate statement is clear that “North Somerset does not have capacity to meet some of Bristol’s needs at this time”. We do not agree with that position. We highlight the importance of North Somerset’s position in the context of South Gloucestershire Council also making no provision in its Draft Local Plan (plan submitted for examination) to contribute towards Bristol’s unmet need. Similarly, through its emerging local plan process, B&NES Council has made no commitment to contributing to Bristol’s unmet need owing to it being heavily constrained and having to deal with its own significant housing requirement uplift (approximately double that before the new 2024 standard method). In this regard, it is noted that on 21 November 2025, the inspectors published their final post-hearing advice following examination of the new Bristol Local Plan. The inspectors have requested modifications to the plan from BCC to set out an increased housing need and clearly set out what the level of unmet housing need is. An extract from the inspectors’ post-hearing advice is provided below, which reinforces the position that no agreement is in place between BCC and any neighbouring authority, including North Somerset, to accommodate the unmet need. The inspectors set out that they:			

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					“acknowledge that there is insufficient capacity to meet the Council’s objectively assessed housing need, as calculated by the standard method. Nevertheless, we do not consider the figure of 34,650 dwellings over the Plan period to be positively prepared or justified. Given the significant shortfall in meeting overall needs, and the current lack of agreement between Bristol and any neighbouring authorities to provide assistance, we consider it imperative that the Council seeks to maximise housing delivery. Inherent uncertainties in housing delivery in the longer period do not justify setting a housing requirement substantially below the overall housing capacity figure identified at submission. The evidence submitted since the end of the hearing sessions has not persuaded us that a lower figure is justified.” Therefore, it stands that BCC’s significant unmet housing need will continue to go unmet with none of its neighbouring authorities committing to assist. We find this problematic with particular regard to North Somerset as we consider there to be appropriate scope for a greater number of housing sites to be identified in the new Local Plan and delivered through the course of the plan period. The Council’s own additional sites consultation in February/March 2025 demonstrated that this was the case. The unmet need for Bristol is significant, cannot be ignored and requires to be addressed within the new North Somerset Local Plan. National guidance within the NPPF is clear that plans should ensure that, inter alia, unmet development needs from neighbouring areas are provided for to ensure effective strategic planning across local planning authority boundaries. It is clear from the Council’s own work that North Somerset are in a strong position to be able to identify significant additional housing sites through allocations in the new local plan. This would positively overachieve the Council’s housing need target and provide a meaningful contribution to the unmet need of BCC. Pursuant to the Council’s emerging local plan process, it carried out consultation on potential additional housing sites to be included as draft allocations in the Reg 19 plan (‘Consultation paper on additional sites for the Regulation 19 Plan’, February 2025). That identified sites which the Council considered to be ‘most suitable’, such as that at Yanley Lane South West Bristol (HE20110) in addition to a raft of sites identified as having ‘other potential’, including sites now identified as draft allocations i.e. around Pill and Easton-in-Gordano and sites now omitted as draft allocations i.e. the University of Bristol’s land south of Long Asthon (site: HE20139) and land to the west of Wyndhurst Road, Churchill (site: HE20590). The Council set out within that consultation that sites with ‘other potential’ comprised:			

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					“sites at the towns and larger, more sustainable villages consistent with the spatial strategy”. [our emphasis] It stands that the Council rightfully identified suitable residential sites in sustainable locations pursuant to the ‘other potential’ sites in the ‘Consultation paper on additional sites for the Regulation 19 Plan’ (February 2025). However, such sites have been unduly disregarded at the Reg 19 plan stage and, in our view insofar as the University of Bristol’s land south of Long Asthon (site: HE20139) and land to the west of Wyndhurst Road, Churchill (site: HE20590) wrongfully omitted. The latter lies outside the Green Belt and so should be preferred to the various sites proposed to be released from the Green Belt, as sought be national planning policy guidance. Site HE20139 and HE20590 are available now and deliverable to contribute towards significant positive growth within the plan period and should be supported for allocation. We consider that there is scope for additional appropriate housing sites to deliver over the plan period which are available, suitable and viable. In the Council’s own words these disregarded sites are “consistent with the spatial strategy” and yet have been ignored. We contend this is the wrong approach, particularly in the context of the significant identified unmet need for Bristol. We therefore disagree with the Council’s position that it cannot accommodate any of the unmet housing need from Bristol in North Somerset. In this context, the North Somerset Local Plan is not considered to be positively prepared, justified, effective or consistent with national policy. Justified: In accordance with the NPPF, to be justified this requires: “an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.” As set out above, it is considered that reasonable alternative sites for housing allocations have been unduly discounted by the Council, in conflict with the evidence base which should otherwise support its approach. Therefore, we do not consider that all draft housing allocations are sufficiently justified which goes to the soundness of the plan. Paragraph 148 of the NPPF is clear that where it is necessary to release Green Belt land for development, as is established and agreed in North Somerset, plans should give: “priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations.” Prior to this, non Green Belt sites should be prioritised for allocation.			

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					In this regard, our client has consistently promoted its land south of Long Ashton and at Wyndhurst Farm (site: HE20590) and Stock Lane Farm (site: HE203031) at Churchill/Langford. However, the Council is not supporting a draft housing allocation on any of the three land parcels. We consider this to be contrary to NPPF paragraph 148 and is not a justified approach in plan making terms. Land at Stock Lane Farm, Langford – HE203031: The University's land at Stock Lane Farm comprises previously developed land, outside of the Green Belt. This is sustainably located in relation to Langford and Churchill and has been promoted for development with capacity for up to 64 dwellings. There is a realistic prospect that houses could be delivered on the site within five years. The site was previously identified as a 'less sustainable' site, wrongfully in our view, as part of the Council's Consultation paper on additional sites for the Regulation 19 Plan' (February 2025). The consultation ran to March 2025 to which representations were submitted by the University in relation to all three of its land parcels referenced. In this regard, the site is well related to the settlement and existing facilities and services in Churchill and Langford. Adjacent to the west of the University's land at Stock Lane Farm, planning permission ref: 23/P/0448/OUT was approved by the Council in March 2025 for a mixed-use development comprising up to 120 dwellings, new flexible employment, children's day nursery and café, along with associated car parking, landscaping, tree works, public open space and local equipped area for play, drainage infrastructure, access improvements and connections to the existing footpath network. We note the Council's also identified that land as a 'less sustainable' site in the previous consultation, while granted it planning permission, and now identifying it as a draft allocation. This outlines the inconstancy in the Council's approach to its housing sites in the new local plan. The presence of planning permission 23/P/0448/OUT only further supports development on the University's land adjacent at Stock Lane Farm (HE203031) which critically comprises previously developed land. In this context, the University's land is annotated red on the plan (see attachement) which comprises the adjacent approved development (and now draft allocation). The Council's decision to omit the University's land at Stock Lane farm is not justified in the context of Draft Policies SP3 and SP8. The site is sustainably located, outside of the Green Belt on previously developed land and adjacent to the Monaghan Mushrooms site (Draft Policy LP23), pursuant to planning permission 23/P/0448/OUT. Land to the West of Wyndhurst Farm – HE20590:			

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					The University's land west of Wyndhurst Farm Stock Lane Farm comprises greenfield land adjacent to the settlement boundary of Churchill. This is sustainably located and has been promoted for development with capacity for up to 90 dwellings at a density of 29 dwellings per ha. There is a realistic prospect that houses could be delivered on the site within five years. The site was previously identified as a site with 'other potential' as part of the Council's Consultation paper on additional sites for the Regulation 19 Plan' (February 2025). The Council set out within that consultation that sites with 'other potential' comprised: "sites at the towns and larger, more sustainable villages consistent with the spatial strategy". [our emphasis] The Council's published 'North Somerset Strategic Housing Land Availability Assessment Main Report' (October 2025) further sets out that the site was considered by the Council to have "potential for further consideration". Notwithstanding this, the Council's published 'Spatial strategy, site selection and capacity paper' (October 2025) confirms that this site is not a proposed allocation in the draft Local Plan with commentary provided as follows: "The site is outside settlement boundary with a distinctive rural character providing a clearly defined separation between the area of Churchill centred around Bristol Road and Pudding Pie Lane, and the smaller settlement of Lower Langford to the east. Due to the impact on the landscape and potential impact on heritage assets, it is not considered appropriate to take this site forward as a housing allocation." We do not agree with the Council's assessment of the site and its position to omit this as a draft allocation. We note that pre-application discussions with the Council resulted in the suggestion to promote the site at that time through the local plan which has been comprehensively done and so it is disappointing to see this be omitted as a draft allocation. This is particularly the case given the extent of the Council's housing need which should, in the first instance be addressed by appropriate sites such as this outside of the Green Belt before seeking to remove land from the Green Belt. Development on the site would comfortably assimilate with the surrounding built form, providing sustainable development. It is notable that planning permission (ref: 22/P/2908/OUT) was approved in November 2024 for nine dwellings adjacent to the south of the site which only provides further support for development in this location. Different development options have been considered which would address all material considerations for the site, which include a scheme for 24 units and a scheme for up to 90 units in this regard, as illustrated below.			

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					The site is wholly sustainable with any associated impacts of development more than capable of being addressed with appropriate mitigation. In this regard, the Council's decision to omit the University's land is not justified in the context of Draft Policies SP3 and SP8. Land south of Long Ashton – HE20139: The University's land south of Long Ashton comprises land within the Green Belt, adjacent to the settlement boundary of Long Ashton. This is sustainably located and has been consistently promoted for a number of years to the emerging local plan, and previous WECA joint spatial plans for development with capacity for up to 1,500 dwellings. The site was previously identified as a site with 'other potential' as part of the Council's Consultation paper on additional sites for the Regulation 19 Plan' (February 2025). The Council's published 'North Somerset Strategic Housing Land Availability Assessment Main Report' (October 2025) further identifies that the site was considered by the Council to have "potential for further consideration". Notwithstanding this, the Council's published 'Spatial strategy, site selection and capacity paper' (October 2025) confirms that this site is not a proposed allocation in the draft Local Plan with commentary provided as follows: "Site not consistent with the spatial strategy as it is detached from the existing built-up area of Long Ashton." We do not agree with the Council's assessment of the site and its position to omit this as a draft allocation. It is clear that the site should accord with an appropriate spatial strategy which directs growth to the most sustainable locations. Therefore, the Council is not following this by omitting the University's land as an allocation. The site is well related to Long Ashton in addition to the city of Bristol. It appears that the Council have unduly set preference to directing growth to the neighbouring Yanley Lane/ Woodspring site (HE20110) (draft allocation for 3,500 dwellings under Policy LP2) at an early stage of the plan making process. This position has not shifted even as the evidence base has been developed which indicates to the contrary. Attention is turned to the Council's Sustainability Appraisal Report (October 2025). This sets out the findings of the assessment of potential allocation sites against the sustainability appraisal objectives. A summary is provided (see attached document) with comparison of our client's land south of Long Ashton, which has been discounted by the Council and the Yanley Lane South West Bristol land, which is proposed to be allocated for development by the			

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					Council in the Local Plan. This comparison is provided owing to the proximity and context of both sites, and similarity with regard to scope to provide strategic growth. This sets out the similarities in the Council's assessment of both sites which, when compared, identifies fewer negative effects of development on our client's land than that identified for allocation by the Council at Yanley Lane. The sustainability credentials of our client's land are clear and development of this land should be supported. The Council's Spatial Strategy, Site Selection and Capacity Paper (October 2025) provides commentary on the potential allocation sites. For our client's land south of Long Ashton (HE20139) this states that the site is not proposed for allocation and that the: "Site not consistent with the spatial strategy as it is detached from the existing built-up area of Long Ashton". Whereas for the Yanley Lane site (HE20110), this states that the site is proposed for allocation and that the: "Site [was] previously identified (in smaller form) in Regulation 18 plan". The fact that the Yanley Lane/Woodspring site was preferred by the Council at early stages of the plan, in advance of the supporting evidence base work being carried out, is not sufficient justification for it to be allocated. This is required to be justified and supported by the evidence base, which we do not consider it to be, in the context of the University's land south of Long Ashton. The Council's approach contradicts NPPF paragraph 148 in identifies sites to be removed from the Green Belt for development. The Council's 'Stage 2 Green Belt Assessment' (October 2025) identifies the land south of Long Ashton to make an overall weak contribution to the purposes of the Green Belt. Whereas, the Yanley Lane/ Woodspring site is determined to make a greater contribution, set at 'moderate' to the Green Belt purposes. This comparison is provided (see attached document), pursuant to the Council's Stage 2 Green Belt Assessment. In Green Belt terms, it is clear that the University's land south of Long Ashton makes less off a contribution to the Green Belt purposes than the Council's proposed allocation at Yanley Lane/Woodspring. Moreover, our client's land would wholly support sustainable patterns of development in the context of Long Asthon and Bristol, in accordance with NPPF paragraph 148. Further to this, as can be seen in the Green Belt assessment, the University's land makes a weak contribution to Green Belt purposes A, B and D. There are no relevant footnote 7 assets that would provide a strong reason for refusing or restricting development on the land. Therefore, this can be considered Grey Belt, subject to the			

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					specifics of the development proposal. The Council's Stage 2 Green Belt assessment agrees with this position however the Pre-Submission (Reg 19) version of the plan still determines not to allocate the land for development which we consider to not be justified. The NPPF is clear that Grey Belt land should be supported for directing development in new local plans (NPPF paragraph 148). In this context with the omission of our client's land for allocation, we dispute the Council's claim at page 30 of the Pre-Submission Plan (Reg 19) that: "A sequential approach to Green Belt release has been taken prioritising previously developed land, followed by grey belt sites and then other Green Belt locations". The omission of the University's land south of Long Ashton seemingly goes against the supporting evidence base and therefore we do not consider the approach to be justified, with particular regard to Draft Policies SP3, SP7, SP8 and LP2. The Council's overall spatial strategy and policies/ allocations to direct housing growth are required to be informed by the evidence base. Effective: In accordance with the NPPF, to be effective means to be: "deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground." As set out above, where we consider the plan to not have been positively prepared, the Council's 'Duty to Co-operate Statement of Compliance Regulation 19 Stage' (October 2025) sets out that BCC have requested for neighbouring authorities, including North Somerset Council, to accommodate its unmet housing need. The Council's Duty to Co-operate statement is clear that "North Somerset does not have capacity to meet some of Bristol's needs at this time". We do not agree with that position on account of suitable sites being omitted for development allocations, particularly where the Council has previously acknowledged the sites to have 'other potential' which, in the Council's words are "sites at the towns and larger, more sustainable villages consistent with the spatial strategy". This is particularly relevant to the University's land south of Long Ashton and at Stock Lane Farm and Wyndhurst Farm in Churchill/Langford which comprise either previously developed land outside the Green Belt, land outside the Green Belt adjacent to the Category A village settlement boundary for Churchill, or Grey Belt land adjacent to the Category A village settlement boundary for Long Ashton. While the Council's housing figure over the plan period (Draft Policy SP8) is prescribes as a minimum, this is a negative approach when considering that additional sites are readily available to deliver above this figure, and			

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					should be set out as such in policy. This strongly supports our position that North Somerset is fully capable of accommodating additional growth, thereby contributing towards the unmet need from BCC. However, the Council is unduly deciding not to do this – this is not effective plan making. Moreover, the NPPF is clear that planning policies should identify a supply of specific, deliverable sites for five years following the intended date of adoption, with an appropriate buffer. It is likely that some of the larger strategic development/urban extension areas identified for allocation in the plan will not begin to deliver homes within the first five years and so this means that greater flexibility and contingency is required to be built in to ensure housing delivery is forthcoming in the early years of the plan to meet the minimum requirements. Ensuring early delivery of housing early in the plan period is critical. Consistent with National Policy: In accordance with the NPPF, consistency with national policy should be adhered to: “enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.” For the reasons set out within these representations, it is considered that the Council’s Reg 19 Pre-Submission Plan is not consistent with national policy with particular regard to the guidance in the NPPF relating to failure under the duty corporate and the approach to accommodate none of BCC’s identified unmet housing need. The plan inadequately makes provision for insufficient housing in this context which is not justified owing to the evidence base supporting identification of additional land which could positively support housing growth over the plan period. Moreover, we consider the Council’s approach to identifying the draft housing allocation sites is flawed and inconsistent with national policy in overlooking suitable sustainable previously developed land and greenfield sites in the first instance ahead of Green Belt sites; and subsequently overlooking suitable sustainable Grey Belt sites which should be prioritised for development ahead of the remainder of the Green Belt. Conclusions: For the reasons set out above, we consider the plan to be unsound in its current form. Ultimately, the primary reason the plan is not considered to be sound is owing to the approach that the evidence base has followed the Council’s overall strategy; rather than the other way around. The evidence base should directly support the approach laid out in the plan and this is not the case.			

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					Notwithstanding this position, the University provides support for Draft Policy LP19 for the 'University of Bristol site in Langford' allocation. We welcome the recognition this policy provides for the significant educational and employment benefits made by the University of Bristol's campus in Langford to the local, and wider, area. The University of Bristol support the policy aims of LP19 which recognise the importance of the facility and support the new development opportunities that will enable the university to grow and accommodate necessary expansion in terms of student numbers and staff employment. We consider that Draft Policy LP19 in isolation is sound as this does not relate to the outstanding wider concerns raised which relate to housing in terms of housing growth quantum and spatial approach. Minor modifications are suggested to the wording of Draft Policy LP19, in so far as we consider this to present a negative picture of the existing sustainability credentials of the site. For users of the campus not based locally, this is readily accessible by non-car modes with regular bus services available. This includes the U2 service which the University provides free passes to students of the veterinary school to travel. Therefore, while this draft policy is strongly supported, we would support minor wording changes to the policy which acknowledge its sustainability. Further detail is hereby provided below and appended in relation to the University of Bristol's land at Stock Lane farm and Wyndhurst Farm in Churchill/Langford and land south of Long Ashton. Development on this land, with support from residential allocations should be provided in a new sound North Somerset Local Plan. Land at Stock Lane Farm, Langford – HE203031: Availability: Site HE203031 is in single ownership by the University of Bristol. The land has been identified as surplus to requirements, having previously been used in association with the University's Langford Veterinary Campus for research and academic studies. It is readily available now, able to make a meaningful contribution to the Council's five-year land supply. Suitability: Site HE203031 offers a suitable location for development of housing. There are no development constraints that would prevent allocation of the site for its early development for housing. The site is well related to a 'Category A' village (most sustainable) and so its allocation fits comfortably into the Council's emerging spatial strategy. The site is accessible by a choice of means of transport to local facilities, including employment opportunities, schools, shops and other services. 4			

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					The site, comprising previously developed land, forms part of the existing built form along Stock Lane and is subject to no designations/constraints that would restrict redevelopment of the site for housing. Likely Economic Viability: There are no known extra-over costs associated with the development of this site nor any issues with utilities which would mean that it would be economically unviable. There is a realistic prospect that houses could be delivered on the site within five years. 4.7 The site has capacity for up to 64 dwellings, subject to detailed design and is available, suitable and economically viable. It should be allocated in the local plan to assist North Somerset providing a sufficient supply and mix of sites to meet their minimum required housing need. Land to the West of Wyndhurst Farm – HE20590: Availability: Site HE20590 is in single ownership by the University of Bristol. The land has been identified as surplus to requirements for some years. It is readily available now, able to make a meaningful contribution to the Council's five-year land supply. The site has consistently been promoted for allocation through the local plan process following the advice of the Council during a formal preapplication submission in 2020. Suitability: Site HE20950 offers a suitable location for development of housing. There are no development constraints that would prevent allocation of Site HE20590 for its early development for housing. The site lies adjoining a 'Category A' village (most sustainable) and so its allocation fits comfortably into the Council's emerging spatial strategy. The site is accessible by a choice of means of transport to local facilities, including employment opportunities, schools, shops and other services. The site lies abutting the settlement boundary of Churchill as proposed in the emerging local plan. It has no landscape, heritage or other designation. It is in Flood Zone 1 (low risk) and grade 3 agricultural land. Likely Economic Viability: There are no known extra-over costs associated with the development of this site nor any issues with utilities which would mean that it would be economically unviable. There is a realistic prospect that houses could be delivered on the site within five years. The site has capacity for circa for 90dwellings at a density of 29dwellings per hectare. An example of how the site might be developed for housing is provided below. Site HE20590 is available, suitable and economically viable and should be allocated in the local plan to assist North Somerset providing a sufficient supply and mix of sites to			

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					meet their minimum required housing need. Land south of Long Ashton – HE20139: Availability: The site is in single ownership by the University of Bristol. The land has been identified as surplus to requirements for some years. It is readily available now, able to make a significant contribution to the Council's housing need over the plan period. The site would form a natural extension to Long Asthon being contiguous with the existing settlement boundary of to the north and is physically contained between the A370 to the east/south and Wild Country Lane to the west. Allocation of the site for development, and its release from the Green Belt, is supported by NPPF paragraph 148 in that growth here will promote a sustainable pattern of development on Grey Belt land. This is a requirement of the NPPF. Notably, significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes as is the case for this site. Moreover, releasing land from the Green Belt for development are required to ensure that, inter alia, sustainable transport modes are prioritised, safe and suitable access can be achieved and any significant impacts from the development on the transport network, or on highway safety, can be cost effectively mitigated to an acceptable degree through a vison-led approach. The University's land south of Long Ashton fulfils all criteria with its strong relationship with the existing Long Ashton settlement and being in close proximity, and well connected to, Bristol. Suitability: The site offers a suitable location for development of housing on Grey Belt land. There are no development constraints that would prevent allocation of Site HE20139 for its development for housing. This conclusion is informed by a suite of past technical information on the site. The site lies adjoining a 'Category A' village (most sustainable) and so its allocation fits comfortably into the Council's stated spatial strategy. The site is accessible by a choice of means of transport to local facilities, including employment opportunities, schools, shops and other services. Likely Economic Viability: There are no known extra-over costs associated with the development of this site nor any issues with utilities which would mean that it would be economically unviable. There is a realistic prospect that houses could be delivered on the site over the plan period. The site is available, suitable and economically viable and should be allocated in the local plan to assist North Somerset providing a sufficient supply and mix of sites to			

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					meet their minimum required housing need. The proposal on the site is informed by the substantial of technical work which has been carried out to date. Key facets of a future development of this site could include: • Up to 1,500 dwellings, including a mix of tenures and affordable housing; • Potential to include a mix of non-residential uses; • New access onto the A370 • Cycle routes and public footpaths; • Green infrastructure, including public open space; • Biodiversity Net Gain. A plan demonstrating how development could be achieved on the site is provided in the attached document.			
SP7: Green Belt	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	The University of Bristol's view is that the Local Plan is unsound and not legally compliant with regard to the Woodspring strategic development allocation (Policy LP2). The soundness of the plan in this regard is set out below. Positively Prepared: In accordance with the NPPF, positively prepared is defined as: "providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development." The NPPF is clear that, in calculating housing need under the standard method, this figure is to be treated as a minimum. Therefore, should there be suitable sites available to deliver housing over the local plan period, these should be supported notwithstanding the Council's position that is has reached its requisite 'target' under the standard method. Moreover, owing to the Council's most recent Housing Delivery Test measurement, it is appropriate that a 20% buffer is applied for the first five-years of the plan, in accordance with the NPPF. While stated as a minimum figure, we consider the quantum of housing planned for under Policy SP8 to be negative and insufficient. A number of suitable sites promoted through the local plan process have been unduly discounted by the Council and we consider this to be the antithesis of the plan being positively prepared. One such site comprises the University of Bristol's land south of Long Ashton (HE20139). The site lies adjacent to the settlement boundary, sustainably located in the context of Long Ashton and Bristol, comprising grey belt land	The Council's overarching spatial strategy, housing numbers and allocation sites identified should be comprehensively reviewed and revisited as it is clear that. This requires review of suitable residential allocation sites omitted from the draft plan which are, in the first instance outside the Green Belt, and then sites which are agreed to be Grey Belt. We contend that the following sites owned by the University of Bristol represent suitable, available and viable development sites which would positively support sustainable growth over the plan period, including in the early years, and should be allocated for development in the new local plan: • Land at Stock Lane Farm, Langford – HE203031 • Land to the West of Wyndhurst Farm – HE20590 • Land south of Long Ashton – HE20139 The University supports Draft Policy LP19, albeit we consider that minor modifications to the policy wording should be made to acknowledge the sustainability of the location. As present, we consider the policy wording to present an overly negative position of the area		NSLP_Pre_Submission_Plan_Representation_Form_Part_B_UOB_SP7.pdf

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					which could/should comfortably be brought forward for development in the new local plan. The Council's Spatial Strategy, Site Selection and Capacity Paper (October 2025) identifies Long Ashton as a Category A village, which represents settlements "considered to be relatively sustainable in their own right with a range of easily accessible services and facilities and good public transport links to towns". It is very notable that despite its acknowledged sustainability credentials, and acknowledgement that Green Belt land is required to be released, Long Ashton has all but been ignored for any growth of scale over the plan period. Two small sites are identified within the existing settlement boundary to deliver 42 dwellings. We consider this to be highly irregular for such a sustainable settlement to be consistently overlooked by the Council for accommodating any real growth and raise significant concerns with the Spatial Strategy under Policy SP3 in this context. Planning for a mere 42 homes in Long Ashton to 2041 is not considered to be a positively prepared spatial strategy approach. Additional housing sites which have been consistently promoted to the Council by the University, and consistently overlooked through the emerging local plan process include land to the west of Wyndhurst Road (adjoining the Category A village of Churchill settlement boundary) (site: HE20590) and the nearby land at Stock Lane Farm, Langford (previously developed land) (site: HE203031). The Council's 'Duty to Co-operate Statement of Compliance Regulation 19 Stage' (October 2025) sets out that Bristol City Council (BCC) have requested for neighbouring authorities, including North Somerset Council, to accommodate its unmet housing need. The Council's Duty to Co-operate statement is clear that "North Somerset does not have capacity to meet some of Bristol's needs at this time". We do not agree with that position. We highlight the importance of North Somerset's position in the context of South Gloucestershire Council also making no provision in its Draft Local Plan (plan submitted for examination) to contribute towards Bristol's unmet need. Similarly, through its emerging local plan process, B&NES Council has made no commitment to contributing to Bristol's unmet need owing to it being heavily constrained and having to deal with its own significant housing requirement uplift (approximately double that before the new 2024 standard method). In this regard, it is noted that on 21 November 2025, the inspectors published their final post-hearing advice following examination of the new Bristol Local Plan. The inspectors have requested modifications to the plan from BCC to set out an increased housing need and clearly set out what the level of unmet housing need is. An extract from the inspectors' post-hearing advice is provided below,	which would conflict with the aspirations of the policy to support University development in this area.		

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					which reinforces the position that no agreement is in place between BCC and any neighbouring authority, including North Somerset, to accommodate the unmet need. The inspectors set out that they: “acknowledge that there is insufficient capacity to meet the Council’s objectively assessed housing need, as calculated by the standard method. Nevertheless, we do not consider the figure of 34,650 dwellings over the Plan period to be positively prepared or justified. Given the significant shortfall in meeting overall needs, and the current lack of agreement between Bristol and any neighbouring authorities to provide assistance, we consider it imperative that the Council seeks to maximise housing delivery. Inherent uncertainties in housing delivery in the longer period do not justify setting a housing requirement substantially below the overall housing capacity figure identified at submission. The evidence submitted since the end of the hearing sessions has not persuaded us that a lower figure is justified.” Therefore, it stands that BCC’s significant unmet housing need will continue to go unmet with none of its neighbouring authorities committing to assist. We find this problematic with particular regard to North Somerset as we consider there to be appropriate scope for a greater number of housing sites to be identified in the new Local Plan and delivered through the course of the plan period. The Council’s own additional sites consultation in February/March 2025 demonstrated that this was the case. The unmet need for Bristol is significant, cannot be ignored and requires to be addressed within the new North Somerset Local Plan. National guidance within the NPPF is clear that plans should ensure that, inter alia, unmet development needs from neighbouring areas are provided for to ensure effective strategic planning across local planning authority boundaries. It is clear from the Council’s own work that North Somerset are in a strong position to be able to identify significant additional housing sites through allocations in the new local plan. This would positively overachieve the Council’s housing need target and provide a meaningful contribution to the unmet need of BCC. Pursuant to the Council’s emerging local plan process, it carried out consultation on potential additional housing sites to be included as draft allocations in the Reg 19 plan (‘Consultation paper on additional sites for the Regulation 19 Plan’, February 2025). That identified sites which the Council considered to be ‘most suitable’, such as that at Yanley Lane South West Bristol (HE20110) in addition to a raft of sites identified as having ‘other potential’, including sites now identified as draft allocations i.e. around Pill and Easton-in-Gordano and sites now omitted as draft allocations i.e. the University of Bristol’s land south of Long Asthon (site: HE20139) and land to the west of Wyndhurst Road, Churchill (site: HE20590).			

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					The Council set out within that consultation that sites with 'other potential' comprised: "sites at the towns and larger, more sustainable villages consistent with the spatial strategy". [our emphasis] It stands that the Council rightfully identified suitable residential sites in sustainable locations pursuant to the 'other potential' sites in the 'Consultation paper on additional sites for the Regulation 19 Plan' (February 2025). However, such sites have been unduly disregarded at the Reg 19 plan stage and, in our view insofar as the University of Bristol's land south of Long Asthon (site: HE20139) and land to the west of Wyndhurst Road, Churchill (site: HE20590) wrongfully omitted. The latter lies outside the Green Belt and so should be preferred to the various sites proposed to be released from the Green Belt, as sought be national planning policy guidance. Site HE20139 and HE20590 are available now and deliverable to contribute towards significant positive growth within the plan period and should be supported for allocation. We consider that there is scope for additional appropriate housing sites to deliver over the plan period which are available, suitable and viable. In the Council's own words these disregarded sites are "consistent with the spatial strategy" and yet have been ignored. We contend this is the wrong approach, particularly in the context of the significant identified unmet need for Bristol. We therefore disagree with the Council's position that it cannot accommodate any of the unmet housing need from Bristol in North Somerset. In this context, the North Somerset Local Plan is not considered to be positively prepared, justified, effective or consistent with national policy. Justified: In accordance with the NPPF, to be justified this requires: "an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence." As set out above, it is considered that reasonable alternative sites for housing allocations have been unduly discounted by the Council, in conflict with the evidence base which should otherwise support its approach. Therefore, we do not consider that all draft housing allocations are sufficiently justified which goes to the soundness of the plan. Paragraph 148 of the NPPF is clear that where it is necessary to release Green Belt land for development, as is established and agreed in North Somerset, plans should give: "priority to previously developed land, then consider grey belt which is not previously developed, and then other			

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					Green Belt locations." Prior to this, non Green Belt sites should be prioritised for allocation. In this regard, our client has consistently promoted its land south of Long Ashton and at Wyndhurst Farm (site: HE20590) and Stock Lane Farm (site: HE203031) at Churchill/Langford. However, the Council is not supporting a draft housing allocation on any of the three land parcels. We consider this to be contrary to NPPF paragraph 148 and is not a justified approach in plan making terms. Land at Stock Lane Farm, Langford – HE203031: The University's land at Stock Lane Farm comprises previously developed land, outside of the Green Belt. This is sustainably located in relation to Langford and Churchill and has been promoted for development with capacity for up to 64 dwellings. There is a realistic prospect that houses could be delivered on the site within five years. The site was previously identified as a 'less sustainable' site, wrongfully in our view, as part of the Council's Consultation paper on additional sites for the Regulation 19 Plan' (February 2025). The consultation ran to March 2025 to which representations were submitted by the University in relation to all three of its land parcels referenced. In this regard, the site is well related to the settlement and existing facilities and services in Churchill and Langford. Adjacent to the west of the University's land at Stock Lane Farm, planning permission ref: 23/P/0448/OUT was approved by the Council in March 2025 for a mixed-use development comprising up to 120 dwellings, new flexible employment, children's day nursery and café, along with associated car parking, landscaping, tree works, public open space and local equipped area for play, drainage infrastructure, access improvements and connections to the existing footpath network. We note the Council's also identified that land as a 'less sustainable' site in the previous consultation, while granted it planning permission, and now identifying it as a draft allocation. This outlines the inconstancy in the Council's approach to its housing sites in the new local plan. The presence of planning permission 23/P/0448/OUT only further supports development on the University's land adjacent at Stock Lane Farm (HE203031) which critically comprises previously developed land. In this context, the University's land is annotated red on the plan (see attachement) which comprises the adjacent approved development (and now draft allocation). The Council's decision to omit the University's land at Stock Lane farm is not justified in the context of Draft Policies SP3 and SP8. The site is sustainably located, outside of the Green Belt on previously developed land and adjacent to the Monaghan Mushrooms site (Draft Policy			

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					LP23), pursuant to planning permission 23/P/0448/OUT. Land to the West of Wyndhurst Farm – HE20590: The University's land west of Wyndhurst Farm Stock Lane Farm comprises greenfield land adjacent to the settlement boundary of Churchill. This is sustainably located and has been promoted for development with capacity for up to 90 dwellings at a density of 29 dwellings per ha. There is a realistic prospect that houses could be delivered on the site within five years. The site was previously identified as a site with 'other potential' as part of the Council's Consultation paper on additional sites for the Regulation 19 Plan' (February 2025). The Council set out within that consultation that sites with 'other potential' comprised: "sites at the towns and larger, more sustainable villages consistent with the spatial strategy". [our emphasis] The Council's published 'North Somerset Strategic Housing Land Availability Assessment Main Report' (October 2025) further sets out that the site was considered by the Council to have "potential for further consideration". Notwithstanding this, the Council's published 'Spatial strategy, site selection and capacity paper' (October 2025) confirms that this site is not a proposed allocation in the draft Local Plan with commentary provided as follows: "The site is outside settlement boundary with a distinctive rural character providing a clearly defined separation between the area of Churchill centred around Bristol Road and Pudding Pie Lane, and the smaller settlement of Lower Langford to the east. Due to the impact on the landscape and potential impact on heritage assets, it is not considered appropriate to take this site forward as a housing allocation." We do not agree with the Council's assessment of the site and its position to omit this as a draft allocation. We note that pre-application discussions with the Council resulted in the suggestion to promote the site at that time through the local plan which has been comprehensively done and so it is disappointing to see this be omitted as a draft allocation. This is particularly the case given the extent of the Council's housing need which should, in the first instance be addressed by appropriate sites such as this outside of the Green Belt before seeking to remove land from the Green Belt. Development on the site would comfortably assimilate with the surrounding built form, providing sustainable development. It is notable that planning permission (ref: 22/P/2908/OUT) was approved in November 2024 for nine dwellings adjacent to the south of the site which only provides further support for development in this location.			

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					Different development options have been considered which would address all material considerations for the site, which include a scheme for 24 units and a scheme for up to 90 units in this regard, as illustrated below. The site is wholly sustainable with any associated impacts of development more than capable of being addressed with appropriate mitigation. In this regard, the Council's decision to omit the University's land is not justified in the context of Draft Policies SP3 and SP8. Land south of Long Ashton – HE20139: The University's land south of Long Ashton comprises land within the Green Belt, adjacent to the settlement boundary of Long Ashton. This is sustainably located and has been consistently promoted for a number of years to the emerging local plan, and previous WECA joint spatial plans for development with capacity for up to 1,500 dwellings. The site was previously identified as a site with 'other potential' as part of the Council's Consultation paper on additional sites for the Regulation 19 Plan' (February 2025). The Council's published 'North Somerset Strategic Housing Land Availability Assessment Main Report' (October 2025) further identifies that the site was considered by the Council to have "potential for further consideration". Notwithstanding this, the Council's published 'Spatial strategy, site selection and capacity paper' (October 2025) confirms that this site is not a proposed allocation in the draft Local Plan with commentary provided as follows: "Site not consistent with the spatial strategy as it is detached from the existing built-up area of Long Ashton." We do not agree with the Council's assessment of the site and its position to omit this as a draft allocation. It is clear that the site should accord with an appropriate spatial strategy which directs growth to the most sustainable locations. Therefore, the Council is not following this by omitting the University's land as an allocation. The site is well related to Long Ashton in addition to the city of Bristol. It appears that the Council have unduly set preference to directing growth to the neighbouring Yanley Lane/ Woodspring site (HE20110) (draft allocation for 3,500 dwellings under Policy LP2) at an early stage of the plan making process. This position has not shifted even as the evidence base has been developed which indicates to the contrary. Attention is turned to the Council's Sustainability Appraisal Report (October 2025). This sets out the findings of the assessment of potential allocation sites against the sustainability appraisal objectives. A summary is provided			

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					(see attached document) with comparison of our client's land south of Long Ashton, which has been discounted by the Council and the Yanley Lane South West Bristol land, which is proposed to be allocated for development by the Council in the Local Plan. This comparison is provided owing to the proximity and context of both sites, and similarity with regard to scope to provide strategic growth. This sets out the similarities in the Council's assessment of both sites which, when compared, identifies fewer negative effects of development on our client's land than that identified for allocation by the Council at Yanley Lane. The sustainability credentials of our client's land are clear and development of this land should be supported. The Council's Spatial Strategy, Site Selection and Capacity Paper (October 2025) provides commentary on the potential allocation sites. For our client's land south of Long Ashton (HE20139) this states that the site is not proposed for allocation and that the: "Site not consistent with the spatial strategy as it is detached from the existing built-up area of Long Ashton". Whereas for the Yanley Lane site (HE20110), this states that the site is proposed for allocation and that the: "Site [was] previously identified (in smaller form) in Regulation 18 plan". The fact that the Yanley Lane/Woodspring site was preferred by the Council at early stages of the plan, in advance of the supporting evidence base work being carried out, is not sufficient justification for it to be allocated. This is required to be justified and supported by the evidence base, which we do not consider it to be, in the context of the University's land south of Long Ashton. The Council's approach contradicts NPPF paragraph 148 in identifies sites to be removed from the Green Belt for development. The Council's 'Stage 2 Green Belt Assessment' (October 2025) identifies the land south of Long Ashton to make an overall weak contribution to the purposes of the Green Belt. Whereas, the Yanley Lane/ Woodspring site is determined to make a greater contribution, set at 'moderate' to the Green Belt purposes. This comparison is provided (see attached document), pursuant to the Council's Stage 2 Green Belt Assessment. In Green Belt terms, it is clear that the University's land south of Long Ashton makes less off a contribution to the Green Belt purposes than the Council's proposed allocation at Yanley Lane/Woodspring. Moreover, our client's land would wholly support sustainable patterns of development in the context of Long Asthon and Bristol, in accordance with NPPF paragraph 148. Further to this, as can be seen in the Green Belt assessment, the University's land makes a weak			

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					contribution to Green Belt purposes A, B and D. There are no relevant footnote 7 assets that would provide a strong reason for refusing or restricting development on the land. Therefore, this can be considered Grey Belt, subject to the specifics of the development proposal. The Council's Stage 2 Green Belt assessment agrees with this position however the Pre-Submission (Reg 19) version of the plan still determines not to allocate the land for development which we consider to not be justified. The NPPF is clear that Grey Belt land should be supported for directing development in new local plans (NPPF paragraph 148). In this context with the omission of our client's land for allocation, we dispute the Council's claim at page 30 of the Pre-Submission Plan (Reg 19) that: "A sequential approach to Green Belt release has been taken prioritising previously developed land, followed by grey belt sites and then other Green Belt locations". The omission of the University's land south of Long Ashton seemingly goes against the supporting evidence base and therefore we do not consider the approach to be justified, with particular regard to Draft Policies SP3, SP7, SP8 and LP2. The Council's overall spatial strategy and policies/ allocations to direct housing growth are required to be informed by the evidence base. Effective: In accordance with the NPPF, to be effective means to be: "deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground." As set out above, where we consider the plan to not have been positively prepared, the Council's 'Duty to Co-operate Statement of Compliance Regulation 19 Stage' (October 2025) sets out that BCC have requested for neighbouring authorities, including North Somerset Council, to accommodate its unmet housing need. The Council's Duty to Co-operate statement is clear that "North Somerset does not have capacity to meet some of Bristol's needs at this time". We do not agree with that position on account of suitable sites being omitted for development allocations, particularly where the Council has previously acknowledged the sites to have 'other potential' which, in the Council's words are "sites at the towns and larger, more sustainable villages consistent with the spatial strategy". This is particularly relevant to the University's land south of Long Ashton and at Stock Lane Farm and Wyndhurst Farm in Churchill/Langford which comprise either previously developed land outside the Green Belt, land outside the Green Belt adjacent to the Category A village settlement boundary for Churchill, or Grey Belt land adjacent to the Category A village settlement boundary for Long Ashton.			

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					While the Council's housing figure over the plan period (Draft Policy SP8) is prescribes as a minimum, this is a negative approach when considering that additional sites are readily available to deliver above this figure, and should be set out as such in policy. This strongly supports our position that North Somerset is fully capable of accommodating additional growth, thereby contributing towards the unmet need from BCC. However, the Council is unduly deciding not to do this – this is not effective plan making. Moreover, the NPPF is clear that planning policies should identify a supply of specific, deliverable sites for five years following the intended date of adoption, with an appropriate buffer. It is likely that some of the larger strategic development/urban extension areas identified for allocation in the plan will not begin to deliver homes within the first five years and so this means that greater flexibility and contingency is required to be built in to ensure housing delivery is forthcoming in the early years of the plan to meet the minimum requirements. Ensuring early delivery of housing early in the plan period is critical. Consistent with National Policy: In accordance with the NPPF, consistency with national policy should be adhered to: "enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant." For the reasons set out within these representations, it is considered that the Council's Reg 19 Pre-Submission Plan is not consistent with national policy with particular regard to the guidance in the NPPF relating to failure under the duty corporate and the approach to accommodate none of BCC's identified unmet housing need. The plan inadequately makes provision for insufficient housing in this context which is not justified owing to the evidence base supporting identification of additional land which could positively support housing growth over the plan period. Moreover, we consider the Council's approach to identifying the draft housing allocation sites is flawed and inconsistent with national policy in overlooking suitable sustainable previously developed land and greenfield sites in the first instance ahead of Green Belt sites; and subsequently overlooking suitable sustainable Grey Belt sites which should be prioritised for development ahead of the remainder of the Green Belt. Conclusions: For the reasons set out above, we consider the plan to be unsound in its current form. Ultimately, the primary reason the plan is not considered to be sound is owing to the approach that the evidence base has followed the Council's			

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					overall strategy; rather than the other way around. The evidence base should directly support the approach laid out in the plan and this is not the case. Notwithstanding this position, the University provides support for Draft Policy LP19 for the 'University of Bristol site in Langford' allocation. We welcome the recognition this policy provides for the significant educational and employment benefits made by the University of Bristol's campus in Langford to the local, and wider, area. The University of Bristol support the policy aims of LP19 which recognise the importance of the facility and support the new development opportunities that will enable the university to grow and accommodate necessary expansion in terms of student numbers and staff employment. We consider that Draft Policy LP19 in isolation is sound as this does not relate to the outstanding wider concerns raised which relate to housing in terms of housing growth quantum and spatial approach. Minor modifications are suggested to the wording of Draft Policy LP19, in so far as we consider this to present a negative picture of the existing sustainability credentials of the site. For users of the campus not based locally, this is readily accessible by non-car modes with regular bus services available. This includes the U2 service which the University provides free passes to students of the veterinary school to travel. Therefore, while this draft policy is strongly supported, we would support minor wording changes to the policy which acknowledge its sustainability. Further detail is hereby provided below and appended in relation to the University of Bristol's land at Stock Lane farm and Wyndhurst Farm in Churchill/Langford and land south of Long Ashton. Development on this land, with support from residential allocations should be provided in a new sound North Somerset Local Plan. Land at Stock Lane Farm, Langford – HE203031: Availability: Site HE203031 is in single ownership by the University of Bristol. The land has been identified as surplus to requirements, having previously been used in association with the University's Langford Veterinary Campus for research and academic studies. It is readily available now, able to make a meaningful contribution to the Council's five-year land supply. Suitability: Site HE203031 offers a suitable location for development of housing. There are no development constraints that would prevent allocation of the site for its early development for housing. The site is well related to a 'Category A' village (most sustainable) and so its allocation fits comfortably into the Council's emerging spatial			

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					strategy. The site is accessible by a choice of means of transport to local facilities, including employment opportunities, schools, shops and other services. 4 The site, comprising previously developed land, forms part of the existing built form along Stock Lane and is subject to no designations/constraints that would restrict redevelopment of the site for housing. Likely Economic Viability: There are no known extra-over costs associated with the development of this site nor any issues with utilities which would mean that it would be economically unviable. There is a realistic prospect that houses could be delivered on the site within five years. 4.7 The site has capacity for up to 64 dwellings, subject to detailed design and is available, suitable and economically viable. It should be allocated in the local plan to assist North Somerset providing a sufficient supply and mix of sites to meet their minimum required housing need. Land to the West of Wyndhurst Farm – HE20590: Availability: Site HE20590 is in single ownership by the University of Bristol. The land has been identified as surplus to requirements for some years. It is readily available now, able to make a meaningful contribution to the Council's five-year land supply. The site has consistently been promoted for allocation through the local plan process following the advice of the Council during a formal preapplication submission in 2020. Suitability: Site HE20950 offers a suitable location for development of housing. There are no development constraints that would prevent allocation of Site HE20590 for its early development for housing. The site lies adjoining a 'Category A' village (most sustainable) and so its allocation fits comfortably into the Council's emerging spatial strategy. The site is accessible by a choice of means of transport to local facilities, including employment opportunities, schools, shops and other services. The site lies abutting the settlement boundary of Churchill as proposed in the emerging local plan. It has no landscape, heritage or other designation. It is in Flood Zone 1 (low risk) and grade 3 agricultural land. Likely Economic Viability: There are no known extra-over costs associated with the development of this site nor any issues with utilities which would mean that it would be economically unviable. There is a realistic prospect that houses could be delivered on the site within five years. The site has capacity for circa for 90dwellings at a density of 29dwellings per hectare. An example of how the site might be developed for housing is provided below.			

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					Site HE20590 is available, suitable and economically viable and should be allocated in the local plan to assist North Somerset providing a sufficient supply and mix of sites to meet their minimum required housing need. Land south of Long Ashton – HE20139: Availability: The site is in single ownership by the University of Bristol. The land has been identified as surplus to requirements for some years. It is readily available now, able to make a significant contribution to the Council's housing need over the plan period. The site would form a natural extension to Long Asthon being contiguous with the existing settlement boundary of to the north and is physically contained between the A370 to the east/south and Wild Country Lane to the west. Allocation of the site for development, and its release from the Green Belt, is supported by NPPF paragraph 148 in that growth here will promote a sustainable pattern of development on Grey Belt land. This is a requirement of the NPPF. Notably, significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes as is the case for this site. Moreover, releasing land from the Green Belt for development are required to ensure that, inter alia, sustainable transport modes are prioritised, safe and suitable access can be achieved and any significant impacts from the development on the transport network, or on highway safety, can be cost effectively mitigated to an acceptable degree through a vison-led approach. The University's land south of Long Ashton fulfils all criteria with its strong relationship with the existing Long Ashton settlement and being in close proximity, and well connected to, Bristol. Suitability: The site offers a suitable location for development of housing on Grey Belt land. There are no development constraints that would prevent allocation of Site HE20139 for its development for housing. This conclusion is informed by a suite of past technical information on the site. The site lies adjoining a 'Category A' village (most sustainable) and so its allocation fits comfortably into the Council's stated spatial strategy. The site is accessible by a choice of means of transport to local facilities, including employment opportunities, schools, shops and other services. Likely Economic Viability: There are no known extra-over costs associated with the development of this site nor any issues with utilities which would mean that it would be economically unviable. There is a realistic prospect that houses could be delivered on the site over the plan period.			

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					The site is available, suitable and economically viable and should be allocated in the local plan to assist North Somerset providing a sufficient supply and mix of sites to meet their minimum required housing need. The proposal on the site is informed by the substantial of technical work which has been carried out to date. Key facets of a future development of this site could include: • Up to 1,500 dwellings, including a mix of tenures and affordable housing; • Potential to include a mix of non-residential uses; • New access onto the A370 • Cycle routes and public footpaths; • Green infrastructure, including public open space; • Biodiversity Net Gain. A plan demonstrating how development could be achieved on the site is provided in the attached document.			
SP8: Housing	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The University of Bristol's view is that the Local Plan is unsound and not legally compliant with regard to the Woodspring strategic development allocation (Policy LP2). The soundness of the plan in this regard is set out below. Positively Prepared: In accordance with the NPPF, positively prepared is defined as: "providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development." The NPPF is clear that, in calculating housing need under the standard method, this figure is to be treated as a minimum. Therefore, should there be suitable sites available to deliver housing over the local plan period, these should be supported notwithstanding the Council's position that is has reached its requisite 'target' under the standard method. Moreover, owing to the Council's most recent Housing Delivery Test measurement, it is appropriate that a 20% buffer is applied for the first five-years of the plan, in accordance with the NPPF. While stated as a minimum figure, we consider the quantum of housing planned for under Policy SP8 to be negative and insufficient. A number of suitable sites promoted through the local plan process have been unduly discounted by the Council and we consider this to be the antithesis of the plan being positively prepared.	The Council's overarching spatial strategy, housing numbers and allocation sites identified should be comprehensively reviewed and revisited as it is clear that. This requires review of suitable residential allocation sites omitted from the draft plan which are, in the first instance outside the Green Belt, and then sites which are agreed to be Grey Belt. We contend that the following sites owned by the University of Bristol represent suitable, available and viable development sites which would positively support sustainable growth over the plan period, including in the early years, and should be allocated for development in the new local plan: • Land at Stock Lane Farm, Langford – HE203031 • Land to the West of Wyndhurst Farm – HE20590 • Land south of Long Ashton – HE20139 The University supports Draft Policy LP19, albeit we consider that minor modifications to the policy wording should be made to acknowledge the		NSLP_Pre_Submission_Plan_Representation_Form_Part_B_UOB_SP8.pdf

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					One such site comprises the University of Bristol's land south of Long Ashton (HE20139). The site lies adjacent to the settlement boundary, sustainably located in the context of Long Ashton and Bristol, comprising grey belt land which could/should comfortably be brought forward for development in the new local plan. The Council's Spatial Strategy, Site Selection and Capacity Paper (October 2025) identifies Long Ashton as a Category A village, which represents settlements "considered to be relatively sustainable in their own right with a range of easily accessible services and facilities and good public transport links to towns". It is very notable that despite its acknowledged sustainability credentials, and acknowledgement that Green Belt land is required to be released, Long Ashton has all but been ignored for any growth of scale over the plan period. Two small sites are identified within the existing settlement boundary to deliver 42 dwellings. We consider this to be highly irregular for such a sustainable settlement to be consistently overlooked by the Council for accommodating any real growth and raise significant concerns with the Spatial Strategy under Policy SP3 in this context. Planning for a mere 42 homes in Long Ashton to 2041 is not considered to be a positively prepared spatial strategy approach. Additional housing sites which have been consistently promoted to the Council by the University, and consistently overlooked through the emerging local plan process include land to the west of Wyndhurst Road (adjoining the Category A village of Churchill settlement boundary) (site: HE20590) and the nearby land at Stock Lane Farm, Langford (previously developed land) (site: HE203031). The Council's 'Duty to Co-operate Statement of Compliance Regulation 19 Stage' (October 2025) sets out that Bristol City Council (BCC) have requested for neighbouring authorities, including North Somerset Council, to accommodate its unmet housing need. The Council's Duty to Co-operate statement is clear that "North Somerset does not have capacity to meet some of Bristol's needs at this time". We do not agree with that position. We highlight the importance of North Somerset's position in the context of South Gloucestershire Council also making no provision in its Draft Local Plan (plan submitted for examination) to contribute towards Bristol's unmet need. Similarly, through its emerging local plan process, B&NES Council has made no commitment to contributing to Bristol's unmet need owing to it being heavily constrained and having to deal with its own significant housing requirement uplift (approximately double that before the new 2024 standard method). In this regard, it is noted that on 21 November 2025, the inspectors published their final post-hearing advice following examination of the new Bristol Local Plan. The	sustainability of the location. As present, we consider the policy wording to present an overly negative position of the area which would conflict with the aspirations of the policy to support University development in this area.		

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					inspectors have requested modifications to the plan from BCC to set out an increased housing need and clearly set out what the level of unmet housing need is. An extract from the inspectors' post-hearing advice is provided below, which reinforces the position that no agreement is in place between BCC and any neighbouring authority, including North Somerset, to accommodate the unmet need. The inspectors set out that they: "acknowledge that there is insufficient capacity to meet the Council's objectively assessed housing need, as calculated by the standard method. Nevertheless, we do not consider the figure of 34,650 dwellings over the Plan period to be positively prepared or justified. Given the significant shortfall in meeting overall needs, and the current lack of agreement between Bristol and any neighbouring authorities to provide assistance, we consider it imperative that the Council seeks to maximise housing delivery. Inherent uncertainties in housing delivery in the longer period do not justify setting a housing requirement substantially below the overall housing capacity figure identified at submission. The evidence submitted since the end of the hearing sessions has not persuaded us that a lower figure is justified." Therefore, it stands that BCC's significant unmet housing need will continue to go unmet with none of its neighbouring authorities committing to assist. We find this problematic with particular regard to North Somerset as we consider there to be appropriate scope for a greater number of housing sites to be identified in the new Local Plan and delivered through the course of the plan period. The Council's own additional sites consultation in February/March 2025 demonstrated that this was the case. The unmet need for Bristol is significant, cannot be ignored and requires to be addressed within the new North Somerset Local Plan. National guidance within the NPPF is clear that plans should ensure that, inter alia, unmet development needs from neighbouring areas are provided for to ensure effective strategic planning across local planning authority boundaries. It is clear from the Council's own work that North Somerset are in a strong position to be able to identify significant additional housing sites through allocations in the new local plan. This would positively overachieve the Council's housing need target and provide a meaningful contribution to the unmet need of BCC. Pursuant to the Council's emerging local plan process, it carried out consultation on potential additional housing sites to be included as draft allocations in the Reg 19 plan ('Consultation paper on additional sites for the Regulation 19 Plan', February 2025). That identified sites which the Council considered to be 'most suitable', such as that at Yanley Lane South West Bristol (HE20110) in addition to a raft of sites identified as having 'other potential', including sites now identified as draft allocations i.e. around Pill and			

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					Easton-in-Gordano and sites now omitted as draft allocations i.e. the University of Bristol's land south of Long Asthon (site: HE20139) and land to the west of Wyndhurst Road, Churchill (site: HE20590). The Council set out within that consultation that sites with 'other potential' comprised: "sites at the towns and larger, more sustainable villages consistent with the spatial strategy". [our emphasis] It stands that the Council rightfully identified suitable residential sites in sustainable locations pursuant to the 'other potential' sites in the 'Consultation paper on additional sites for the Regulation 19 Plan' (February 2025). However, such sites have been unduly disregarded at the Reg 19 plan stage and, in our view insofar as the University of Bristol's land south of Long Asthon (site: HE20139) and land to the west of Wyndhurst Road, Churchill (site: HE20590) wrongfully omitted. The latter lies outside the Green Belt and so should be preferred to the various sites proposed to be released from the Green Belt, as sought be national planning policy guidance. Site HE20139 and HE20590 are available now and deliverable to contribute towards significant positive growth within the plan period and should be supported for allocation. We consider that there is scope for additional appropriate housing sites to deliver over the plan period which are available, suitable and viable. In the Council's own words these disregarded sites are "consistent with the spatial strategy" and yet have been ignored. We contend this is the wrong approach, particularly in the context of the significant identified unmet need for Bristol. We therefore disagree with the Council's position that it cannot accommodate any of the unmet housing need from Bristol in North Somerset. In this context, the North Somerset Local Plan is not considered to be positively prepared, justified, effective or consistent with national policy. Justified: In accordance with the NPPF, to be justified this requires: "an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence." As set out above, it is considered that reasonable alternative sites for housing allocations have been unduly discounted by the Council, in conflict with the evidence base which should otherwise support its approach. Therefore, we do not consider that all draft housing allocations are sufficiently justified which goes to the soundness of the plan. Paragraph 148 of the NPPF is clear that where it is necessary to release Green Belt land for development, as is established and agreed in North Somerset, plans should			

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					give: “priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations.” Prior to this, non Green Belt sites should be prioritised for allocation. In this regard, our client has consistently promoted its land south of Long Ashton and at Wyndhurst Farm (site: HE20590) and Stock Lane Farm (site: HE203031) at Churchill/Langford. However, the Council is not supporting a draft housing allocation on any of the three land parcels. We consider this to be contrary to NPPF paragraph 148 and is not a justified approach in plan making terms. Land at Stock Lane Farm, Langford – HE203031: The University’s land at Stock Lane Farm comprises previously developed land, outside of the Green Belt. This is sustainably located in relation to Langford and Churchill and has been promoted for development with capacity for up to 64 dwellings. There is a realistic prospect that houses could be delivered on the site within five years. The site was previously identified as a ‘less sustainable’ site, wrongfully in our view, as part of the Council’s Consultation paper on additional sites for the Regulation 19 Plan’ (February 2025). The consultation ran to March 2025 to which representations were submitted by the University in relation to all three of its land parcels referenced. In this regard, the site is well related to the settlement and existing facilities and services in Churchill and Langford. Adjacent to the west of the University’s land at Stock Lane Farm, planning permission ref: 23/P/0448/OUT was approved by the Council in March 2025 for a mixed-use development comprising up to 120 dwellings, new flexible employment, children’s day nursery and café, along with associated car parking, landscaping, tree works, public open space and local equipped area for play, drainage infrastructure, access improvements and connections to the existing footpath network. We note the Council’s also identified that land as a ‘less sustainable’ site in the previous consultation, while granted it planning permission, and now identifying it as a draft allocation. This outlines the inconstancy in the Council’s approach to its housing sites in the new local plan. The presence of planning permission 23/P/0448/OUT only further supports development on the University’s land adjacent at Stock Lane Farm (HE203031) which critically comprises previously developed land. In this context, the University’s land is annotated red on the plan (see attachement) which comprises the adjacent approved development (and now draft allocation). The Council’s decision to omit the University’s land at			

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					Stock Lane farm is not justified in the context of Draft Policies SP3 and SP8. The site is sustainably located, outside of the Green Belt on previously developed land and adjacent to the Monaghan Mushrooms site (Draft Policy LP23), pursuant to planning permission 23/P/0448/OUT. Land to the West of Wyndhurst Farm – HE20590: The University's land west of Wyndhurst Farm Stock Lane Farm comprises greenfield land adjacent to the settlement boundary of Churchill. This is sustainably located and has been promoted for development with capacity for up to 90 dwellings at a density of 29 dwellings per ha. There is a realistic prospect that houses could be delivered on the site within five years. The site was previously identified as a site with 'other potential' as part of the Council's Consultation paper on additional sites for the Regulation 19 Plan' (February 2025). The Council set out within that consultation that sites with 'other potential' comprised: "sites at the towns and larger, more sustainable villages consistent with the spatial strategy". [our emphasis] The Council's published 'North Somerset Strategic Housing Land Availability Assessment Main Report' (October 2025) further sets out that the site was considered by the Council to have "potential for further consideration". Notwithstanding this, the Council's published 'Spatial strategy, site selection and capacity paper' (October 2025) confirms that this site is not a proposed allocation in the draft Local Plan with commentary provided as follows: "The site is outside settlement boundary with a distinctive rural character providing a clearly defined separation between the area of Churchill centred around Bristol Road and Pudding Pie Lane, and the smaller settlement of Lower Langford to the east. Due to the impact on the landscape and potential impact on heritage assets, it is not considered appropriate to take this site forward as a housing allocation." We do not agree with the Council's assessment of the site and its position to omit this as a draft allocation. We note that pre-application discussions with the Council resulted in the suggestion to promote the site at that time through the local plan which has been comprehensively done and so it is disappointing to see this be omitted as a draft allocation. This is particularly the case given the extent of the Council's housing need which should, in the first instance be addressed by appropriate sites such as this outside of the Green Belt before seeking to remove land from the Green Belt. Development on the site would comfortably assimilate with the surrounding built form, providing sustainable development. It is notable that planning permission (ref:			

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					22/P/2908/OUT) was approved in November 2024 for nine dwellings adjacent to the south of the site which only provides further support for development in this location. Different development options have been considered which would address all material considerations for the site, which include a scheme for 24 units and a scheme for up to 90 units in this regard, as illustrated below. The site is wholly sustainable with any associated impacts of development more than capable of being addressed with appropriate mitigation. In this regard, the Council's decision to omit the University's land is not justified in the context of Draft Policies SP3 and SP8. Land south of Long Ashton – HE20139: The University's land south of Long Ashton comprises land within the Green Belt, adjacent to the settlement boundary of Long Ashton. This is sustainably located and has been consistently promoted for a number of years to the emerging local plan, and previous WECA joint spatial plans for development with capacity for up to 1,500 dwellings. The site was previously identified as a site with 'other potential' as part of the Council's Consultation paper on additional sites for the Regulation 19 Plan' (February 2025). The Council's published 'North Somerset Strategic Housing Land Availability Assessment Main Report' (October 2025) further identifies that the site was considered by the Council to have "potential for further consideration". Notwithstanding this, the Council's published 'Spatial strategy, site selection and capacity paper' (October 2025) confirms that this site is not a proposed allocation in the draft Local Plan with commentary provided as follows: "Site not consistent with the spatial strategy as it is detached from the existing built-up area of Long Ashton." We do not agree with the Council's assessment of the site and its position to omit this as a draft allocation. It is clear that the site should accord with an appropriate spatial strategy which directs growth to the most sustainable locations. Therefore, the Council is not following this by omitting the University's land as an allocation. The site is well related to Long Ashton in addition to the city of Bristol. It appears that the Council have unduly set preference to directing growth to the neighbouring Yanley Lane/ Woodspring site (HE20110) (draft allocation for 3,500 dwellings under Policy LP2) at an early stage of the plan making process. This position has not shifted even as the evidence base has been developed which indicates to the contrary.			

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					Attention is turned to the Council's Sustainability Appraisal Report (October 2025). This sets out the findings of the assessment of potential allocation sites against the sustainability appraisal objectives. A summary is provided (see attached document) with comparison of our client's land south of Long Ashton, which has been discounted by the Council and the Yanley Lane South West Bristol land, which is proposed to be allocated for development by the Council in the Local Plan. This comparison is provided owing to the proximity and context of both sites, and similarity with regard to scope to provide strategic growth. This sets out the similarities in the Council's assessment of both sites which, when compared, identifies fewer negative effects of development on our client's land than that identified for allocation by the Council at Yanley Lane. The sustainability credentials of our client's land are clear and development of this land should be supported. The Council's Spatial Strategy, Site Selection and Capacity Paper (October 2025) provides commentary on the potential allocation sites. For our client's land south of Long Ashton (HE20139) this states that the site is not proposed for allocation and that the: "Site not consistent with the spatial strategy as it is detached from the existing built-up area of Long Ashton". Whereas for the Yanley Lane site (HE20110), this states that the site is proposed for allocation and that the: "Site [was] previously identified (in smaller form) in Regulation 18 plan". The fact that the Yanley Lane/Woodspring site was preferred by the Council at early stages of the plan, in advance of the supporting evidence base work being carried out, is not sufficient justification for it to be allocated. This is required to be justified and supported by the evidence base, which we do not consider it to be, in the context of the University's land south of Long Ashton. The Council's approach contradicts NPPF paragraph 148 in identifies sites to be removed from the Green Belt for development. The Council's 'Stage 2 Green Belt Assessment' (October 2025) identifies the land south of Long Ashton to make an overall weak contribution to the purposes of the Green Belt. Whereas, the Yanley Lane/ Woodspring site is determined to make a greater contribution, set at 'moderate' to the Green Belt purposes. This comparison is provided (see attached document), pursuant to the Council's Stage 2 Green Belt Assessment. In Green Belt terms, it is clear that the University's land south of Long Ashton makes less off a contribution to the Green Belt purposes than the Council's proposed allocation at Yanley Lane/Woodspring. Moreover, our client's land would wholly support sustainable patterns of development in the context of Long Asthon and Bristol, in accordance			

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					with NPPF paragraph 148. Further to this, as can be seen in the Green Belt assessment, the University's land makes a weak contribution to Green Belt purposes A, B and D. There are no relevant footnote 7 assets that would provide a strong reason for refusing or restricting development on the land. Therefore, this can be considered Grey Belt, subject to the specifics of the development proposal. The Council's Stage 2 Green Belt assessment agrees with this position however the Pre-Submission (Reg 19) version of the plan still determines not to allocate the land for development which we consider to not be justified. The NPPF is clear that Grey Belt land should be supported for directing development in new local plans (NPPF paragraph 148). In this context with the omission of our client's land for allocation, we dispute the Council's claim at page 30 of the Pre-Submission Plan (Reg 19) that: "A sequential approach to Green Belt release has been taken prioritising previously developed land, followed by grey belt sites and then other Green Belt locations". The omission of the University's land south of Long Ashton seemingly goes against the supporting evidence base and therefore we do not consider the approach to be justified, with particular regard to Draft Policies SP3, SP7, SP8 and LP2. The Council's overall spatial strategy and policies/ allocations to direct housing growth are required to be informed by the evidence base. Effective: In accordance with the NPPF, to be effective means to be: "deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground." As set out above, where we consider the plan to not have been positively prepared, the Council's 'Duty to Co-operate Statement of Compliance Regulation 19 Stage' (October 2025) sets out that BCC have requested for neighbouring authorities, including North Somerset Council, to accommodate its unmet housing need. The Council's Duty to Co-operate statement is clear that "North Somerset does not have capacity to meet some of Bristol's needs at this time". We do not agree with that position on account of suitable sites being omitted for development allocations, particularly where the Council has previously acknowledged the sites to have 'other potential' which, in the Council's words are "sites at the towns and larger, more sustainable villages consistent with the spatial strategy". This is particularly relevant to the University's land south of Long Ashton and at Stock Lane Farm and Wyndhurst Farm in Churchill/Langford which comprise either previously developed land outside the Green Belt, land outside the Green Belt adjacent to the			

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					Category A village settlement boundary for Churchill, or Grey Belt land adjacent to the Category A village settlement boundary for Long Ashton. While the Council's housing figure over the plan period (Draft Policy SP8) is prescribes as a minimum, this is a negative approach when considering that additional sites are readily available to deliver above this figure, and should be set out as such in policy. This strongly supports our position that North Somerset is fully capable of accommodating additional growth, thereby contributing towards the unmet need from BCC. However, the Council is unduly deciding not to do this – this is not effective plan making. Moreover, the NPPF is clear that planning policies should identify a supply of specific, deliverable sites for five years following the intended date of adoption, with an appropriate buffer. It is likely that some of the larger strategic development/urban extension areas identified for allocation in the plan will not begin to deliver homes within the first five years and so this means that greater flexibility and contingency is required to be built in to ensure housing delivery is forthcoming in the early years of the plan to meet the minimum requirements. Ensuring early delivery of housing early in the plan period is critical. Consistent with National Policy: In accordance with the NPPF, consistency with national policy should be adhered to: "enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant." For the reasons set out within these representations, it is considered that the Council's Reg 19 Pre-Submission Plan is not consistent with national policy with particular regard to the guidance in the NPPF relating to failure under the duty corporate and the approach to accommodate none of BCC's identified unmet housing need. The plan inadequately makes provision for insufficient housing in this context which is not justified owing to the evidence base supporting identification of additional land which could positively support housing growth over the plan period. Moreover, we consider the Council's approach to identifying the draft housing allocation sites is flawed and inconsistent with national policy in overlooking suitable sustainable previously developed land and greenfield sites in the first instance ahead of Green Belt sites; and subsequently overlooking suitable sustainable Grey Belt sites which should be prioritised for development ahead of the remainder of the Green Belt. Conclusions:			

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					For the reasons set out above, we consider the plan to be unsound in its current form. Ultimately, the primary reason the plan is not considered to be sound is owing to the approach that the evidence base has followed the Council's overall strategy; rather than the other way around. The evidence base should directly support the approach laid out in the plan and this is not the case. Notwithstanding this position, the University provides support for Draft Policy LP19 for the 'University of Bristol site in Langford' allocation. We welcome the recognition this policy provides for the significant educational and employment benefits made by the University of Bristol's campus in Langford to the local, and wider, area. The University of Bristol support the policy aims of LP19 which recognise the importance of the facility and support the new development opportunities that will enable the university to grow and accommodate necessary expansion in terms of student numbers and staff employment. We consider that Draft Policy LP19 in isolation is sound as this does not relate to the outstanding wider concerns raised which relate to housing in terms of housing growth quantum and spatial approach. Minor modifications are suggested to the wording of Draft Policy LP19, in so far as we consider this to present a negative picture of the existing sustainability credentials of the site. For users of the campus not based locally, this is readily accessible by non-car modes with regular bus services available. This includes the U2 service which the University provides free passes to students of the veterinary school to travel. Therefore, while this draft policy is strongly supported, we would support minor wording changes to the policy which acknowledge its sustainability. Further detail is hereby provided below and appended in relation to the University of Bristol's land at Stock Lane farm and Wyndhurst Farm in Churchill/Langford and land south of Long Ashton. Development on this land, with support from residential allocations should be provided in a new sound North Somerset Local Plan. Land at Stock Lane Farm, Langford – HE203031: Availability: Site HE203031 is in single ownership by the University of Bristol. The land has been identified as surplus to requirements, having previously been used in association with the University's Langford Veterinary Campus for research and academic studies. It is readily available now, able to make a meaningful contribution to the Council's five-year land supply. Suitability: Site HE203031 offers a suitable location for development of housing. There are no development constraints that			

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					would prevent allocation of the site for its early development for housing. The site is well related to a ‘Category A’ village (most sustainable) and so its allocation fits comfortably into the Council’s emerging spatial strategy. The site is accessible by a choice of means of transport to local facilities, including employment opportunities, schools, shops and other services. 4 The site, comprising previously developed land, forms part of the existing built form along Stock Lane and is subject to no designations/constraints that would restrict redevelopment of the site for housing. Likely Economic Viability: There are no known extra-over costs associated with the development of this site nor any issues with utilities which would mean that it would be economically unviable. There is a realistic prospect that houses could be delivered on the site within five years. 4.7 The site has capacity for up to 64 dwellings, subject to detailed design and is available, suitable and economically viable. It should be allocated in the local plan to assist North Somerset providing a sufficient supply and mix of sites to meet their minimum required housing need. Land to the West of Wyndhurst Farm – HE20590: Availability: Site HE20590 is in single ownership by the University of Bristol. The land has been identified as surplus to requirements for some years. It is readily available now, able to make a meaningful contribution to the Council’s five-year land supply. The site has consistently been promoted for allocation through the local plan process following the advice of the Council during a formal preapplication submission in 2020. Suitability: Site HE20950 offers a suitable location for development of housing. There are no development constraints that would prevent allocation of Site HE20590 for its early development for housing. The site lies adjoining a ‘Category A’ village (most sustainable) and so its allocation fits comfortably into the Council’s emerging spatial strategy. The site is accessible by a choice of means of transport to local facilities, including employment opportunities, schools, shops and other services. The site lies abutting the settlement boundary of Churchill as proposed in the emerging local plan. It has no landscape, heritage or other designation. It is in Flood Zone 1 (low risk) and grade 3 agricultural land. Likely Economic Viability: There are no known extra-over costs associated with the development of this site nor any issues with utilities which would mean that it would be economically unviable. There is a realistic prospect that houses could be delivered on the site within five years.			

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					The site has capacity for circa for 90dwellings at a density of 29dwellings per hectare. An example of how the site might be developed for housing is provided below. Site HE20590 is available, suitable and economically viable and should be allocated in the local plan to assist North Somerset providing a sufficient supply and mix of sites to meet their minimum required housing need. Land south of Long Ashton – HE20139: Availability: The site is in single ownership by the University of Bristol. The land has been identified as surplus to requirements for some years. It is readily available now, able to make a significant contribution to the Council's housing need over the plan period. The site would form a natural extension to Long Asthon being contiguous with the existing settlement boundary of to the north and is physically contained between the A370 to the east/south and Wild Country Lane to the west. Allocation of the site for development, and its release from the Green Belt, is supported by NPPF paragraph 148 in that growth here will promote a sustainable pattern of development on Grey Belt land. This is a requirement of the NPPF. Notably, significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes as is the case for this site. Moreover, releasing land from the Green Belt for development are required to ensure that, inter alia, sustainable transport modes are prioritised, safe and suitable access can be achieved and any significant impacts from the development on the transport network, or on highway safety, can be cost effectively mitigated to an acceptable degree through a vison-led approach. The University's land south of Long Ashton fulfils all criteria with its strong relationship with the existing Long Ashton settlement and being in close proximity, and well connected to, Bristol. Suitability: The site offers a suitable location for development of housing on Grey Belt land. There are no development constraints that would prevent allocation of Site HE20139 for its development for housing. This conclusion is informed by a suite of past technical information on the site. The site lies adjoining a 'Category A' village (most sustainable) and so its allocation fits comfortably into the Council's stated spatial strategy. The site is accessible by a choice of means of transport to local facilities, including employment opportunities, schools, shops and other services. Likely Economic Viability: There are no known extra-over costs associated with the			

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					development of this site nor any issues with utilities which would mean that it would be economically unviable. There is a realistic prospect that houses could be delivered on the site over the plan period. The site is available, suitable and economically viable and should be allocated in the local plan to assist North Somerset providing a sufficient supply and mix of sites to meet their minimum required housing need. The proposal on the site is informed by the substantial of technical work which has been carried out to date. Key facets of a future development of this site could include: • Up to 1,500 dwellings, including a mix of tenures and affordable housing; • Potential to include a mix of non-residential uses; • New access onto the A370 • Cycle routes and public footpaths; • Green infrastructure, including public open space; • Biodiversity Net Gain. A plan demonstrating how development could be achieved on the site is provided in the attached document.			
Policy LP5: Housing, employment and mixed use allocations	No • Positively prepared • Justified • Effective • Consistent with national policy		No	No	The University of Bristol's view is that the Local Plan is unsound and not legally compliant with regard to the Woodspring strategic development allocation (Policy LP2). The soundness of the plan in this regard is set out below. Positively Prepared: In accordance with the NPPF, positively prepared is defined as: "providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development." The NPPF is clear that, in calculating housing need under the standard method, this figure is to be treated as a minimum. Therefore, should there be suitable sites available to deliver housing over the local plan period, these should be supported notwithstanding the Council's position that is has reached its requisite 'target' under the standard method. Moreover, owing to the Council's most recent Housing Delivery Test measurement, it is appropriate that a 20% buffer is applied for the first five-years of the plan, in accordance with the NPPF. While stated as a minimum figure, we consider the quantum of housing planned for under Policy SP8 to be negative and insufficient. A number of suitable sites promoted through the local plan	The Council's overarching spatial strategy, housing numbers and allocation sites identified should be comprehensively reviewed and revisited as it is clear that. This requires review of suitable residential allocation sites omitted from the draft plan which are, in the first instance outside the Green Belt, and then sites which are agreed to be Grey Belt. We contend that the following sites owned by the University of Bristol represent suitable, available and viable development sites which would positively support sustainable growth over the plan period, including in the early years, and should be allocated for development in the new local plan: • Land at Stock Lane Farm, Langford – HE203031 • Land to the West of Wyndhurst Farm – HE20590 • Land south of Long Ashton – HE20139 The University supports Draft		NSLP_Pre_Submission_Plan_Representation_Form_Part_B_UOB_LP2.pdf

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					process have been unduly discounted by the Council and we consider this to be the antithesis of the plan being positively prepared. One such site comprises the University of Bristol's land south of Long Ashton (HE20139). The site lies adjacent to the settlement boundary, sustainably located in the context of Long Ashton and Bristol, comprising grey belt land which could/should comfortably be brought forward for development in the new local plan. The Council's Spatial Strategy, Site Selection and Capacity Paper (October 2025) identifies Long Ashton as a Category A village, which represents settlements "considered to be relatively sustainable in their own right with a range of easily accessible services and facilities and good public transport links to towns". It is very notable that despite its acknowledged sustainability credentials, and acknowledgement that Green Belt land is required to be released, Long Ashton has all but been ignored for any growth of scale over the plan period. Two small sites are identified within the existing settlement boundary to deliver 42 dwellings. We consider this to be highly irregular for such a sustainable settlement to be consistently overlooked by the Council for accommodating any real growth and raise significant concerns with the Spatial Strategy under Policy SP3 in this context. Planning for a mere 42 homes in Long Ashton to 2041 is not considered to be a positively prepared spatial strategy approach. Additional housing sites which have been consistently promoted to the Council by the University, and consistently overlooked through the emerging local plan process include land to the west of Wyndhurst Road (adjoining the Category A village of Churchill settlement boundary) (site: HE20590) and the nearby land at Stock Lane Farm, Langford (previously developed land) (site: HE203031). The Council's 'Duty to Co-operate Statement of Compliance Regulation 19 Stage' (October 2025) sets out that Bristol City Council (BCC) have requested for neighbouring authorities, including North Somerset Council, to accommodate its unmet housing need. The Council's Duty to Co-operate statement is clear that "North Somerset does not have capacity to meet some of Bristol's needs at this time". We do not agree with that position. We highlight the importance of North Somerset's position in the context of South Gloucestershire Council also making no provision in its Draft Local Plan (plan submitted for examination) to contribute towards Bristol's unmet need. Similarly, through its emerging local plan process, B&NES Council has made no commitment to contributing to Bristol's unmet need owing to it being heavily constrained and having to deal with its own significant housing requirement uplift (approximately double that before the new 2024 standard method).	Policy LP19, albeit we consider that minor modifications to the policy wording should be made to acknowledge the sustainability of the location. As present, we consider the policy wording to present an overly negative position of the area which would conflict with the aspirations of the policy to support University development in this area.		

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					In this regard, it is noted that on 21 November 2025, the inspectors published their final post-hearing advice following examination of the new Bristol Local Plan. The inspectors have requested modifications to the plan from BCC to set out an increased housing need and clearly set out what the level of unmet housing need is. An extract from the inspectors' post-hearing advice is provided below, which reinforces the position that no agreement is in place between BCC and any neighbouring authority, including North Somerset, to accommodate the unmet need. The inspectors set out that they: "acknowledge that there is insufficient capacity to meet the Council's objectively assessed housing need, as calculated by the standard method. Nevertheless, we do not consider the figure of 34,650 dwellings over the Plan period to be positively prepared or justified. Given the significant shortfall in meeting overall needs, and the current lack of agreement between Bristol and any neighbouring authorities to provide assistance, we consider it imperative that the Council seeks to maximise housing delivery. Inherent uncertainties in housing delivery in the longer period do not justify setting a housing requirement substantially below the overall housing capacity figure identified at submission. The evidence submitted since the end of the hearing sessions has not persuaded us that a lower figure is justified." Therefore, it stands that BCC's significant unmet housing need will continue to go unmet with none of its neighbouring authorities committing to assist. We find this problematic with particular regard to North Somerset as we consider there to be appropriate scope for a greater number of housing sites to be identified in the new Local Plan and delivered through the course of the plan period. The Council's own additional sites consultation in February/March 2025 demonstrated that this was the case. The unmet need for Bristol is significant, cannot be ignored and requires to be addressed within the new North Somerset Local Plan. National guidance within the NPPF is clear that plans should ensure that, inter alia, unmet development needs from neighbouring areas are provided for to ensure effective strategic planning across local planning authority boundaries. It is clear from the Council's own work that North Somerset are in a strong position to be able to identify significant additional housing sites through allocations in the new local plan. This would positively overachieve the Council's housing need target and provide a meaningful contribution to the unmet need of BCC. Pursuant to the Council's emerging local plan process, it carried out consultation on potential additional housing sites to be included as draft allocations in the Reg 19 plan ('Consultation paper on additional sites for the Regulation 19 Plan', February 2025). That identified sites which the			

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					Council considered to be ‘most suitable’, such as that at Yanley Lane South West Bristol (HE20110) in addition to a raft of sites identified as having ‘other potential’, including sites now identified as draft allocations i.e. around Pill and Easton-in-Gordano and sites now omitted as draft allocations i.e. the University of Bristol’s land south of Long Asthon (site: HE20139) and land to the west of Wyndhurst Road, Churchill (site: HE20590). The Council set out within that consultation that sites with ‘other potential’ comprised: “sites at the towns and larger, more sustainable villages consistent with the spatial strategy”. [our emphasis] It stands that the Council rightfully identified suitable residential sites in sustainable locations pursuant to the ‘other potential’ sites in the ‘Consultation paper on additional sites for the Regulation 19 Plan’ (February 2025). However, such sites have been unduly disregarded at the Reg 19 plan stage and, in our view insofar as the University of Bristol’s land south of Long Asthon (site: HE20139) and land to the west of Wyndhurst Road, Churchill (site: HE20590) wrongfully omitted. The latter lies outside the Green Belt and so should be preferred to the various sites proposed to be released from the Green Belt, as sought be national planning policy guidance. Site HE20139 and HE20590 are available now and deliverable to contribute towards significant positive growth within the plan period and should be supported for allocation. We consider that there is scope for additional appropriate housing sites to deliver over the plan period which are available, suitable and viable. In the Council’s own words these disregarded sites are “consistent with the spatial strategy” and yet have been ignored. We contend this is the wrong approach, particularly in the context of the significant identified unmet need for Bristol. We therefore disagree with the Council’s position that it cannot accommodate any of the unmet housing need from Bristol in North Somerset. In this context, the North Somerset Local Plan is not considered to be positively prepared, justified, effective or consistent with national policy. Justified: In accordance with the NPPF, to be justified this requires: “an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.” As set out above, it is considered that reasonable alternative sites for housing allocations have been unduly discounted by the Council, in conflict with the evidence base which should otherwise support its approach. Therefore, we do not consider that all draft housing allocations are sufficiently justified which goes to the soundness of the plan.			

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					Paragraph 148 of the NPPF is clear that where it is necessary to release Green Belt land for development, as is established and agreed in North Somerset, plans should give: “priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations.” Prior to this, non Green Belt sites should be prioritised for allocation. In this regard, our client has consistently promoted its land south of Long Ashton and at Wyndhurst Farm (site: HE20590) and Stock Lane Farm (site: HE203031) at Churchill/Langford. However, the Council is not supporting a draft housing allocation on any of the three land parcels. We consider this to be contrary to NPPF paragraph 148 and is not a justified approach in plan making terms. Land at Stock Lane Farm, Langford – HE203031: The University’s land at Stock Lane Farm comprises previously developed land, outside of the Green Belt. This is sustainably located in relation to Langford and Churchill and has been promoted for development with capacity for up to 64 dwellings. There is a realistic prospect that houses could be delivered on the site within five years. The site was previously identified as a ‘less sustainable’ site, wrongfully in our view, as part of the Council’s Consultation paper on additional sites for the Regulation 19 Plan’ (February 2025). The consultation ran to March 2025 to which representations were submitted by the University in relation to all three of its land parcels referenced. In this regard, the site is well related to the settlement and existing facilities and services in Churchill and Langford. Adjacent to the west of the University’s land at Stock Lane Farm, planning permission ref: 23/P/0448/OUT was approved by the Council in March 2025 for a mixed-use development comprising up to 120 dwellings, new flexible employment, children’s day nursery and café, along with associated car parking, landscaping, tree works, public open space and local equipped area for play, drainage infrastructure, access improvements and connections to the existing footpath network. We note the Council’s also identified that land as a ‘less sustainable’ site in the previous consultation, while granted it planning permission, and now identifying it as a draft allocation. This outlines the inconstancy in the Council’s approach to its housing sites in the new local plan. The presence of planning permission 23/P/0448/OUT only further supports development on the University’s land adjacent at Stock Lane Farm (HE203031) which critically comprises previously developed land. In this context, the University’s land is annotated red on the plan (see attachement) which			

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					comprises the adjacent approved development (and now draft allocation). The Council's decision to omit the University's land at Stock Lane farm is not justified in the context of Draft Policies SP3 and SP8. The site is sustainably located, outside of the Green Belt on previously developed land and adjacent to the Monaghan Mushrooms site (Draft Policy LP23), pursuant to planning permission 23/P/0448/OUT. Land to the West of Wyndhurst Farm – HE20590: The University's land west of Wyndhurst Farm Stock Lane Farm comprises greenfield land adjacent to the settlement boundary of Churchill. This is sustainably located and has been promoted for development with capacity for up to 90 dwellings at a density of 29 dwellings per ha. There is a realistic prospect that houses could be delivered on the site within five years. The site was previously identified as a site with 'other potential' as part of the Council's Consultation paper on additional sites for the Regulation 19 Plan' (February 2025). The Council set out within that consultation that sites with 'other potential' comprised: "sites at the towns and larger, more sustainable villages consistent with the spatial strategy". [our emphasis] The Council's published 'North Somerset Strategic Housing Land Availability Assessment Main Report' (October 2025) further sets out that the site was considered by the Council to have "potential for further consideration". Notwithstanding this, the Council's published 'Spatial strategy, site selection and capacity paper' (October 2025) confirms that this site is not a proposed allocation in the draft Local Plan with commentary provided as follows: "The site is outside settlement boundary with a distinctive rural character providing a clearly defined separation between the area of Churchill centred around Bristol Road and Pudding Pie Lane, and the smaller settlement of Lower Langford to the east. Due to the impact on the landscape and potential impact on heritage assets, it is not considered appropriate to take this site forward as a housing allocation." We do not agree with the Council's assessment of the site and its position to omit this as a draft allocation. We note that pre-application discussions with the Council resulted in the suggestion to promote the site at that time through the local plan which has been comprehensively done and so it is disappointing to see this be omitted as a draft allocation. This is particularly the case given the extent of the Council's housing need which should, in the first instance be addressed by appropriate sites such as this outside of the Green Belt before seeking to remove land from the Green Belt.			

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					Development on the site would comfortably assimilate with the surrounding built form, providing sustainable development. It is notable that planning permission (ref: 22/P/2908/OUT) was approved in November 2024 for nine dwellings adjacent to the south of the site which only provides further support for development in this location. Different development options have been considered which would address all material considerations for the site, which include a scheme for 24 units and a scheme for up to 90 units in this regard, as illustrated below. The site is wholly sustainable with any associated impacts of development more than capable of being addressed with appropriate mitigation. In this regard, the Council's decision to omit the University's land is not justified in the context of Draft Policies SP3 and SP8. Land south of Long Ashton – HE20139: The University's land south of Long Ashton comprises land within the Green Belt, adjacent to the settlement boundary of Long Ashton. This is sustainably located and has been consistently promoted for a number of years to the emerging local plan, and previous WECA joint spatial plans for development with capacity for up to 1,500 dwellings. The site was previously identified as a site with 'other potential' as part of the Council's Consultation paper on additional sites for the Regulation 19 Plan' (February 2025). The Council's published 'North Somerset Strategic Housing Land Availability Assessment Main Report' (October 2025) further identifies that the site was considered by the Council to have "potential for further consideration". Notwithstanding this, the Council's published 'Spatial strategy, site selection and capacity paper' (October 2025) confirms that this site is not a proposed allocation in the draft Local Plan with commentary provided as follows: "Site not consistent with the spatial strategy as it is detached from the existing built-up area of Long Ashton." We do not agree with the Council's assessment of the site and its position to omit this as a draft allocation. It is clear that the site should accord with an appropriate spatial strategy which directs growth to the most sustainable locations. Therefore, the Council is not following this by omitting the University's land as an allocation. The site is well related to Long Ashton in addition to the city of Bristol. It appears that the Council have unduly set preference to directing growth to the neighbouring Yanley Lane/ Woodspring site (HE20110) (draft allocation for 3,500 dwellings under Policy LP2) at an early stage of the plan			

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					making process. This position has not shifted even as the evidence base has been developed which indicates to the contrary. Attention is turned to the Council's Sustainability Appraisal Report (October 2025). This sets out the findings of the assessment of potential allocation sites against the sustainability appraisal objectives. A summary is provided (see attached document) with comparison of our client's land south of Long Ashton, which has been discounted by the Council and the Yanley Lane South West Bristol land, which is proposed to be allocated for development by the Council in the Local Plan. This comparison is provided owing to the proximity and context of both sites, and similarity with regard to scope to provide strategic growth. This sets out the similarities in the Council's assessment of both sites which, when compared, identifies fewer negative effects of development on our client's land than that identified for allocation by the Council at Yanley Lane. The sustainability credentials of our client's land are clear and development of this land should be supported. The Council's Spatial Strategy, Site Selection and Capacity Paper (October 2025) provides commentary on the potential allocation sites. For our client's land south of Long Ashton (HE20139) this states that the site is not proposed for allocation and that the: "Site not consistent with the spatial strategy as it is detached from the existing built-up area of Long Ashton". Whereas for the Yanley Lane site (HE20110), this states that the site is proposed for allocation and that the: "Site [was] previously identified (in smaller form) in Regulation 18 plan". The fact that the Yanley Lane/Woodspring site was preferred by the Council at early stages of the plan, in advance of the supporting evidence base work being carried out, is not sufficient justification for it to be allocated. This is required to be justified and supported by the evidence base, which we do not consider it to be, in the context of the University's land south of Long Ashton. The Council's approach contradicts NPPF paragraph 148 in identifies sites to be removed from the Green Belt for development. The Council's 'Stage 2 Green Belt Assessment' (October 2025) identifies the land south of Long Ashton to make an overall weak contribution to the purposes of the Green Belt. Whereas, the Yanley Lane/ Woodspring site is determined to make a greater contribution, set at 'moderate' to the Green Belt purposes. This comparison is provided (see attached document), pursuant to the Council's Stage 2 Green Belt Assessment. In Green Belt terms, it is clear that the University's land south of Long Ashton makes less off a contribution to the			

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					Green Belt purposes than the Council's proposed allocation at Yanley Lane/Woodspring. Moreover, our client's land would wholly support sustainable patterns of development in the context of Long Asthon and Bristol, in accordance with NPPF paragraph 148. Further to this, as can be seen in the Green Belt assessment, the University's land makes a weak contribution to Green Belt purposes A, B and D. There are no relevant footnote 7 assets that would provide a strong reason for refusing or restricting development on the land. Therefore, this can be considered Grey Belt, subject to the specifics of the development proposal. The Council's Stage 2 Green Belt assessment agrees with this position however the Pre-Submission (Reg 19) version of the plan still determines not to allocate the land for development which we consider to not be justified. The NPPF is clear that Grey Belt land should be supported for directing development in new local plans (NPPF paragraph 148). In this context with the omission of our client's land for allocation, we dispute the Council's claim at page 30 of the Pre-Submission Plan (Reg 19) that: "A sequential approach to Green Belt release has been taken prioritising previously developed land, followed by grey belt sites and then other Green Belt locations". The omission of the University's land south of Long Ashton seemingly goes against the supporting evidence base and therefore we do not consider the approach to be justified, with particular regard to Draft Policies SP3, SP7, SP8 and LP2. The Council's overall spatial strategy and policies/ allocations to direct housing growth are required to be informed by the evidence base. Effective: In accordance with the NPPF, to be effective means to be: "deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground." As set out above, where we consider the plan to not have been positively prepared, the Council's 'Duty to Co-operate Statement of Compliance Regulation 19 Stage' (October 2025) sets out that BCC have requested for neighbouring authorities, including North Somerset Council, to accommodate its unmet housing need. The Council's Duty to Co-operate statement is clear that "North Somerset does not have capacity to meet some of Bristol's needs at this time". We do not agree with that position on account of suitable sites being omitted for development allocations, particularly where the Council has previously acknowledged the sites to have 'other potential' which, in the Council's words are "sites at the towns and larger, more sustainable villages consistent with the spatial strategy". This is particularly relevant to the			

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					University's land south of Long Ashton and at Stock Lane Farm and Wyndhurst Farm in Churchill/Langford which comprise either previously developed land outside the Green Belt, land outside the Green Belt adjacent to the Category A village settlement boundary for Churchill, or Grey Belt land adjacent to the Category A village settlement boundary for Long Ashton. While the Council's housing figure over the plan period (Draft Policy SP8) is prescribes as a minimum, this is a negative approach when considering that additional sites are readily available to deliver above this figure, and should be set out as such in policy. This strongly supports our position that North Somerset is fully capable of accommodating additional growth, thereby contributing towards the unmet need from BCC. However, the Council is unduly deciding not to do this – this is not effective plan making. Moreover, the NPPF is clear that planning policies should identify a supply of specific, deliverable sites for five years following the intended date of adoption, with an appropriate buffer. It is likely that some of the larger strategic development/urban extension areas identified for allocation in the plan will not begin to deliver homes within the first five years and so this means that greater flexibility and contingency is required to be built in to ensure housing delivery is forthcoming in the early years of the plan to meet the minimum requirements. Ensuring early delivery of housing early in the plan period is critical. Consistent with National Policy: In accordance with the NPPF, consistency with national policy should be adhered to: "enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant." For the reasons set out within these representations, it is considered that the Council's Reg 19 Pre-Submission Plan is not consistent with national policy with particular regard to the guidance in the NPPF relating to failure under the duty corporate and the approach to accommodate none of BCC's identified unmet housing need. The plan inadequately makes provision for insufficient housing in this context which is not justified owing to the evidence base supporting identification of additional land which could positively support housing growth over the plan period. Moreover, we consider the Council's approach to identifying the draft housing allocation sites is flawed and inconsistent with national policy in overlooking suitable sustainable previously developed land and greenfield sites in the first instance ahead of Green Belt sites; and subsequently overlooking suitable sustainable Grey Belt sites which should be prioritised for development ahead of			

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					the remainder of the Green Belt. Conclusions: For the reasons set out above, we consider the plan to be unsound in its current form. Ultimately, the primary reason the plan is not considered to be sound is owing to the approach that the evidence base has followed the Council's overall strategy; rather than the other way around. The evidence base should directly support the approach laid out in the plan and this is not the case. Notwithstanding this position, the University provides support for Draft Policy LP19 for the 'University of Bristol site in Langford' allocation. We welcome the recognition this policy provides for the significant educational and employment benefits made by the University of Bristol's campus in Langford to the local, and wider, area. The University of Bristol support the policy aims of LP19 which recognise the importance of the facility and support the new development opportunities that will enable the university to grow and accommodate necessary expansion in terms of student numbers and staff employment. We consider that Draft Policy LP19 in isolation is sound as this does not relate to the outstanding wider concerns raised which relate to housing in terms of housing growth quantum and spatial approach. Minor modifications are suggested to the wording of Draft Policy LP19, in so far as we consider this to present a negative picture of the existing sustainability credentials of the site. For users of the campus not based locally, this is readily accessible by non-car modes with regular bus services available. This includes the U2 service which the University provides free passes to students of the veterinary school to travel. Therefore, while this draft policy is strongly supported, we would support minor wording changes to the policy which acknowledge its sustainability. Further detail is hereby provided below and appended in relation to the University of Bristol's land at Stock Lane farm and Wyndhurst Farm in Churchill/Langford and land south of Long Ashton. Development on this land, with support from residential allocations should be provided in a new sound North Somerset Local Plan. Land at Stock Lane Farm, Langford – HE203031: Availability: Site HE203031 is in single ownership by the University of Bristol. The land has been identified as surplus to requirements, having previously been used in association with the University's Langford Veterinary Campus for research and academic studies. It is readily available now, able to make a meaningful contribution to the Council's five-year land supply.			

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					Suitability: Site HE203031 offers a suitable location for development of housing. There are no development constraints that would prevent allocation of the site for its early development for housing. The site is well related to a 'Category A' village (most sustainable) and so its allocation fits comfortably into the Council's emerging spatial strategy. The site is accessible by a choice of means of transport to local facilities, including employment opportunities, schools, shops and other services. 4 The site, comprising previously developed land, forms part of the existing built form along Stock Lane and is subject to no designations/constraints that would restrict redevelopment of the site for housing. Likely Economic Viability: There are no known extra-over costs associated with the development of this site nor any issues with utilities which would mean that it would be economically unviable. There is a realistic prospect that houses could be delivered on the site within five years. 4.7 The site has capacity for up to 64 dwellings, subject to detailed design and is available, suitable and economically viable. It should be allocated in the local plan to assist North Somerset providing a sufficient supply and mix of sites to meet their minimum required housing need. Land to the West of Wyndhurst Farm – HE20590: Availability: Site HE20590 is in single ownership by the University of Bristol. The land has been identified as surplus to requirements for some years. It is readily available now, able to make a meaningful contribution to the Council's five-year land supply. The site has consistently been promoted for allocation through the local plan process following the advice of the Council during a formal preapplication submission in 2020. Suitability: Site HE20950 offers a suitable location for development of housing. There are no development constraints that would prevent allocation of Site HE20590 for its early development for housing. The site lies adjoining a 'Category A' village (most sustainable) and so its allocation fits comfortably into the Council's emerging spatial strategy. The site is accessible by a choice of means of transport to local facilities, including employment opportunities, schools, shops and other services. The site lies abutting the settlement boundary of Churchill as proposed in the emerging local plan. It has no landscape, heritage or other designation. It is in Flood Zone 1 (low risk) and grade 3 agricultural land. Likely Economic Viability: There are no known extra-over costs associated with the			

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					development of this site nor any issues with utilities which would mean that it would be economically unviable. There is a realistic prospect that houses could be delivered on the site within five years. The site has capacity for circa for 90dwellings at a density of 29dwellings per hectare. An example of how the site might be developed for housing is provided below. Site HE20590 is available, suitable and economically viable and should be allocated in the local plan to assist North Somerset providing a sufficient supply and mix of sites to meet their minimum required housing need. Land south of Long Ashton – HE20139: Availability: The site is in single ownership by the University of Bristol. The land has been identified as surplus to requirements for some years. It is readily available now, able to make a significant contribution to the Council's housing need over the plan period. The site would form a natural extension to Long Asthon being contiguous with the existing settlement boundary of to the north and is physically contained between the A370 to the east/south and Wild Country Lane to the west. Allocation of the site for development, and its release from the Green Belt, is supported by NPPF paragraph 148 in that growth here will promote a sustainable pattern of development on Grey Belt land. This is a requirement of the NPPF. Notably, significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes as is the case for this site. Moreover, releasing land from the Green Belt for development are required to ensure that, inter alia, sustainable transport modes are prioritised, safe and suitable access can be achieved and any significant impacts from the development on the transport network, or on highway safety, can be cost effectively mitigated to an acceptable degree through a vison-led approach. The University's land south of Long Ashton fulfils all criteria with its strong relationship with the existing Long Ashton settlement and being in close proximity, and well connected to, Bristol. Suitability: The site offers a suitable location for development of housing on Grey Belt land. There are no development constraints that would prevent allocation of Site HE20139 for its development for housing. This conclusion is informed by a suite of past technical information on the site. The site lies adjoining a 'Category A' village (most sustainable) and so its allocation fits comfortably into the Council's stated spatial strategy. The site is accessible by a choice of means of transport to local facilities, including employment opportunities, schools, shops and other			

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					services. Likely Economic Viability: There are no known extra-over costs associated with the development of this site nor any issues with utilities which would mean that it would be economically unviable. There is a realistic prospect that houses could be delivered on the site over the plan period. The site is available, suitable and economically viable and should be allocated in the local plan to assist North Somerset providing a sufficient supply and mix of sites to meet their minimum required housing need. The proposal on the site is informed by the substantial of technical work which has been carried out to date. Key facets of a future development of this site could include: • Up to 1,500 dwellings, including a mix of tenures and affordable housing; • Potential to include a mix of non-residential uses; • New access onto the A370 • Cycle routes and public footpaths; • Green infrastructure, including public open space; • Biodiversity Net Gain. A plan demonstrating how development could be achieved on the site is provided in the attached document.			
Policy LP19: University of Bristol site in Langford	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The University of Bristol's view is that the Local Plan is unsound and not legally compliant with regard to the Woodspring strategic development allocation (Policy LP2). The soundness of the plan in this regard is set out below. Positively Prepared: In accordance with the NPPF, positively prepared is defined as: "providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development." The NPPF is clear that, in calculating housing need under the standard method, this figure is to be treated as a minimum. Therefore, should there be suitable sites available to deliver housing over the local plan period, these should be supported notwithstanding the Council's position that is has reached its requisite 'target' under the standard method. Moreover, owing to the Council's most recent Housing Delivery Test measurement, it is appropriate that a 20% buffer is applied for the first five-years of the plan, in accordance with the NPPF. While stated as a minimum figure, we consider the quantum of	The Council's overarching spatial strategy, housing numbers and allocation sites identified should be comprehensively reviewed and revisited as it is clear that. This requires review of suitable residential allocation sites omitted from the draft plan which are, in the first instance outside the Green Belt, and then sites which are agreed to be Grey Belt. We contend that the following sites owned by the University of Bristol represent suitable, available and viable development sites which would positively support sustainable growth over the plan period, including in the early years, and should be allocated for development in the new local plan: • Land at Stock Lane Farm, Langford – HE203031 • Land to the West of Wyndhurst Farm – HE20590		NSLP_Pre_Submission_Plan_Representation_Form_Part_B_UOB_LP19.pdf

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					housing planned for under Policy SP8 to be negative and insufficient. A number of suitable sites promoted through the local plan process have been unduly discounted by the Council and we consider this to be the antithesis of the plan being positively prepared. One such site comprises the University of Bristol's land south of Long Ashton (HE20139). The site lies adjacent to the settlement boundary, sustainably located in the context of Long Ashton and Bristol, comprising grey belt land which could/should comfortably be brought forward for development in the new local plan. The Council's Spatial Strategy, Site Selection and Capacity Paper (October 2025) identifies Long Ashton as a Category A village, which represents settlements "considered to be relatively sustainable in their own right with a range of easily accessible services and facilities and good public transport links to towns". It is very notable that despite its acknowledged sustainability credentials, and acknowledgement that Green Belt land is required to be released, Long Ashton has all but been ignored for any growth of scale over the plan period. Two small sites are identified within the existing settlement boundary to deliver 42 dwellings. We consider this to be highly irregular for such a sustainable settlement to be consistently overlooked by the Council for accommodating any real growth and raise significant concerns with the Spatial Strategy under Policy SP3 in this context. Planning for a mere 42 homes in Long Ashton to 2041 is not considered to be a positively prepared spatial strategy approach. Additional housing sites which have been consistently promoted to the Council by the University, and consistently overlooked through the emerging local plan process include land to the west of Wyndhurst Road (adjoining the Category A village of Churchill settlement boundary) (site: HE20590) and the nearby land at Stock Lane Farm, Langford (previously developed land) (site: HE203031). The Council's 'Duty to Co-operate Statement of Compliance Regulation 19 Stage' (October 2025) sets out that Bristol City Council (BCC) have requested for neighbouring authorities, including North Somerset Council, to accommodate its unmet housing need. The Council's Duty to Co-operate statement is clear that "North Somerset does not have capacity to meet some of Bristol's needs at this time". We do not agree with that position. We highlight the importance of North Somerset's position in the context of South Gloucestershire Council also making no provision in its Draft Local Plan (plan submitted for examination) to contribute towards Bristol's unmet need. Similarly, through its emerging local plan process, B&NES Council has made no commitment to contributing	• Land south of Long Ashton – HE20139 The University supports Draft Policy LP19, albeit we consider that minor modifications to the policy wording should be made to acknowledge the sustainability of the location. As present, we consider the policy wording to present an overly negative position of the area which would conflict with the aspirations of the policy to support University development in this area.		

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					to Bristol's unmet need owing to it being heavily constrained and having to deal with its own significant housing requirement uplift (approximately double that before the new 2024 standard method). In this regard, it is noted that on 21 November 2025, the inspectors published their final post-hearing advice following examination of the new Bristol Local Plan. The inspectors have requested modifications to the plan from BCC to set out an increased housing need and clearly set out what the level of unmet housing need is. An extract from the inspectors' post-hearing advice is provided below, which reinforces the position that no agreement is in place between BCC and any neighbouring authority, including North Somerset, to accommodate the unmet need. The inspectors set out that they: "acknowledge that there is insufficient capacity to meet the Council's objectively assessed housing need, as calculated by the standard method. Nevertheless, we do not consider the figure of 34,650 dwellings over the Plan period to be positively prepared or justified. Given the significant shortfall in meeting overall needs, and the current lack of agreement between Bristol and any neighbouring authorities to provide assistance, we consider it imperative that the Council seeks to maximise housing delivery. Inherent uncertainties in housing delivery in the longer period do not justify setting a housing requirement substantially below the overall housing capacity figure identified at submission. The evidence submitted since the end of the hearing sessions has not persuaded us that a lower figure is justified." Therefore, it stands that BCC's significant unmet housing need will continue to go unmet with none of its neighbouring authorities committing to assist. We find this problematic with particular regard to North Somerset as we consider there to be appropriate scope for a greater number of housing sites to be identified in the new Local Plan and delivered through the course of the plan period. The Council's own additional sites consultation in February/March 2025 demonstrated that this was the case. The unmet need for Bristol is significant, cannot be ignored and requires to be addressed within the new North Somerset Local Plan. National guidance within the NPPF is clear that plans should ensure that, inter alia, unmet development needs from neighbouring areas are provided for to ensure effective strategic planning across local planning authority boundaries. It is clear from the Council's own work that North Somerset are in a strong position to be able to identify significant additional housing sites through allocations in the new local plan. This would positively overachieve the Council's housing need target and provide a meaningful contribution to the unmet need of BCC. Pursuant to the Council's emerging local plan process, it			

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					carried out consultation on potential additional housing sites to be included as draft allocations in the Reg 19 plan ('Consultation paper on additional sites for the Regulation 19 Plan', February 2025). That identified sites which the Council considered to be 'most suitable', such as that at Yanley Lane South West Bristol (HE20110) in addition to a raft of sites identified as having 'other potential', including sites now identified as draft allocations i.e. around Pill and Easton-in-Gordano and sites now omitted as draft allocations i.e. the University of Bristol's land south of Long Asthon (site: HE20139) and land to the west of Wyndhurst Road, Churchill (site: HE20590). The Council set out within that consultation that sites with 'other potential' comprised: "sites at the towns and larger, more sustainable villages consistent with the spatial strategy". [our emphasis] It stands that the Council rightfully identified suitable residential sites in sustainable locations pursuant to the 'other potential' sites in the 'Consultation paper on additional sites for the Regulation 19 Plan' (February 2025). However, such sites have been unduly disregarded at the Reg 19 plan stage and, in our view insofar as the University of Bristol's land south of Long Asthon (site: HE20139) and land to the west of Wyndhurst Road, Churchill (site: HE20590) wrongfully omitted. The latter lies outside the Green Belt and so should be preferred to the various sites proposed to be released from the Green Belt, as sought be national planning policy guidance. Site HE20139 and HE20590 are available now and deliverable to contribute towards significant positive growth within the plan period and should be supported for allocation. We consider that there is scope for additional appropriate housing sites to deliver over the plan period which are available, suitable and viable. In the Council's own words these disregarded sites are "consistent with the spatial strategy" and yet have been ignored. We contend this is the wrong approach, particularly in the context of the significant identified unmet need for Bristol. We therefore disagree with the Council's position that it cannot accommodate any of the unmet housing need from Bristol in North Somerset. In this context, the North Somerset Local Plan is not considered to be positively prepared, justified, effective or consistent with national policy. Justified: In accordance with the NPPF, to be justified this requires: "an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence." As set out above, it is considered that reasonable alternative sites for housing allocations have been unduly discounted by the Council, in conflict with the evidence			

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					base which should otherwise support its approach. Therefore, we do not consider that all draft housing allocations are sufficiently justified which goes to the soundness of the plan. Paragraph 148 of the NPPF is clear that where it is necessary to release Green Belt land for development, as is established and agreed in North Somerset, plans should give: “priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations.” Prior to this, non Green Belt sites should be prioritised for allocation. In this regard, our client has consistently promoted its land south of Long Ashton and at Wyndhurst Farm (site: HE20590) and Stock Lane Farm (site: HE203031) at Churchill/Langford. However, the Council is not supporting a draft housing allocation on any of the three land parcels. We consider this to be contrary to NPPF paragraph 148 and is not a justified approach in plan making terms. Land at Stock Lane Farm, Langford – HE203031: The University’s land at Stock Lane Farm comprises previously developed land, outside of the Green Belt. This is sustainably located in relation to Langford and Churchill and has been promoted for development with capacity for up to 64 dwellings. There is a realistic prospect that houses could be delivered on the site within five years. The site was previously identified as a ‘less sustainable’ site, wrongfully in our view, as part of the Council’s Consultation paper on additional sites for the Regulation 19 Plan’ (February 2025). The consultation ran to March 2025 to which representations were submitted by the University in relation to all three of its land parcels referenced. In this regard, the site is well related to the settlement and existing facilities and services in Churchill and Langford. Adjacent to the west of the University’s land at Stock Lane Farm, planning permission ref: 23/P/0448/OUT was approved by the Council in March 2025 for a mixed-use development comprising up to 120 dwellings, new flexible employment, children’s day nursery and café, along with associated car parking, landscaping, tree works, public open space and local equipped area for play, drainage infrastructure, access improvements and connections to the existing footpath network. We note the Council’s also identified that land as a ‘less sustainable’ site in the previous consultation, while granted it planning permission, and now identifying it as a draft allocation. This outlines the inconstancy in the Council’s approach to its housing sites in the new local plan. The presence of planning permission 23/P/0448/OUT only further supports			

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					development on the University's land adjacent at Stock Lane Farm (HE203031) which critically comprises previously developed land. In this context, the University's land is annotated red on the plan (see attachement) which comprises the adjacent approved development (and now draft allocation). The Council's decision to omit the University's land at Stock Lane farm is not justified in the context of Draft Policies SP3 and SP8. The site is sustainably located, outside of the Green Belt on previously developed land and adjacent to the Monaghan Mushrooms site (Draft Policy LP23), pursuant to planning permission 23/P/0448/OUT. Land to the West of Wyndhurst Farm – HE20590: The University's land west of Wyndhurst Farm Stock Lane Farm comprises greenfield land adjacent to the settlement boundary of Churchill. This is sustainably located and has been promoted for development with capacity for up to 90 dwellings at a density of 29 dwellings per ha. There is a realistic prospect that houses could be delivered on the site within five years. The site was previously identified as a site with 'other potential' as part of the Council's Consultation paper on additional sites for the Regulation 19 Plan' (February 2025). The Council set out within that consultation that sites with 'other potential' comprised: "sites at the towns and larger, more sustainable villages consistent with the spatial strategy". [our emphasis] The Council's published 'North Somerset Strategic Housing Land Availability Assessment Main Report' (October 2025) further sets out that the site was considered by the Council to have "potential for further consideration". Notwithstanding this, the Council's published 'Spatial strategy, site selection and capacity paper' (October 2025) confirms that this site is not a proposed allocation in the draft Local Plan with commentary provided as follows: "The site is outside settlement boundary with a distinctive rural character providing a clearly defined separation between the area of Churchill centred around Bristol Road and Pudding Pie Lane, and the smaller settlement of Lower Langford to the east. Due to the impact on the landscape and potential impact on heritage assets, it is not considered appropriate to take this site forward as a housing allocation." We do not agree with the Council's assessment of the site and its position to omit this as a draft allocation. We note that pre-application discussions with the Council resulted in the suggestion to promote the site at that time through the local plan which has been comprehensively done and so it is disappointing to see this be omitted as a draft allocation. This is particularly the case given the extent of			

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					the Council's housing need which should, in the first instance be addressed by appropriate sites such as this outside of the Green Belt before seeking to remove land from the Green Belt. Development on the site would comfortably assimilate with the surrounding built form, providing sustainable development. It is notable that planning permission (ref: 22/P/2908/OUT) was approved in November 2024 for nine dwellings adjacent to the south of the site which only provides further support for development in this location. Different development options have been considered which would address all material considerations for the site, which include a scheme for 24 units and a scheme for up to 90 units in this regard, as illustrated below. The site is wholly sustainable with any associated impacts of development more than capable of being addressed with appropriate mitigation. In this regard, the Council's decision to omit the University's land is not justified in the context of Draft Policies SP3 and SP8. Land south of Long Ashton – HE20139: The University's land south of Long Ashton comprises land within the Green Belt, adjacent to the settlement boundary of Long Ashton. This is sustainably located and has been consistently promoted for a number of years to the emerging local plan, and previous WECA joint spatial plans for development with capacity for up to 1,500 dwellings. The site was previously identified as a site with 'other potential' as part of the Council's Consultation paper on additional sites for the Regulation 19 Plan' (February 2025). The Council's published 'North Somerset Strategic Housing Land Availability Assessment Main Report' (October 2025) further identifies that the site was considered by the Council to have "potential for further consideration". Notwithstanding this, the Council's published 'Spatial strategy, site selection and capacity paper' (October 2025) confirms that this site is not a proposed allocation in the draft Local Plan with commentary provided as follows: "Site not consistent with the spatial strategy as it is detached from the existing built-up area of Long Ashton." We do not agree with the Council's assessment of the site and its position to omit this as a draft allocation. It is clear that the site should accord with an appropriate spatial strategy which directs growth to the most sustainable locations. Therefore, the Council is not following this by omitting the University's land as an allocation. The site is well related to Long Ashton in addition to the city of Bristol.			

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					It appears that the Council have unduly set preference to directing growth to the neighbouring Yanley Lane/ Woodspring site (HE20110) (draft allocation for 3,500 dwellings under Policy LP2) at an early stage of the plan making process. This position has not shifted even as the evidence base has been developed which indicates to the contrary. Attention is turned to the Council's Sustainability Appraisal Report (October 2025). This sets out the findings of the assessment of potential allocation sites against the sustainability appraisal objectives. A summary is provided (see attached document) with comparison of our client's land south of Long Ashton, which has been discounted by the Council and the Yanley Lane South West Bristol land, which is proposed to be allocated for development by the Council in the Local Plan. This comparison is provided owing to the proximity and context of both sites, and similarity with regard to scope to provide strategic growth. This sets out the similarities in the Council's assessment of both sites which, when compared, identifies fewer negative effects of development on our client's land than that identified for allocation by the Council at Yanley Lane. The sustainability credentials of our client's land are clear and development of this land should be supported. The Council's Spatial Strategy, Site Selection and Capacity Paper (October 2025) provides commentary on the potential allocation sites. For our client's land south of Long Ashton (HE20139) this states that the site is not proposed for allocation and that the: "Site not consistent with the spatial strategy as it is detached from the existing built-up area of Long Ashton". Whereas for the Yanley Lane site (HE20110), this states that the site is proposed for allocation and that the: "Site [was] previously identified (in smaller form) in Regulation 18 plan". The fact that the Yanley Lane/Woodspring site was preferred by the Council at early stages of the plan, in advance of the supporting evidence base work being carried out, is not sufficient justification for it to be allocated. This is required to be justified and supported by the evidence base, which we do not consider it to be, in the context of the University's land south of Long Ashton. The Council's approach contradicts NPPF paragraph 148 in identifies sites to be removed from the Green Belt for development. The Council's 'Stage 2 Green Belt Assessment' (October 2025) identifies the land south of Long Ashton to make an overall weak contribution to the purposes of the Green Belt. Whereas, the Yanley Lane/ Woodspring site is determined to make a greater contribution, set at 'moderate' to the Green Belt purposes. This comparison is provided (see attached document),			

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					pursuant to the Council's Stage 2 Green Belt Assessment. In Green Belt terms, it is clear that the University's land south of Long Ashton makes less off a contribution to the Green Belt purposes than the Council's proposed allocation at Yanley Lane/Woodspring. Moreover, our client's land would wholly support sustainable patterns of development in the context of Long Asthon and Bristol, in accordance with NPPF paragraph 148. Further to this, as can be seen in the Green Belt assessment, the University's land makes a weak contribution to Green Belt purposes A, B and D. There are no relevant footnote 7 assets that would provide a strong reason for refusing or restricting development on the land. Therefore, this can be considered Grey Belt, subject to the specifics of the development proposal. The Council's Stage 2 Green Belt assessment agrees with this position however the Pre-Submission (Reg 19) version of the plan still determines not to allocate the land for development which we consider to not be justified. The NPPF is clear that Grey Belt land should be supported for directing development in new local plans (NPPF paragraph 148). In this context with the omission of our client's land for allocation, we dispute the Council's claim at page 30 of the Pre-Submission Plan (Reg 19) that: "A sequential approach to Green Belt release has been taken prioritising previously developed land, followed by grey belt sites and then other Green Belt locations". The omission of the University's land south of Long Ashton seemingly goes against the supporting evidence base and therefore we do not consider the approach to be justified, with particular regard to Draft Policies SP3, SP7, SP8 and LP2. The Council's overall spatial strategy and policies/ allocations to direct housing growth are required to be informed by the evidence base. Effective: In accordance with the NPPF, to be effective means to be: "deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground." As set out above, where we consider the plan to not have been positively prepared, the Council's 'Duty to Co-operate Statement of Compliance Regulation 19 Stage' (October 2025) sets out that BCC have requested for neighbouring authorities, including North Somerset Council, to accommodate its unmet housing need. The Council's Duty to Co-operate statement is clear that "North Somerset does not have capacity to meet some of Bristol's needs at this time". We do not agree with that position on account of suitable sites being omitted for development allocations, particularly where the Council			

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					has previously acknowledged the sites to have 'other potential' which, in the Council's words are "sites at the towns and larger, more sustainable villages consistent with the spatial strategy". This is particularly relevant to the University's land south of Long Ashton and at Stock Lane Farm and Wyndhurst Farm in Churchill/Langford which comprise either previously developed land outside the Green Belt, land outside the Green Belt adjacent to the Category A village settlement boundary for Churchill, or Grey Belt land adjacent to the Category A village settlement boundary for Long Ashton. While the Council's housing figure over the plan period (Draft Policy SP8) is prescribes as a minimum, this is a negative approach when considering that additional sites are readily available to deliver above this figure, and should be set out as such in policy. This strongly supports our position that North Somerset is fully capable of accommodating additional growth, thereby contributing towards the unmet need from BCC. However, the Council is unduly deciding not to do this – this is not effective plan making. Moreover, the NPPF is clear that planning policies should identify a supply of specific, deliverable sites for five years following the intended date of adoption, with an appropriate buffer. It is likely that some of the larger strategic development/urban extension areas identified for allocation in the plan will not begin to deliver homes within the first five years and so this means that greater flexibility and contingency is required to be built in to ensure housing delivery is forthcoming in the early years of the plan to meet the minimum requirements. Ensuring early delivery of housing early in the plan period is critical. Consistent with National Policy: In accordance with the NPPF, consistency with national policy should be adhered to: "enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant." For the reasons set out within these representations, it is considered that the Council's Reg 19 Pre-Submission Plan is not consistent with national policy with particular regard to the guidance in the NPPF relating to failure under the duty corporate and the approach to accommodate none of BCC's identified unmet housing need. The plan inadequately makes provision for insufficient housing in this context which is not justified owing to the evidence base supporting identification of additional land which could positively support housing growth over the plan period. Moreover, we consider the Council's approach to identifying the draft housing allocation sites is flawed and inconsistent with national policy in overlooking suitable			

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					sustainable previously developed land and greenfield sites in the first instance ahead of Green Belt sites; and subsequently overlooking suitable sustainable Grey Belt sites which should be prioritised for development ahead of the remainder of the Green Belt. Conclusions: For the reasons set out above, we consider the plan to be unsound in its current form. Ultimately, the primary reason the plan is not considered to be sound is owing to the approach that the evidence base has followed the Council's overall strategy; rather than the other way around. The evidence base should directly support the approach laid out in the plan and this is not the case. Notwithstanding this position, the University provides support for Draft Policy LP19 for the 'University of Bristol site in Langford' allocation. We welcome the recognition this policy provides for the significant educational and employment benefits made by the University of Bristol's campus in Langford to the local, and wider, area. The University of Bristol support the policy aims of LP19 which recognise the importance of the facility and support the new development opportunities that will enable the university to grow and accommodate necessary expansion in terms of student numbers and staff employment. We consider that Draft Policy LP19 in isolation is sound as this does not relate to the outstanding wider concerns raised which relate to housing in terms of housing growth quantum and spatial approach. Minor modifications are suggested to the wording of Draft Policy LP19, in so far as we consider this to present a negative picture of the existing sustainability credentials of the site. For users of the campus not based locally, this is readily accessible by non-car modes with regular bus services available. This includes the U2 service which the University provides free passes to students of the veterinary school to travel. Therefore, while this draft policy is strongly supported, we would support minor wording changes to the policy which acknowledge its sustainability. Further detail is hereby provided below and appended in relation to the University of Bristol's land at Stock Lane farm and Wyndhurst Farm in Churchill/Langford and land south of Long Ashton. Development on this land, with support from residential allocations should be provided in a new sound North Somerset Local Plan. Land at Stock Lane Farm, Langford – HE203031: Availability: Site HE203031 is in single ownership by the University of Bristol. The land has been identified as surplus to requirements, having previously been used in association			

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					with the University's Langford Veterinary Campus for research and academic studies. It is readily available now, able to make a meaningful contribution to the Council's five-year land supply. Suitability: Site HE203031 offers a suitable location for development of housing. There are no development constraints that would prevent allocation of the site for its early development for housing. The site is well related to a 'Category A' village (most sustainable) and so its allocation fits comfortably into the Council's emerging spatial strategy. The site is accessible by a choice of means of transport to local facilities, including employment opportunities, schools, shops and other services. 4 The site, comprising previously developed land, forms part of the existing built form along Stock Lane and is subject to no designations/constraints that would restrict redevelopment of the site for housing. Likely Economic Viability: There are no known extra-over costs associated with the development of this site nor any issues with utilities which would mean that it would be economically unviable. There is a realistic prospect that houses could be delivered on the site within five years. 4.7 The site has capacity for up to 64 dwellings, subject to detailed design and is available, suitable and economically viable. It should be allocated in the local plan to assist North Somerset providing a sufficient supply and mix of sites to meet their minimum required housing need. Land to the West of Wyndhurst Farm – HE20590: Availability: Site HE20590 is in single ownership by the University of Bristol. The land has been identified as surplus to requirements for some years. It is readily available now, able to make a meaningful contribution to the Council's five-year land supply. The site has consistently been promoted for allocation through the local plan process following the advice of the Council during a formal preapplication submission in 2020. Suitability: Site HE20950 offers a suitable location for development of housing. There are no development constraints that would prevent allocation of Site HE20590 for its early development for housing. The site lies adjoining a 'Category A' village (most sustainable) and so its allocation fits comfortably into the Council's emerging spatial strategy. The site is accessible by a choice of means of transport to local facilities, including employment opportunities, schools, shops and other services. The site lies abutting the settlement boundary of Churchill as proposed in the emerging local plan. It has no landscape, heritage or other designation. It is in Flood			

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					Zone 1 (low risk) and grade 3 agricultural land. Likely Economic Viability: There are no known extra-over costs associated with the development of this site nor any issues with utilities which would mean that it would be economically unviable. There is a realistic prospect that houses could be delivered on the site within five years. The site has capacity for circa for 90dwellings at a density of 29dwellings per hectare. An example of how the site might be developed for housing is provided below. Site HE20590 is available, suitable and economically viable and should be allocated in the local plan to assist North Somerset providing a sufficient supply and mix of sites to meet their minimum required housing need. Land south of Long Ashton – HE20139: Availability: The site is in single ownership by the University of Bristol. The land has been identified as surplus to requirements for some years. It is readily available now, able to make a significant contribution to the Council's housing need over the plan period. The site would form a natural extension to Long Asthon being contiguous with the existing settlement boundary of to the north and is physically contained between the A370 to the east/south and Wild Country Lane to the west. Allocation of the site for development, and its release from the Green Belt, is supported by NPPF paragraph 148 in that growth here will promote a sustainable pattern of development on Grey Belt land. This is a requirement of the NPPF. Notably, significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes as is the case for this site. Moreover, releasing land from the Green Belt for development are required to ensure that, inter alia, sustainable transport modes are prioritised, safe and suitable access can be achieved and any significant impacts from the development on the transport network, or on highway safety, can be cost effectively mitigated to an acceptable degree through a vison-led approach. The University's land south of Long Ashton fulfils all criteria with its strong relationship with the existing Long Ashton settlement and being in close proximity, and well connected to, Bristol. Suitability: The site offers a suitable location for development of housing on Grey Belt land. There are no development constraints that would prevent allocation of Site HE20139 for its development for housing. This conclusion is informed by a suite of past technical information on the site. The site lies adjoining a 'Category A' village (most			

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					sustainable) and so its allocation fits comfortably into the Council's stated spatial strategy. The site is accessible by a choice of means of transport to local facilities, including employment opportunities, schools, shops and other services. Likely Economic Viability: There are no known extra-over costs associated with the development of this site nor any issues with utilities which would mean that it would be economically unviable. There is a realistic prospect that houses could be delivered on the site over the plan period. The site is available, suitable and economically viable and should be allocated in the local plan to assist North Somerset providing a sufficient supply and mix of sites to meet their minimum required housing need. The proposal on the site is informed by the substantial of technical work which has been carried out to date. Key facets of a future development of this site could include: • Up to 1,500 dwellings, including a mix of tenures and affordable housing; • Potential to include a mix of non-residential uses; • New access onto the A370 • Cycle routes and public footpaths; • Green infrastructure, including public open space; • Biodiversity Net Gain. A plan demonstrating how development could be achieved on the site is provided in the attached document.			

Name: Ursula Lucas **I.D:** 17699457

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Land at Tower Farm	No	• Justified	Yes	Yes	Tower Farm is in a sensitive location. In my view, NSC has not properly considered the following: Alternative brownfield or greenfield sites with far lower ecological impact, both in Portishead and across North Somerset. Opportunities to increase housing density on proposed brownfield sites, which could remove the need to develop Tower Farm. The strategic ecological importance of this site in protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor. The fact that this area was added to the Green Belt in the late 1980s due to its high ecological value. I would argue that national planning policy allows Green Belt changes only in exceptional circumstances — and these have not been demonstrated.			

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					In addition, this site cannot provide safe or suitable access and development would create unacceptable transport impacts, failing national soundness tests.			
Black Rock, north of Clevedon Road	No	• Justified	Yes	Yes	Black Rock is in a sensitive location. In my view, NSC has not properly considered the following: Alternative brownfield or greenfield sites with far lower ecological impact, both in Portishead and across North Somerset. Opportunities to increase housing density on proposed brownfield sites, which could remove the need to develop Black Rock. The strategic ecological importance of this site in protecting Weston Big Wood (SSSI) and the Gordano Valley green corridor. The fact that this area was added to the Green Belt in the late 1980s due to its high ecological value. I would argue that national planning policy allows Green Belt changes only in exceptional circumstances — and these have not been demonstrated. In addition: this site cannot provide safe or suitable access and development would create unacceptable transport impacts, failing national soundness tests.			

Name: V Draper **I.D:** 38932257

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	This development would lead to massive overdevelopment of the village. 800 houses have already been approved doubling the size of Backwell. It will destroy the village's identity. The infrastructure has not been considered. There will not be adequate school places, available dentist or doctors' appointments. Even with a new road, with the huge increase in traffic the roads will be dangerous and will not effectively serve the area. The increased housing allocation will destroy the character of the village and Backwell is taking an unfair share, more than any other North Somerset village. It is not fit for purpose as a transport hub with an inaccessible railway station and lack of parking. Nearby streets are already becoming dangerous with station users parking to avoid charges. This will destroy prime green belt, agriculture land and wildlife habitats and we will no longer have a rural village but a town. To deliver the volume of growth with infrastructure and services in such a short period of time is destabilising and undeliverable. It's unthinkable and I cannot understand how it is even being considered. Ultimately this much loved village will be destroyed and to someone who has lived here her whole life, the thought is devasting.			

Name: V Parfitt **I.D:** 62687457

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at North West Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure				

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Land north of Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	This plan is unsound and ill thought out for the following reasons: The effects of the number of new houses on Nailsea and Backwell would cause unsustainable over development. Backwell is a large village. Nailsea is a small commuter town, with limited within town work opportunities and many working residents commuting to nearby larger centres such as Bristol and Weston super Mare to work. Backwell and Nailsea should therefore not be considered a 'Strategic Location' as they do not meet North Somersets Council's (NSC) Policy SP1 for a variety of reasons, including: • Most of the proposed sites will fall outside the usual catchment for walking distances (town centres, school, bus stops and train station) and will therefore not prioritise walking and cycling and the use of public transport. • The plan does not support the delivery of economic growth and job creation in Nailsea as the location is not easily accessible, (B roads in and out) and there are no plans to improve existing highways network (see below). Nailsea and Backwell are unlikely to be a site for local employment so most new residents will end up commuting elsewhere. • More development in and around Backwell and Nailsea is will have negative environmental impacts regarding water, pollution, flooding risk and safety of residents, congestion on roads and rat running down rural lanes with increased accident risk. • Nailsea Railway station is not an appropriate major transport hub. It is small, with short platforms, and difficult to access for those with mobility issues. Currently the populations of Nailsea and Backwell are, according to the Census in 2021: Nailsea 15,917 Backwell 4,589 The Local Plan housing allocation is for 3,728 new dwellings across these sites. Based on 2.3 persons per household (the average household in North Somerset according to the 2021 Census), that means an additional 8,574 persons across the two towns, an overall increase of 42%. For each town, the growth would be: Nailsea - an extra 4,179 persons or an additional 26% Backwell - an extra 3,870 persons or an additional 84% This is a huge increase in population which is completely unsustainable with the current local infrastructure and will ruin the lives of current and future residents of Nailsea and Backwell. This degree of expansion would have a detrimental impact on the character and nature of Backwell and Nailsea and their communities. • Nailsea has already had significant development with over 350 homes already built and several hundred more granted planning permission, this all in addition to the above proposed expansion. No new infrastructure has attended any of this. Effects on local infrastructure This further population increase will overload local infrastructure including healthcare, schools, leisure facilities and town centre parking. The Local Plan suggests developer-led delivery of infrastructure to support this, rather than a policy driven approach. This will inevitably mean that the infrastructure to support this increased population, in terms of schools, healthcare, leisure facilities and travel and transport is not guaranteed, may not happen and at best would be delayed long after it is needed. This means that access to these facilities, particularly healthcare and schools, will be badly affected, for current and new residents. Effects on travel and highways	Proposed new housing should be significantly reduced or reconsidered altogether as an expansion of population of the extent suggested is never going to be sustainable and represents an overdevelopment of Nailsea and Backwell without any realistic likelihood of local employment increasing to match the population increase or of local infrastructure being able to increase to accomodate this. A maximum 10% increase in population over Nailsea and Backwell would be a far more realistic target to aim for. • Before any new housing is proposed there should be a clear policy led, not developer led, plan for all the necessary infrastructure improvements, including healthcare, GP surgeries, leisure facilities, schools and transport modifications. These should be planned prior to any new development.		

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					There is no A road directly into and out of Nailsea, only B roads which are narrow and already heavily congested with traffic. Access to Nailsea from the A 370, which passes between Nailsea and Backwell, is only via the busy and congested Backwell crossroads and Station Road. Station Road is an accident black spot with both pedestrians and cyclists coming into conflict with the vehicles when passing under the railway line bridge on the single track, traffic lights controlled junction. Backwell School creates a significant amount of traffic. • The policy states that to accommodate the additional housing transport infrastructure development is needed. NSC proposes that an East Backwell Link Road is built. The road would go under the London to Penzance mainline rail track from Station Road to the A370. • However this link road would be extremely hard to build from an engineering perspective and very expensive because it is close to the river Kenn. The road would require a water pumping solution as it will go through an area susceptible to flooding. It will need cutting through the railway embankment. Developers will be expected to contribute to the funding for the road, however developer contributions will not cover the whole cost of the road. The developer Rubix has stated that it will only connect the road through their site once the housing has been built, this statement does not align with NSC statement on linking proposed development to infrastructure provision in a phased plan. • The East Backwell Link Road will only assist the Nailsea developments to the south of Nailsea. Developments to the north of Nailsea will use existing B roads out towards Wraxall and Clevedon and Portbury Lane. Developments east of Backwell wishing to get to the M5 will travel through Nailsea. It will not reduce traffic to and from Backwell and Bristol and junctions 19 and 20 of the M5. • NSC has failed to address the junctions to the north of Nailsea along the B3138 and B3130 which are already at capacity and are known accident black spots. There is no mitigation suggested meaning an even greater volume of traffic and more accidents. • NSC has placed a lot of emphasis on Active Travel (walking, cycling, horse riding) however many development sites are too far from the town of village centre to make walking a viable solution. • Rural "Quiet" Lanes. NSC has failed to address how they will protect the rural lanes around Nailsea and Backwell from rat-running. Traffic volumes on the lanes have steadily increased in recent years as developments to the west of Nailsea have been built. This is noticeable on The Causeway to the north and West End Lane and Netherton Wood Lane to the west and Chelvey Lane to the south west. This also happens on Chapel Hill leading into Backwell Bow, with people attempting to bypass queues on the a70 at Backwell Crossroads. This rat-running down rural lanes will only get worse with the proposed developments. All these lanes are single track with no pavements. • Backwell and Nailsea Train Station has not been identified within Policy LP3 for improvements. The station is currently not accessible for many and the platforms too short for intercity services. No funding has been identified for this work. Effects on environment and ecology There will be loss of green space and local countryside. Access to nature and countryside for walking etc is very important for the physical and mental health of residents and should not just be built over without consideration of this. On Backwell Common there will be a significant loss of Grade 1 and 2 agricultural land, particularly with the proposed East Backwell New Road and housing developments in this area. Other development areas will cause similar loss. Farmland of this quality is essential for growing food, for food resilience for the local population, reducing reliance on imported food and future proofing the			

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					population against climate and political changes that may make imported food more expensive and difficult to obtain in the future. The development off Pound Lane will have a bad impact on Moor End Spout Nature Reserve. Development south of Nailsea is too close to Backwell Lake which is a designated reservoir and an important area for wildlife particularly birds. Much of this area is a flood plain and dwellings here will be liable to flooding. Most areas around Nailsea are low lying and in areas at risk of flooding, which will become an increasing problem with climate change. There will be adverse effects on wildlife and biodiversity, e.g. with wildlife corridors being cut off.			

Name: Val Eglon **I.D:** 58816801

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell is/was a village with many amenities. It has been ruined by too many houses already, many without our consent. Traffic is congested on the A370 and Station Road our two main routes out of the village. More building will take away most of our valuable green/agricultural and recreational land in detriment to the present villagers. We have few amenities compared to when we moved here 40 years ago. The same one doctors surgery chemist who struggle to cope now. the schools are at capacity with very little play facility for the present children. The present road infrastructure is at capacity, not having been built to take the present vehicles let alone another 2000+. A370 is non stop now being the main road to Bristol and Weston, an accident on the Motorway causes great problems when diverted to A370 now and makes difficulties for people gaining access from side roads, further traffic even the number at present being built will cause gridlock at times. A lot of land near the Station is frequently flooded, how can that be built on? Some common sense needs to be used Too many houses have been built here without consideration to the present residents and we can't continue to let builders ride roughshod over us for their greed. They should consider the local residents as we live here THEY DONT!!! This is behalf of myself AND my husband.			

Name: Valerie Wells **I.D:** 51298369

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Doubling the number of houses in Backwell, from under 2,000 to nearly 4,000 in 15 years is a major overdevelopment and unsustainable, particularly given the large numbers of new houses being constructed in Backwell and other parts of North Somerset currently.. Our roads and rail links are poor with the A roads narrow and are already very busy. Our rural lanes are already seeing an undesirable increase in traffic. Our Nailsea/Backwell station is inaccessible for anyone with a disability, wheelchair or pram. Backwell is not an employment hub, and most working age residents commute by car to jobs in the outskirts of Bristol or in various other urban and rural areas. Only those living and working close to the A370 use the X1 bus, which is the only service which is regular and reliable.and widely used The Backwell E and Gleeson (S Nailsea) developments of over 1300 houses, , plus the hugely expensive (not yet costed and probably unaffordable) new road and railway crossing will destroy the character of Backwell village, destroy valuable wildlife habitats and increase the likelihood of flooding in the low-lying parts of our area.	THERE IS AN ALTERNATIVE. This LP does not take full advantage of available land in the S. Bristol and Ashton Vale area. Some of this is green belt, and serves little purpose, but is close to the vibrant city of Bristol with its wealth of jobs, shops, services and facilities. Many of these would accessible by foot, cycle or public transport – much better for the environment than additional housing in Backwell..		

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					All the plans proposed have a high degree of uncertainty in them, with regard to costings plus likely sources of finance. Our village services, schools, health centres etc will struggle to cope. Our shops benefit from being together in the village centre, supported by parking places close to capacity. 50% more houses could make it impossible for those who need to drive to visit the health centre, dentist etc, The growth indicated by this Local Plan, over a short period of time, will cause chaos in our roads (as the current developments are doing) and in the long term destroy the well balanced community of Backwell that has developed gradually during the last few decades.			

Name: Vanessa Pilley **I.D:** 51325921

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Backwell has already received a 40% approved increased - anymore would lead to overdevelopment. The A370, and minor roads around the village cannot cope with current capacity - both building traffic and new housing traffic (especially at commuting time) cannot be accommodated. If a new road is being promised, that should be built first. The surrounding amenities are also at breaking point - long wait times for healthcare, few shopping facilities, poor railway infrastructure. More info and evidence is needed to understand the requirements before any more proposed housing is built. Grade 1 agricultural land should be a last resort. Please start reusing brownfield sites! Has an environmental impact assessment been done? I see little evidence for due diligence. Has future flood risk been taken into account? Those fields struggle in the winter - every winter - and will only get worse with climate change. Finally, this is very unpopular in the village - I worry about the social cohesion aspects.			

Name: Various Taylor Wimpey Crest Nicholson Barratt Redrow Vistry Group **I.D:** 63191617

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP1: Sustainable Development	No	• Consistent with national policy	Yes	Yes		These representations have been prepared and submitted by Savills on behalf of various clients including Taylor Wimpey, Crest Nicholson, Barratt Redrow, and Vistry Group. 2. This draft policy requires development to demonstrate compliance with a list of ten bullet points in order to 'be sustainable'. 3. Whilst we support the intent of this policy and recognise the importance of, and indeed legal requirement to achieve, sustainable development, the policy wording is too high level to serve any meaningful purpose as a strategic policy in the determination of planning applications. Furthermore, a number of the individual bullet points are duplicated later within development management policies and in some cases are not entirely consistent. 4. Paragraph 21 of the Framework, explains that strategic policies 'should be limited to those necessary to address the strategic priorities of the area … to provide a clear starting point for any non-strategic policies that are needed. Strategic policies should not extend to detailed matters that are more appropriately dealt with through … other non-strategic policies'. Further, paragraph 16(f) of the Framework requires plans to 'serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area'. 5. We understand why, for a local authority which has declared a climate emergency, there is a desire to put a sustainable development policy front and centre in the Local Plan. However, the policy does not sit comfortably in the strategic policies section of the plan. Much of what it is trying to achieve can and indeed is better covered by subsequent detailed development management policies. 6. Furthermore, there are areas of inconsistency with the Framework, for example, the draft policy wording seeks to 'Protect valued natural and historic assets and support green infrastructure and biodiversity;'			

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						(emphasis added), is in conflict with the adopted approach outlined in national policy. In relation to heritage for example, Chapter 16 of the Framework (Conserving and Enhancing the Historic Environment) instructs the decision-taker to balance the harm with public benefits in arriving at a planning judgement. A policy which requires 'protection' of heritage assets establishes a different test for planning applications which means that no harm is considered acceptable, irrespective of the public benefits arising from the development. 7. In light of the above, and for consistency with the Framework, we consider that this policy should be converted into supporting text and updated to ensure consistency with the broad approach of the Framework. As supporting text it would set the scene for the detailed development management policies which follow later in the draft Plan but without duplication		
SP2: Climate Change	No	• Effective • Consistent with national policy	Yes	Yes		These representations have been prepared and submitted by Savills on behalf of various clients including Taylor Wimpey, Crest Nicholson, Barratt Redrow, and Vistry Group. 2. This draft policy requires development proposals to demonstrate how they will address climate change mitigation and adaptation, encourage decarbonisation of energy and transport, and support the delivery of a carbon neutral North Somerset by 2030. Development proposals will be supported if they are in line with the ten bullet points listed. 3. Whilst we support the general intent of this policy and recognise the importance of considering climate change in the decision-making process, its content is not naturally covered in a strategic policy and much of it is later duplicated within the development management policies. 4. Paragraph 21 of the Framework, explains that strategic policies "should be limited to those necessary to address the strategic priorities of the area … to provide a clear starting point for any non-strategic policies that are needed. Strategic policies should not extend to detailed matters that are more appropriately dealt with through … other non-strategic policies". Further, paragraph 16(f) of the Framework requires plans to avoid "unnecessary duplication of policies that apply to a particular area". 5. As we have explained in our representation to Policy SP1, we understand why, for a local authority which has declared a climate emergency, there is a desire to put a climate change policy front and centre in the Local Plan. However, the policy does not sit comfortably in the strategic policies section of the plan. Much of what it is trying to achieve can and indeed is better covered by detailed development management policies. 6. The danger of having duplicate policies which cover the same matters is that they are inconsistent and set differing requirements. For example, Policy SP2 states development proposals will be supported where they deliver a net zero energy standard, while Policy DP6 requires all new buildings to achieve net zero operational energy for both regulated and unregulated energy immediately, progressing to full net zero embodied carbon by 2030. This inconsistency in approach creates ambiguity for both developers and decision makers. 7. In light of the above, and in order meet the requirements of the Framework we consider this policy would be better suited to supporting text, albeit with amendments to avoid any inconsistencies		
SP4: Placemaking	No	• Effective • Consistent with national policy	Yes	Yes		These representations have been prepared and submitted by Savills on behalf of various clients including Taylor Wimpey, Crest Nicholson, Barratt Redrow, and Vistry Group. This draft policy encourages robust design processes taking into consideration the eight bullet points listed. The overarching aspiration is supported and the objective of creating high quality places that respond to their local context and create safe, attractive and desirable buildings and spaces which function well to serve the community, is shared by our clients. The policy is, however, a generalisation of policy provisions which are covered in detail elsewhere in the draft Local Plan, taking the first three bullet points for example: • "Are of high quality architecture, landscaping, design and layout" – covered in detail by Policy DP1 (High Quality Design). • "Reflect, protect or enhance local character including local heritage" - covered in detail by Policy DP38 (Landscape) and Policy DP40 (Built Heritage). • "Contribute positively to addressing the climate and nature emergencies and are future-proofed against changing climatic conditions" - covered in detail by Policy DP5 (Climate Change Adaptation and Resilience). Paragraph 21 of the Framework, explains that strategic policies 'should be limited to those necessary to address the strategic priorities of the area … to provide a clear starting point for any non-strategic policies that are needed. Strategic policies should not extend to detailed matters that are more appropriately dealt with through … other non-strategic policies'. Further, paragraph 16(f) of the Framework requires plans to 'serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area'. Strategic policies are only needed where they are dealing with genuinely strategic matters. Not all subsequent detailed policies need to have a related strategic policy. Placemaking is one such area. As		

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						important as it is, it is not a ‘strategic’ issue and the positive objectives of the policy can just as easily be achieved by the more detailed development management policies. In light of the above, and for consistency with the Framework, we consider it would be preferable to appropriately convert this policy into supporting text which, in effect, sets the scene for the detailed development management policies which follow later in the draft Plan. Notwithstanding, if the policy is retained then changes are required to the final two paragraphs in order to ensure the policy approach is not in conflict with the Framework. Policy SP4 requires a Community Engagement Statement (CES) for all major applications (10+ dwellings / 1,000m²) and expects collaboration with local communities. This reads as a de facto requirement for early engagement before submission of a planning application. Paragraph 41 of the Framework makes clear that local planning authorities “cannot require … but where they think this would be beneficial, encourage any applicants who are not already required to do so by law to engage with the local community … before submitting their applications.” Additionally, paragraph 137 of the Framework says early, proactive engagement is looked on more favourably, i.e. it’s incentivised, not prescribed. Policy SP4 also introduces an expectation that development will be the subject of design review. Whilst our experience is that design review can be helpful, particularly on larger developments, it is not a process which should be written into policy as an expectation. The Design Review Panel operating in the West of England – Design West – operates on a commercial basis, with applicants required to paid for their scheme to be reviewed. Whilst it can be encouraged, it is not appropriate for policy to oblige an applicant to use an external paid for service. These aspects of the policy render it inconsistent with national policy and therefore unsound. If it is not deleted, in order to remedy this unsoundness, it is proposed that Policy SP4 is modified to encourage early engagement and design review rather than require or expect them		
SP8: Housing	No	‣ Positively prepared ‣ Consistent with national policy	Yes	Yes		Summary of Representation • The consortium support the use of the latest Standard Method output to calculate the housing requirement over the 15 year plan period. • If the Inspectors come to the conclusion through the Examination process that there should be an uplift to the housing requirement in order to accommodate a proportion of the unmet needs of Bristol, the groundwork to facilitate this during the Examination has been undertaken and the local authority could move swiftly to allocate further land for residential development if required to do so. 1. These representations have been prepared and submitted by Savills on behalf of various clients including Taylor Wimpey, Crest Nicholson, Barratt Redrow, and Vistry Group. 2. Some clients have specific sites in North Somerset which are either allocated or being promoted for development as omission sites, others do not have site specific interests but wish to ensure that the North Somerset Local Plan positive supports future housing development and provides a positive policy context. 3. Representations were submitted at the previous Regulation 19 Stage in October 2023. Since that time there has been a significant uplift in the housing requirement in order to accommodate the output of the revised Standard Method published in December 2024. That uplift and the increase over the plan period will ensure that North Somerset delivers sufficient housing to meet its own needs during the lifetime of the plan, consistent with the relevant provisions of the Framework. 4. The one area related to the housing requirement that we commented upon extensively at the previous Regulation 19 stage was the need to accommodate a proportion of the unmet housing needs from Bristol City. In the time since those representations, the Bristol Local Plan has progressed into the Examination stage and the other local authority with the Bristol Housing Market Area – South Gloucestershire – has consulted upon a Regulation 19 Local Plan and subsequently submitted it for Examination. 5. The Inspectors examining the Bristol Local Plan have advised in their Examination Note IN11 (dated 21 November 2025) that the housing requirement should be increased from 1,925 dwellings per annum (dpa) to 2,218 dpa. The Inspectors have also concluded in the same Note that: “The Council must also set out what the level of unmet housing need is. While the objectively assessed housing need may change over time, we consider it necessary for this Plan to be clear about the situation at the time of adoption. This may, for example, be important in continuing work being done on other Plans. MMs should be drafted to paragraph 6.8 to set out what remaining need exists”. 6. Based on the current Standard Method output (from May 2025), the updated housing requirement for Bristol City proposed by the Inspectors falls 745 dpa short of the identified level of need1 and the South Gloucestershire Local Plan proposes a housing requirement which falls 195 dpa short of the identified level of need2.		

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						7. Across the Housing Market Area, there is therefore a shortfall of 940 dpa and, as far as we can see, no mechanism in place to grasp the nettle and proactively accommodate these homes. For the Local Plan to be sound it must be ‘consistent with national policy’ in the Framework and be ‘positively prepared’. At the present time the Local Plan does not seek to accommodate the unmet housing need arising from the wider HMA and, unless justified, there is potential for the Inspector(s) at the Examination stage to require an uplift to the housing requirement for North Somerset in order to accommodate a proportion of this overall shortfall. Should they do so, the process that the local authority has followed in evaluating the potential contribution from, and sustainability of, additional sites through the consultation in early 2025 places it in a strong position to introduce further allocations through the Examination process. There would no doubt be a need to evaluate the potential additional sites further and to engage with the relevant developers but the ground work has been done to enable the Examination to progress swiftly		
SP11: Historic and natural environment	No	• Justified • Effective • Consistent with national policy	Yes	Yes		These representations have been prepared and submitted by Savills on behalf of various clients including Taylor Wimpey, Crest Nicholson, Barratt Redrow, and Vistry Group. This draft policy sets out the approach to the determination of planning applications impacting upon green infrastructure and the historic environment. In so doing, the Policy is seeking to cover a lot of ground and only therefore touches upon some policy areas at a very high level, often with a short sentence. The challenge with covering these policy requirements in such a summary form is the potential for inconsistencies with national policy. This is what has happened with Policy SP11 and there are various components of the draft policy which need to be revisited. By way of example, we highlight three elements of the policy which are inconsistent with the Framework, each considered in turn below. A) ‘Preserve and enhance conservation areas, listed buildings, buildings of local significance, scheduled monuments other archaeological sites, registered and unregistered historic parks and gardens’ 4. The Framework states that “when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be)” (paragraph 212). It goes on to state that “any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification” (paragraph 213). Paragraph 214addresses proposals which would lead to a substantial harm to heritage, stating that ‘local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss or all of the following apply’. 5. Paragraph 215 explains how decision takers should approach development which would “lead to less than substantial harm to the significance of a designated heritage asset”. In such circumstances “this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use”. 6. The draft policy establishes a different test to that set out in the Framework, requiring development to ‘preserve and enhance’ heritage assets rather than allowing the level of harm to the significance of the heritage assets to be assessed, followed by an evaluation of whether the level of harm is outweighed by the public benefits arising from the development. B) ‘Conserve and enhance the landscape and scenic beauty of the Mendip Hills National Landscape and the wildlife and cultural heritage, including ensuring that development in its setting is sensitively located and designed to avoid or minimise adverse impacts’ 7. Paragraph 189 of the Framework states that “great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues” (emphasis added). Whilst much of the wording is similar, the removal of the emphasised text above changes the nature of this policy test from a factor which should be considered in the planning balance, albeit with great weight, to a binary test which excludes other considerations. In effect it therefore goes above and beyond National Policy and applies a test which, in		Policy SP11 (Historic and Natural) for Various (Dec 25).pdf

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						many instances will be unachievable. If the policy is retained, to be sound this criteria must be revised to more accurately reflect the provisions of the Framework. C) 'Protection of the best and most versatile agricultural land' 8. Paragraph 187 of the Framework states that 'Planning policies and decisions should contribute to and enhance the natural and local environment by: ... b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland' (emphasis added). The draft policy goes far beyond national policy in applying a blanket requirement to protect the best and most versatile agricultural land, rather than requiring its economic and other benefits to be recognised and taken into consideration in determining planning applications. D) 'Retain existing trees and support new planting, including street trees, and woodland creation to help increase district-wide canopy cover' 9. While retention of existing trees is desirable, this wording reads as an absolute expectation, which is inconsistent with the NPPF's proportionate approach. Paragraph 136 of the Framework states that "Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and that existing trees are retained wherever possible" [emphasis added]. SP11 should therefore qualify retention using the same caveat, recognising that some tree loss may be unavoidable when balancing competing policy objectives such as housing delivery and infrastructure. 10. In light of the examples above, and in order to satisfy the requirements of Paragraph 35 of the Framework, we recommend that the draft policy wording is revised in line with the Framework. An alternative approach, and one we prefer, is to remove this draft policy from the plan and to instead rely upon the subsequent development management policies set out later in the draft plan. This would remove duplication and be consistent with the Framework which states that 'Strategic policies should not extend to detailed matters that are more appropriately dealt with through ... other non-strategic policies' (paragraph 21). The deletion of this policy would also ensure that there is no duplication or confusion once the National Development Management Policies are published alongside the December 2025 update to the Framework See attached document for underlined text/emphasis added.		
Policy DP1: High quality design	No	• Effective	Yes	Yes		These representations have been prepared and submitted by Savills on behalf of various clients including Taylor Wimpey, Crest Nicholson, Barratt Redrow, and Vistry Group. This draft policy focuses on the detailed aspects of design and the requirements for different forms of development. Our clients are thoroughly committed to the delivery of high quality design and support a policy framework that helps to achieve that objective. The comments made below and the suggested changes are aimed at enabling both effective decision making and high quality design outcomes. As an overarching point, the current draft of the policy is very lengthy. In a number of places it covers matters that are already the subject of other policies or Council documents and therefore do not need to be duplicated here. Below we suggest specific areas where changes could be made to streamline the policy wording, without compromising on the quality of outcomes that it will achieve, however, we would also be supportive of more comprehensive revisiting of the policy wording with a view to further streamlining and the removal of duplication - suggested changes to policy wording are contained in the attached document.		Policy DP1 (High Quality Design) for Various (Dec 25).pdf
Policy DP5: Climate change adaptation	No	• Positively prepared	Yes	Yes		These representations have been prepared and submitted by Savills on behalf of various clients including Taylor Wimpey, Crest Nicholson, Barratt Redrow, and Vistry Group. This draft policy sets out ways in which development can be designed to demonstrate that the vulnerability		Policy DP5 (Climate Change) for Various (Dec

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and resilience		• Effective				to climate change has been taken into consideration. Our clients support the principle of what the draft policy seeks to achieve, i.e. encouraging new development to be resilient to the impacts of climate change. However, they have one detailed objection to this policy. The requirements to 'protect existing … green and blue infrastructure including peatlands, wetlands and woodlands' (heading 2, bullet point 1 (emphasis added)) and 'protect existing … biodiversity' (heading 2, bullet point 2) should be removed. The inclusion of the word 'including' suggests that the list that follows is not closed. The effect of the policy is therefore to protect (i.e. retain unchanged) all green and blue infrastructure. As such, these requirements are unnecessarily onerous and imprecise and, thereby, ineffective. Furthermore, they do not take into consideration the quality of existing green/blue infrastructure and biodiversity features or the principle of mitigating e.g. it may be that a higher percentage of biodiversity net gain could be achieved through the removal of existing poor quality habitats and the provision of new high quality habitats. See attached document for emphasis added.		25).pdf
Policy DP6: Net zero construction	No	• Consistent with national policy	Yes	Yes		These representations have been prepared and submitted by Savills on behalf of various clients including Taylor Wimpey, Crest Nicholson, Barratt Redrow, and Vistry Group. Draft Policy DP6 seeks to establish a series of standards for new residential and non-residential buildings relating to embodied carbon, fabric efficiency in new buildings and the generation of on-site renewable energy. Whilst we acknowledge the desire to establish ambitious targets for future development in North Somerset, for the reasons explained below, we do not consider the proposed policy approach to be consistent with national policy and therefore sound. On 13 December 2023 there was a Written Ministerial Statement (WMS) published by the Minister of State for Housing, Lee Rowley, which directly addresses policies such as DP6. The WMS includes a number of statements which are pertinent to the soundness of the draft policy:a) "The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government's commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. .b) Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well⟐reasoned and robustly costed rationale that ensures:• That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework.• The additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP) c) Where plan policies go beyond current or planned building regulations, those polices should be applied flexibly to decisions on planning applications and appeals where the applicant can demonstrate that meeting the higher standards is not technically feasible, in relation to the availability of appropriate local energy infrastructure (for example adequate existing and planned grid connections) and access to adequate supply chains.d) To be sound, local plans must be consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework and other statements of national planning policy, including this one". [emphasis added] In June 2024, a legal challenge against the 13 December 2023 WMS was heard in the High Court on three grounds: failure to consider environmental principles under the Environment Act 2021, unlawful constraint of local planning authority powers under the Planning and Energy Act 2008, and misdirection regarding the presumption in favour of the development plan. The challenge was unsuccessful on all counts. In June 2025, an appeal of the above verdict was heard, and the Court of Appeal dismissed the claim and maintained that the 2023 WMS represents a sound interpretation of the legislation by setting the parameters under which the Government expects the legislation to be applied, namely that an LPA is able to set a local standard up to the level of the draft Future Homes Standard. It is clear from the WMS that the Government considers the Building Regulations to be the preferred and primary mechanism to deliver improvements in energy efficiency and reduce the carbon emissions from development. There are a number of reasons why such an approach is supported and considered to be		Policy DP6 (Net Zero) for Various (Dec 25).pdf

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						appropriate and sound. First, there is a logical cut off point between the two statutory regimes which it is helpful to remain separate. Planning is concerned with matters such as the location, form and design of new development, and Building Regulations controls matters of detailed design and construction such as building fabric, fire safety, access etc. These two statutory regimes are both equally important but have necessarily separate application and approval processes which reflect the stage at which they are applied to development and the knowledge of building form and fabric which is available at each stage. There is a good logic to maintaining a clear separation between these two regimes. Planning has an extremely important role to play in reducing carbon emissions and tackling the climate emergency but it should seek to achieve this through policies which direct and 'plan' for development in a sustainable manner; it should not seek to stray into territory which is better achieved through nationally prescribed Building Regulations. According to Government published statistics from 2021, the largest contributor to greenhouse gas emissions in the UK is transport. Indeed, the movement of people and goods accounts for approximately 26% of emissions, considerably more than residential emissions which account for 16%1. The plan-making process therefore has an extremely important role to play in addressing the NSC declared climate emergency without stepping into and duplicating policy areas which are better addressed at the Building Regulations stage of the development process. Second, as expressed at Policy (c) above, the Government has strategic (i.e. beyond local authority level) concerns over the capacity of the current grid to accommodate additional local energy infrastructure and the availability of supply chains to meet the need for new building technologies that are required to achieve tightening standards. The former is a particular concern for a policy approach such as that proposed in Policy DP6. Draft Policy DP6 proposes that "on-site renewable energy generation is maximised, equivalent to at least the onsite energy demand". In order to meet this target it is inevitable that off-plot renewable energy will be required as very few buildings have sufficient roof space to accommodate PV panels which would meet the building's operational energy demands. Any renewable energy generated which is not provided within a build demise would need to have a connection to the grid. This results in a number of complications over ownership of the energy infrastructure, the establishment of energy supply companies, grid connections etc which are highly likely to preclude the technical and financial viability of achieving the draft policy requirement. Third, it is important to consider the policy in the context of the changing national requirements emerging through Building Regulations. The Future Homes Standard is expected to be implemented in England by December 2027, following the final regulations expected to be published at the end of 2025 and becoming 1 https://www.gov.uk/government/statistics/final-uk-greenhouse-gas-emissions-national-statistics-1990-to-2021 law in December 2026. This will necessitate all new homes to achieve the Future Homes Standard and be net zero ready. Then in 2030, the Government is committed to having decarbonised the grid. Consequently, homes built to the Future Homes Standard during the early years of the plan period will operate with very low carbon emissions, meaning that the difference between national standards and local plan requirements will diminish significantly over time. Conclusion Our clients consider the emerging policy approach to be unsound - it is plainly not consistent with national policy as the requirements of the policy are not expressed as a percentage uplift from the TER as now required by the WMS. The next logical question that follows is whether, in light of the WMS, there is merit in including a policy in the DLP or instead relying upon Building Regulations. For the reasons set out above, our clients consider that there are good reasons to delete draft Policy DP6 rather than modify it. The DLP can then focus on ensuring development is directed towards sustainable locations (a matter covered in more detail in other representations) and leave the Building Regulations regime to control the detailed standards for building		

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						fabric and energy generation. Such an approach would be entirely consistent with the Government's expectation for the plan-making process		
Policy DP8: Efficient use of land	No	• Justified • Consistent with national policy	Yes	Yes		These representations have been prepared and submitted by Savills on behalf of various clients including Taylor Wimpey, Crest Nicholson, Barratt Redrow, and Vistry Group. This draft policy seeks to encourage development on vacant and previously developed land and optimal use of land more generally. The draft policy wording states: 'The minimum target density will be 40 dwellings per ha, but this should be higher at accessible locations. In all cases density should respect and complement the character of the surrounding area.' Whilst our clients support the efficient use of land and the associated benefits it brings, adopting a minimum density target fails to acknowledge site context and constraints. Each and every development opportunity must be considered on its merits and in the context of its surroundings. Two sites that directly adjoin each other could prove to be optimized by very different development densities. Minimum density requirements are a very blunt tool and are incapable of providing the nuanced response to site specific considerations which is necessary to achieve the approach specified in paragraph 130 of the Framework. If the starting point for the authority is an unrealistic density range then there will likely be as many exceptions to the rule as there are schemes which are policy compliant. Notwithstanding, the draft policy wording and Justification text approach density in a different manner, and apply potentially contradictory standards. The Justification text states:'The NPPF does not specify minimum density targets and considers that density levels should be set by local authorities to reflect local circumstances. Within North Somerset the minimum target net density will be 40 dwellings per hectare within the developable area. However, this is an average and the appropriate density will vary depending on local circumstances. Within accessible locations such as town and local centres and transport hubs there will be a presumption in favour of higher densities as this can help increase vitality and viability in these areas, support public transport and provide different types of accommodation.' [emphasis added] The '40 dwellings per ha' figure is stated to both be a 'minimum' and an 'average'. Since this policy will be used to assess and determine planning applications there must be clarity in how it is to be applied to individual planning applications across the local authority area. Rather than seeking to establish fixed density ranges through the plan, we strongly recommend the authority instead encourage efficient use of land where it is appropriate to do so and in the context of the five considerations specified under paragraph 129 of the Framework		Policy DP8 (Efficient Use of Land) for Various (Dec 25).pdf
Policy DP16: Active travel routes	No	• Justified • Effective				These representations have been prepared and submitted by Savills on behalf of various clients including Taylor Wimpey, Crest Nicholson, Barratt Redrow, and Vistry Group. This draft policy seeks to safeguard and enhance active travel routes and ensure new development provides safe, direct connections to them. The vast majority of the policy is supported by our clients, who recognise the benefits of integrating active travel infrastructure into new development proposals. It is important that the form and type of active travel infrastructure is proportionate to its intended use and the intensity of that use. There can at times be an aspiration on the part of active travel consultees to seek over-engineered infrastructure which, whilst not itself objectionable, has implications for the width of movement corridors and can result in the less efficient use of land. A balanced approach is therefore required in the implementation of this policy which ensures that infrastructure is both appropriate and justified. Furthermore, the primary focus of new active travel infrastructure should be to replace journeys which would otherwise be made by car with a safe and convenient active alternative. It is with this in mind that we have one specific objection to the draft policy wording. The draft policy states that:'Where a new or improved active travel route is proposed, it shall be designed for use by pedestrians including those who use mobility aids, cyclists and where possible for equestrian users, unless appropriate evidence demonstrates that the route should be limited to specific users.'		Policy DP16 (Active Travel) for Various (Dec 25).pdf

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						While our clients support inclusive design, a default position which requires equestrian access in all cases is not appropriate and would likely conflict with the safe and efficient use of the active travel network, particularly in urban or higher-density contexts. Since the use of horses is almost exclusively a leisure activity, this is also not necessary to achieve the primary objective of maximising active travel as an alternative to the car. We therefore recommend that the text “and where possible for equestrian users” should be deleted. As an alternative, this could be replaced in the supporting text of the policy with an encouragement for applicants to consider whether new routes should be made suitable for equestrian use in specific circumstances where the route would enhance or complete an identified equestrian route		
Policy DP35: Nature conservation	No	• Consistent with national policy	Yes	Yes		These representations have been prepared and submitted by Savills on behalf of various clients including Taylor Wimpey, Crest Nicholson, Barratt Redrow, and Vistry Group. We broadly support the approach adopted within this policy, which aims to conserve biodiversity. However, there are aspects of the policy to which we object. The first paragraph under the heading ‘Sites of International and National Importance’ should be amended to reflect the provisions of the Conservation of Habitats and Species Regulations 2017. In particular, the binary test of the first sentence which states ‘Development which would have an adverse impact on identified sites of international importance (which include Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites) will not be permitted’ (emphasis added) should be removed or amended. This sentence is contrary to the steps undertaken through a Habitat Regulations Assessment, which include an Appropriate Assessment (where mitigation of adverse effects is explored) and Derogation (which allows consideration as to whether proposals that would have an adverse effect on a European site qualify for an exemption). The draft policy wording goes on to state that ‘Development within or in proximity to a Site of Special Scientific Interest (SSSI) or National Nature Reserve that is likely to have a direct or indirect adverse effect on its biodiversity or geological interest will not normally be permitted’. This wording is similar to but not the same as Framework Paragraph 193 bullet point b) and importantly omits the exception (being ‘where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest’). Local Plan policies must be careful when paraphrasing national planning policy to ensure they accurately reflect the approach set out in the Framework in its entirety. As such, the wording should be amended or removed as appropriate. Additionally, DP35 states that application proposals will be required to demonstrate ‘that the principles set out in Building with Nature have been addressed to ensure that developments take advantage of opportunities to enhance the built environment for nature.’ Building for Nature is a non-statutory tool developed in a collaboration between Gloucestershire Wildlife Trust and the University of the West of England. It’s principles go beyond the mitigation of ecological impacts and seek to secure a biodiversity gain. With the advent of Biodiversity Net Gain and it’s enshrinement in national legislation, there is no need to add a further regulatory burden on development by which goes beyond the mitigation of impacts. This aspect of the policy should therefore be deleted See attached document for emphasis added.		Policy DP35 (Nature Conservation) for Various (Dec 25).pdf
Policy DP36: Biodiversity Net Gain	No	• Effective • Consistent with national policy	Yes	Yes		These representations have been prepared and submitted by Savills on behalf of various clients including Taylor Wimpey, Crest Nicholson, Barratt Redrow, and Vistry Group. Draft Policy DP36 aims to ensure development delivers at least a 10% biodiversity net gain (BNG) by following the biodiversity hierarchy, prioritising on-site habitat retention and enhancement, and using off-site mitigation only where necessary. Whilst we acknowledge the Council’s ambition to secure biodiversity improvements, we do not consider the proposed policy approach to be consistent with national policy and therefore sound, for the reasons set out below.		Policy DP36 (BNG) for Various (Dec 25).pdf

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						Planning Practice Guidance states: ‘BNG is an approach to development. It makes sure that habitats for wildlife are left in a measurably better state than they were before the development. In England, BNG is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Developers must deliver a BNG of 10%. This means a development will result in more or better quality natural habitat than there was before development’. Framework Paragraph 16(f) states that Local Plans should avoid ‘unnecessary duplication of policies that apply to a particular area’. Since BNG is a statutory requirement and therefore on the same footing as the Local Plan, Policy DP36 represents an unnecessary duplication. PPG (Paragraph 007 Reference ID: 74-007-20240214) reinforces this stating that ‘Plan-makers should be aware of the statutory framework for biodiversity net gain, but they do not need to include policies which duplicate the detailed provisions of this statutory framework’. Additionally, Policy DP36 states that ‘in all cases, proposals must demonstrate how BNG will be implemented and monitored’. This goes beyond the statutory framework, which requires a Biodiversity Gain Plan and 30-year maintenance secured by legal agreement but does not mandate universal monitoring plans. PPG (Paragraph 007 Reference ID: 74-007-20240214) encourages monitoring as good practice and suggests LPAs may update enforcement plans, but it does not impose a blanket requirement. Making monitoring mandatory for all proposals introduces unnecessary burdens and renders the policy inconsistent with the Framework. To conclude, including this policy would create unnecessary duplication, as BNG is already a statutory requirement. The PPG advises against duplication. Furthermore, if national policy on BNG changes, retaining this policy locally could result in uncertainty and unnecessary complexity. We therefore recommend that this policy is deleted. See attached document for underlined text and emphasis added.		
Policy DP37: Trees, Woodlands and Hedges	No	• Justified • Effective	Yes	Yes		These representations have been prepared and submitted by Savills on behalf of various clients including Taylor Wimpey, Crest Nicholson, Barratt Redrow, and Vistry Group. This draft policy covers the protection of existing trees and woodland as well as new planting. Although we support the general principle of what the draft policy seeks to achieve, there are a number of aspects which require further consideration. These are addressed in turn below. A. ‘The equivalent of a minimum of one tree per dwelling is planted, to be located in gardens where practical or within community gardens;’ - No justification or evidence is offered to underpin this as a formula. It also gives no consideration to site specific characteristics. - Notwithstanding the above, on a point of practicality, we don’t believe that encouraging tree planting within gardens ‘where practical’ is necessarily desirable, for the following reasons:• Planting trees within the demise of dwellings places the responsibility for their maintenance and longevity with individual residents, as opposed to a management company or other party, making it more likely that they are removed.• This takes no account of the specifics of the dwellings and gardens in question, such as topography, residential amenity or practicalities of maintenance. - For the reasons above, we recommend that reference to planting within gardens be removed from the draft policy. B. In exceptional circumstances where loss is unavoidable and fully justified, a suitable compensation strategy for replacement of trees, hedgerows, or to rectify damage (direct or indirect) to woodland is identified’ -It is not clear whether this requirement relates to all existing trees or whether it specifically applies to certain trees such as veteran or champion trees. No definition is offered, however, if this requirement is intended to relate to all trees (and hedgerows), it is overly onerous. There are many circumstances where the		Policy DP37 (Trees) for Various Dec 25).pdf

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						removal of trees or hedgerows is required in order to facilitate development and/or achieve high quality design and masterplanning. These situations are commonplace and should not be limited to 'exceptional circumstances'. -Furthermore, it is unclear what would be required by a 'suitable compensation strategy'. Is such a strategy intended to secure financial compensation for the loss of trees, in which case any payment must be CIL Regulation 122 test compliant, or alternatively, is the policy seeking on-site compensation through replacement tree planting. If the latter then there are already statutory provisions in the Environment Act to secure BNG, part of the assessment of which requires a net gain in 'hedgerow units'. To secure BNG applicants are already incentivised to retain as much valuable habitat on site as possible and this aspect of Policy DP37 is not therefore considered necessary. C. 'Proposals for off-site provision is made where tree planting is not appropriate or practical on site' 8. This requirement lacks specificity and, therefore, is not appropriate as part of a policy for decision making. If this aspect of the policy is retained, it should be made clear in what circumstances tree planting will be considered to be 'not appropriate or practical on site'		
Policy DP40: Built Heritage	No	• Consistent with national policy	Yes	Yes		These representations have been prepared and submitted by Savills on behalf of various clients including Taylor Wimpey, Crest Nicholson, Barratt Redrow, and Vistry Group. Policy DP40 sets out requirements for development proposals that affect conservation areas and listed buildings. Amongst other things it requires that: • 'New development should not cause harm to the existing character and appearance of the Conservation Area and wherever possible positively enhance it'. • 'New development affecting the setting of a Conservation Area or listed building should seek to preserve those elements of the setting that make a positive contribution and, where possible, better reveals the significance of the Conservation Area or listed building'. • 'Development will be expected to preserve and where appropriate enhance the character, appearance and special interest of Conservation Areas and listed buildings and their settings'. All three of these extracts propose a threshold of "no harm" or "preserve" – a binary starting point where no harm is acceptable. The Framework, however, seeks to balance harm against public benefits, even in circumstances where substantial harm will occur. It states that 'when considering the impact of a proposed development on the significance of a designated heritage asset, great weight1 should be given to the asset's conservation (and the more important the asset, the greater the weight should be)' (paragraph 212). 4. It goes on to state that 'any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification' (paragraph 213). 5. Paragraph 214 then explains that if a 'proposed development will lead to substantial harm to … a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss' or all of the criteria outlined apply. 1 Underlining here and throughout the remainder of the response to this draft policy has been added by Savills as emphasis. 6. Paragraph 215 addresses the considerably more common situation where development proposals would result in 'less than substantial harm' to a heritage asset. In such circumstances, it states that 'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'.		Policy DP40 (Built Heritage) for Various (Dec 25).pdf

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						7. Whilst we recognise the need to have careful and considered regard to designated heritage assets, the current proposed policy wording is unduly prescriptive and conflicts with the more nuanced / judgement◈based approach set out in paragraphs 212–215 of the Framework. 8. The Framework offers a clear and well-established methodology for assessing harm and balancing public benefits, ensuring decisions are justified and transparent. Aligning Policy DP40 with this approach will support effective, consistent decision-making and safeguard heritage assets without imposing unrealistic requirements. It will also remedy the current unsoundness of the draft Policy DP40 See attached document for underlined text/emphasis added.		
Policy DP41: Archaeology	No	‣ Justified ‣ Effective	Yes	Yes		These representations have been prepared and submitted by Savills on behalf of various clients including Taylor Wimpey, Crest Nicholson, Barratt Redrow, and Vistry Group. This draft policy sets out how archaeological interests should be considered as part of development proposals. Below ground archaeology is an important planning consideration in the determination of planning applications and it is helpful for developers to have a clear policy approach which establishes the Council's expectations. It is important therefore that the policy establishes a clear, reasonable and proportionate approach to the evaluation of archaeology. As currently drafted we consider the approach lacks clarity and is not therefore effective or sound. Our clients do not object to undertaking archaeological evaluations, however given the potentially substantial costs involved (which can run well into the hundreds of thousands of pounds on a large site) they do want to ensure that an appropriate extent and form of evaluation is undertaken which reflects the particular circumstances of each site, and the likelihood of there being below ground archaeology. On that basis we advocate the following stepped / cascade approach in the policy. First, and for all sites, there should be a desk-based assessment. This assessment will reveal whether there is a reasonable likelihood of the site containing archaeological remains. Second, when deemed appropriate and necessary as an outcome from the desk-based assessment, a geo◈physical survey should be undertaken to establish whether there are any below ground structures or disturbances which require further investigation. Third, if the geo-physical survey does reveal anomalies in the ground which warrant further excavation then a targeted (as opposed to percentage site-wide) archaeological investigation should be undertaken to investigate these further. We consider this stepped approach to be proportionate at the pre-application stage as it is highly likely to identify any archaeology on the site which is of such significant that it requires preservation in situ and ensures that the location of the archaeology informs the planning application proposals. Subsequent archaeological evaluation conducted post-determination as a condition of the permission may identify further areas of interest, however, the likelihood is that this would not require preservation in situ, could therefore be excavated and recorded, and would consequently not impact upon the ability to deliver the planning permission. In the highly unlikely event that post-determination archaeological evaluation does require preservation of remains then this may lead to a change in the proposals as suggested in the fifth paragraph of the policy. The prospects of this is however extremely low and this risk is outweighed by the proportionate approach at the pre-submission stage. We strongly advocate a rewording of the policy to reflect the stepped approach set out above so that there is a clear, proportionate and effective policy requirement. The other aspect of the policy which we consider to be unsound is the third paragraph, and specifically the texted underlined in the extract below. "Development proposals that would affect archaeological remains will be expected to demonstrate, by a thorough understanding of the significance of the asset, how any change proposed would preserve and,		Policy DP41 (Archaeology) for Various (Dec 25).pdf

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						where appropriate, enhance their significance. If there is any perceived harm to any heritage asset this harm will need to be fully justified and weighed against any public benefits of the overall development scheme within the final planning balance" (emphasis added) The policy wording as drafted is internally inconsistent. The first sentence requires that an asset is 'preserved'. It is helpful at times to look back to the ordinary meaning of a word, and in this case 'preserve' is defined in the Cambridge Dictionary as: "to keep something as it is, especially in order to prevent it from decaying or being damaged or destroyed". By definition therefore, if something is 'preserved' then it cannot be harmed. Yet, the second sentence of this paragraph in the policy explains the response if harm is expected to occur. These two policy responses cannot coexist, as an asset is either preserved or harmed. To remove this inconsistency requires a change in the emphasis of the third paragraph of the policy as follows: "Development proposals that would affect archaeological remains will be expected to demonstrate, by a thorough understanding of the significance of the asset, how any change proposed would preserve and, where appropriate, enhance impact upon their significance. If there is any perceived harm to any heritage asset this harm will need to be fully justified and weighed against any public benefits of the overall development scheme within the final planning balance". See attached document for underline text/emphasis added.		
Policy DP42: Historic Parks and Gardens	No	• Justified • Effective • Consistent with national policy	Yes	Yes		These representations have been prepared and submitted by Savills on behalf of various clients including Taylor Wimpey, Crest Nicholson, Barratt Redrow, and Vistry Group. We have explained in our representations to Policies DP40 and DP41 our objections to the use of the word 'preserve' in relation to heritage assets and we have the same objection to Policy DP42. Indeed, we strongly object to the approach adopted in Policy DP42, which aims to protect the historic character and setting of North Somerset's parks and gardens by requiring development proposals to demonstrate no harm through detailed heritage assessments. There is no expectation or requirement in national policy that development would result in 'no harm' to historic parks and gardens or their setting and, as designated heritage assets, they fall under the ambit of the balanced, judgement-based approach set out in paragraphs 212-215 of the Framework. In that respect, paragraph 214 outlines that if a 'proposed development will lead to substantial harm to … a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss' or all of the criteria outlined apply'. Paragraph 215 adds to the above, stating that 'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'. As is the case with the preceding two policies of the Local Plan, Policy DP42 must be modified to bring the tests in the policy into line with those of the Framework		Policy DP42 (Historic Parks Gardens) for Various (Dec 25).pdf
Policy DP46: Housing Type and Mix	No	• Justified • Effective • Consistent with national policy	Yes	Yes		These representations have been prepared and submitted by Savills on behalf of various clients including Taylor Wimpey, Crest Nicholson, Barratt Redrow, and Vistry Group. This policy encourages the delivery of a wide choice of homes to meet a range of accommodation needs, seeking residential developments to provide a mix of housing tenures, types and sizes appropriate to the site size, characteristics and location. On the face of it, the intention of the policy is reasonable, however, there are a number of specific aspects which are either not practical, implementable or sound. The second paragraph introduces a threshold of '10 or more dwellings', beyond which proposals will be 'expected to demonstrate that they have taken account of local needs evidence to, where appropriate, make provision for …' a mix of types and sizes of homes (including bungalows, downsizing properties, retirement accommodation, and accessible homes) and an appropriate proportion of self-build and custom build plots.		Policy DP46 (Type and Mix) for Various (Dec 25).pdf

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						This is an extremely low threshold for such a policy and a significant outlier compared with similar adopted policies in other local plans. The reason that such a threshold hasn't been pursued elsewhere is that it is impractical, inappropriate and in some cases would be unworkable for small-scale developments. Applying these requirements to schemes of this size risks creating unnecessary complexity, design constraints, and viability challenges, without delivering meaningful strategic outcomes. In its place, we recommend that Policy DP46 applies only to sites above 100 dwellings. Furthermore, whilst the policy includes a threshold over which the requirements are applicable, other than in respect of 'accessible and adaptable homes', it refers only to qualifying developments 'making provision for' the listed types of housing. There is no precision in the policy indicating the quantum of each type of home that is required to satisfy the requirements. Accessible and Adaptable Homes The supporting text to the policy states that:'The requirement for all homes to be accessible and adaptable reflects the government's intention to incorporate M4(2) standard into building regulations and ensures more choice, particularly for older people, to live independently for longer which reduces the pressure on the care system'. We have a number of concerns with the blanket application of this requirement to all new homes. First, national planning guidance in the PPG (Paragraph: 007 Reference ID: 56-007-20150327) advises local planning authorities that 'based on their housing needs assessment and other available datasets it will be for local planning authorities to set out how they intend to approach demonstrating the need for Requirement M4(2) (accessible and adaptable dwellings), and/or M4(3) (wheelchair user dwellings), of the Building Regulations.' While we support improving accessibility, the blanket requirement for all homes to meet M4(2) standards remains disproportionate without robust evidence. The Local Plan should set evidence-based targets informed by the Housing Market Assessment and allow flexibility for site-specific constraints as for some sites it would be extremely difficult to provide some or all of the homes as Part M4(2) compliant. Some of these site-specific factors such as vulnerability to flooding and site topography are mentioned specifically in Paragraph: 008 Reference ID: 56-008-20160519 of the PPG. Furthermore, if the Building Regulations are updated after the plan is adopted, this will supersede the planning policy. It is not appropriate however to make policy on the basis of changes the authority consider may take place in a regime outside of planning. Second, building homes to Policy M4(2) compliance can add significant costs. Not only is there specific arrangements for all dwellings which will increase the size of the building floorplates, but other requirements such as a parking bay will also increase land take. 10. In accordance with the PPG, the authority should use the Housing Market Assessment to determine the appropriate target provision for the number of Part M4(2) compliant homes and to insert this into the policy with a degree of flexibility to take into account site specific circumstances. Self-Build & Custom Build The requirement for self-build and custom-build plots remains unclear in terms of quantum and implementation. Hypothetically, if an application is submitted for 10 dwellings and there are 10 individuals registered on the self-build register, does that mean that the Council will seek all of the new homes to be self-build? We assume not, but there is so little certainty in the way in which the policy is to be applied that it could be one interpretation. A clear requirement is needed in the policy which reflects the number of individuals with a genuine interest in self-build as part of a larger housing development. To provide the necessary clarity, the policy should specify a maximum proportion of self build and custom-build plots that will be sought linked to genuine demand on the register, rather than leaving interpretation open-ended. Clear guidance is needed to avoid uncertainty and ensure practical delivery within larger housing developments		

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Policy DP53: Best and most versatile land	No	• Justified • Effective • Consistent with national policy	Yes	Yes	These representations have been prepared and submitted by Savills on behalf of various clients including Taylor Wimpey, Crest Nicholson, Barratt Redrow, and Vistry Group. 2. This policy seeks to protect best and most versatile agricultural land (Grades 1, 2 and 3a of the Agricultural Land Classification, 'BMV land') from "significant, inappropriate and unsustainable proposals". 3. The policy states Grade 1 and 2 BMV land will be safeguarded from development to ensure its long-term potential for food production and to protect the soil resource, with development not to be permitted unless it is for one of the four listed uses. The policy goes on to state that where development is proposed on sites of one hectare or greater on Grade 3a BMV agricultural land, development will only be permitted if one of the listed criteria are met. 4. Paragraph 188 of the Framework states that "Plans should: distinguish between the hierarchy international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other			Policy DP53 (BMV) for Various (Dec 25).pdf

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					policies in this Framework". 5. Footnote 65 goes on to state that "where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. (emphasis added). 6. The draft wording of Policy DP53 goes far beyond the requirements of the Framework which seeks to direct development towards areas of poorer quality land where "significant" development of agricultural land is demonstrated to be necessary. The draft policy wording indicates no threshold and instead appears to apply to development of any size however small. 7. Furthermore, the Framework does not seek to prevent development of BMV land, instead encouraging consideration of the availability of agricultural land used for food production and other policies in the Framework in order to determine which sites are most appropriate for development. As such, agricultural land classification is but one consideration of many to be weighed up when ascertaining locations for sustainable development.			

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					8. It is this interpretation of the Framework that has clearly been adopted in selecting the sites proposed for allocation in the emerging Local Plan. Indeed, there appear to be proposed allocations on Grade 1 & 2 land. Strict adherence to Policy DP53 would render these allocations unimplementable and the policy approach is therefore internally inconsistent. 9. In light of the foregoing, the wording of draft Policy DP53 should be amended in order to ensure consistency with national policy.			
Policy DP63: Infrastructure delivery and development contributions	No	• Consistent with national policy	Yes	Yes		These representations have been prepared and submitted by Savills on behalf of various clients including Taylor Wimpey, Crest Nicholson, Barratt Redrow, and Vistry Group. This policy requires development proposals to provide a contribution towards the cost of infrastructure through Section 106 agreements and CIL. It goes on to lists matters for which contributions may be collected. Residential developments make a very significant contribution towards the delivery of new infrastructure and our clients are proud that they help fund and deliver new schools, health centres, children's play areas etc. The provision of infrastructure alongside new homes must be proportionate and reflect the needs arising from the proposed development. For that reason, we consider that the policy wording should expressly reference the statutory tests in Regulation 122 of The Community Infrastructure Levy Regulations 2010 (as amended), which state that planning obligations must be: a) necessary to make the development acceptable in planning terms; b) directly related to the development; and c) fairly and reasonably related in scale and kind to the development. These tests are reiterated in Paragraph 57 of the Framework and, as such, the draft policy wording should be updated to ensure consistency with national planning policy and provide clarity for users of the Local Plan		Policy DP63 (Infra & Contribs) for Various (Dec 2025).pdf
Policy DP64: Adoption of open space and green infrastructure	No	• Justified • Effective • Consistent with national policy	Yes	Yes	These representations have been prepared and submitted by Savills on behalf of various clients including Taylor Wimpey, Crest Nicholson, Barratt Redrow, and Vistry Group. Policy DP64 'expects and encourages'			Policy DP64 (Adoption of Open Space) for Various (Dec 25).pdf

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					adoption of open space and green infrastructure by the Council or community, with safeguards for maintenance. Policy DP64 states: 'Developers will implement the infrastructure to the Council's required standards, pay supervision and adoption fees and commuted sums to fund the reasonable costs of its future maintenance' There is no clear evidence base demonstrating why adoption by the Council is necessary in all cases, particularly where robust private management arrangements can achieve the same outcomes. The justification provided focuses on risks of private management failure, but these risks can be mitigated through site-specific planning conditions and Section 106 agreements, without imposing blanket adoption requirements. Long-term maintenance and quality control can already be secured through planning conditions, Section 106 agreements, and management company arrangements, making the policy unnecessary and duplicative. The proposed approach risks creating administrative burdens for the Council and developers without clear added value.			

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					Policy DP64 is unsound because it is not justified, is overly prescriptive, and fails to demonstrate consistency with national policy.			

Name: Veronique Herzog **I.D:** 58533921

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Pill Green	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The Plan is unsound (not justified, not effective, and not consistent with national policy) and raises concerns about legal compliance and Duty to Cooperate. Key points: Sustainability Appraisal fails SEA Directive – No assessment of brownfield alternatives to Pill Green (Quote Reg 12 / 2024 Brownfield Register: 2,800+ units ignored) No Duty to Cooperate on Bristol's 8,000 unmet need (none shown in Pill allocations), no Statement of Common Ground on Bristol's 1,100-home dump in Pill/Easton-in-Gordano. Green Belt exceptional circumstances not evidenced (NPPF 147), parcel identified as high-performing agricultural land; no sequential test. 44% population bomb on Pill & Easton in Gordano - disproportional & unjustified(600 homes = 24% from one site alone) No deliverability plan for A369, M5 J19,	Delete the Pill Green Site (600 homes) from the LP8 Schedule of Sites or amend Policy LP8 as follows: "No development on Pill Green until exceptional circumstances are independently verified (NPPF para 147) and sequential testing confirms no viable non-Green Belt alternatives are available, prioritising brownfield sites in Weston-super-Mare, Portishead and Bristol fringe. Cap total LP8 allocation across all sites; require full funding (via s106/CIL agreements) for flood defences to 1-in-1000 year standard + 45% climate change allowance, A369 and M5 J19 capacity upgrades, and additional school and GP places alongside associated additional communal infrastructure before granting outline permission. Insert new para 6.79: 'Allocations must demonstrate no disproportionate impact on village populations, defined as <5% increase per site without evidenced need. Allocation in villages with a population under 10,000 must not result in population increase of more than 5% from any single site unless exceptional circumstances are independently verified and full infrastructure delivery (transport, education, health, drainage) is secured upfront via s106/CIL. Cumulative impacts across all sites within a settlement must not exceed 20% without a master planned, funded delivery strategy."	N/A	

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					schools or drainage by 2041 (Pill Green undeliverable = ineffective) Brownfield first policy ignored – 2,500+ viable urban units still available (Weston, Portishead, Bristol fringe). Pill Green breaches NPPF 159 – No sequential test for non-Green Belt sites (excellent sustainable transport links make urban/brownfield viable) Request independent verification of “exceptional circumstances” before any Pill Green consent. Cap village growth at <5% per site SEA/SA does not demonstrate reasonable alternatives for Pill/Easton-in-Gordano. No updated Statements of Common Ground with Bristol, B&NES, South Gloucestershire, WECA reflecting higher housing numbers and transport dependencies. Failure to agree redistribution of unmet Bristol need or cross-boundary transport mitigation. No evidence of active cooperation on strategic Green Belt approach.			

Name: Verto Homes **I.D:** 58534081

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP2: Climate Change	No	• Justified • Consistent with national policy	Yes	No	Firstly, it is inappropriate to expect every development proposal to meet/demonstrate compliance with every criterion within SP2, simply some of the criteria just won't apply, and some will be superseded in time by other national policy and regulations. Hence the policy should be amended to acknowledge this. Further, the reference to 'minimise energy use and deliver a net zero energy standard in new building' is unachievable. Verto is fully committed to sustainability including in the ongoing zero-carbon operation of buildings, but all buildings will require energy from some source. The point is to contribute towards the national commitment to net zero future with reference to greenhouse gas emissions (carbon). In terms of building, the NPPF consistently refers to 'low carbon' measures, rather than zero carbon. Where net zero carbon is achieved then the NPPF directs this to be given significant weight in the planning balance. A policy expectation for all developments to achieve a net zero (carbon) standard detracts from this benefit weighting.	SP2 should be amended to ready, "…In order to reduce the overall environmental impact of development, where relevant, proposals will be expected to demonstrate how they:…" and then, "Minimise energy use and deliver a low carbon energy standard in new buildings."		Representation form Part B_SP2 Climate Change.docx
SP3: Spatial strategy	No	• Positively prepared • Effective • Consistent with national policy	Yes	No	Support is given to locating new residential development close to urban areas, broadly termed under the justification as a sequential approach. However, whilst the policy intention to restrict development in the countryside is understood, this is not entirely consistent with the NPPF. Whilst it may be appropriate to limit development at a small village to that associated with meeting local community needs, development beyond the settlement boundaries of the main settlements and larger villages, such as Banwell, may be appropriate to meet district-wide needs, particularly in circumstances where there is a five-year housing land supply. In this respect, the policy should reflect the settlement hierarchy.	SP3 should be amended to read, "…. Beyond strategic development areas, the amount of development at villages and in the countryside will reflect the settlement hierarchy."		Representation form Part B_SP3 Spatial Strategy.docx
SP4: Placemaking	No	• Justified • Consistent with national policy	Yes	No	Policy requirements to demonstrate 'collaboration' with local communities is inconsistent with the NPPF (para 137), which instead expects community engagement and for designs to 'take account of the view of the community." Collaboration is defined as the action of two or more people, entities or organizations working in partnership to produce something together. Collaboration with local communities is often unlikely to be achievable in practice, particularly where there is a strong objector group which acts to frustrate and sabotage community engagement. In any event, there will often be different, and competing, opinion regarding development principle and design approach, sometimes driven by personal preferences. Hence consultation and the need to take account of views is an appropriate and effective approach	The word 'collaboration' should be replaced with 'consultation'.		Representation form Part B_SP4 Placemaking.docx
SP6: Villages and rural areas	No	• Effective • Consistent with national policy	Yes	No	There are only four towns within North Somerset, and whilst these are the focus for growth, the plan does allocate sites for development at some of the larger villages (and there have been a number of local planning permissions and approved appeals supporting development at the North Somerset villages), recognising their suitability credentials. Policy SP6 places all villages and rural areas within the same pool within the settlement hierarchy. This is inappropriate given the housing need, distributional strategy and opportunities available to secure sustainable development at some of the larger, well-serviced, villages. The policy should introduce a more layered and flexible approach, recognising the opportunities.	SP6 should be amended, to introduce a settlement hierarchy differentiating between well-serviced settlements and smaller villages / rural areas and if only to read, "…. Outside settlement boundaries new residential development will		Representation form Part B_SP6 Villages and rural areas.docx

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						be permitted, if there is a demonstrable need and in accordance with the settlement hierarchy. In other circumstances, residential development will be restricted….”		
SP8: Housing	No	• Positively prepared • Effective • Consistent with national policy	Yes	No	The NPPF (para 22) expects plans to be prepared to cover a minimum 15 year period from adoption. The February 2025 LDS anticipated submission of the plan for examination in October 2025 with adoption November 2026. Slippage has already occurred, pushing adoption into 2027. On this basis, the plan period should extend to 4042.	Extend the plan period to 2042, which would have consequences for development requirements across the plan period.		Representation form Part B_Plan period.docx
SP8: Housing	No	• Positively prepared • Effective • Consistent with national policy	Yes	No	The NPPF (para 22) expects plans to be prepared to cover a minimum 15 year period from adoption. The February 2025 LDS anticipated submission of the plan for examination in October 2025 with adoption November 2026. Slippage has already occurred, pushing adoption into 2027. On this basis, the plan period should extend to 4042. SP8 sets the housing requirement for the District, this being 1,580 dpa across the plan period based on the standard methodology (SM LHN). Setting aside concerns regarding the plan period (which is too short), we agree that the starting point for setting the requirement should be the standard method but are concerned that a further uplift has not been contemplated, specifically to help with the unmet need generated from Bristol and Bath, or to assist further with affordability, or to support infrastructure provision. The NPPF is clear about needing to boost housing land supply, to meet objectively assessed needs and to provide for needs that cannot be met within neighbouring areas, supported by the PPG which states, “Where authorities plan for higher growth this should not normally have to be thoroughly justified at examination.” In terms of unmet need, whilst the Duty to Cooperate is not being ‘saved’ under transitional arrangements moving to the new plan-making system, the Government and national policy continues to expect collaboration and effective cooperation over unmet need. For context, North Somerset lies within the wider Bristol City Housing Market Area (comprising Bristol City, North Somerset and South Gloucestershire, where the void in addressing Bristol’s unmet need has persisted over several years, through failed attempts at joint strategic planning. At the present time, the Bristol Local Plan emerging requirement of 1,925 homes a year leaves an annual unmet need of 1,037 homes (BC SM LHN 2,962 dpa). Bristol has asked all of the relevant neighbouring authorities to assist but North Somerset’s Duty to Cooperate compliance statement states that, “The evidence supporting the local plan demonstrates that North Somerset does not have capacity to meet some of Bristol’s needs at this time.” However, this is not the case, the evidence does no such thing, and despite differing evidence supporting the Bristol Local Plan examination which clearly anticipates some help from North Somerset, to be actioned through the current local plan preparation, an uplift in North Somerset’s housing numbers has simply not been contemplated and has not therefore been tested in the Sustainability Appraisal. The SA is clear that it tests the SM LHN and tests difference spatial options to meet that need (e.g. see SA para 2.28). What it doesn’t do is test a higher growth option which renders the plan unsound, it is not positively prepared and not justified or effective in meeting overall housing requirements. The knock-on effect of failing to assist in meeting the unmet need will be to increase affordability issues, as pressure for housing is increased. Whilst the plan will fail to address affordability issues in full, no consideration was given to increasing the housing requirement to better redress the acute problem. Finally, in order to deliver the infrastructure necessary to support the delivery of housing, a more flexible and positive approach should be taken to the housing requirement, to ensure development is viable. In conclusion, the SA is flawed, because it fails to consider the option of a higher housing requirement (higher growth scenario) and the plan strategy is therefore unjustified, ineffective, and unsound. Moving to the spatial distribution of the housing requirement, there is greater capacity at Banwell, particularly noting the anticipated completion of the Banwell by-pass in 2027 which presents a significant change in the village’s circumstances, characteristics, and status. The highway itself provides a new defensible development boundary	Extend the plan period to 2042, which would have consequences for development requirements across the plan period. Also an uplift in the housing requirement must be considered and tested through the SA, and if appropriate additional land allocations made to meet the need. An uplift in the housing provision at the villages should be made, presenting a settlement hierarchy approach whereby larger villages such as Banwell can be identified as sustainable locations to deliver the additional growth needed. This more refined settlement		Representation form Part B_SP8 Housing.docx

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					to the settlement, which should be utilised to deliver additional 'developable' housing capacity. This land is well-related to the north-eastern edge of Banwell, and sits outside the proposed strategic gap to the north of Banwell. It can be developed such that it is not subject to flood constraints (contrary to the SHLAA assessment which is flawed in this respect - given the scale of the site there is potential to introduce a sequential approach whereby the developable area avoids areas of flood risk).	hierarchy approach should be secured in the plan, with the allocation of land for housing between the existing settlement of Banwell and the by-pass, outside the proposed strategic gap. The allocation of this land would deliver 250 – 300 homes at a sustainable location.		
Policy LP1: Strategic location: Wolvershill (north of Banwell)	No	• Positively prepared • Effective • Consistent with national policy	Yes	No	The NPPF (para 22) expects plans to be prepared to cover a minimum 15 year period from adoption. The February 2025 LDS anticipated submission of the plan for examination in October 2025 with adoption November 2026. Slippage has already occurred, pushing adoption into 2027. On this basis, the plan period should extend to 4042. SP8 sets the housing requirement for the District, this being 1,580 dpa across the plan period based on the standard methodology (SM LHN). Setting aside concerns regarding the plan period (which is too short), we agree that the starting point for setting the requirement should be the standard method but are concerned that a further uplift has not been contemplated, specifically to help with the unmet need generated from Bristol and Bath, or to assist further with affordability, or to support infrastructure provision. The NPPF is clear about needing to boost housing land supply, to meet objectively assessed needs and to provide for needs that cannot be met within neighbouring areas, supported by the PPG which states, "Where authorities plan for higher growth this should not normally have to be thoroughly justified at examination." In terms of unmet need, whilst the Duty to Cooperate is not being 'saved' under transitional arrangements moving to the new plan-making system, the Government and national policy continues to expect collaboration and effective cooperation over unmet need. For context, North Somerset lies within the wider Bristol City Housing Market Area (comprising Bristol City, North Somerset and South Gloucestershire, where the void in addressing Bristol's unmet need has persisted over several years, through failed attempts at joint strategic planning. At the present time, the Bristol Local Plan emerging requirement of 1,925 homes a year leaves an annual unmet need of 1,037 homes (BC SM LHN 2,962 dpa). Bristol has asked all of the relevant neighbouring authorities to assist but North Somerset's Duty to Cooperate compliance statement states that, "The evidence supporting the local plan demonstrates that North Somerset does not have capacity to meet some of Bristol's needs at this time." However, this is not the case, the evidence does no such thing, and despite differing evidence supporting the Bristol Local Plan examination which clearly anticipates some help from North Somerset, to be actioned through the current local plan preparation, an uplift in North Somerset's housing numbers has simply not been contemplated and has not therefore been tested in the Sustainability Appraisal. The SA is clear that it tests the SM LHN and tests difference spatial options to meet that need (e.g. see SA para 2.28). What it doesn't do is test a higher growth option which renders the plan unsound, it is not positively prepared and not justified or effective in meeting overall housing requirements. The knock-on effect of failing to assist in meeting the unmet need will be to increase affordability issues, as pressure for housing is increased. Whilst the plan will fail to address affordability issues in full, no consideration was given to increasing the housing requirement to better redress the acute problem. Finally, in order to deliver the infrastructure necessary to support the delivery of housing, a more flexible and positive approach should be taken to the housing requirement, to ensure development is viable.	Extend the plan period to 2042, which would have consequences for development requirements across the plan period. Also an uplift in the housing requirement must be considered and tested through the SA, and if appropriate additional land allocations made to meet the need. An uplift in the housing provision at the villages should be made, presenting a settlement hierarchy approach whereby larger villages such as Banwell can be identified as sustainable locations to deliver the additional growth needed. This more refined settlement hierarchy		

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					In conclusion, the SA is flawed, because it fails to consider the option of a higher housing requirement (higher growth scenario) and the plan strategy is therefore unjustified, ineffective, and unsound. Moving to the spatial distribution of the housing requirement, there is greater capacity at Banwell, particularly noting the anticipated completion of the Banwell by-pass in 2027 which presents a significant change in the village's circumstances, characteristics, and status. The highway itself provides a new defensible development boundary to the settlement, which should be utilised to deliver additional 'developable' housing capacity. This land is well-related to the north-eastern edge of Banwell, and sits outside the proposed strategic gap to the north of Banwell. It can be developed such that it is not subject to flood constraints (contrary to the SHLAA assessment which is flawed in this respect - given the scale of the site there is potential to introduce a sequential approach whereby the developable area avoids areas of flood risk).	approach should be secured in the plan, with the allocation of land for housing between the existing settlement of Banwell and the by-pass, outside the proposed strategic gap. The allocation of this land would deliver 250 – 300 homes at a sustainable location.		
Policy LP5: Housing, employment and mixed use allocations	No	• Positively prepared • Effective • Consistent with national policy	Yes	No	The NPPF (para 22) expects plans to be prepared to cover a minimum 15 year period from adoption. The February 2025 LDS anticipated submission of the plan for examination in October 2025 with adoption November 2026. Slippage has already occurred, pushing adoption into 2027. On this basis, the plan period should extend to 4042. SP8 sets the housing requirement for the District, this being 1,580 dpa across the plan period based on the standard methodology (SM LHN). Setting aside concerns regarding the plan period (which is too short), we agree that the starting point for setting the requirement should be the standard method but are concerned that a further uplift has not been contemplated, specifically to help with the unmet need generated from Bristol and Bath, or to assist further with affordability, or to support infrastructure provision. The NPPF is clear about needing to boost housing land supply, to meet objectively assessed needs and to provide for needs that cannot be met within neighbouring areas, supported by the PPG which states, "Where authorities plan for higher growth this should not normally have to be thoroughly justified at examination." In terms of unmet need, whilst the Duty to Cooperate is not being 'saved' under transitional arrangements moving to the new plan-making system, the Government and national policy continues to expect collaboration and effective cooperation over unmet need. For context, North Somerset lies within the wider Bristol City Housing Market Area (comprising Bristol City, North Somerset and South Gloucestershire, where the void in addressing Bristol's unmet need has persisted over several years, through failed attempts at joint strategic planning. At the present time, the Bristol Local Plan emerging requirement of 1,925 homes a year leaves an annual unmet need of 1,037 homes (BC SM LHN 2,962 dpa). Bristol has asked all of the relevant neighbouring authorities to assist but North Somerset's Duty to Cooperate compliance statement states that, "The evidence supporting the local plan demonstrates that North Somerset does not have capacity to meet some of Bristol's needs at this time." However, this is not the case, the evidence does no such thing, and despite differing evidence supporting the Bristol Local Plan examination which clearly anticipates some help from North Somerset, to be actioned through the current local plan preparation, an uplift in North Somerset's housing numbers has simply not been contemplated and has not therefore been tested in the Sustainability Appraisal. The SA is clear that it tests the SM LHN and tests difference spatial options to meet that need (e.g. see SA para 2.28). What it doesn't do is test a higher growth option which renders the plan unsound, it is not positively prepared and not justified or effective in meeting overall housing requirements. The knock-on effect of failing to assist in meeting the unmet need will be to increase affordability issues, as pressure for housing is increased. Whilst the plan will fail to address affordability issues in full, no consideration was given to increasing the housing requirement to better redress the acute problem. Finally, in order to deliver the infrastructure necessary to support the delivery of housing, a more flexible and positive approach should be taken to the housing requirement, to ensure development is viable. In conclusion, the SA is flawed, because it fails to consider the option of a higher housing requirement (higher growth scenario) and the plan strategy is therefore unjustified, ineffective, and unsound. Moving to the spatial distribution of the housing requirement, there is greater capacity at Banwell, particularly noting the anticipated completion of the Banwell by-pass in	Extend the plan period to 2042, which would have consequences for development requirements across the plan period. Also an uplift in the housing requirement must be considered and tested through the SA, and if appropriate additional land allocations made to meet the need. An uplift in the housing provision at the villages should be made, presenting a settlement hierarchy approach whereby larger villages such as Banwell can be identified as sustainable locations to deliver the additional growth needed. This more refined settlement hierarchy approach should		

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					2027 which presents a significant change in the village's circumstances, characteristics, and status. The highway itself provides a new defensible development boundary to the settlement, which should be utilised to deliver additional 'developable' housing capacity. This land is well-related to the north-eastern edge of Banwell, and sits outside the proposed strategic gap to the north of Banwell. It can be developed such that it is not subject to flood constraints (contrary to the SHLAA assessment which is flawed in this respect - given the scale of the site there is potential to introduce a sequential approach whereby the developable area avoids areas of flood risk).	be secured in the plan, with the allocation of land for housing between the existing settlement of Banwell and the by-pass, outside the proposed strategic gap. The allocation of this land would deliver 250 – 300 homes at a sustainable location.		

Name: Vicki Whitesmith **I.D:** 62832673

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	This plan is Not Sound for several critical reasons, mainly revolving around the sheer scale of the development and the devastating lack of supporting infrastructure and environmental protection. The proposal for another 1,000 houses, on top of the 800 new houses already approved, would take Backwell's housing growth to over an 80% total increase. With NO new infrastructure or services planned to support this dramatic population jump. The lack of well thought through, costed proposals with funding committment re: the new road are a significant concern. It seems only a vague idea and one that will quickly fall foul of mounting costs and be deemed 'unachievable', leaving traffic choas in the wake of the housing developments. The feasibility and expense of building the road under or over the railway is highly dubious. The railway station is not currently fit for purpose as a transport hub, remaining inaccessible for people with mobility issues and challenging for those with young children. There are no propsals to improve this for the benefit of current and new residents to Backwell. The most concerning issue though is that the proposed development is on precious GRADE 1 Agricultural GREENBELT Land. Once built upon there will be no going back and as the economic stability nationally and global continues to be worrying, our position as a small Island will not be helped by a reduction in land suitable to grow food for the local and national residents. This land east of Backwell is the highest quality agricultural land, currently used for food crops and grazing. Only **7%** of this Grade 1 land is left in the whole of North Somerset. Government policy clearly states we must protect our best land to safeguard food security making these proposals a direct contradiction. This feels like a national disaster waiting to happen - how can we explain to the next generation that it felt ok to destroy grade 1 agricultural land to build houses on?	Reject this proposal and find alternative land in the North Somerset region that is not Grade 1 Agricultural Greenbelt. Backwell has a number of other developments already approved and in progress plus more in planning. We are already growing significantly and taking this precious land can not be justified when other options can be explored.		

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					This development would destroy valuable wildlife habitats and harm biodiversity including the Brockley Maternity Roost and Site of Special Scientific Interest, as rare Lesser and Greater Horseshoe Bats rely on this land for food. Backwell Common, Backwell Lake, and the adjacent fields are on a floodplain that floods regularly. Aggravating this flood-prone area with more housing is highly irresponsible and will cost the local council in repairs and dealing with issues. The most concerning issue though is that the proposed development will eradicate precious GRADE 1 Agricultural GREENBELT Land. As the economic stability nationally and global continues to be worrying, our position as a small Island will not be helped by a reduction in land suitable to grow food for the local and national residents. This land east of Backwell is the highest quality agricultural land, currently used for food crops and grazing. Only **7%** of this Grade 1 land is left in the whole of North Somerset. Government policy clearly states we must protect our best land to safeguard food security making these proposals a direct contradiction. This feels like a national disaster waiting to happen, especially if similar proposals are being made nationally. The proposed growth for Backwell is unsustainable, and undeliverable due to the lack of infrastructure, the destruction of critical wildlife habitats and the unacceptable threat to our Grade 1 Greenbelt. I urge the Independent Inspector to reject this flawed plan.			

Name: Vicky Cridland **I.D:** 62865601

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Churchill Avenue	No	‣ Effective	No	No	Doesn’t appear to have taken into account the environmental impact on the river and potential flooding if surrounding houses. Also increase in traffic on already busy roads with lots of parked cars.	Included consideration of wider environmental impact and flooding.		
Great Western Road	No	‣ Justified	No	No	No consideration appears to have been taken on the impact of replacing car parking space with housing on the local shops. If we want to keep shops open and the Queens Square alive, it needs shops to be successful with footfall.			

Name: Vicky Moss **I.D:** 50605825

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Land south of Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I wish to object to the proposed development in Backwell, which, alongside the many other large-scale housing proposals in Nailsea and Backwell, is overwhelming the area and effectively merging two distinct communities. Both Nailsea and Backwell are already absorbing the highest levels of population growth within North Somerset, yet this expansion is not being matched by adequate improvements to local infrastructure and services. Essential community facilities are already under strain. Medical centres, secondary schools, and leisure facilities are stretched beyond capacity, and no plans have been presented to expand or support these services. Residents are routinely forced to travel to Weston-super-Mare for hospital and further education needs, highlighting the chronic imbalance in service provision across the district. The proposal also fails to meet the needs of an ageing population. There appears to be minimal provision for bungalows or sheltered accommodation, with development instead focused on family housing and high-density builds. Environmental concerns are equally serious. The proposed site lies on a flood plain, posing obvious risks to both housing			

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					and wildlife. The construction and subsequent urbanisation would severely impact local biodiversity, including the rare Lesser and Greater Horseshoe bats, which rely on the remaining habitat and feeding grounds in this area. Agricultural land is rapidly disappearing—if this and other developments proceed, only around 7% of North Somerset's farmland will remain. Backwell Lake, which supports a rich variety of birdlife, is one of the few wildlife havens left locally. Increasing housing density so close to this vital green space will disturb the habitat and diminish the wellbeing benefits it currently brings to residents. The existing transport infrastructure is wholly inadequate to cope with additional traffic volumes these developments will generate. Congestion on surrounding routes, including the A370, is already a significant issue. Government policy states that we must protect our best and most versatile agricultural land. This proposal—and others like it—appear to contradict that principle entirely. For these reasons, I strongly urge the council to reject this application.			
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I am writing to strongly object to the proposed large-scale housing developments planned for Backwell. The scale of these developments will dramatically transform our village into a suburb of Bristol, eroding the close-knit community atmosphere that defines Backwell. There are already significant surface water drainage and flooding problems linked to current housing projects in the area. The A370 is frequently affected by overflowing drains, which require constant pumping and maintenance. The proposed new developments are situated on even lower ground prone to flooding throughout the winter months. This raises serious concerns about the capacity and adequacy of existing drainage infrastructure to manage additional surface water runoff. The loss of countryside land is also deeply troubling. The local farmer has previously received government grants to protect and promote wildlife habitats here, which these developments would irrevocably damage. While there are plans for a new primary school, there has been no provision made for secondary education, playgroups, youth clubs, recreation spaces, or medical facilities. No social cohesion impact assessment has been provided to demonstrate that community needs will be met. Furthermore, while proximity to the railway station and A370 might seem advantageous, both are currently insufficient for coping with the increased traffic and population these developments would bring. The A370 is already congested, and the railway station is small with accessibility issues, particularly for those with mobility challenges. For these reasons, I urge you to reject the proposal. The developments risk overwhelming infrastructure, flooding, loss of valued green space, and degradation of community character.			

Name: Vicky Smale **I.D:** 58346849

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Policy LP3: Strategic location: Nailsea and Backwell	No	‣ Justified	Unsure	No	The plan does not take into account what local people want. The proposals for Nailsea and Backwell will spoil the character of the towns and is not in keeping with national planning policy.	Fewer houses and sites at Nailsea and Backwell.		

Name: Victoria Giles **I.D:** 58577441

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Black Rock, north of Clevedon Road	No	‣ Justified ‣ Effective ‣ Consistent with national policy	No	Unsure	In breach of 7 sections of the NPPF: S110, S115, S147, S156, S187, S192 and S193	Needs to comply with the above 7 sections.		

Name: Victoria Sale **I.D:** 62860417

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land at Tower Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	PTC cites the plan in breach of 7 sections of the NPPF: S110, S115, S147, S156, S187, S192 & S193. Avon Wildlife Trust cites that it is in breach of sections of the NPPF – 124, 188, 192 and Section 40 of Natural Environment and Rural Communities Act 2006 The Plan is not sound or legally compliant. NSC did not adequately consider alternative sites with lower ecological impact before proposing the Tower Farm and Black Rock sites in the Local Plan. More housing could be built on brownfield sites to eliminate the need to develop these locations. These sites play a key ecological role for Weston Big Wood (SSSI and SNCI) and the Gordano Valley corridor and were added to the Green Belt in the late 1980s due to their high ecological value. National Planning Policy requires exceptional circumstances for removal of Green Belt status, which have not been demonstrated. Additionally, both sites lack sustainable, safe access and would cause transport issues, failing policy soundness tests. Therefore, Tower Farm and Black Rock should be excluded from the Local Plan. The Gordano Valley is a connected ecosystem, with habitats that depend on each other; development anywhere disrupts the entire system. The long-recognized ecological value of the area is highlighted by both historic and recent studies. A 2023 report commissioned by Portishead Town Council found further decline and significant recreational damage to Weston Big Wood during the Covid pandemic, warning that developments like Tower Farm or Black Rock would lead to significantly increased footfall, noise and light pollution which would have devastating ecological effects on the wood. The valley features diverse habitats - rhynes, saltmarsh, woodland, grassland, orchards, hedgerows, quarries, and rock exposures which support various species, including butterflies, dragonflies, bats, rare birds, birds of prey and rich flora. The 2023 assessment found Weston Big Wood in a declining state due to ash dieback, poor management, and recreational use. The Gordano Valley is highlighted as the area’s key wet meadow and wetland bird habitat, with a need to reconnect fragmented environments using Biodiversity Net Gain measures. Black Rock and Tower Farm are within a protected development avoidance zone, also showing high bat activity. Developing on these sites would harm both Weston Big Wood and the larger valley system. Scientific consensus over more than fifty years confirms this landscape is exceptionally valuable and vulnerable, recognised nationally as “one of the most important biodiversity sites in North Somerset. The ancient woodlands at Weston Big Wood have developed over centuries and are now amongst the most fragile and rare of all landscapes in the country. Once damaged they cannot be restored.” Avon Wildlife Trust The proposed development of around 400 homes at Tower Farm is situated adjacent to Weston Big Wood which is managed by the Woodland Trust with support from Avon Wildlife Trust. Thie area forms part of to the Gordano Valley ecological network and is a nationally significant habitat mosaic that includes open grassland, wetland, and woodland areas. Taken from the Foreword from the Avon Wildlife Trust: We know the natural world is in crisis. Every year we’re overwhelmed with new statistics about the shocking losses in wildlife around us. Nature is declining globally at rates unprecedented in human history. Since 1970, we have lost 69% of our wild animals, 50% of all marine wildlife and a staggering 83% of freshwater wildlife. Here in Avon the picture is equally bleak – for example we have 96% fewer starlings and swifts than we did in the 1990s and we’ve seen sharp declines in familiar friends like nesting birds and hedgehogs. The loss of our natural world is rapid, and it’s accelerating at an alarming rate. The first Wildlife Trusts were set up to protect at-risk habitats – and that aim is still central to our mission. For decades we’ve worked hard to protect the few wild areas that remain, saving species in nature reserves and even bringing some back from local extinction. For over 30 years we have worked with landowners across whole landscapes to create more spaces for nature and join them		I do not support the North Somerset Local Plan 2041 for the Tower Hill Farm location. Developing this site would result in irreversible harm to this area given its direct adjacency to the ancient woodland and its vital role in local biodiversity. To allow development here would be a profound and permanent mistake for both nature and our community. The land here must be preserved as open, undeveloped green space—managed for the benefit of our wildlife and people, not sacrificed for short-term gain. We must protect this site as it is an irreplaceable habitat, thereby upholding our society’s commitment to nature recovery. Alternative brownfield sites allowing far lower ecological impact, both in Portishead and across North Somerset have not been properly and fully considered by NSC. Sustainable development can certainly be delivered on brownfield sites across North Somerset, for example Wyndham Way in Portishead and the Castlewood site in Clevedon. The Wyndham Way site is currently unused but has long been set aside for commercial use. Developing this with both housing and businesses could boost local employment and make use of its proximity to the new railway station. Reclassifying the area as mixed-use would encourage development and remove the need for homes near a sensitive SSSI. Increasing housing density on such brownfield sites should most definitely be the priority here and full and proper consideration of these sites may well negate the need to encroach upon green belt land. Castlewood, owned by North Somerset Council, has an area of 3.37 hectares, allows a flat walk to the High Street and is served by multiple local Bristol buses. National guidance classifies sites as suburban (100–120 dwellings per hectare) or urban (200+ dph). This brownfield site could therefore support 300–600 homes, rather than the planned 120, removing pressure on ecologically sensitive areas like Tower Farm and Black Rock. Higher density should be considered before altering Green Belt boundaries to comply with NPPF. Efficient development at Castlewood would increase Clevedon's housing supply, currently low compared to other North Somerset towns, promoting fairer distribution. It’s worth noting that Portishead’s population has grown 60% between 2001 and 2025, and NSC has a duty to maximise revenue from their land.	

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					up with wildlife corridors. But now, in the face of these devastating losses, we need to go further to restore, regenerate and rewild places everywhere, creating more space for nature to recover - before it's too late. The next 10 years are crucial. The 2020s must be a powerful decade of transformation, where people everywhere start taking meaningful action on the ecological crisis. We are encouraged that local authorities in our region have declared nature emergencies and are developing plans for how to respond. Not Justified A robust alternatives assessment has not been published which demonstrates that this sensitive site is the sole or most suitable location for development. The potential loss of best and most versatile (BMV) farmland (classified as Grade 2/3a according to the ALC dataset), together with the risk of permanent harm to ancient woodland, renders this allocation wholly inappropriate. Not Consistent with National Policy The allocation is not consistent with paragraphs 180–182 of the National Planning Policy Framework (NPPF), which stipulate that developments causing the loss or degradation of irreplaceable habitats, such as ancient woodland, should be refused unless there are wholly exceptional circumstances. The Council's reference to an "ecological buffer" lacks specificity, enforceability, and adequacy in mitigating indirect effects, including root-zone disturbance, hydrological alterations, or impacts on wildlife. Both the Woodland Trust and Avon Wildlife Trust have indicated that damage to ancient woodland is irreversible. Furthermore, while the Framework mandates delivering biodiversity net gain, the allocation does not provide a clear mechanism to secure this outcome. Expert opinion from naturalist Chris Sperring MBE concludes in relation to the developer's report: "The plans will represent a significant loss of biodiversity over time due to the proximity of the site to Weston Big Wood. No amount of mitigation or BNG credits are going to replace an ancient Woodland and SSSI and the ecosystem that it supports. The Woodland Trust and Avon Wildlife Trust state that ancient woodland is irrecoverable once damaged. Once it is gone it will be gone forever. Instead, consideration should be made for designating Tower Farm as a Biodiversity Net Gain site which would allow some of the ecological damage over the last 50 years to be repaired." Not Positively Prepared The proposed locations piles pressure on established and ongoing challenges within Portishead, including strains on schools, healthcare services, and transport infrastructure such as those affecting the A369 corridor. Development at these peripheral sites would increase reliance on private vehicles and contribute to higher pollution levels, rather than fostering sustainable travel habits as outlined in NPPF paragraphs 104–106. Not Effective Delivery is contingent upon several as yet unsettled dependencies, including the provision of a new school, contributions to bus services, off-site biodiversity management, and improvements to rights-of-way and buffer zones. There is no published phasing plan, funding mechanism, or legal agreement to secure these requirements. In the absence of such mechanisms, the allocation cannot be deemed deliverable within the plan period (NPPF paragraph 35(c)). Landscape & Connectivity		Brownfield sites provide valuable opportunities to increase housing density across North Somerset. According to the AECOM Housing Needs Assessment, in Portishead there is a priority demand for affordable 1, 2, and 3-bedroom homes for diverse needs and incomes, with no additional need for 4-bedroom properties. Fully utilizing North Somerset's brownfield sites could eliminate the need to develop Tower Farm and Black Rock. These locations are better suited to deliver affordable, well-planned housing near local amenities and sustainable transport, without impacting the ecologically significant Green Belt and SSSI woodland around Weston Big Wood, protected for its strategic importance since 1988. With decades of evidence supporting its importance, the Tower Farm site should not be considered for development. Furthermore, there are some additional greenfield sites which should be proposed before considering any alternation to the Green Belt, for example in Backwell and Long Ashton which could better accommodate development as even these greenfield sites are not of the same ecologically vital calibre as the land surrounding Weston Big Wood. Neither Tower Farm nor Black Rock offers safe or practical access, especially for vulnerable groups. Developing these sites would increase car dependency and infrastructure strain in Portishead. National planning policy restricts Green Belt changes to exceptional cases, which have not been shown here. Any development at Tower Farm and/or Black Rock would irreversibly damage habitats, fragment the Gordano Valley ecological network and undermine nature recovery ambitions. No mitigation or buffer can render this site suitable. The land here must be managed as open countryside to support biodiversity, landscape quality and sustainable community use.	

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					The farmland and woodland boundary serves as a vital ecological and landscape transition zone: development within this would likely result in habitat fragmentation, reduce the effectiveness of the Gordano Valley wildlife corridor, and impact the rural fringe character. Even with the implementation of a buffer, considerable visual and ecological intrusion on the woodland and surrounding landscape would be substantial. Drainage & Hydrology Construction and built environment will alter surface water run-off, compact soil, and disrupt the hydrology that supports nearby ancient woodland. These changes increase risks of nutrient run-off, changes to infiltration and harm to the woodland's root zone. Cumulative Impact When considered alongside other allocations in the Portishead area, such as Black Rock, the cumulative impact on ecology, infrastructure and transport is considerable and compromises the Council's commitments to nature recovery and sustainable development. No modification could be made apart from removing the allocation entirely. The Tower Farm and Black Rock sites are inappropriate for development. The immediate proximity of the ancient woodland means that its inevitable decline caused by any development here would be permanent and cannot be adequately mitigated. The land should be preserved and protected as undeveloped green space, actively managed to support biodiversity and facilitate sustainable public access, consistent with the Avon Wildlife Trust's 2030 Strategy and national "30 by 30" nature recovery goals.			
Black Rock, north of Clevedon Road	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	Not Justified The allocation of around 100 homes at Black Rock is unjustified, as environmental needs cannot be met on-site and require off-site mitigation. This contradicts NPPF paragraph 180(a), which prioritizes impact avoidance over remediation or compensation. The need for offset land highlights the site's unsuitability, and there is no evidence that less sensitive alternatives have been considered. Not Consistent with National Policy The reliance on off-site mitigation and an unspecified "ecological buffer" indicates a reactive approach to biodiversity, rather than a preventative one. This allocation does not meet NPPF paragraphs 180–182, as it fails to secure habitat conservation, protection, or long-term management. It also conflicts with the Avon Wildlife Trust's 2030 Strategy, which prioritises restoring land for nature and improving landscape connectivity in the Gordano Valley. Not Positively Prepared Unsustainable pattern of growth The site lies on the western approach to Portishead along Clevedon Road, where public transport is limited and local services are minimal. Residents would be heavily reliant on private vehicles to access schools, health care and employment. The fact that footways and new bus stop contributions are required underlines existing infrastructure inadequacy. This car-dependent pattern of development conflicts with the sustainable transport objectives of NPPF paragraphs 104–106. The site is located on Clevedon Road on the western approach to Portishead, with limited public transport and few local services. Residents would rely heavily on cars for schools, healthcare, and jobs, highlighting insufficient infrastructure. This car-dependent growth contradicts NPPF sustainable transport goals in paragraphs 104–106.			

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					Not Effective - Unclear delivery and infrastructure dependencies The site relies on various off-site and third-party actions—such as land offsets, new pedestrian paths, bus services, and part of the Gordano Greenway—without a clear funding source, responsible entity, or phasing plan. This undermines deliverability and fails NPPF paragraph 35(c). Landscape & Setting The site is open countryside, serving as a rural buffer for Portishead and the Gordano Valley. Expanding west would erode this transition zone, reduce openness, and lead to urban sprawl. Agriculture & Soils The farmland is likely high-quality (Grade 2/3a), and its conversion to housing isn't justified when less sensitive areas are available. The Plan does not convincingly justify releasing this land. Hydrology & Ecology Development may disrupt drainage, compact soils, and fragment wildlife corridors tied to the Gordano Valley's woodlands and wetlands. Ongoing development threatens the ecological network. Cumulative Impact Alongside other developments like Tower Farm, Black Rock would further strain local ecology, transport, and infrastructure, clashing with the Council's goals for nature recovery and sustainable growth. No modification could be made apart from removing the allocation entirely. The Tower Farm and Black Rock sites are inappropriate for development. The immediate proximity of the ancient woodland means that its inevitable decline caused by any development here would be permanent and cannot be adequately mitigated. The land should be preserved and protected as undeveloped green space, actively managed to support biodiversity and facilitate sustainable public access, consistent with the Avon Wildlife Trust's 2030 Strategy and national "30 by 30" nature recovery goals. I do not support the the North Somerset Local Plan 2041 for the Black Rock location.			

Name: Vistry Group **I.D:** 63186689

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SP2: Climate Change	Yes					Whilst Vistry support the objectives outlined in draft Policy SP2, Vistry maintain that the distribution of development across the district does not reduce greenhouse gas emissions and amongst others and will not assist in delivering carbon neutrality to assist the delivery of this strategic policy. One of the criteria includes minimising energy use and a commitment to deliver		North Somerset Local Plan Pre-submission Plan -

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						a net zero energy standard in new buildings. However, NSC's evidence base refers to guidance from a study prepared to support planning policies specific to Cornwall Council. To find Policy SP2 sound, Vistry considers that the policy needs to be based on a proportionate evidence base that assesses the delivery of net zero operational energy use for residential development that is specific for North Somerset district.		Representation form Policy LP5.pdf
Policy LP3: Strategic location: Nailsea and Backwell	Yes		Yes				Vistry supports the identification of Nailsea as a Strategic Location within draft Policy LP3 and welcomes the increase to 225 homes from 75 homes reflecting the deliverability of Vistry's land at Hanham Way. The land at Hanham Way, forms a part of the land referred to as land at north west Nailsea, which benefits from a resolution to grant planning permission. The partially consented scheme is correctly detailed in the accompanying Schedule 1 as a large site for residential development. Whilst Vistry support the intention to ensure development proposals in Nailsea deliver a package of new transport infrastructure and a coordinated approach to mitigation, there is the need for contributions to be proportionate and for the delivery of their land at north west Nailsea not to be held up by wider phasing and infrastructure delivery. In accordance with national policy and guidance ID: 23b-002-20190901, planning obligations must always comply with the relevant tests, they must be: • necessary to make the development acceptable in planning terms; • directly related to the development; and • fairly and reasonably related in scale and kind to the development. In this case Vistry are in the process of finalising the s106 Agreement with the Council and are eager to progress to Reserved Matters without delay. Development to the north of Hanham Way, Nailsea, is in accordance with adopted Policy SA1 North west Nailsea and draft Policy LP2 Strategic location at Nailsea and Policy LP5 Housing allocations set out in Schedule 1. The NPPF identifies three dimensions of sustainable development: economic, social and environmental. We have summarised the proposed site allocation against each of these roles, in accordance with paragraph 8 of the NPPF below: Economic Role • New home bonus to enable the Council to spend within the local community;	North Somerset Local Plan Pre-submission Plan - Representation form Policy LP3.pdf

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							• Additional council tax receipts to pay for local services; • A boost to the local economy in terms of construction work in building the new homes; • A boost to local shops and services from increased trade because of the new homes; and • S.106 Obligations and CIL payments to help deliver local infrastructure needs. Social Role • Provision of up to 150 homes to fulfil housing need at a local level; • 30% affordable homes with a tenure split between affordable and shared ownership; • More choice in private and affordable housing options within Nailsea; • Provision of a mix of family homes, range of homes within the scheme allowing for people to move around the proposed site and create a community within the area; • Near to community sport provision, including football and rugby clubs; and • Health and well-being benefits of the provision of a new community recreation resource including walking routes, play spaces, community growing and allotments. Environmental Role • Enabling the Council to maintain a five-year housing land supply and housing trajectory to the end of the current plan period, thus safeguarding other land in less sustainable locations from development; • Delivering housing to fulfil the Council's Spatial Strategy; • Improved pedestrian and cycle connectivity to the to surround area; • The provision of quality public open space and enhanced green infrastructure; • The provision of linear attenuation basins to the west of the developed part of the site offering a sustainable urban drainage system (SuDS) which also offer a wetland habitat for wildlife; • A substantial ecological buffer (up to 50m) along the western and north western boundary of the site to conserve natural habitat where wildlife can thrive, and bat flight paths are protected; and • Onsite 10% biodiversity net gain (due to on-site constraints)	
Policy LP5: Housing, employment and mixed use	Yes						Vistry supports the inclusion of land north west of Nailsea within Schedule 1: large sites for residential development. We say this because: • Vistry's land at north west Nailsea benefits from a	North Somerset Local Plan Pre-submission

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allocations							resolution to grant Outline Planning Permission (LPA Ref. 23/P/2322/OUT) for the delivery of up to 150 dwellings and associated works on part of the land allocation under SAP Policy SA1 demonstrating a commitment to the much-needed delivery of market and affordable housing. • Vistry have already evidenced throughout the Outline planning application and previous written representations that the land under their control, can be delivered without forming part of a wider coordinated approach to mitigation. • Vistry are committed to the delivery of housing at the site in the early years of the Draft LP period. Development to the north of Hanham Way, Nailsea, is in accordance with adopted Policy SA1 North west Nailsea and draft Policy LP2 Strategic location at Nailsea and Policy LP5 Housing allocations set out in Schedule 1. The NPPF identifies three dimensions of sustainable development: economic, social and environmental. We have summarised the proposed site allocation against each of these roles, in accordance with paragraph 8 of the NPPF below: Economic Role • New home bonus to enable the Council to spend within the local community; • Additional council tax receipts to pay for local services; • A boost to the local economy in terms of construction work in building the new homes; • A boost to local shops and services from increased trade because of the new homes; and • S.106 Obligations and CIL payments to help deliver local infrastructure needs. Social Role • Provision of up to 150 homes to fulfil housing need at a local level; • 30% affordable homes with a tenure split between affordable and shared ownership; • More choice in private and affordable housing options within Nailsea; • Provision of a mix of family homes, range of homes within the scheme allowing for people to move around the proposed site and create a community within the area; • Near to community sport provision, including football and rugby clubs; and • Health and well-being benefits of the provision of a new community recreation resource including walking routes, play spaces, community growing and allotments. Environmental Role	Plan - Representation form Policy LP5.pdf

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							• Enabling the Council to maintain a five-year housing land supply and housing trajectory to the end of the current plan period, thus safeguarding other land in less sustainable locations from development; • Delivering housing to fulfil the Council's Spatial Strategy; • Improved pedestrian and cycle connectivity to the to surround area; • The provision of quality public open space and enhanced green infrastructure; • The provision of linear attenuation basins to the west of the developed part of the site offering a sustainable urban drainage system (SuDS) which also offer a wetland habitat for wildlife; • A substantial ecological buffer (up to 50m) along the western and north western boundary of the site to conserve natural habitat where wildlife can thrive, and bat flight paths are protected; and • Onsite 10% biodiversity net gain (due to on-site constraints)	
Policy DP1: High quality design	Yes					Vistry considers that the requirements for major development should not be set out in policy, as they should be covered by the formally adopted local list. As Policy DP1 is not consistent with a local list and does not provide sufficient flexibility, raises issues of soundness in respect to the effectiveness of the policy.		North Somerset Local Plan Pre-submission Plan - Representation form Policy LP5.pdf
Policy DP6: Net zero construction	Yes					There is no mention of the Future Homes Standard within the supporting text and the omission of any reference to FHS brings into question the soundness of the policy in terms of consistency with national policy. The Policy seeks to move away from the carbon reduction methods set out in current Part L of the Building Regulations and instead sets out a net zero operational energy requirement with specifications for space heating demand and operational energy use. Vistry is concerned that these specifications may not be consistent with the final FHS specifications and therefore not consistent with national policy. As such, the Council should ensure Policy DP6 is consistent with FHS and does not go beyond planned building regulations		North Somerset Local Plan Pre-submission Plan - Representation form Policy LP5.pdf
Policy DP8: Efficient use of land						Whilst Vistry support the efficient use of land, they maintain that draft Policy DP8 remains too broad and is not supported by sufficient evidence to demonstrate which parts of the district should be subject to higher target densities. Vistry maintain that draft Policy DP8 does not sufficiently account for reasonable alternatives, such as development proposals which improve the accessibility of a location. As such, a specified minimum density figure (40 dwellings per hectare) is not appropriate and flexibility should be maintained according to site suitability. No mention of Future Homes Standard is made within the supporting text and the omission of any reference to FHS brings into question the soundness of the policy in terms of consistency with national policy. The Policy seeks to move away from the carbon reduction methods set out in current Part L of the		North Somerset Local Plan Pre-submission Plan - Representation form Policy LP5.pdf

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						Building Regulations and instead sets out a net zero operational energy requirement with specifications for space heating demand and operational energy use. Vistry is concerned that these specifications may not be consistent with the final FHS specifications and therefore not consistent with national policy. As such, the Council should ensure Policy DP6 is consistent with FHS and does not go beyond planned building regulations		
Policy DP12: Development in the Green Belt	Yes					Vistry maintain that draft Policy DP12 is a repetition of national policy and that the first part of the draft policy could be deleted. The proposed amendment to draft Policy DP12 is as follows: Proposals for development in the Green Belt will be determined in accordance with national policy. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. The NPPF indicates that development in the Green Belt is inappropriate unless specified exceptions apply.		North Somerset Local Plan Pre-submission Plan - Representation form Policy LP5.pdf
Policy DP36: Biodiversity Net Gain	Yes					Vistry support draft Policy DP36 Biodiversity Net Gain in the emerging Local Plan and maintain that the approach taken by NSC for this policy is line with NPPF by promoting the for the appropriate provision BNG of at least 10%. As a result of the recently published NPPF (December 2024, amended in February 2025) the second paragraph of the justification under the draft policy wording regarding point (d) will need to be updated. As the recent version of the NPPF refers to improving the area rather than minimising impacts.		North Somerset Local Plan Pre-submission Plan - Representation form Policy LP5.pdf
Policy DP43: Affordable housing (including rural exception schemes)	Yes					Vistry note that comments from previous regulation 19 representations have been taken on board from the council, with the reduction of affordable housing to be provided on greenfield sites reduced to 30% from 38.5%		North Somerset Local Plan Pre-submission Plan - Representation form Policy LP5.pdf
Policy DP46: Housing Type and Mix	Yes					Whilst Vistry support the high-level costs based on the analysis as described in the 'Raising accessibility standards in new homes' consultation document for housing standard M4(2) they remain concerned the overall deliverability of both M4(2) and M4(3) on large development sites is viable. It is considered that NSC need to monitor the costs of delivering both housing standard M4(2) and M4(3) across the industry and plan making period to ensure the viability of large residential schemes is not compromised and remain deliverable when policy is adopted. Furthermore, the self-build requirement needs to relate to the self-build register for the locality of the site specifically, rather than the register for the district.		North Somerset Local Plan Pre-submission Plan - Representation form Policy LP5.pdf
Policy DP47: Older Persons Accommodation	Yes					Vistry note that comments from previous regulation 18 representations have been taken on board from the council with the introduction of a new individual policy for older population is welcomed.		North Somerset Local Plan Pre-submission Plan - Representation form Policy LP5.pdf

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Policy DP63: Infrastructure delivery and development contributions	Yes					Vistry consider a breakdown of how education contributions would be provided, whether through s106 or CIL, should be provided at the end of the policy. The Council's adopted Community Infrastructure Levy 123 List confirms that early years provision, primary school provision at Strategic Development Areas and the secondary school provision at the Weston Villages will be secured via planning obligations with all other education provision to be provided via CIL funding		North Somerset Local Plan Pre-submission Plan - Representation form Policy LP5.pdf
Land at North West Nailsea	Yes						Development to the north of Hanham Way, Nailsea, is in accordance with adopted Policy SA1 North west Nailsea and draft Policy LP2 Strategic location at Nailsea and Policy LP5 Housing allocations set out in Schedule 1. The NPPF identifies three dimensions of sustainable development: economic, social and environmental. We have summarised the proposed site allocation against each of these roles, in accordance with paragraph 8 of the NPPF below: Economic Role • New home bonus to enable the Council to spend within the local community; • Additional council tax receipts to pay for local services; • A boost to the local economy in terms of construction work in building the new homes; • A boost to local shops and services from increased trade because of the new homes; and • S.106 Obligations and CIL payments to help deliver local Social Role • Provision of up to 150 homes to fulfil housing need at a local level; • 30% affordable homes with a tenure split between affordable and shared ownership; • More choice in private and affordable housing options within Nailsea; • Provision of a mix of family homes, range of homes within the scheme allowing for people to move around the proposed site and create a community within the area; • Near to community sport provision, including football and rugby clubs; and • Health and well-being benefits of the provision of a new community recreation resource including walking routes, play spaces, community growing and allotments. Environmental Role	North Somerset Local Plan Pre-submission Plan - Representation form Policy LP5.pdf

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							• Enabling the Council to maintain a five-year housing land supply and housing trajectory to the end of the current plan period, thus safeguarding other land in less sustainable locations from development; • Delivering housing to fulfil the Council's Spatial Strategy; • Improved pedestrian and cycle connectivity to the to surround area; • The provision of quality public open space and enhanced green infrastructure; • The provision of linear attenuation basins to the west of the developed part of the site offering a sustainable urban drainage system (SuDS) which also offer a wetland habitat for wildlife; • A substantial ecological buffer (up to 50m) along the western and north western boundary of the site to conserve natural habitat where wildlife can thrive, and bat flight paths are protected; and • Onsite 10% biodiversity net gain (due to on-site constraints)	

Name: Vitaliy Garashchenko **I.D:** 62851617

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	This dvelopment would irreversibly damage our village, enviroment and our food security! 7% of grade 1 land left in the whole NOrth Somerset? is that no longer important to anyone? STOP THIS UNTIL ITS NOT TOO LATE!			

Name: W Morrison **I.D:** 62852993

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Land at North West Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national	Unsure	Unsure	Introducing 1,817 new homes in Nailsea would overwhelm and massively over-develop the town. The expected population increase in population could not be matched in terms of infrastructure. The surrounding road-networks are already at capacity, a 55% (Nailsea) and 80% (Backwell) increase would grind the surrounding routes to a standstill. The new link road across Backwell Common, under rail crossing is likely to be extremely expensive and the engineering problematic due to the proximity to the River Kenn and railway line. Even so, it leads out on to the A370, which is already running at capacity at busy times. Other routes out of Nailsea and Backwell are narrow country roads not designed for the capacity increase, leading to possible safety issues.			

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		policy			Additionally, the current rail network already struggles to support the capacity required at rush hour, and such an increase would leave the service heavily overcrowded. Nailsea & Backwell station already does not lend itself to overcrowding on the platforms without putting passengers at risk. Beyond that, other important infrastructure would not support the new development. The proposal for new primary schools is dependent on the developer and no locations have been identified. Additional demand on health facilities would be overwhelming. In terms of the general environment, such a large population increase and loss of greenbelt and agricultural land, together with dramatic change to the landscape will be detrimental. The loss of green space and natural habitats will be a huge loss to the area. Removal of the green space between Nailsea and Backwell (either side of the railway track) means the two locations become more or less as one - but with double the population. This may also have an affect on the wildlife found at Backwell lake, and possible water quality there (especially being a floodplain).			
Youngwood Lane	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Introducing 1,817 new homes in Nailsea would overwhelm and massively over-develop the town. The expected population increase in population could not be matched in terms of infrastructure. The surrounding road-networks are already at capacity, a 55% (Nailsea) and 80% (Backwell) increase would grind the surrounding routes to a standstill. The new link road across Backwell Common, under rail crossing is likely to be extremely expensive and the engineering problematic due to the proximity to the River Kenn and railway line. Even so, it leads out on to the A370, which is already running at capacity at busy times. Other routes out of Nailsea and Backwell are narrow country roads not designed for the capacity increase, leading to possible safety issues. Additionally, the current rail network already struggles to support the capacity required at rush hour, and such an increase would leave the service heavily overcrowded. Nailsea & Backwell station already does not lend itself to overcrowding on the platforms without putting passengers at risk. Beyond that, other important infrastructure would not support the new development. The proposal for new primary schools is dependent on the developer and no locations have been identified. Additional demand on health facilities would be overwhelming. In terms of the general environment, such a large population increase and loss of greenbelt and agricultural land, together with dramatic change to the landscape will be detrimental. The loss of green space and natural habitats will be a huge loss to the area. Removal of the green space between Nailsea and Backwell (either side of the railway track) means the two locations become more or less as one - but with double the population. This may also have an affect on the wildlife found at Backwell lake, and possible water quality there (especially being a floodplain).			
Trendlewood Way	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	Introducing 1,817 new homes in Nailsea would overwhelm and massively over-develop the town. The expected population increase in population could not be matched in terms of infrastructure. The surrounding road-networks are already at capacity, a 55% (Nailsea) and 80% (Backwell) increase would grind the surrounding routes to a standstill. The new link road across Backwell Common, under rail crossing is likely to be extremely expensive and the engineering problematic due to the proximity to the River Kenn and railway line. Even so, it leads out on to the A370, which is already running at capacity at busy times. Other routes out of Nailsea and Backwell are narrow country roads not designed for the capacity increase, leading to possible safety issues. Additionally, the current rail network already struggles to support the capacity required at rush hour, and such an increase would leave the service heavily overcrowded. Nailsea & Backwell station already does not lend itself to overcrowding on the platforms without putting passengers at risk. Beyond that, other important infrastructure would not support the new development. The proposal for new primary schools is dependent on the developer and no locations have been identified. Additional demand on health facilities would be overwhelming. In terms of the general environment, such a large population increase and loss of greenbelt and agricultural land, together with dramatic change to the landscape will be detrimental. The loss of green space and natural habitats will			

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					be a huge loss to the area. Removal of the green space between Nailsea and Backwell (either side of the railway track) means the two locations become more or less as one - but with double the population. This may also have an affect on the wildlife found at Backwell lake, and possible water quality there (especially being a floodplain).			
Land off Pound Lane, Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Introducing 1,817 new homes in Nailsea would overwhelm and massively over-develop the town. The expected population increase in population could not be matched in terms of infrastructure. The surrounding road-networks are already at capacity, a 55% (Nailsea) and 80% (Backwell) increase would grind the surrounding routes to a standstill. The new link road across Backwell Common, under rail crossing is likely to be extremely expensive and the engineering problematic due to the proximity to the River Kenn and railway line. Even so, it leads out on to the A370, which is already running at capacity at busy times. Other routes out of Nailsea and Backwell are narrow country roads not designed for the capacity increase, leading to possible safety issues. Additionally, the current rail network already struggles to support the capacity required at rush hour, and such an increase would leave the service heavily overcrowded. Nailsea & Backwell station already does not lend itself to overcrowding on the platforms without putting passengers at risk. Beyond that, other important infrastructure would not support the new development. The proposal for new primary schools is dependent on the developer and no locations have been identified. Additional demand on health facilities would be overwhelming. In terms of the general environment, such a large population increase and loss of greenbelt and agricultural land, together with dramatic change to the landscape will be detrimental. The loss of green space and natural habitats will be a huge loss to the area. Removal of the green space between Nailsea and Backwell (either side of the railway track) means the two locations become more or less as one - but with double the population. This may also have an affect on the wildlife found at Backwell lake, and possible water quality there (especially being a floodplain).			
Poplar Farm, Nailsea	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Introducing 1,817 new homes in Nailsea would overwhelm and massively over-develop the town. The expected population increase in population could not be matched in terms of infrastructure. The surrounding road-networks are already at capacity, a 55% (Nailsea) and 80% (Backwell) increase would grind the surrounding routes to a standstill. The new link road across Backwell Common, under rail crossing is likely to be extremely expensive and the engineering problematic due to the proximity to the River Kenn and railway line. Even so, it leads out on to the A370, which is already running at capacity at busy times. Other routes out of Nailsea and Backwell are narrow country roads not designed for the capacity increase, leading to possible safety issues. Additionally, the current rail network already struggles to support the capacity required at rush hour, and such an increase would leave the service heavily overcrowded. Nailsea & Backwell station already does not lend itself to overcrowding on the platforms without putting passengers at risk. Beyond that, other important infrastructure would not support the new development. The proposal for new primary schools is dependent on the developer and no locations have been identified. Additional demand on health facilities would be overwhelming. In terms of the general environment, such a large population increase and loss of greenbelt and agricultural land, together with dramatic change to the landscape will be detrimental. The loss of green space and natural habitats will be a huge loss to the area. Removal of the green space between Nailsea and Backwell (either side of the railway track) means the two locations become more or less as one - but with double the population. This may also have an affect on the wildlife found at Backwell lake, and possible water quality there (especially being a floodplain).			
Land south of Nailsea	No	‣ Positively prepared	Unsure	Unsure	Introducing 1,817 new homes in Nailsea would overwhelm and massively over-develop the town. The expected population increase in population could not be matched in terms of infrastructure. The surrounding road-networks are already at capacity, a 55% (Nailsea) and 80% (Backwell) increase would grind the surrounding routes to a standstill.			

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		‣ Justified ‣ Effective ‣ Consistent with national policy			The new link road across Backwell Common, under rail crossing is likely to be extremely expensive and the engineering problematic due to the proximity to the River Kenn and railway line. Even so, it leads out on to the A370, which is already running at capacity at busy times. Other routes out of Nailsea and Backwell are narrow country roads not designed for the capacity increase, leading to possible safety issues. Additionally, the current rail network already struggles to support the capacity required at rush hour, and such an increase would leave the service heavily overcrowded. Nailsea & Backwell station already does not lend itself to overcrowding on the platforms without putting passengers at risk. Beyond that, other important infrastructure would not support the new development. The proposal for new primary schools is dependent on the developer and no locations have been identified. Additional demand on health facilities would be overwhelming. In terms of the general environment, such a large population increase and loss of greenbelt and agricultural land, together with dramatic change to the landscape will be detrimental. The loss of green space and natural habitats will be a huge loss to the area. Removal of the green space between Nailsea and Backwell (either side of the railway track) means the two locations become more or less as one - but with double the population. This may also have an affect on the wildlife found at Backwell lake, and possible water quality there (especially being a floodplain).			

Name: Waddeton Park Ltd (Land at Pill Road) **I.D:** 29190241

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP7: Green Belt	Yes		Yes	Yes		Waddeton Park Limited strongly supports the proposed allocation of its land within the new local plan for development. However, it has drawn attention to the indicative site capacity and site requirements laid out for the Land at Pill Road in the Pre-Submission Plan. Related amendments are, therefore, proposed. For clarity, and for the avoidance of uncertainty and unnecessary delays in determining the future planning application, Waddeton Park suggests that it would be appropriate for a modification to be made to the proposed allocation wording to the extent that development would permit up to 100 dwellings and a care home. The allocation should be worded to specifically ‘permit up to 100 dwellings’ and additionally ‘support, but not require, a care home on the site’ (or similar wording). In this regard, there is a demonstrable need for older persons housing in North Somerset over the plan period to 2041, as supported by the ‘North Somerset Local Housing Need Assessment Report of Findings, September 2025’ (LHNA). Figure 49 of the LHNA, which forms part of the local plan evidence base, quantifies the need for specialist older person housing to 2041. This sets out that there would be need to provide an additional 1,400-1,500 specialist older person housing units over the 15-year plan period 2026-2041.	Waddeton Park Limited’s view is that the Local Plan is legally compliant regarding the proposed site allocation for residential development at Land at Pill Road in Pill (Schedule 1 of the Local Plan, page 280), to which these representations relate. Moreover, Waddeton Park Limited believes that the proposed Local Plan, as set out in the Regulation 19 consultation can be found to be sound in that that the allocation of the land at Pill Road, Pill for residential development (identified on page 280 under Schedule 1) is consistent with each of the tests of soundness insofar as they are directly relevant. These representations are	North_Somerset_Local_Plan_Pre-Submission_Plan_Representation_Form_Part_B_WPL_SP7.pdf

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						Therefore, the need for this type of development is clear and should be appropriately accommodated for in the local plan. The appended illustrative masterplan outlines one way in which a care home could appropriately form part of the development scheme, in addition to 100 dwellings on the site. Waddeton Park proposes that the following requirement is removed from being a site requirement: “Active travel connection required between Pill Green and Land at Pill Road, crossing Markham Brook to enable creation of safe walking routes to schools, along with proportionate contribution to Markham Brook active travel overbridge.” Waddeton Park suggests that it would be appropriate for a modification to be made to the proposed allocation to remove this element as a ‘site requirement’. Firstly, the site has appropriate accessible connections for future residents to walk to St Katherine’s School opposite. This site already benefits from safe walking routes to schools; therefore, it is onerous and unreasonable to expect development on the site to fund/deliver additional connections where not necessary to make the site itself acceptable in planning terms. As assessed within the appended Transport Technical Note, the site’s accessibility review shows that the key desire line to travel from the site is to Pill village centre along Pill Road north and St Katherine’s secondary school opposite the site. To the north, Pill Road also connects to Crockerne Primary School. Overall, access to day-to-day facilities and amenities for education, shopping, and community uses is primarily towards the north and east (to the secondary school). In addition, there are existing PRoWs opposite the site on Pill Road for recreational walks. Therefore, it does not seem reasonable for the Land at Pill Road site to have to deliver and/or contribute to the delivery of the connection over Markham Brook to the west as this is not necessary for future residents. The sustainability credentials of the site without this link are clearly acceptable; the delivery of the land at Pill Road without any reliance on the Pill Green land should be wholly supported. It seems the benefit of such connection would be for the Pill Green site (draft allocation for 600 dwellings) and, as such, should this connection be necessary it should be delivered by that site. Furthermore, an ‘overbridge’ to Markham Brook is very likely to be impractical and unrealistic physically, given the sloping valley and steep topography around the brook, and it is likely to have detrimental effects upon trees and biodiversity. Furthermore, the financial implications could risk the viability of the land at Pill Road allocation coming forward for development and this would materially affect the Council’s housing position. Finally, fundamentally the requirement for	supported by the appended Transport Technical Note, prepared by Ridge, which supports the sustainability of the land at Pill Road for development. The land at Pill Road site allocation is part of the proposed means of implementing the spatial strategy, which has been properly arrived at through the identification of properly explained strategic options and their testing through sustainability and deliverability evidence and appraisals, and through stakeholder and community consultation. It is, therefore, a proper product of the positive preparation of the Local Plan and is justified. This forms part of the spatial strategy in appropriately directing strategic growth at Pill and Easton-in-Gordano under Policy LP4. The allocation of the site will be effective, in that it will assist in making the Local Plan deliverable. The site is wholly in one ownership and free of any significant constraints so its development can begin and be completed in the early years of the local plan period. The allocation is consistent with national policy and with the policies in the emerging Local Plan which is to be examined according to relevant national planning policy. It is clear that exceptional circumstances exist, and	

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						an active travel bridge over Markham Brook is not considered to be necessary, as set out in the appended Transport Technical Note. There is no desire line to travel to the south/ west of the site, as this has excellent accessibility to local facilities and amenities in the village centre and the secondary school is conveniently located opposite the site. These proposed minor changes need not be a matter of any significance for the examination but could be a modification proposed by the Council before submission of the Local Plan to the Secretary of State, and as a minor change should not trigger a need for any further consultation.	have been appropriately evidenced, to justify release of Green Belt land to support growth to meet North Somerset Council's identified housing need for the plan period. Paragraph 148 of the NPPF is clear that where it is necessary to release Green Belt land for development, as is established and agreed in North Somerset, plans should give: "priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations." In this regard, Waddeton Park has consistently promoted the land at Pill Road throughout the emerging local plan process and strongly supports its allocation for residential development in the plan. The site is sustainably located with a strong relationship with the existing settlement of Pill. This strong cohesion between site and settlement is a significant benefit in allocating residential development here. The site is well located to the existing settlement with good accessibility to local services and in walking distance to key facilities. Pursuant to the Council's 'Spatial strategy, site selection and capacity paper' (October 2025), Pill/ Easton-in-Gordano is identified as a Category A	

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							village which are described as “villages considered to be relatively sustainable in their own right with a range of easily accessible services and facilities and goof public transport links to towns”. The Council’s approach is wholly appropriate to direct growth to such settlements. It is highlighted that work to reopen the railway line has commenced with Pill train station set to reopen by 2028 which will only further enhance the existing sustainability of the settlement. The land at Pill Road has been appropriately and comprehensively assessed as suitable through the SHLAA and adjoins a Category A village in a sustainable location where exceptional circumstances for Green Belt release have been identified. With regard to the Green Belt, the site has been assessed by the Council, as part of a slightly larger land parcel, within the ‘Stage 2 Green Belt Assessment’ (October 2025), as delineated below (see attached document). The overall assessment of this parcel concludes it makes a weak contribution to the purposes of the Green Belt. This is set out in turn as follows: Purpose A - to check the unrestricted sprawl of large builtup area; (Bristol): Weak Purpose B - to prevent neighbouring towns merging into one another:	

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							Weak Purpose C - to assist in safeguarding the countryside from encroachment: Moderate Purpose D - to preserve the setting and special character of historic towns: Weak Purpose E -To assist in urban regeneration, by encouraging the recycling of derelict and other urban land: Neutral Further to this, as can be seen in the Green Belt assessment, our Waddeton Park's land makes a weak contribution to Green Belt purposes A, B and D. There are no relevant footnote 7 assets that would provide a strong reason for refusing or restricting development on the land. Therefore, this can be considered Grey Belt, subject to the specifics of the development proposal. The Council's Stage 2 Green Belt assessment agrees with this position in that the parcel can be identified as Grey Belt. This wholly supports the Council's approach to allocate development on the land, in accordance with the provisions of NPPF paragraph 148 which first priorities previously developed land and then Grey Belt land before any other Green Belt locations. The site is easily accessible, being within walking and cycling distance to a number and facilities and services within the village and nearby. This includes St Katherine's School	

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							opposite the site to the east. The site is available in the short term and can be delivered as a standalone development, without dependency on any major infrastructure intervention. The residential development has been driven by the context and topography, and by a wish to achieve an appropriate network of green infrastructure, positively responding to the woodland around Markham Brook to the west. The site is within Flood Zone 1 and, therefore, having a low risk of flooding and being appropriate for residential development. It is the preferred location under the flood sequential approach to selection of housing sites. Supporting technical surveys and assessments have been carried out to inform the development allocation. Demonstration of the deliverability of development on the site is the intention to submit an outline planning application for development of the site, following pre-application discussions with the Council, shortly after the close of this Regulation 19 consultation. This will ensure development can be brought forward in the early years of the plan and supports the requirement for the Council to identify “specific, deliverable sites for five years following the	

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							intended date of adoption." (NPPF paragraph 72). Overall, the proposed allocation on land at Pill Road is strongly supported. Comment is, however, made with regard to the site-specific deliverability of the development, with regard to the site requirements as set out on page 280 of the published Reg 19 Pre-submission Plan for the proposed allocation. In this context, the draft allocation makes provision for an indicative capacity of 100 dwellings on the site. Pursuant to the work undertaken to date the site may also be able to accommodate a care home, ensuring an efficient use of land and meeting a need for such facilities. As illustrated on the appended illustrative masterplan, a scheme is currently being progressed via pre-application discussions for 100 dwellings and a c. 70-bed care home. It is appropriate that the supporting wording for the allocation is amended to reflect this potential development, without making it an absolute requirement. The site can comfortably and appropriately accommodate a care home in addition to traditional residential dwellings, which will make a significant contribution in an area where there is demonstrable need. In accordance with the enclosed plan, key elements of Waddeton Park Limited's development	

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							proposal on the land at Pill Road include: • New homes generally to the eastern boundary with lower density residential frontage towards the woodland; • Policy compliant affordable housing; • Care home in accessible location in the north of the site with views across landscape edge and woodland, providing a sensitive response to existing dwellings in St Catherine's Mead; • Vehicular access from Pill Road; • Pedestrian/cycle and potential emergency access connection to the north of the site, serving a foot/ cycle path which runs north/south within the site; • Mobility hub, with potential for electric scooter/bicycle hire, bicycle parking, car club space, parcel lockers and occasional events (i.e. food truck); • Traffic management to help create a low speed environment; • Potential for pedestrian crossing of Pill Road to Public Right of Way running east; • Pedestrian/cycle access to Pill Road linking with existing bus stop, serving a foot/cycle path which runs north/south within the site; • Potential for improved crossing/traffic management along Pill Road; • Wildlife area with informal recreation; • Northern pocket park responding to existing space in St Catherine's Mead;	

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							• Multi-functional green corridor with swale, footpath and new planting; • Open space with play area in an accessible location, helping to retain an open character at the gateway to the village; • North to south swale within landscape edge to woodland. • New and retained hedgerow to south of vehicular access, along the eastern boundary with Pill Road, helping to retain a green character on the entrance to the village; • Green corridor with significant tree planting on site high point to help soften views; • Attenuation pond within landscape corridor.	
SP8: Housing	Yes		Yes	Yes		Waddeton Park Limited strongly supports the proposed allocation of its land within the new local plan for development. However, it has drawn attention to the indicative site capacity and site requirements laid out for the Land at Pill Road in the Pre-Submission Plan. Related amendments are, therefore, proposed. For clarity, and for the avoidance of uncertainty and unnecessary delays in determining the future planning application, Waddeton Park suggests that it would be appropriate for a modification to be made to the proposed allocation wording to the extent that development would permit up to 100 dwellings and a care home. The allocation should be worded to specifically 'permit up to 100 dwellings' and additionally 'support, but not require, a care home on the site' (or similar wording). In this regard, there is a demonstrable need for older persons housing in North Somerset over the plan period to 2041, as supported by the 'North Somerset Local Housing Need Assessment Report of Findings, September 2025' (LHNA). Figure 49 of the LHNA, which forms part of the local plan evidence base, quantifies the need for specialist older person housing to 2041. This sets out that there would be need to provide an additional 1,400-1,500 specialist older person housing units over the 15-year plan period 2026-2041. Therefore, the need for this type of development is clear and should be appropriately accommodated for in the local plan. The appended illustrative masterplan outlines one way in	Waddeton Park Limited's view is that the Local Plan is legally compliant regarding the proposed site allocation for residential development at Land at Pill Road in Pill (Schedule 1 of the Local Plan, page 280), to which these representations relate. Moreover, Waddeton Park Limited believes that the proposed Local Plan, as set out in the Regulation 19 consultation can be found to be sound in that that the allocation of the land at Pill Road, Pill for residential development (identified on page 280 under Schedule 1) is consistent with each of the tests of soundness insofar as they are directly relevant. These representations are supported by the appended Transport Technical Note, prepared by Ridge, which	North_Somerset_Local_Plan_Pre-Submission_Plan_Representation_Form_Part_B_WPL_SP8.pdf

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						which a care home could appropriately form part of the development scheme, in addition to 100 dwellings on the site. Waddeton Park proposes that the following requirement is removed from being a site requirement: “Active travel connection required between Pill Green and Land at Pill Road, crossing Markham Brook to enable creation of safe walking routes to schools, along with proportionate contribution to Markham Brook active travel overbridge.” Waddeton Park suggests that it would be appropriate for a modification to be made to the proposed allocation to remove this element as a ‘site requirement’. Firstly, the site has appropriate accessible connections for future residents to walk to St Katherine’s School opposite. This site already benefits from safe walking routes to schools; therefore, it is onerous and unreasonable to expect development on the site to fund/deliver additional connections where not necessary to make the site itself acceptable in planning terms. As assessed within the appended Transport Technical Note, the site’s accessibility review shows that the key desire line to travel from the site is to Pill village centre along Pill Road north and St Katherine’s secondary school opposite the site. To the north, Pill Road also connects to Crockerne Primary School. Overall, access to day-to-day facilities and amenities for education, shopping, and community uses is primarily towards the north and east (to the secondary school). In addition, there are existing PRoWs opposite the site on Pill Road for recreational walks. Therefore, it does not seem reasonable for the Land at Pill Road site to have to deliver and/or contribute to the delivery of the connection over Markham Brook to the west as this is not necessary for future residents. The sustainability credentials of the site without this link are clearly acceptable; the delivery of the land at Pill Road without any reliance on the Pill Green land should be wholly supported. It seems the benefit of such connection would be for the Pill Green site (draft allocation for 600 dwellings) and, as such, should this connection be necessary it should be delivered by that site. Furthermore, an ‘overbridge’ to Markham Brook is very likely to be impractical and unrealistic physically, given the sloping valley and steep topography around the brook, and it is likely to have detrimental effects upon trees and biodiversity. Furthermore, the financial implications could risk the viability of the land at Pill Road allocation coming forward for development and this would materially affect the Council’s housing position. Finally, fundamentally the requirement for an active travel bridge over Markham Brook is not considered to be necessary, as set out in the appended Transport Technical Note. There is no desire line to travel to the south/	supports the sustainability of the land at Pill Road for development. The land at Pill Road site allocation is part of the proposed means of implementing the spatial strategy, which has been properly arrived at through the identification of properly explained strategic options and their testing through sustainability and deliverability evidence and appraisals, and through stakeholder and community consultation. It is, therefore, a proper product of the positive preparation of the Local Plan and is justified. This forms part of the spatial strategy in appropriately directing strategic growth at Pill and Easton-in-Gordano under Policy LP4. The allocation of the site will be effective, in that it will assist in making the Local Plan deliverable. The site is wholly in one ownership and free of any significant constraints so its development can begin and be completed in the early years of the local plan period. The allocation is consistent with national policy and with the policies in the emerging Local Plan which is to be examined according to relevant national planning policy. It is clear that exceptional circumstances exist, and have been appropriately evidenced, to justify release of Green Belt land to	

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						west of the site, as this has excellent accessibility to local facilities and amenities in the village centre and the secondary school is conveniently located opposite the site. These proposed minor changes need not be a matter of any significance for the examination but could be a modification proposed by the Council before submission of the Local Plan to the Secretary of State, and as a minor change should not trigger a need for any further consultation.	support growth to meet North Somerset Council's identified housing need for the plan period. Paragraph 148 of the NPPF is clear that where it is necessary to release Green Belt land for development, as is established and agreed in North Somerset, plans should give: "priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations." In this regard, Waddeton Park has consistently promoted the land at Pill Road throughout the emerging local plan process and strongly supports its allocation for residential development in the plan. The site is sustainably located with a strong relationship with the existing settlement of Pill. This strong cohesion between site and settlement is a significant benefit in allocating residential development here. The site is well located to the existing settlement with good accessibility to local services and in walking distance to key facilities. Pursuant to the Council's 'Spatial strategy, site selection and capacity paper' (October 2025), Pill/ Easton-in-Gordano is identified as a Category A village which are described as "villages considered to be relatively sustainable in	

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							their own right with a range of easily accessible services and facilities and goof public transport links to towns". The Council's approach is wholly appropriate to direct growth to such settlements. It is highlighted that work to reopen the railway line has commenced with Pill train station set to reopen by 2028 which will only further enhance the existing sustainability of the settlement. The land at Pill Road has been appropriately and comprehensively assessed as suitable through the SHLAA and adjoins a Category A village in a sustainable location where exceptional circumstances for Green Belt release have been identified. With regard to the Green Belt, the site has been assessed by the Council, as part of a slightly larger land parcel, within the 'Stage 2 Green Belt Assessment' (October 2025), as delineated below (see attached document). The overall assessment of this parcel concludes it makes a weak contribution to the purposes of the Green Belt. This is set out in turn as follows: Purpose A - to check the unrestricted sprawl of large builtup area; (Bristol): Weak Purpose B - to prevent neighbouring towns merging into one another: Weak Purpose C - to assist in safeguarding the	

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							countryside from encroachment: Moderate Purpose D - to preserve the setting and special character of historic towns: Weak Purpose E -To assist in urban regeneration, by encouraging the recycling of derelict and other urban land: Neutral Further to this, as can be seen in the Green Belt assessment, our Waddeton Park's land makes a weak contribution to Green Belt purposes A, B and D. There are no relevant footnote 7 assets that would provide a strong reason for refusing or restricting development on the land. Therefore, this can be considered Grey Belt, subject to the specifics of the development proposal. The Council's Stage 2 Green Belt assessment agrees with this position in that the parcel can be identified as Grey Belt. This wholly supports the Council's approach to allocate development on the land, in accordance with the provisions of NPPF paragraph 148 which first priorities previously developed land and then Grey Belt land before any other Green Belt locations. The site is easily accessible, being within walking and cycling distance to a number and facilities and services within the village and nearby. This includes St Katherine's School opposite the site to the east.	

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							The site is available in the short term and can be delivered as a standalone development, without dependency on any major infrastructure intervention. The residential development has been driven by the context and topography, and by a wish to achieve an appropriate network of green infrastructure, positively responding to the woodland around Markham Brook to the west. The site is within Flood Zone 1 and, therefore, having a low risk of flooding and being appropriate for residential development. It is the preferred location under the flood sequential approach to selection of housing sites. Supporting technical surveys and assessments have been carried out to inform the development allocation. Demonstration of the deliverability of development on the site is the intention to submit an outline planning application for development of the site, following pre-application discussions with the Council, shortly after the close of this Regulation 19 consultation. This will ensure development can be brought forward in the early years of the plan and supports the requirement for the Council to identify “specific, deliverable sites for five years following the intended date of adoption.” (NPPF paragraph 72).	

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							Overall, the proposed allocation on land at Pill Road is strongly supported. Comment is, however, made with regard to the site-specific deliverability of the development, with regard to the site requirements as set out on page 280 of the published Reg 19 Pre-submission Plan for the proposed allocation. In this context, the draft allocation makes provision for an indicative capacity of 100 dwellings on the site. Pursuant to the work undertaken to date the site may also be able to accommodate a care home, ensuring an efficient use of land and meeting a need for such facilities. As illustrated on the appended illustrative masterplan, a scheme is currently being progressed via pre-application discussions for 100 dwellings and a c. 70-bed care home. It is appropriate that the supporting wording for the allocation is amended to reflect this potential development, without making it an absolute requirement. The site can comfortably and appropriately accommodate a care home in addition to traditional residential dwellings, which will make a significant contribution in an area where there is demonstrable need. In accordance with the enclosed plan, key elements of Waddeton Park Limited’s development proposal on the land at Pill Road include: • New homes generally to	

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							the eastern boundary with lower density residential frontage towards the woodland; • Policy compliant affordable housing; • Care home in accessible location in the north of the site with views across landscape edge and woodland, providing a sensitive response to existing dwellings in St Catherine's Mead; • Vehicular access from Pill Road; • Pedestrian/cycle and potential emergency access connection to the north of the site, serving a foot/ cycle path which runs north/south within the site; • Mobility hub, with potential for electric scooter/bicycle hire, bicycle parking, car club space, parcel lockers and occasional events (i.e. food truck); • Traffic management to help create a low speed environment; • Potential for pedestrian crossing of Pill Road to Public Right of Way running east; • Pedestrian/cycle access to Pill Road linking with existing bus stop, serving a foot/cycle path which runs north/south within the site; • Potential for improved crossing/traffic management along Pill Road; • Wildlife area with informal recreation; • Northern pocket park responding to existing space in St Catherine's Mead; • Multi-functional green corridor with swale, footpath and new planting;	

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							• Open space with play area in an accessible location, helping to retain an open character at the gateway to the village; • North to south swale within landscape edge to woodland. • New and retained hedgerow to south of vehicular access, along the eastern boundary with Pill Road, helping to retain a green character on the entrance to the village; • Green corridor with significant tree planting on site high point to help soften views; • Attenuation pond within landscape corridor.	
Policy LP4: Strategic location: Pill and Easton-in-Gordano	Yes		Yes	Yes		Waddeton Park Limited strongly supports the proposed allocation of its land within the new local plan for development. However, it has drawn attention to the indicative site capacity and site requirements laid out for the Land at Pill Road in the Pre-Submission Plan. Related amendments are, therefore, proposed. For clarity, and for the avoidance of uncertainty and unnecessary delays in determining the future planning application, Waddeton Park suggests that it would be appropriate for a modification to be made to the proposed allocation wording to the extent that development would permit up to 100 dwellings and a care home. The allocation should be worded to specifically 'permit up to 100 dwellings' and additionally 'support, but not require, a care home on the site' (or similar wording). In this regard, there is a demonstrable need for older persons housing in North Somerset over the plan period to 2041, as supported by the 'North Somerset Local Housing Need Assessment Report of Findings, September 2025' (LHNA). Figure 49 of the LHNA, which forms part of the local plan evidence base, quantifies the need for specialist older person housing to 2041. This sets out that there would be need to provide an additional 1,400-1,500 specialist older person housing units over the 15-year plan period 2026-2041. Therefore, the need for this type of development is clear and should be appropriately accommodated for in the local plan. The appended illustrative masterplan outlines one way in which a care home could appropriately form part of the development scheme, in addition to 100 dwellings on the site.	Waddeton Park Limited's view is that the Local Plan is legally compliant regarding the proposed site allocation for residential development at Land at Pill Road in Pill (Schedule 1 of the Local Plan, page 280), to which these representations relate. Moreover, Waddeton Park Limited believes that the proposed Local Plan, as set out in the Regulation 19 consultation can be found to be sound in that that the allocation of the land at Pill Road, Pill for residential development (identified on page 280 under Schedule 1) is consistent with each of the tests of soundness insofar as they are directly relevant. These representations are supported by the appended Transport Technical Note, prepared by Ridge, which supports the sustainability of the land at Pill Road for development.	North_Somerset_Local_Plan_Pre-Submission_Plan_Representation_Form_Part_B_WPL_LP4.pdf

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						Waddeton Park proposes that the following requirement is removed from being a site requirement: “Active travel connection required between Pill Green and Land at Pill Road, crossing Markham Brook to enable creation of safe walking routes to schools, along with proportionate contribution to Markham Brook active travel overbridge.” Waddeton Park suggests that it would be appropriate for a modification to be made to the proposed allocation to remove this element as a ‘site requirement’. Firstly, the site has appropriate accessible connections for future residents to walk to St Katherine’s School opposite. This site already benefits from safe walking routes to schools; therefore, it is onerous and unreasonable to expect development on the site to fund/deliver additional connections where not necessary to make the site itself acceptable in planning terms. As assessed within the appended Transport Technical Note, the site’s accessibility review shows that the key desire line to travel from the site is to Pill village centre along Pill Road north and St Katherine’s secondary school opposite the site. To the north, Pill Road also connects to Crockerne Primary School. Overall, access to day-to-day facilities and amenities for education, shopping, and community uses is primarily towards the north and east (to the secondary school). In addition, there are existing PRoWs opposite the site on Pill Road for recreational walks. Therefore, it does not seem reasonable for the Land at Pill Road site to have to deliver and/or contribute to the delivery of the connection over Markham Brook to the west as this is not necessary for future residents. The sustainability credentials of the site without this link are clearly acceptable; the delivery of the land at Pill Road without any reliance on the Pill Green land should be wholly supported. It seems the benefit of such connection would be for the Pill Green site (draft allocation for 600 dwellings) and, as such, should this connection be necessary it should be delivered by that site. Furthermore, an ‘overbridge’ to Markham Brook is very likely to be impractical and unrealistic physically, given the sloping valley and steep topography around the brook, and it is likely to have detrimental effects upon trees and biodiversity. Furthermore, the financial implications could risk the viability of the land at Pill Road allocation coming forward for development and this would materially affect the Council’s housing position. Finally, fundamentally the requirement for an active travel bridge over Markham Brook is not considered to be necessary, as set out in the appended Transport Technical Note. There is no desire line to travel to the south/ west of the site, as this has excellent accessibility to local facilities and amenities in the village centre and the secondary school is conveniently located opposite the site.	The land at Pill Road site allocation is part of the proposed means of implementing the spatial strategy, which has been properly arrived at through the identification of properly explained strategic options and their testing through sustainability and deliverability evidence and appraisals, and through stakeholder and community consultation. It is, therefore, a proper product of the positive preparation of the Local Plan and is justified. This forms part of the spatial strategy in appropriately directing strategic growth at Pill and Easton-in-Gordano under Policy LP4. The allocation of the site will be effective, in that it will assist in making the Local Plan deliverable. The site is wholly in one ownership and free of any significant constraints so its development can begin and be completed in the early years of the local plan period. The allocation is consistent with national policy and with the policies in the emerging Local Plan which is to be examined according to relevant national planning policy. It is clear that exceptional circumstances exist, and have been appropriately evidenced, to justify release of Green Belt land to support growth to meet North Somerset Council’s identified housing need for	

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						These proposed minor changes need not be a matter of any significance for the examination but could be a modification proposed by the Council before submission of the Local Plan to the Secretary of State, and as a minor change should not trigger a need for any further consultation.	the plan period. Paragraph 148 of the NPPF is clear that where it is necessary to release Green Belt land for development, as is established and agreed in North Somerset, plans should give: “priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations.” In this regard, Waddeton Park has consistently promoted the land at Pill Road throughout the emerging local plan process and strongly supports its allocation for residential development in the plan. The site is sustainably located with a strong relationship with the existing settlement of Pill. This strong cohesion between site and settlement is a significant benefit in allocating residential development here. The site is well located to the existing settlement with good accessibility to local services and in walking distance to key facilities. Pursuant to the Council’s ‘Spatial strategy, site selection and capacity paper’ (October 2025), Pill/ Easton-in-Gordano is identified as a Category A village which are described as “villages considered to be relatively sustainable in their own right with a range of easily accessible services and facilities and	

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							goof public transport links to towns". The Council's approach is wholly appropriate to direct growth to such settlements. It is highlighted that work to reopen the railway line has commenced with Pill train station set to reopen by 2028 which will only further enhance the existing sustainability of the settlement. The land at Pill Road has been appropriately and comprehensively assessed as suitable through the SHLAA and adjoins a Category A village in a sustainable location where exceptional circumstances for Green Belt release have been identified. With regard to the Green Belt, the site has been assessed by the Council, as part of a slightly larger land parcel, within the 'Stage 2 Green Belt Assessment' (October 2025), as delineated below (see attached document). The overall assessment of this parcel concludes it makes a weak contribution to the purposes of the Green Belt. This is set out in turn as follows: Purpose A - to check the unrestricted sprawl of large builtup area; (Bristol): Weak Purpose B - to prevent neighbouring towns merging into one another: Weak Purpose C - to assist in safeguarding the countryside from encroachment: Moderate Purpose D - to preserve the	

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							setting and special character of historic towns: Weak Purpose E -To assist in urban regeneration, by encouraging the recycling of derelict and other urban land: Neutral Further to this, as can be seen in the Green Belt assessment, our Waddeton Park's land makes a weak contribution to Green Belt purposes A, B and D. There are no relevant footnote 7 assets that would provide a strong reason for refusing or restricting development on the land. Therefore, this can be considered Grey Belt, subject to the specifics of the development proposal. The Council's Stage 2 Green Belt assessment agrees with this position in that the parcel can be identified as Grey Belt. This wholly supports the Council's approach to allocate development on the land, in accordance with the provisions of NPPF paragraph 148 which first priorities previously developed land and then Grey Belt land before any other Green Belt locations. The site is easily accessible, being within walking and cycling distance to a number and facilities and services within the village and nearby. This includes St Katherine's School opposite the site to the east. The site is available in the short term and can be delivered as a standalone	

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							development, without dependency on any major infrastructure intervention. The residential development has been driven by the context and topography, and by a wish to achieve an appropriate network of green infrastructure, positively responding to the woodland around Markham Brook to the west. The site is within Flood Zone 1 and, therefore, having a low risk of flooding and being appropriate for residential development. It is the preferred location under the flood sequential approach to selection of housing sites. Supporting technical surveys and assessments have been carried out to inform the development allocation. Demonstration of the deliverability of development on the site is the intention to submit an outline planning application for development of the site, following pre-application discussions with the Council, shortly after the close of this Regulation 19 consultation. This will ensure development can be brought forward in the early years of the plan and supports the requirement for the Council to identify “specific, deliverable sites for five years following the intended date of adoption.” (NPPF paragraph 72). Overall, the proposed allocation on land at Pill Road is strongly supported.	

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							Comment is, however, made with regard to the site-specific deliverability of the development, with regard to the site requirements as set out on page 280 of the published Reg 19 Pre-submission Plan for the proposed allocation. In this context, the draft allocation makes provision for an indicative capacity of 100 dwellings on the site. Pursuant to the work undertaken to date the site may also be able to accommodate a care home, ensuring an efficient use of land and meeting a need for such facilities. As illustrated on the appended illustrative masterplan, a scheme is currently being progressed via pre-application discussions for 100 dwellings and a c. 70-bed care home. It is appropriate that the supporting wording for the allocation is amended to reflect this potential development, without making it an absolute requirement. The site can comfortably and appropriately accommodate a care home in addition to traditional residential dwellings, which will make a significant contribution in an area where there is demonstrable need. In accordance with the enclosed plan, key elements of Waddeton Park Limited's development proposal on the land at Pill Road include: • New homes generally to the eastern boundary with lower density residential frontage towards the	

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							woodland; • Policy compliant affordable housing; • Care home in accessible location in the north of the site with views across landscape edge and woodland, providing a sensitive response to existing dwellings in St Catherine's Mead; • Vehicular access from Pill Road; • Pedestrian/cycle and potential emergency access connection to the north of the site, serving a foot/ cycle path which runs north/south within the site; • Mobility hub, with potential for electric scooter/bicycle hire, bicycle parking, car club space, parcel lockers and occasional events (i.e. food truck); • Traffic management to help create a low speed environment; • Potential for pedestrian crossing of Pill Road to Public Right of Way running east; • Pedestrian/cycle access to Pill Road linking with existing bus stop, serving a foot/cycle path which runs north/south within the site; • Potential for improved crossing/traffic management along Pill Road; • Wildlife area with informal recreation; • Northern pocket park responding to existing space in St Catherine's Mead; • Multi-functional green corridor with swale, footpath and new planting; • Open space with play area in an accessible location, helping to retain	

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							an open character at the gateway to the village; • North to south swale within landscape edge to woodland. • New and retained hedgerow to south of vehicular access, along the eastern boundary with Pill Road, helping to retain a green character on the entrance to the village; • Green corridor with significant tree planting on site high point to help soften views; • Attenuation pond within landscape corridor.	
Policy LP5: Housing, employment and mixed use allocations	Yes		Yes	Yes		Waddeton Park Limited strongly supports the proposed allocation of its land within the new local plan for development. However, it has drawn attention to the indicative site capacity and site requirements laid out for the Land at Pill Road in the Pre-Submission Plan. Related amendments are, therefore, proposed. For clarity, and for the avoidance of uncertainty and unnecessary delays in determining the future planning application, Waddeton Park suggests that it would be appropriate for a modification to be made to the proposed allocation wording to the extent that development would permit up to 100 dwellings and a care home. The allocation should be worded to specifically 'permit up to 100 dwellings' and additionally 'support, but not require, a care home on the site' (or similar wording). In this regard, there is a demonstrable need for older persons housing in North Somerset over the plan period to 2041, as supported by the 'North Somerset Local Housing Need Assessment Report of Findings, September 2025' (LHNA). Figure 49 of the LHNA, which forms part of the local plan evidence base, quantifies the need for specialist older person housing to 2041. This sets out that there would be need to provide an additional 1,400-1,500 specialist older person housing units over the 15-year plan period 2026-2041. Therefore, the need for this type of development is clear and should be appropriately accommodated for in the local plan. The appended illustrative masterplan outlines one way in which a care home could appropriately form part of the development scheme, in addition to 100 dwellings on the site. Waddeton Park proposes that the following requirement is removed from being a site requirement: "Active travel connection required between Pill Green and	Waddeton Park Limited's view is that the Local Plan is legally compliant regarding the proposed site allocation for residential development at Land at Pill Road in Pill (Schedule 1 of the Local Plan, page 280), to which these representations relate. Moreover, Waddeton Park Limited believes that the proposed Local Plan, as set out in the Regulation 19 consultation can be found to be sound in that that the allocation of the land at Pill Road, Pill for residential development (identified on page 280 under Schedule 1) is consistent with each of the tests of soundness insofar as they are directly relevant. These representations are supported by the appended Transport Technical Note, prepared by Ridge, which supports the sustainability of the land at Pill Road for development. The land at Pill Road site allocation is part of the	North_Somerset_Local_Plan_Pre-Submission_Plan_Representation_Form_Part_B_WPL_LP5.pdf

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						Land at Pill Road, crossing Markham Brook to enable creation of safe walking routes to schools, along with proportionate contribution to Markham Brook active travel overbridge." Waddeton Park suggests that it would be appropriate for a modification to be made to the proposed allocation to remove this element as a 'site requirement'. Firstly, the site has appropriate accessible connections for future residents to walk to St Katherine's School opposite. This site already benefits from safe walking routes to schools; therefore, it is onerous and unreasonable to expect development on the site to fund/deliver additional connections where not necessary to make the site itself acceptable in planning terms. As assessed within the appended Transport Technical Note, the site's accessibility review shows that the key desire line to travel from the site is to Pill village centre along Pill Road north and St Katherine's secondary school opposite the site. To the north, Pill Road also connects to Crockerne Primary School. Overall, access to day-to-day facilities and amenities for education, shopping, and community uses is primarily towards the north and east (to the secondary school). In addition, there are existing PRoWs opposite the site on Pill Road for recreational walks. Therefore, it does not seem reasonable for the Land at Pill Road site to have to deliver and/or contribute to the delivery of the connection over Markham Brook to the west as this is not necessary for future residents. The sustainability credentials of the site without this link are clearly acceptable; the delivery of the land at Pill Road without any reliance on the Pill Green land should be wholly supported. It seems the benefit of such connection would be for the Pill Green site (draft allocation for 600 dwellings) and, as such, should this connection be necessary it should be delivered by that site. Furthermore, an 'overbridge' to Markham Brook is very likely to be impractical and unrealistic physically, given the sloping valley and steep topography around the brook, and it is likely to have detrimental effects upon trees and biodiversity. Furthermore, the financial implications could risk the viability of the land at Pill Road allocation coming forward for development and this would materially affect the Council's housing position. Finally, fundamentally the requirement for an active travel bridge over Markham Brook is not considered to be necessary, as set out in the appended Transport Technical Note. There is no desire line to travel to the south/ west of the site, as this has excellent accessibility to local facilities and amenities in the village centre and the secondary school is conveniently located opposite the site. These proposed minor changes need not be a matter of any significance for the examination but could be a modification	proposed means of implementing the spatial strategy, which has been properly arrived at through the identification of properly explained strategic options and their testing through sustainability and deliverability evidence and appraisals, and through stakeholder and community consultation. It is, therefore, a proper product of the positive preparation of the Local Plan and is justified. This forms part of the spatial strategy in appropriately directing strategic growth at Pill and Easton-in-Gordano under Policy LP4. The allocation of the site will be effective, in that it will assist in making the Local Plan deliverable. The site is wholly in one ownership and free of any significant constraints so its development can begin and be completed in the early years of the local plan period. The allocation is consistent with national policy and with the policies in the emerging Local Plan which is to be examined according to relevant national planning policy. It is clear that exceptional circumstances exist, and have been appropriately evidenced, to justify release of Green Belt land to support growth to meet North Somerset Council's identified housing need for the plan period. Paragraph 148 of the NPPF is clear that where it is necessary	

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						proposed by the Council before submission of the Local Plan to the Secretary of State, and as a minor change should not trigger a need for any further consultation.	to release Green Belt land for development, as is established and agreed in North Somerset, plans should give: “priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations.” In this regard, Waddeton Park has consistently promoted the land at Pill Road throughout the emerging local plan process and strongly supports its allocation for residential development in the plan. The site is sustainably located with a strong relationship with the existing settlement of Pill. This strong cohesion between site and settlement is a significant benefit in allocating residential development here. The site is well located to the existing settlement with good accessibility to local services and in walking distance to key facilities. Pursuant to the Council’s ‘Spatial strategy, site selection and capacity paper’ (October 2025), Pill/ Easton-in-Gordano is identified as a Category A village which are described as “villages considered to be relatively sustainable in their own right with a range of easily accessible services and facilities and goof public transport links to towns”. The Council’s approach is wholly	

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							appropriate to direct growth to such settlements. It is highlighted that work to reopen the railway line has commenced with Pill train station set to reopen by 2028 which will only further enhance the existing sustainability of the settlement. The land at Pill Road has been appropriately and comprehensively assessed as suitable through the SHLAA and adjoins a Category A village in a sustainable location where exceptional circumstances for Green Belt release have been identified. With regard to the Green Belt, the site has been assessed by the Council, as part of a slightly larger land parcel, within the 'Stage 2 Green Belt Assessment' (October 2025), as delineated below (see attached document). The overall assessment of this parcel concludes it makes a weak contribution to the purposes of the Green Belt. This is set out in turn as follows: Purpose A - to check the unrestricted sprawl of large builtup area; (Bristol): Weak Purpose B - to prevent neighbouring towns merging into one another: Weak Purpose C - to assist in safeguarding the countryside from encroachment: Moderate Purpose D - to preserve the setting and special character of historic towns: Weak	

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							Purpose E -To assist in urban regeneration, by encouraging the recycling of derelict and other urban land: Neutral Further to this, as can be seen in the Green Belt assessment, our Waddeton Park's land makes a weak contribution to Green Belt purposes A, B and D. There are no relevant footnote 7 assets that would provide a strong reason for refusing or restricting development on the land. Therefore, this can be considered Grey Belt, subject to the specifics of the development proposal. The Council's Stage 2 Green Belt assessment agrees with this position in that the parcel can be identified as Grey Belt. This wholly supports the Council's approach to allocate development on the land, in accordance with the provisions of NPPF paragraph 148 which first priorities previously developed land and then Grey Belt land before any other Green Belt locations. The site is easily accessible, being within walking and cycling distance to a number and facilities and services within the village and nearby. This includes St Katherine's School opposite the site to the east. The site is available in the short term and can be delivered as a standalone development, without dependency on any major infrastructure intervention.	

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							The residential development has been driven by the context and topography, and by a wish to achieve an appropriate network of green infrastructure, positively responding to the woodland around Markham Brook to the west. The site is within Flood Zone 1 and, therefore, having a low risk of flooding and being appropriate for residential development. It is the preferred location under the flood sequential approach to selection of housing sites. Supporting technical surveys and assessments have been carried out to inform the development allocation. Demonstration of the deliverability of development on the site is the intention to submit an outline planning application for development of the site, following pre-application discussions with the Council, shortly after the close of this Regulation 19 consultation. This will ensure development can be brought forward in the early years of the plan and supports the requirement for the Council to identify “specific, deliverable sites for five years following the intended date of adoption.” (NPPF paragraph 72). Overall, the proposed allocation on land at Pill Road is strongly supported. Comment is, however, made with regard to the site-specific deliverability	

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							of the development, with regard to the site requirements as set out on page 280 of the published Reg 19 Pre-submission Plan for the proposed allocation. In this context, the draft allocation makes provision for an indicative capacity of 100 dwellings on the site. Pursuant to the work undertaken to date the site may also be able to accommodate a care home, ensuring an efficient use of land and meeting a need for such facilities. As illustrated on the appended illustrative masterplan, a scheme is currently being progressed via pre-application discussions for 100 dwellings and a c. 70-bed care home. It is appropriate that the supporting wording for the allocation is amended to reflect this potential development, without making it an absolute requirement. The site can comfortably and appropriately accommodate a care home in addition to traditional residential dwellings, which will make a significant contribution in an area where there is demonstrable need. In accordance with the enclosed plan, key elements of Waddeton Park Limited's development proposal on the land at Pill Road include: • New homes generally to the eastern boundary with lower density residential frontage towards the woodland; • Policy compliant affordable housing;	

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							• Care home in accessible location in the north of the site with views across landscape edge and woodland, providing a sensitive response to existing dwellings in St Catherine's Mead; • Vehicular access from Pill Road; • Pedestrian/cycle and potential emergency access connection to the north of the site, serving a foot/ cycle path which runs north/south within the site; • Mobility hub, with potential for electric scooter/bicycle hire, bicycle parking, car club space, parcel lockers and occasional events (i.e. food truck); • Traffic management to help create a low speed environment; • Potential for pedestrian crossing of Pill Road to Public Right of Way running east; • Pedestrian/cycle access to Pill Road linking with existing bus stop, serving a foot/cycle path which runs north/south within the site; • Potential for improved crossing/traffic management along Pill Road; • Wildlife area with informal recreation; • Northern pocket park responding to existing space in St Catherine's Mead; • Multi-functional green corridor with swale, footpath and new planting; • Open space with play area in an accessible location, helping to retain an open character at the gateway to the village; • North to south swale	

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							within landscape edge to woodland. • New and retained hedgerow to south of vehicular access, along the eastern boundary with Pill Road, helping to retain a green character on the entrance to the village; • Green corridor with significant tree planting on site high point to help soften views; • Attenuation pond within landscape corridor.	
Policy LP9: Extent of the Green Belt	Yes		Yes	Yes		Waddeton Park Limited strongly supports the proposed allocation of its land within the new local plan for development. However, it has drawn attention to the indicative site capacity and site requirements laid out for the Land at Pill Road in the Pre-Submission Plan. Related amendments are, therefore, proposed. For clarity, and for the avoidance of uncertainty and unnecessary delays in determining the future planning application, Waddeton Park suggests that it would be appropriate for a modification to be made to the proposed allocation wording to the extent that development would permit up to 100 dwellings and a care home. The allocation should be worded to specifically 'permit up to 100 dwellings' and additionally 'support, but not require, a care home on the site' (or similar wording). In this regard, there is a demonstrable need for older persons housing in North Somerset over the plan period to 2041, as supported by the 'North Somerset Local Housing Need Assessment Report of Findings, September 2025' (LHNA). Figure 49 of the LHNA, which forms part of the local plan evidence base, quantifies the need for specialist older person housing to 2041. This sets out that there would be need to provide an additional 1,400-1,500 specialist older person housing units over the 15-year plan period 2026-2041. Therefore, the need for this type of development is clear and should be appropriately accommodated for in the local plan. The appended illustrative masterplan outlines one way in which a care home could appropriately form part of the development scheme, in addition to 100 dwellings on the site. Waddeton Park proposes that the following requirement is removed from being a site requirement: "Active travel connection required between Pill Green and Land at Pill Road, crossing Markham Brook to enable creation of safe walking routes to schools, along with proportionate contribution to Markham Brook active travel overbridge."	Waddeton Park Limited's view is that the Local Plan is legally compliant regarding the proposed site allocation for residential development at Land at Pill Road in Pill (Schedule 1 of the Local Plan, page 280), to which these representations relate. Moreover, Waddeton Park Limited believes that the proposed Local Plan, as set out in the Regulation 19 consultation can be found to be sound in that that the allocation of the land at Pill Road, Pill for residential development (identified on page 280 under Schedule 1) is consistent with each of the tests of soundness insofar as they are directly relevant. These representations are supported by the appended Transport Technical Note, prepared by Ridge, which supports the sustainability of the land at Pill Road for development. The land at Pill Road site allocation is part of the proposed means of implementing the spatial strategy, which has been	North_Somerset_Local_Plan_Pre-Submission_Plan_Representation_Form_Part_B_WPL_LP9.pdf

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						Waddeton Park suggests that it would be appropriate for a modification to be made to the proposed allocation to remove this element as a 'site requirement'. Firstly, the site has appropriate accessible connections for future residents to walk to St Katherine's School opposite. This site already benefits from safe walking routes to schools; therefore, it is onerous and unreasonable to expect development on the site to fund/deliver additional connections where not necessary to make the site itself acceptable in planning terms. As assessed within the appended Transport Technical Note, the site's accessibility review shows that the key desire line to travel from the site is to Pill village centre along Pill Road north and St Katherine's secondary school opposite the site. To the north, Pill Road also connects to Crockerne Primary School. Overall, access to day-to-day facilities and amenities for education, shopping, and community uses is primarily towards the north and east (to the secondary school). In addition, there are existing PRoWs opposite the site on Pill Road for recreational walks. Therefore, it does not seem reasonable for the Land at Pill Road site to have to deliver and/or contribute to the delivery of the connection over Markham Brook to the west as this is not necessary for future residents. The sustainability credentials of the site without this link are clearly acceptable; the delivery of the land at Pill Road without any reliance on the Pill Green land should be wholly supported. It seems the benefit of such connection would be for the Pill Green site (draft allocation for 600 dwellings) and, as such, should this connection be necessary it should be delivered by that site. Furthermore, an 'overbridge' to Markham Brook is very likely to be impractical and unrealistic physically, given the sloping valley and steep topography around the brook, and it is likely to have detrimental effects upon trees and biodiversity. Furthermore, the financial implications could risk the viability of the land at Pill Road allocation coming forward for development and this would materially affect the Council's housing position. Finally, fundamentally the requirement for an active travel bridge over Markham Brook is not considered to be necessary, as set out in the appended Transport Technical Note. There is no desire line to travel to the south/ west of the site, as this has excellent accessibility to local facilities and amenities in the village centre and the secondary school is conveniently located opposite the site. These proposed minor changes need not be a matter of any significance for the examination but could be a modification proposed by the Council before submission of the Local Plan to the Secretary of State, and as a minor change should not trigger a need for any further consultation.	properly arrived at through the identification of properly explained strategic options and their testing through sustainability and deliverability evidence and appraisals, and through stakeholder and community consultation. It is, therefore, a proper product of the positive preparation of the Local Plan and is justified. This forms part of the spatial strategy in appropriately directing strategic growth at Pill and Easton-in-Gordano under Policy LP4. The allocation of the site will be effective, in that it will assist in making the Local Plan deliverable. The site is wholly in one ownership and free of any significant constraints so its development can begin and be completed in the early years of the local plan period. The allocation is consistent with national policy and with the policies in the emerging Local Plan which is to be examined according to relevant national planning policy. It is clear that exceptional circumstances exist, and have been appropriately evidenced, to justify release of Green Belt land to support growth to meet North Somerset Council's identified housing need for the plan period. Paragraph 148 of the NPPF is clear that where it is necessary to release Green Belt land for development, as is established and agreed in	

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							North Somerset, plans should give: “priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations.” In this regard, Waddeton Park has consistently promoted the land at Pill Road throughout the emerging local plan process and strongly supports its allocation for residential development in the plan. The site is sustainably located with a strong relationship with the existing settlement of Pill. This strong cohesion between site and settlement is a significant benefit in allocating residential development here. The site is well located to the existing settlement with good accessibility to local services and in walking distance to key facilities. Pursuant to the Council’s ‘Spatial strategy, site selection and capacity paper’ (October 2025), Pill/ Easton-in-Gordano is identified as a Category A village which are described as “villages considered to be relatively sustainable in their own right with a range of easily accessible services and facilities and goof public transport links to towns”. The Council’s approach is wholly appropriate to direct growth to such settlements. It is highlighted that work	

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							to reopen the railway line has commenced with Pill train station set to reopen by 2028 which will only further enhance the existing sustainability of the settlement. The land at Pill Road has been appropriately and comprehensively assessed as suitable through the SHLAA and adjoins a Category A village in a sustainable location where exceptional circumstances for Green Belt release have been identified. With regard to the Green Belt, the site has been assessed by the Council, as part of a slightly larger land parcel, within the 'Stage 2 Green Belt Assessment' (October 2025), as delineated below (see attached document). The overall assessment of this parcel concludes it makes a weak contribution to the purposes of the Green Belt. This is set out in turn as follows: Purpose A - to check the unrestricted sprawl of large builtup area; (Bristol): Weak Purpose B - to prevent neighbouring towns merging into one another: Weak Purpose C - to assist in safeguarding the countryside from encroachment: Moderate Purpose D - to preserve the setting and special character of historic towns: Weak Purpose E -To assist in urban regeneration, by encouraging the recycling	

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							of derelict and other urban land: Neutral Further to this, as can be seen in the Green Belt assessment, our Waddeton Park's land makes a weak contribution to Green Belt purposes A, B and D. There are no relevant footnote 7 assets that would provide a strong reason for refusing or restricting development on the land. Therefore, this can be considered Grey Belt, subject to the specifics of the development proposal. The Council's Stage 2 Green Belt assessment agrees with this position in that the parcel can be identified as Grey Belt. This wholly supports the Council's approach to allocate development on the land, in accordance with the provisions of NPPF paragraph 148 which first priorities previously developed land and then Grey Belt land before any other Green Belt locations. The site is easily accessible, being within walking and cycling distance to a number and facilities and services within the village and nearby. This includes St Katherine's School opposite the site to the east. The site is available in the short term and can be delivered as a standalone development, without dependency on any major infrastructure intervention. The residential development has been	

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							driven by the context and topography, and by a wish to achieve an appropriate network of green infrastructure, positively responding to the woodland around Markham Brook to the west. The site is within Flood Zone 1 and, therefore, having a low risk of flooding and being appropriate for residential development. It is the preferred location under the flood sequential approach to selection of housing sites. Supporting technical surveys and assessments have been carried out to inform the development allocation. Demonstration of the deliverability of development on the site is the intention to submit an outline planning application for development of the site, following pre-application discussions with the Council, shortly after the close of this Regulation 19 consultation. This will ensure development can be brought forward in the early years of the plan and supports the requirement for the Council to identify “specific, deliverable sites for five years following the intended date of adoption.” (NPPF paragraph 72). Overall, the proposed allocation on land at Pill Road is strongly supported. Comment is, however, made with regard to the site-specific deliverability of the development, with regard to the site requirements as set out on	

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							page 280 of the published Reg 19 Pre-submission Plan for the proposed allocation. In this context, the draft allocation makes provision for an indicative capacity of 100 dwellings on the site. Pursuant to the work undertaken to date the site may also be able to accommodate a care home, ensuring an efficient use of land and meeting a need for such facilities. As illustrated on the appended illustrative masterplan, a scheme is currently being progressed via pre-application discussions for 100 dwellings and a c. 70-bed care home. It is appropriate that the supporting wording for the allocation is amended to reflect this potential development, without making it an absolute requirement. The site can comfortably and appropriately accommodate a care home in addition to traditional residential dwellings, which will make a significant contribution in an area where there is demonstrable need. In accordance with the enclosed plan, key elements of Waddeton Park Limited's development proposal on the land at Pill Road include: • New homes generally to the eastern boundary with lower density residential frontage towards the woodland; • Policy compliant affordable housing; • Care home in accessible location in the north of the site with views across	

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							landscape edge and woodland, providing a sensitive response to existing dwellings in St Catherine's Mead; • Vehicular access from Pill Road; • Pedestrian/cycle and potential emergency access connection to the north of the site, serving a foot/ cycle path which runs north/south within the site; • Mobility hub, with potential for electric scooter/bicycle hire, bicycle parking, car club space, parcel lockers and occasional events (i.e. food truck); • Traffic management to help create a low speed environment; • Potential for pedestrian crossing of Pill Road to Public Right of Way running east; • Pedestrian/cycle access to Pill Road linking with existing bus stop, serving a foot/cycle path which runs north/south within the site; • Potential for improved crossing/traffic management along Pill Road; • Wildlife area with informal recreation; • Northern pocket park responding to existing space in St Catherine's Mead; • Multi-functional green corridor with swale, footpath and new planting; • Open space with play area in an accessible location, helping to retain an open character at the gateway to the village; • North to south swale within landscape edge to woodland. • New and retained	

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							hedgerow to south of vehicular access, along the eastern boundary with Pill Road, helping to retain a green character on the entrance to the village; • Green corridor with significant tree planting on site high point to help soften views; • Attenuation pond within landscape corridor.	
Land at Pill Road	Yes		Yes	Yes		Waddeton Park Limited strongly supports the proposed allocation of its land within the new local plan for development. However, it has drawn attention to the indicative site capacity and site requirements laid out for the Land at Pill Road in the Pre-Submission Plan. Related amendments are, therefore, proposed. For clarity, and for the avoidance of uncertainty and unnecessary delays in determining the future planning application, Waddeton Park suggests that it would be appropriate for a modification to be made to the proposed allocation wording to the extent that development would permit up to 100 dwellings and a care home. The allocation should be worded to specifically 'permit up to 100 dwellings' and additionally 'support, but not require, a care home on the site' (or similar wording). In this regard, there is a demonstrable need for older persons housing in North Somerset over the plan period to 2041, as supported by the 'North Somerset Local Housing Need Assessment Report of Findings, September 2025' (LHNA). Figure 49 of the LHNA, which forms part of the local plan evidence base, quantifies the need for specialist older person housing to 2041. This sets out that there would be need to provide an additional 1,400-1,500 specialist older person housing units over the 15-year plan period 2026-2041. Therefore, the need for this type of development is clear and should be appropriately accommodated for in the local plan. The appended illustrative masterplan outlines one way in which a care home could appropriately form part of the development scheme, in addition to 100 dwellings on the site. Waddeton Park proposes that the following requirement is removed from being a site requirement: "Active travel connection required between Pill Green and Land at Pill Road, crossing Markham Brook to enable creation of safe walking routes to schools, along with proportionate contribution to Markham Brook active travel overbridge." Waddeton Park suggests that it would be appropriate for a	Waddeton Park Limited's view is that the Local Plan is legally compliant regarding the proposed site allocation for residential development at Land at Pill Road in Pill (Schedule 1 of the Local Plan, page 280), to which these representations relate. Moreover, Waddeton Park Limited believes that the proposed Local Plan, as set out in the Regulation 19 consultation can be found to be sound in that that the allocation of the land at Pill Road, Pill for residential development (identified on page 280 under Schedule 1) is consistent with each of the tests of soundness insofar as they are directly relevant. These representations are supported by the appended Transport Technical Note, prepared by Ridge, which supports the sustainability of the land at Pill Road for development. The land at Pill Road site allocation is part of the proposed means of implementing the spatial strategy, which has been properly arrived at through the identification of properly explained	

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						modification to be made to the proposed allocation to remove this element as a ‘site requirement’. Firstly, the site has appropriate accessible connections for future residents to walk to St Katherine’s School opposite. This site already benefits from safe walking routes to schools; therefore, it is onerous and unreasonable to expect development on the site to fund/deliver additional connections where not necessary to make the site itself acceptable in planning terms. As assessed within the appended Transport Technical Note, the site’s accessibility review shows that the key desire line to travel from the site is to Pill village centre along Pill Road north and St Katherine’s secondary school opposite the site. To the north, Pill Road also connects to Crockerne Primary School. Overall, access to day-to-day facilities and amenities for education, shopping, and community uses is primarily towards the north and east (to the secondary school). In addition, there are existing PRoWs opposite the site on Pill Road for recreational walks. Therefore, it does not seem reasonable for the Land at Pill Road site to have to deliver and/or contribute to the delivery of the connection over Markham Brook to the west as this is not necessary for future residents. The sustainability credentials of the site without this link are clearly acceptable; the delivery of the land at Pill Road without any reliance on the Pill Green land should be wholly supported. It seems the benefit of such connection would be for the Pill Green site (draft allocation for 600 dwellings) and, as such, should this connection be necessary it should be delivered by that site. Furthermore, an ‘overbridge’ to Markham Brook is very likely to be impractical and unrealistic physically, given the sloping valley and steep topography around the brook, and it is likely to have detrimental effects upon trees and biodiversity. Furthermore, the financial implications could risk the viability of the land at Pill Road allocation coming forward for development and this would materially affect the Council’s housing position. Finally, fundamentally the requirement for an active travel bridge over Markham Brook is not considered to be necessary, as set out in the appended Transport Technical Note. There is no desire line to travel to the south/ west of the site, as this has excellent accessibility to local facilities and amenities in the village centre and the secondary school is conveniently located opposite the site. These proposed minor changes need not be a matter of any significance for the examination but could be a modification proposed by the Council before submission of the Local Plan to the Secretary of State, and as a minor change should not trigger a need for any further consultation.	strategic options and their testing through sustainability and deliverability evidence and appraisals, and through stakeholder and community consultation. It is, therefore, a proper product of the positive preparation of the Local Plan and is justified. This forms part of the spatial strategy in appropriately directing strategic growth at Pill and Easton-in-Gordano under Policy LP4. The allocation of the site will be effective, in that it will assist in making the Local Plan deliverable. The site is wholly in one ownership and free of any significant constraints so its development can begin and be completed in the early years of the local plan period. The allocation is consistent with national policy and with the policies in the emerging Local Plan which is to be examined according to relevant national planning policy. It is clear that exceptional circumstances exist, and have been appropriately evidenced, to justify release of Green Belt land to support growth to meet North Somerset Council’s identified housing need for the plan period. Paragraph 148 of the NPPF is clear that where it is necessary to release Green Belt land for development, as is established and agreed in North Somerset, plans should give:	

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							“priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations.” In this regard, Waddeton Park has consistently promoted the land at Pill Road throughout the emerging local plan process and strongly supports its allocation for residential development in the plan. The site is sustainably located with a strong relationship with the existing settlement of Pill. This strong cohesion between site and settlement is a significant benefit in allocating residential development here. The site is well located to the existing settlement with good accessibility to local services and in walking distance to key facilities. Pursuant to the Council’s ‘Spatial strategy, site selection and capacity paper’ (October 2025), Pill/ Easton-in-Gordano is identified as a Category A village which are described as “villages considered to be relatively sustainable in their own right with a range of easily accessible services and facilities and goof public transport links to towns”. The Council’s approach is wholly appropriate to direct growth to such settlements. It is highlighted that work to reopen the railway line has commenced with Pill train station set to reopen	

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							by 2028 which will only further enhance the existing sustainability of the settlement. The land at Pill Road has been appropriately and comprehensively assessed as suitable through the SHLAA and adjoins a Category A village in a sustainable location where exceptional circumstances for Green Belt release have been identified. With regard to the Green Belt, the site has been assessed by the Council, as part of a slightly larger land parcel, within the 'Stage 2 Green Belt Assessment' (October 2025), as delineated below (see attached document). The overall assessment of this parcel concludes it makes a weak contribution to the purposes of the Green Belt. This is set out in turn as follows: Purpose A - to check the unrestricted sprawl of large builtup area; (Bristol): Weak Purpose B - to prevent neighbouring towns merging into one another: Weak Purpose C - to assist in safeguarding the countryside from encroachment: Moderate Purpose D - to preserve the setting and special character of historic towns: Weak Purpose E -To assist in urban regeneration, by encouraging the recycling of derelict and other urban land: Neutral	

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							Further to this, as can be seen in the Green Belt assessment, our Waddeton Park's land makes a weak contribution to Green Belt purposes A, B and D. There are no relevant footnote 7 assets that would provide a strong reason for refusing or restricting development on the land. Therefore, this can be considered Grey Belt, subject to the specifics of the development proposal. The Council's Stage 2 Green Belt assessment agrees with this position in that the parcel can be identified as Grey Belt. This wholly supports the Council's approach to allocate development on the land, in accordance with the provisions of NPPF paragraph 148 which first priorities previously developed land and then Grey Belt land before any other Green Belt locations. The site is easily accessible, being within walking and cycling distance to a number and facilities and services within the village and nearby. This includes St Katherine's School opposite the site to the east. The site is available in the short term and can be delivered as a standalone development, without dependency on any major infrastructure intervention. The residential development has been driven by the context and topography, and by a wish to achieve an appropriate	

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							network of green infrastructure, positively responding to the woodland around Markham Brook to the west. The site is within Flood Zone 1 and, therefore, having a low risk of flooding and being appropriate for residential development. It is the preferred location under the flood sequential approach to selection of housing sites. Supporting technical surveys and assessments have been carried out to inform the development allocation. Demonstration of the deliverability of development on the site is the intention to submit an outline planning application for development of the site, following pre-application discussions with the Council, shortly after the close of this Regulation 19 consultation. This will ensure development can be brought forward in the early years of the plan and supports the requirement for the Council to identify “specific, deliverable sites for five years following the intended date of adoption.” (NPPF paragraph 72). Overall, the proposed allocation on land at Pill Road is strongly supported. Comment is, however, made with regard to the site-specific deliverability of the development, with regard to the site requirements as set out on page 280 of the published Reg 19 Pre-submission Plan for the proposed allocation.	

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							In this context, the draft allocation makes provision for an indicative capacity of 100 dwellings on the site. Pursuant to the work undertaken to date the site may also be able to accommodate a care home, ensuring an efficient use of land and meeting a need for such facilities. As illustrated on the appended illustrative masterplan, a scheme is currently being progressed via pre-application discussions for 100 dwellings and a c. 70-bed care home. It is appropriate that the supporting wording for the allocation is amended to reflect this potential development, without making it an absolute requirement. The site can comfortably and appropriately accommodate a care home in addition to traditional residential dwellings, which will make a significant contribution in an area where there is demonstrable need. In accordance with the enclosed plan, key elements of Waddeton Park Limited's development proposal on the land at Pill Road include: • New homes generally to the eastern boundary with lower density residential frontage towards the woodland; • Policy compliant affordable housing; • Care home in accessible location in the north of the site with views across landscape edge and woodland, providing a	

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							sensitive response to existing dwellings in St Catherine's Mead; • Vehicular access from Pill Road; • Pedestrian/cycle and potential emergency access connection to the north of the site, serving a foot/ cycle path which runs north/south within the site; • Mobility hub, with potential for electric scooter/bicycle hire, bicycle parking, car club space, parcel lockers and occasional events (i.e. food truck); • Traffic management to help create a low speed environment; • Potential for pedestrian crossing of Pill Road to Public Right of Way running east; • Pedestrian/cycle access to Pill Road linking with existing bus stop, serving a foot/cycle path which runs north/south within the site; • Potential for improved crossing/traffic management along Pill Road; • Wildlife area with informal recreation; • Northern pocket park responding to existing space in St Catherine's Mead; • Multi-functional green corridor with swale, footpath and new planting; • Open space with play area in an accessible location, helping to retain an open character at the gateway to the village; • North to south swale within landscape edge to woodland. • New and retained hedgerow to south of vehicular access, along the	

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							eastern boundary with Pill Road, helping to retain a green character on the entrance to the village; • Green corridor with significant tree planting on site high point to help soften views; • Attenuation pond within landscape corridor.	

Name: Waddeton Park Ltd (Land south of Greenhill Road) **I.D:** 31091393

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SP3: Spatial strategy	No	• Positively prepared • Consistent with national policy	Yes	Yes	These representations have been prepared and submitted by Savills on behalf of Waddeton Park Ltd. Waddeton Park have an interest in 1.95 hectares of land south of Greenhill Road, Sandford. This specific response relates to Policy SP3 (Spatial Strategy). Our comments on the consultation and supporting evidence base are made in accordance with paragraph 36 of the NPPF, to assist in ensuring that the Local Plan is found sound when examined in the future. Policy SP3: It is clear that the Site Selection Methodology Paper explains the approach to determining which sites to allocate in the draft Local Plan, informed by the 'spatial strategy'. The Site Selection Methodology references the spatial strategy (Policy SP3) at Stage 1 of the process - paragraph 2.1 reads as follows: "The spatial strategy states that the priority for new residential development is for it to be located in or close to urban areas where there is an existing or proposed wide range of facilities, services and jobs and there are opportunities to encourage active travel and are well served by public transport.". We are concerned however that there does not appear to be any mention in the plan, nor evidence supporting it, which confirms how this broad principle in the spatial strategy is to be applied to the distribution of development in order to deliver a sustainable form of development for this local authority area. Instead, there is a lack of application to North Somerset, and the Site Selection Methodology could be applied to any authority area in the country. We do not agree with this and consider there to be a lack of emphasis on how the approach has been applied to this authority area.	The proposal within draft Policy SP8 to direct only 12% of new homes to the villages and rural areas (a significant reduction from the 23% proposed at the previous Regulation 19 stage) is not proportionate to the increase in the overall housing requirement which has jumped from 15,734 dwellings to 24,495 dwellings to reflect the standard method changes. We therefore continue to maintain the strategy should be amended to address this to ensure that it represents a sustainable and sound spatial strategy and distribution of development in the authority area.		North Somerset Local Plan Pre-submission Plan - Representations SP3.pdf

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					It is particularly important as part of the spatial strategy to consider the location of the housing needs in North Somerset and from where the need for new housing arises. This is best considered with reference to the relationship between Bristol and North Somerset, and the two separate Housing Market Areas (HMAs). In this respect we have reviewed the ORS Local Housing Needs Assessment. For example, within the consultation document and supporting evidence there is no suggestion that the influence of Bristol to the north has had any influence on the spatial strategy or distribution of new homes that is contained in Policy SP8. This is key consideration and should in our view feature prominently in the decisions over the spatial strategy for the plan and the distribution of new homes. In terms of the spatial strategy, Draft Policy SP8 continues to propose a high distribution of new housing towards Weston-Super-Mare (WSM), including the strategic allocation at Wolvershill (North of Banwell). We have concerns over this approach and do not support the directing of such a high proportion of this growth to WSM given it disregards the dynamics of the housing market within the authority area and will in our view undermine the delivery of sustainable development. In order to promote sustainable development and reduce car use, it is not sufficient to simply adopt a spatial strategy which seeks to focus the majority of new residential development at WSM. Instead, there are a number of settlements which provide opportunities for sustainable growth, and which are well connected by public transport. Sandford, for example, is one such sustainable settlement. Indeed, Sandford has a good existing bus service and the village is well located to access the major job markets of Weston-Super-Mare and Bristol, including the nearby Bristol Airport. Sandford also has a range of services and facilities which provide for the day to day needs of residents. As a result, the proposal within draft Policy SP8 to direct 2,948 dwellings to the villages and rural areas (only 12%) is not supported. This is a significant reduction from the amount proposed at the previous Regulation 19 stage where draft Policy SP8 proposed 3,610 dwellings (23%). The overall housing requirement since that time has increased from 15,734 dwellings to 24,495 dwellings to reflect the standard method changes, but clearly there has not been a proportionate change in the spread towards the villages and rural areas. We consider an easy way to address this is to consider how an increase in the housing requirement to reflect the need to accommodate the unmet housing need from the Bristol HMA could help balance the current disproportionately low spread of housing towards the villages. Conclusion It is clear that the changing housing market have an impact upon commuting patterns and associated social, economic and environmental consequences. This factor should, in our view, have been taken into consideration in setting the sustainability of the			

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					housing distribution. It is our view that a more sustainable pattern of development should be proposed which directly addresses the strategic priorities of the draft Local Plan. It is not sufficient to simply adopt a spatial strategy which seeks to focus the majority of new residential development at WSM. Instead, there are a number of settlements which provide opportunities for sustainable growth, and which are well connected by public transport. Sandford, for example, is one such sustainable settlement. Indeed, Sandford has a good existing bus service and the village is well located to access the major job markets of Weston-Super-Mare and Bristol, including the nearby Bristol Airport. Sandford also has a range of services and facilities which provide for the day to day needs of residents. As a result, the proposal within draft Policy SP8 to direct only 12% of new homes to the villages and rural areas (a significant reduction from the 23% proposed at the previous Regulation 19 stage) is not proportionate to the increase in the overall housing requirement which has jumped from 15,734 dwellings to 24,495 dwellings to reflect the standard method changes. We therefore continue to maintain the strategy should be amended to address this to ensure that it represents a sustainable and sound spatial strategy and distribution of development in the authority area. We consider an easy way to address this is to consider how an increase in the housing requirement to reflect the need to accommodate the unmet housing need from the Bristol HMA could help balance the current disproportionately low spread of housing towards the villages.			
SP6: Villages and rural areas	No	• Positively prepared • Consistent with national policy	Yes	Yes	These representations have been prepared and submitted by Savills on behalf of Waddeton Park Ltd. Waddeton Park have an interest in 1.95 hectares of land south of Greenhill Road, Sandford. This specific response relates to draft Policy SP6 (Villages and Rural Areas). Our comments on the consultation and supporting evidence base are made in accordance with paragraph 36 of the NPPF, to assist in ensuring that the draft Local Plan is found sound when examined in the future. Policy SP6 Overall, it is important that the draft Local Plan provides for a wide range of deliverable and developable sites across the authority area in order to provide competition and choice to ensure that housing needs are met in full. The plan should, with particular reference to the villages in North Somerset, set out a logical settlement hierarchy which meets all the housing needs and addresses all areas of the housing market, with a range of sites proposed for allocation.			North Somerset Local Plan Pre-submission Plan - Representations SP6.pdf

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					In order to meet the housing requirement of North Somerset in full, including the need to address Bristol unmet housing need, additional allocations are likely to be required, as explained further in our representations to draft Policy SP8. Such allocations should not avoid the villages and rural areas. It remains our view that the spatial strategy should also recognise that are clusters of villages in North Somerset that provide a range of services for that area within reasonable travelling distance of each other, so there is potential for villages to be grouped together. These means that such areas might be able to sustainably support a higher level of development but may not have all the services within one particular village. In summary, to help address the current issues with draft Policy SP6 there will be a need to review additional allocations to help address the housing requirement in full including Bristol's unmet housing need, and a proportion of the allocations should be at the sustainable villages such as Sandford. We also consider that draft Policy SP6 should include a list of villages which are suitable for additional growth, similar to the way the four towns are listed in draft Policy SP5. Currently, the only way to do this is to review the supporting policy map to see which locations are villages and this is not effective.			
SP8: Housing	No	• Positively prepared • Consistent with national policy	Yes	Yes	These representations have been prepared and submitted by Savills on behalf of Waddeton Park Ltd. Waddeton Park have an interest in 1.95 hectares of land south of Greenhill Road, Sandford. This specific response relates to draft Policy SP8 (Housing). Our comments on the consultation and supporting evidence base are made in accordance with paragraph 36 of the NPPF, to assist in ensuring that the Local Plan is found sound when examined in the future. Policy SP8 Representations were submitted at the previous Regulation 19 Stage in October 2023. It is clear that since that time there has been a significant uplift in the housing requirement in order to accommodate the output of the revised Standard Method published in December 2024. We support that uplift and the increase over the plan period as it will ensure that North Somerset delivers sufficient housing to meet its own needs during the lifetime of the plan, consistent with the relevant provisions of the Framework. We did however comment at the previous Regulation 19 stage on the need to accommodate a proportion of the unmet housing needs from Bristol City. Since that time, the Bristol Local Plan has progressed into the Examination stage and another local authority within the Bristol Housing Market Area - South Gloucestershire - has consulted upon a Regulation 19 Local Plan and subsequently submitted it for Examination. It is clear from the Inspectors Examination Note IN11 (dated 21 November 2025) for the Bristol Local Plan that the housing			North Somerset Local Plan Pre-submission Plan - Representations SP8.pdf

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					requirement should be increased from 1,925 dwellings per annum (dpa) to 2,218 dpa. The Inspectors have also concluded in the same Note that: “The Council must also set out what the level of unmet housing need is. While the objectively assessed housing need may change over time, we consider it necessary for this Plan to be clear about the situation at the time of adoption. This may, for example, be important in continuing work being done on other Plans. MMs should be drafted to paragraph 6.8 to set out what remaining need exists”. It is also clear that based on the current Standard Method output (from May 2025), the updated housing requirement for Bristol City proposed by the Inspectors falls 745 dpa short of the identified level of need. The South Gloucestershire Local Plan also proposes a housing requirement which falls 195 dpa short of the identified level of need. Therefore, across the Housing Market Area, there is a shortfall of 940 dpa. There is no clear mechanism in place accommodate these homes. In our view, for the Local Plan to be sound it must be ‘consistent with national policy’ in the Framework and be ‘positively prepared’. At the present time the Local Plan does not seek to accommodate the unmet housing need arising from the wider HMA and, unless justified, there is potential for the Inspector(s) at the Examination stage to require an uplift to the housing requirement for North Somerset in order to accommodate a proportion of this overall shortfall. Should they do so, the process that the local authority has followed in evaluating the potential contribution from, and sustainability of, additional sites through the consultation in early 2025 places it in a good position to introduce further allocations through the Examination process. There would no doubt be a need to evaluate the potential additional sites further and to engage with the relevant developers but the ground work has been done to help this process as part of the Examination. The same position would also be the case should the authority look to extend the proposed plan period which we note has been set at the ‘minimum’ 15 years in line with the Framework. Should a more proactive approach be taken then that would require a proportionate increase in the housing requirement and therefore additional sites. In this context, the land south of Greenhill Road, Sandford, is a good candidate for inclusion to help address the need for housing in the Sandford and Winscombe area.			
Policy LP5: Housing, employment and mixed use allocations	No	• Positively prepared • Consistent with national policy	Yes	Yes	LAND SOUTH OF GREENHILL ROAD, SANDFORD These representations have been prepared and submitted by Savills on behalf of Waddeton Park Ltd. Waddeton Park have an interest in 1.95 hectares of land south of Greenhill Road, Sandford. This specific response relates to Policy LP5 (housing and employment allocations) and explains why the land south of Greenhill Road, Sandford (see Site Location Plan attached at Appendix 1) controlled by Waddeton Park is a suitable and sustainable location to deliver a	The land south of Greenhill Road, Sandford, is a good candidate for inclusion to help address the need for housing should an uplift in housing sites be required through the examination process.		North Somerset Local Plan Pre-submission Plan - Representations LP5.pdf

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					development of circa 31 market and affordable homes. Our comments on the consultation and supporting evidence base are made in accordance with paragraph 36 of the NPPF, to assist in ensuring that the Local Plan is found sound when examined in the future. Policy LP5: Our representations to Policy SP8 conclude that it is likely the future examining inspector(s) will require an uplift to the housing requirement for North Somerset in order to accommodate a proportion of the unmet housing need from the Bristol Housing Market Area, principally from Bristol itself. Should this happen, the process that the local authority has followed in evaluating the potential contribution from, and sustainability of, additional sites through the consultation in early 2025 places it in a good position to introduce further allocations through the Examination process. In this context, the land south of Greenhill Road, Sandford, is a good candidate for inclusion to help address the need for housing in the Sandford and Winscombe area. This representation first explains why Sandford is a sustainable settlement and capable of accommodating further housing development in a sustainable manner, and secondly why land south of Greenhill Road, Sandford represents a 'sound' opportunity for residential development which is suitable and sustainable. Sandford – a Sustainable Location: Sandford is a logical location for proportionate additional growth within North Somerset. Such additional growth at Sandford would complement the strategic scale development at and on the edge of the major settlements. Indeed, the sustainability of Sandford is already reflected through other recent planning permissions in the village, including two sites (Land at Mead Farm and Land south of Greenhill Lane) which are both identified for allocation in the draft Local Plan. In addition, a number of sites were identified at Sandford as part of the Council's 'additional sites' consultation in early 2025, identified as having potential for development. The village benefits from a number of services and facilities; including a primary school, convenience store, meeting room, and pub; alongside a range of social/community groups. There are also several businesses in the village providing a wider range of services and facilities. Sandford forms part of a village cluster, with additional services and facilities accessible in neighbouring villages, including Winscombe, Churchill and Banwell; with a number of these services and facilities within walking/cycling distances. The village itself benefits from a relatively significant number of employment opportunities given its size; notably the large Thatchers Cider complex. The village is located on a bus route between Weston-Super-Mare and Wells; and in addition is supported by bus services to Bristol Airport, and a number of school/college buses. Whilst there are some small-scale employment opportunities within the village, it is recognised that residents travel beyond the village for work. There are, however, various opportunities for commuters to			

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					travel via sustainable modes, including by bus. Service 125 (which runs from a bus stop on the north east corner of the site) offers a two hourly service between Churchill / Langford and Weston-Super-Mare, providing a commuter route to Weston-Super-Mare in 40 minutes. In addition, services 51S and 62 also stop at the same bus stop adjacent to the site and connect to Banwell, Locking, Highbridge, Bridgwater and Winscombe. Service number 126 also provides connections to Weston-Super-Mare from a bus stop close to the site at Sandford Church. It is therefore the case that Sandford has a range of services and facilities available within the village, and is connected to nearby settlements for employment opportunities via sustainable modes of transport. As set out above, we consider it is likely further allocations will be required through the Examination process, and that the land south of Greenhill Road, Sandford, is a good candidate for inclusion to help address the need for housing in the Sandford and Winscombe area. Our previous Regulation 19 representations provided our assessment of the site against the criteria from the Council's Sustainability Appraisal (SA), including the principal technical and environmental considerations pertinent to the land. We do not wish to repeat this assessment in full within these further representations and instead request that reference be made back to this previous assessment. As well as this, the site has been assessed previously as part of Strategic Housing Land Availability Assessment (SHLAA), and the previous Villages Schedule. Indeed, the Villages Schedule concludes that the site has potential with no primary constraints. The more recent consultation in early 2025 on additional sites identified the site as having potential for development. The site offers an excellent opportunity to accommodate development on a sustainable site, well related to the village, to help address local housing need. An Illustrative Masterplan showing an indicative site layout, influenced by technical input from a consultant team, is appended at Appendix 2. Furthermore, the suitability of the site is further demonstrated through the submission of a planning application for the site for the development of 31 residential dwellings. This application is supported by a full suite of technical assessments to demonstrate that the site is suitable and capable of accommodating development of the scale proposed. Indeed, the planning application confirms that the proposals will deliver the following important benefits: • The delivery of market housing and affordable housing for the local community to address the current housing shortfall. Applying 30% affordable housing would equate to 22 market homes and 9 affordable homes; • economic benefits through the creation of construction jobs and increased expenditure in the local economy, CIL revenue and Council Tax revenue. With reference to the HBF Calculator, the construction			

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					of 31 dwellings would support the employment of 107 people, increase open space, community sport, leisure spending by £27,900 and generate £62,387.50 in council tax revenue; • the provision of new footway infrastructure including a new link to the west bound bus stop on Greenhill Road with waiting area, and facilitating connections for existing residents west towards the village centre. The new link to the west bound bus stop on Greenhill Road, including new waiting area, will be a particularly important benefit locally. At present there is no safe waiting area associated with the bus stop and local, residents instead have to wait on either the grass verge or adjacent lane. It will therefore be a significant improvement. In addition, the development of the site will help to connect residents who currently live further east on Greenhill Road with the nearest existing footpath to the west of the site. The development of the site would enable local residents to walk through the site and connect to the nearest section of footpath via the schemes new pedestrian infrastructure including a new crossing point and small section of new footpath to connect to existing. These improvements will help facilitate easier and safer walking opportunities onwards to the village centre for both existing and new residents. Overall, on the basis of the previous assessment of the site set out in our previous Regulation 19 representations, along with the extensive information submitted with the recent planning application for the site, it is clear that the Land South of Greenhill Road, Sandford, represents a suitable and sustainable location for development. Conclusion: Our representations to Policy SP8 conclude that it is likely the future examining inspector(s) will require an uplift to the housing requirement for North Somerset in order to accommodate a proportion of the unmet housing need from the Bristol Housing Market Area, principally from Bristol itself. Should this happen, the process that the local authority has followed in evaluating the potential contribution from, and sustainability of, additional sites through the consultation in early 2025 places it in a good position to introduce further allocations through the Examination process. In this context, the land south of Greenhill Road, Sandford, is a good candidate for inclusion to help address the need for housing in the Sandford and Winscombe area, helping to increasing housing land supply whilst avoiding any environmental and technical impacts and constraints. Sandford is clearly a suitable and sustainable village for additional growth. Sandford contains a range of services and facilities which contribute to meeting the day-to-day needs of most residents and some employment opportunities, whilst there are existing public transport connections providing access to places of work and choice of travel compared to the use of the private car. The village is, therefore, a suitable and sustainable location for an additional allocation for residential development. Indeed, as set out in these representations, and representations			

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					submitted at the previous Regulation 19 stage, the site is demonstrably suitable and sustainably located for development and is capable of contributing to a boost in housing delivery.			
Policy LP10: Strategic gaps	No	• Positively prepared • Consistent with national policy	Yes	Yes	These representations have been prepared and submitted by Savills on behalf of Waddeton Park Ltd. Waddeton Park have an interest in 1.95 hectares of land south of Greenhill Road, Sandford. This specific response objects to draft Policy LP10 (Strategic Gaps) in its current form and explains why the land south of Greenhill Road, Sandford (see Site Location Plan attached at Appendix 1) controlled by Waddeton Park should be removed from the proposed strategic gap for Sandford and Churchill given that it is a suitable and sustainable location to deliver residential development. The site offers an excellent opportunity to accommodate development on a sustainable site, well related to the village, to help address local housing need. This is supported by the Council's own assessment of the site within the SHLAA, and the fact that the site was identified as a potential opportunity in the Regulation 19 additional sites consultation earlier in 2025, both confirming the potential suitability of the site, as explained in our response to draft Policy LP5. Our comments on the consultation and supporting evidence base are made in accordance with paragraph 36 of the NPPF, to assist in ensuring that the draft Local Plan is found sound when examined in the future. Policy LP10: We continue to strongly object to draft Policy LP10 in its current form and specifically the Sandford and Churchill strategic gap. Draft policy LP10 states that such strategic gaps are included to "help retain the separate identity, character and/or landscape setting of settlements". The draft policy also requires that "development within strategic gaps as shown will only be permitted where: • The open or undeveloped character of the gap would not be significantly adversely affected; • The separate identity and character of the settlements would not be harmed; and • The landscape setting of the settlements would not be harmed. The inclusion of this wording suggests that the key components of the strategic gap, and the purpose for their inclusion, is to ensure an open and undeveloped character is retained, that the identity and character of separate settlements will not be harmed and that development would not harm the landscape setting of such settlements. Before exploring the draft policy text and requirements, it is first important to look at the policy basis (or lack of) for strategic gaps and the Council's evidence base setting out the justification for the inclusion of the new Sandford and Churchill strategic gap. Policy & Evidence Base:	Proposed Changes to draft Policy LP10: On the basis of the above, including information submitted to the previous Regulation 19 consultation, and taking into account the lack of proper justification set out in the latest Strategic Gap Background Paper (2025), we continue to maintain that the land south of Greenhill Road (Appendix 1) should be removed entirely from the proposed strategic gap between Sandford & Churchill. There is a fundamental lack of evidence supporting the inclusion of the site within the designation. In contrast, the evidence submitted, principally in the form of the supporting Landscape Technical Note (Appendix 2) demonstrates why the land is suitable for development from a landscape perspective and why there is a clear lack of justification for inclusion of the land within a new strategic gap. Should the Council pursue this particular strategic gap and considers there is justification for the inclusion of some of the land east of Sandford within such a designation then it continues to be the view of Waddeton Park Ltd that, as an absolute minimum, the Land south of Greenhill Road should be removed from the designation for the reasons explained within these and previous submissions. To assist, we have again appended to these representations an amended version of the policies map showing how the Sandford and Churchill strategic gap should be amended prior to submission of the plan for examination (Appendix 3).		North Somerset Local Plan Pre-submission Plan - Representations LP10.pdf

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					The main points to highlight first is that there is no official definition for strategic gaps within the NPPF or NPPG. Instead, strategic gaps can be explored where such proposals are aligned with the thrust of national policy and guidance, ensuring that plan-makers take a proportionate, evidence based approach. This is clear when reviewing both the Strategic Gaps Background Paper (November 2023) and more recent update paper from October 2025, both published as part of the Council's evidence base. Indeed chapter 2 of the 2023 Paper covers the 'Justification for the strategic gap designation'. It is however clear from that chapter and indeed the entire report that there is no direct policy or guidance basis for strategic gaps, and no set definition. The 2023 Strategic Gaps Background Paper makes reference to various sections of the NPPF in seeking to justify the inclusion of the various strategic gaps within the DLP. However, none of the sections of the NPPF directly support the inclusion of the strategic gaps or the criteria set out in the background paper. It is acknowledged that paragraph 53 of the National Design Guide (NDG), referred to by the background paper, refers to well-designed new development being influenced by various things, including 'the elements of a place or local places that make it distinctive', including for example 'views, vistas and landmarks', and 'soft landscape, landscape setting and backdrop'. This is clearly a reference to landscape setting and the way in which strategic gaps could be used to help to protect them. We address this in relation to the Land South of Greenhill Road and the proposed new Sandford and Churchill strategic gap below. When looking at the more recent October 2025 Strategic Gaps Background Paper, no further justification is provided. Far from this, the updated paper simply states that "justification for strategic gaps is set out in the council's November 2023 Strategic Gaps Background Paper which explains why some strategic gaps were deleted or reduced in an earlier review". Responses are provided in the October 2025 paper to previous objections to draft Policy LP10, including some of those objections raised on behalf of Waddeton Park Ltd. However, none of these responses in our view support the inclusion of the strategic gap as proposed, nor the inclusion of the land south of Greenhill Road. We consider that the Council's flawed position in seeking to introduce this particular strategic gap without proper justification is demonstrated by the change which the authority now proposes to make, confirmed as follows: "However it is now proposed to reduce the strategic gap on the east (Churchill) side and amend the settlement boundary to reflect a planning consent for housing east of Hilliers Lane. It is now proposed that the strategic gap boundary only extends eastwards to a new settlement boundary along Hilliers Lane, as shown on Plan C1 below". Far from seeking to justify this strategic gap, the authority appear quite willing to allow a change given the grant of a recent planning permission within the very gap it is seeking to introduce. The site in			

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					question at Hilliers Lane is no different is size and nature to the land south of Greenhill Road, and yet the authority does not currently seek to exclude the land south of Greenhill Road from the proposed strategic gap. In direct response to objections we previously submitted to the proposed strategic gap on behalf of Waddeton Park Ltd, the 2025 background paper states: “The land in question south of Greenhill Road, (fields east of Sandford, between the properties Heatherdale and The Paddocks) is an important part of the proposed strategic gap. (See site outlined purple on Plan S1 below). It is part of the partly undeveloped road frontage between Sandford and Churchill along the A368. Its loss to development would reduce that, and result in continuous development straddling the A368 between Well Croft on the south side near Sandford, and Sandmead Springs near Churchill on the north side. Then it would only take development of the western field between 86 Greenhill Road and Well Croft, plus two fields west of Hilliers Lane to cause virtual coalescence of the settlements”. This statement is factually incorrect and completely misleading. We make the following points in response: • There is already a sense of continuous development along this part of the A368. This is due to the two properties on the northern side of the road (Nanarth and Cross Gates opposite the land south of Greenhill Road) and the larger properties of Westerhall and Byways to the south within the AONB. Together with the street lighting and the overhead powerlines, these properties are experienced as part of the ‘development envelope’ of Sandford, with the substantial presence of the properties at The Paddocks physically and visually extending the built-up area Sandford to Pye Corner (albeit at a somewhat lower density than the development closer to the village core). • At no point along this part of the A368 are there any views along the road corridor that do not already include clearly visible elements of existing development, so this part of the A368 is already experienced as part of the settlement and there is no clear sense of being within a ‘gap’ between settlements. • Any sense of this section of the road forming a “partly undeveloped road frontage” is due to the mature hedgerows in front of the existing properties to the north and along the north boundary of the Site. If these hedgerow were either lower or not present, the existing areas of development would be far more visible, so any sense of an “undeveloped frontage” would be completely negated. • Due to the way that the mature hedgerows help to assimilate the existing properties into their local context, the proposals for the Site have adopted the same landscape strategy, with the new properties to be located behind the retained hedgerow and set back from the road in a similar way to the existing properties. This will therefore consolidate and reinforce local character within the eastern part of the settlement and accentuate the sense of separation provided by the genuinely undeveloped gap of open countryside to the east of Pye Corner.			

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					• The development of the land south of Greenhill Road would therefore respond closely to the existing local character of this part of Sandford and will merely consolidate the existing situation, which consists of the continuous presence of development extending from the designated settlement boundary to Pye Corner to the east of the properties at The Paddocks and Sandmead Springs. • Sandmead Springs cannot reasonably be described as being “near Churchill.” However, the vegetation around its boundaries, together with that around the Guild House, does define the eastern edge of the ‘development envelope’ of Sandford at Pye Corner. • It is completely misleading to suggest that the development of a single field to the south of Greenhill Road (the Site) would result in “continuous development straddling the A368” unless the majority of other parcels of land between Well Croft and Sandmead Springs aren’t already developed. Rather, development of the Site to the south of Greenhill Road cannot fundamentally change this situation as there is already the sense of continuous development along this part of the road. • With reference to the parcel of land referred to as the “western field between 86 Greenhill Road and Well Croft”, this parcel also has a tall hedgerow along the frontage to the A368, so the internal areas do not contribute to any sense of separation between the settlements. The haulage depot and the other areas of existing development along the A368 to the east then separates this land from the open countryside to the east of Pye Corner. It is therefore simply experienced as an anomaly in the land uses within the settlement area rather than contributing to any sense of separation between the settlements. • When considering the remaining “two fields west of Hilliers Lane”, the Council’s analysis fails to acknowledge that the larger field (which was formerly part of the old nursery) has recently been planted as part of the new orchards associated with the Thatcher’s Cider factory. Due to the recent investment in this planting, this area is highly unlikely to be developed even if the strategy gap policy is not adopted. Furthermore, all the land to the south of this section of the A368 is protected as part of the Mendip Hills National Landscape (formerly the AONB). Consequently, any development to the north of the A368 would only be acceptable if its benefits outweighed the adverse impacts to the AONB and its setting. • In order to be acceptable in terms of impacts to the setting of the AONB, the proposals for the land east of Hillier’s Lane (now consented) included a substantial belt of planting along the southern boundary. As this planting is crucial to the acceptability of those proposals, it seem logical that this area needs to remain permanently undeveloped and therefore be excluded from the revised settlement boundary and included within any proposed strategic gap. As a result, we strongly object to draft Policy LP10 as drafted, specifically the proposed Sandford and Churchill strategic gap. Specific Circumstances relating to the Land South of Greenhill Road, Sandford within the proposed Sandford and Churchill Strategic Gap As explained above, with specific reference to the proposed Sandford			

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					and Churchill Strategic Gap there is a concerning lack of understanding within the Strategic Gaps Background Paper (2023) of the differences in landscape setting and impacts across different parts of the area between Sandford and Churchill. This is not clarified in the more recent 2025 update paper. At paragraph 4.2 of the background paper (2023) it is stated that "This area was considered worthy of closer examination for a possible strategic gap. There are a number of SHLAA sites between the settlements, and other relatively narrow gaps between groups of dwellings along the A368 and Churchill Green, development of which would potentially exacerbate ribbon development along those roads and potentially lead towards coalescence of the settlements. (Therefore detailed consideration of a possible Sandford/Churchill strategic gap is provided below)". Firstly, addressing the potential coalescence point, it is plain to see that existing development has already spread east of Sandford along Greenhill Road, particularly within the vicinity of the land south of Greenhill Road. Whilst there are some gaps between the buildings, travelling along Greenhill Road this development results in a clearly noticeable urbanising influence and effectively extends the development envelope of Sandford along the A368 to Pye Corner. This is reinforced by the 'welcome to Sandford' sign which identifies the start of the settlement area at this point. Indeed, from a landscape perspective, the land to the south of Greenhill Road, currently falling within the proposed new strategic gap, is not perceived as part of the wider rural landscape, with the existing buildings and settlement pattern contributing to the character and local distinctiveness of the land forming the setting to Sandford and the AONB to the south. The site does not however exhibit any of the 'special qualities' of the AONB and does not make a significant contribution to the setting of the designated landscape to the south. This contrasts with the land to the east of Pye Corner, and to a degree north of Greenhill Road, the fields of which form an open break between Sandford and Churchill, with attractive views south towards the wooded slopes within the AONB. Consequently, development of the land south of Greenhill Road would consolidate the existing locally distinctive settlement pattern along the northern edge of the AONB and would not contribute to any sense of coalescence between Sandford and Churchill. Further detail of this can be found in the supporting Landscape Technical Note (Appendix 2). Furthermore, we have strong concerns over the statement made at paragraph 5.2 of the Strategic Gaps Background Paper (2023), which reads "there is particularly likely to be a need for a strategic gap where there is development pressure, especially pressure leading towards potential coalescence of settlements, and particularly in terms of ribbon development along main roads. The need will be increased where there is unlikely to be a landscape reason for refusal". (underlining our emphasis). This statement conflicts with the purposes of the strategic gap.			

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					There is almost a recognition from officers that there are unlikely to be landscape reasons for refusing development on some of the land east of Sandford, but the statement seeks to use this to justify the inclusion of the land within a strategic gap. This is not a sound approach in our view. Equally, paragraph 5.4 of the background paper states “relatively narrow gaps between groups of frontage dwellings lie along the A368 and Churchill Green, development of which would potentially exacerbate ribbon development along those roads and potentially lead towards coalescence of the settlements”. This statement is also incorrect and does not amount to sufficient justification for the inclusion of the land south of Greenhill Road within the proposed strategic gap. Our justification for why the development of this land would not lead to coalescence is set out in these representations and within the supporting Landscape Technical Note. Looking further at the 12 criteria set out from page 11 onwards within the Strategic Gaps Background Paper (2023), there are clear error and misleading statements which need correcting. For example, under ‘sense of the gap’, it is stated that there is a sense of leaving Sandford before Pye Corner despite there being intervening groups of dwellings on either side of the road. Equally, under ‘sense of leaving or arriving at a settlement’ it is claimed that “there is a sense of leaving Sandford when travelling east along the A368 Greenhill Road, when one initially encounters fields on both sides of the road”. We are concerned with such a misleading statement which is simply not true. Instead, one does not have a sense of leaving Sandford until reaching Pye Corner, at the junction of Greenhill Road and Lyncombe Farm. In terms of arriving into Sandford, given that existing development has already spread east of Sandford along Greenhill Road, particularly within the vicinity of the land south of Greenhill Road, there are already a clearly noticeable urbanising influence and which effectively extends the development envelope of Sandford along the A368 to Pye Corner. This is reinforced by the ‘welcome to Sandford’ sign which identifies the start of the settlement area at this point. In terms of a perception of a gap and concerns over potential coalescence, the Land south of Greenhill Road (Appendix 1), has the strong advantage of benefitting from a combination of natural boundaries and the A368 Greenhill Road to the north. This means that the site in itself is generally well contained. It would therefore a) not lead to a sense of further ribbon development given such ribbon development in that location already exists, and b) would not lead to any impact on, or a sense of, reduction on coalescence between Sandford and Churchill. Whilst the same cannot be said of land east of Pye Corner, and to an extent the land north of Greenhill Road, the development of the land south of Greenhill Road would address the various criteria set out in the Strategic Gaps Background Paper (2023) and not lead to coalescence. In terms of criteria 9 ‘Landscape Character / type, it is stated in the background paper that the whole of the proposed strategic gap falls			

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					within the 'J2 River Yeo Rolling Valley Farmland Landscape Character Area (LCA)', and therefore protection of the strategic gap is consistent with the need to 'conserve the landscape'. However, due to the more urbanised character of the land east of Sandford it is evident that the overall strategy for this area and a number of landscape guidelines presented by the previous North Somerset Landscape Character Assessment do not apply to the land south of Greenhill Road as it does not exhibit a rural, pastoral character and does not contain any the landscape features typically associated with the lower lying parts of the LCA, such as wetland habitats or pollarded willows. Overall, contrary to the conclusions set out in paragraph 5.5 of the Strategic Gaps Background Paper (2023), these representations, along with the supporting Landscape Technical Note (Appendix 2), demonstrate that the proposed new strategic gap for Sandford & Churchill is not justified in its current form. There is a fundamental lack of supporting evidence and justification for the inclusion of the land south of Greenhill Road (Appendix 1), and instead the Council's Strategic Gaps Background Paper (2023) contains a number of misleading statements and factually incorrect information. In our view the specific circumstances of the entire strategic gap area are different across the various land parcels and the supporting evidence does not reflect the circumstances specific to the land south of Greenhill Road. Proposed Changes to draft Policy LP10: On the basis of the above, including information submitted to the previous Regulation 19 consultation, and taking into account the lack of proper justification set out in the latest Strategic Gap Background Paper (2025), we continue to maintain that the land south of Greenhill Road (Appendix 1) should be removed entirely from the proposed strategic gap between Sandford & Churchill. There is a fundamental lack of evidence supporting the inclusion of the site within the designation. In contrast, the evidence submitted, principally in the form of the supporting Landscape Technical Note (Appendix 2) demonstrates why the land is suitable for development from a landscape perspective and why there is a clear lack of justification for inclusion of the land within a new strategic gap. Should the Council pursue this particular strategic gap and considers there is justification for the inclusion of some of the land east of Sandford within such a designation then it continues to be the view of Waddeton Park Ltd that, as an absolute minimum, the Land south of Greenhill Road should be removed from the designation for the reasons explained within these and previous submissions. To assist, we have again appended to these representations an amended version of the policies map showing how the Sandford and Churchill strategic gap should be amended prior to submission of the plan for examination (Appendix 3). Conclusion: We strongly object to draft Policy LP10 (Strategic Gaps) in its current form and our representations above explain why the land south of Greenhill Road, Sandford (see Site Location Plan attached at Appendix 1) controlled by Waddeton Park should be removed from			

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					the proposed strategic gap at Sandford and Churchill given that it is a suitable and sustainable location to deliver residential development. The site offers an excellent opportunity to accommodate development on a sustainable site, well related to the village, to help address local housing need. This is supported by the Council's own assessment of the site within the SHLAA, confirming its potential suitability, as explained in our response to draft Policy LP5. When looking in detail at the policy basis and evidence supporting the strategic gap at Sandford and Churchill and the specific context relating to the land south of Greenhill Road, Sandford, there is no justification for the inclusion of the site within this proposed strategic gap. The representations above, along with the supporting Landscape Technical Note demonstrates why the land should therefore be removed from this proposed designation. As expressed in our separate response to policies SP8 and LP5, the plan should be flexible to respond to changing circumstances and the proposal to include land suitable for future development within a strategic gap designation would fundamentally go against that principle. Indeed, it may simply direct development to less sustainable sites as a result. With reference to the proposed strategic gap between Sandford and Churchill, introducing this gap as proposed would simply block the sustainable growth of Sandford therefore also preventing the ability to address local housing needs. If the Council pursues this particular strategic gap and considers there is justification for the inclusion of some of the land east of Sandford within such a designation then it is the view of Waddeton Park Ltd that, as an absolute minimum, the Land south of Greenhill Road should be removed from the designation for the reasons explained. To assist, we have appended to these representations an amended version of the policies map showing how the Sandford and Churchill strategic gap should be amended prior to submission of the local plan for examination (Appendix 3).			

Name: Wain Estates (Wolvershill) **I.D:** 51710305

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SP1: Sustainable Development	No	• Effective			It is encouraging that the core principle of draft Policy SP1 is that "The presumption in favour of sustainable development is at the heart the NPPF and relates to both plan making and decision-taking. The planning system must contribute to the achievement of sustainable development. This Local Plan acknowledges this important national policy requirement." The revised NPPF (December 2024) retains this principle at paragraphs 11 and 12. Paragraph 16(f) of the NPPF (December 2024) confirms that Local			0707-06.M23 Wain Estates NS Pre Submission Reg 19 Local Plan 12.12.25 with Appendices.pdf

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					Plans should avoid unnecessary duplication, including repetition of policies within the NPPF itself. As such it is questionable whether draft Policy SP1 is needed given that it seeks to replicate provisions already within adopted national policy.			
SP2: Climate Change	No	• Effective			The below response to draft Policy SP2 Climate Change has been prepared by Turley on behalf of the consortium of land promoters Wain Estates, Ainscough Strategic Land and Bloor Homes South West at Wolvershill (north of Banwell). Further comments on sustainable development and climate change are provided in response to draft Policy DP6: Net Zero Construction. Draft Policy SP2 sets out the overarching principles for how development should address both climate change mitigation and adaptation, this includes a number of key requirements around resource use, net zero, energy generation, climate resilience, transport, and green infrastructure. The updated Regulation 19 consultation makes no substantial changes to this Policy. While the objective of the policy is welcomed there are elements which need to be reviewed to ensure alignment with subsequent sustainability policies. The UK Climate Projections (UKCP18) set out the likely effects of climate change in the UK, these include increasing annual temperatures, increasing winter rainfall and decreasing summer rainfall as a result of increasing global temperatures, driven by GHG emissions. How development contributes to tackling climate change mitigation and adaptation is therefore a key consideration. We fully support the inclusion of the climate change strategic policy and setting out the overarching aims for development in North Somerset. It is noted that elements of the development expectations include the phrases ‘minimise’ and ‘maximise’. By stating ‘minimising’ or ‘maximising’ the policy sets an open-ended requirement which itself is not fully tested as part of the viability considerations for subsequent Policies including Policy DP5, and Policy DP6. We have recent examples of Local Authorities using the overarching text to maximise or minimise specific requirements for new development which are outside of the intent of the Plan policies and were not considered as part of the preparation of the Plan. There is therefore the potential for interpretation of policies leading to unintended consequences of this wording which could supersede requirements set out in the subsequent Development Management Policies. (See attached document for suggested changes to policy).			0707-06.M23 Wain Estates NS Pre Submission Reg 19 Local Plan 12.12.25 with Appendices.pdf
SP3: Spatial strategy	No	• Effective					We welcome that the Local Plan spatial strategy makes provision for increased housing numbers in line with the standard method. The agree that exceptional circumstances exist that warrant the review of Green Belt boundaries in accordance with the NPPF and support the allocation of additional sites in the Green Belt. We support the aims of this policy.	0707-06.M23 Wain Estates NS Pre Submission Reg 19 Local Plan 12.12.25 with Appendices.pdf

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SP7: Green Belt	No	• Effective					As discussed above we support the release of Green Belt land to help meeting housing targets and the allocations that are identified in the Policy. Furthermore, the incorporation of the NPPF Golden Rules within the policy is also welcomed. We have no objection to the draft Policy.	0707-06.M23 Wain Estates NS Pre Submission Reg 19 Local Plan 12.12.25 with Appendices.pdf
SP8: Housing	No	• Effective			The Plan as proposed risks not allowing for sufficient time (15 years from adoption) to meet a basic requirement for strategic polices set by national policy. A longer Plan period is required to ensure that the North Somerset Local Plan covers a period of at least 15 years from adoption, with a longer period likely to enable the Council to more effectively plan for future development. There is concern, and risks in respect of the soundness of the Plan as proposed where, whilst seeking to meet the minimum level of housing need identified using the standard method, there is evidence to suggest that a higher housing requirement should be set to address affordable housing needs and to also accommodate some of Bristol's unmet needs. There is concern, and risks in respect of the soundness of the Plan as proposed, where no housing delivery trajectory has been provided for the Plan as a whole, or for the specific sites which are identified as part of the proposed strategic policies. This should be addressed as part of the Submission of the Plan.	See attached full document for detailed comments.		0707-06.M23 Wain Estates NS Pre Submission Reg 19 Local Plan 12.12.25 with Appendices.pdf
SP9: Employment	No	• Effective			Draft Policy SP9 includes a requirement to strengthen and reinforce the role of Weston-super-Mare as the principal economic centre alongside housing growth with 43.6 ha of employment proposed for the settlement. We also note the latest Employment Land Supply Background Paper (2025) which forms part of the evidence base. In section 4.4 it states that studies/evidence: "Reconfirmed business land opportunities at Weston-super-Mare, that is preferred over Wolvershill". As a result, the employment allocated at Wolvershill has been reduced to 3ha. We agree with the findings of the evidence and support allocation of employment that can be viably delivered. On this basis, Wain Estates supports draft Policy SP9 in principle. A reduction in employment at Wolvershill also allows for the future planning and delivery of a new motorway junction on the M5 south of J21 is not precluded. (see our comments below on J21A). Please see our comments on employment provision under draft Policy LP1.			0707-06.M23 Wain Estates NS Pre Submission Reg 19 Local Plan 12.12.25 with Appendices.pdf
SP10: Transport	No	• Effective			Please see our comments on transport provision under draft Policy LP1.			0707-06.M23 Wain Estates NS Pre Submission Reg 19 Local Plan 12.12.25 with Appendices.pdf

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SP11: Historic and natural environment	No	• Effective			Please see our comments on the National Landscape, nature parks and green infrastructure under draft Policy LP1.			0707-06.M23 Wain Estates NS Pre Submission Reg 19 Local Plan 12.12.25 with Appendices.pdf
Policy LP1: Strategic location: Wolvershill (north of Banwell)	No	• Effective			We are pleased that draft Policy LP1 allocates Wolvershill (north of Banwell) as a mixed use strategic location to accommodate 3,300 dwellings including affordable housing, 3ha employment and other uses. The strategic location includes Wain Estates' land, which is identified on the site location plan at Appendix 1. We strongly support draft Policy LP1 and the allocation of the strategic location. The allocation is a clear and logical preferential site in the Council's spatial strategy. It is outside of the main constraints in North Somerset – Green Belt to the north; Flood risk to the west; and National Landscape to the south of the District. The release of land at this location is a requirement of the HIF funding that was awarded to fund Banwell bypass, which was granted permission in 2023 and is under construction. We do have concerns over the wording of some elements of the draft Policy. Our responses to the draft Policy and our requested amendments are provided below. Housing The allocation may be suitable for 3,300 homes and we do not object to this approach in draft Policy LP1, but the Consortium considers delivery at this level would go beyond the Plan period; it would be realistic to assume circa 2,800 homes could be delivered by 2042, with the remaining 500 in the next plan period. Affordable Housing Draft Policy LP1 states that "A new mixed use strategic location is proposed at Wolvershill (north of Banwell) at the location defined on the Policies Map to accommodate around 3,300 dwellings, including 990 affordable homes." It is considered that the draft Policy should set out the requirement for affordable housing as a percentage instead of a numerical figure. This would allow for flexibility in the event that the final number of dwellings is not exactly 3,300. This amendment would also be consistent with draft Policy DP43: Affordable Housing, which sets out the requirement for affordable housing as a percentage of the total number of dwellings on a site. The affordable housing requirement is reduced to the equivalent 30%, which reflects the 30% for greenfield land in amended Policy DP43 Affordable Housing. Wain Estates supports the reduction in affordable housing from the previous 38.5% requirement, which was inconsistent with draft Policy DP43. As set out in the viability evidence6, an affordable housing	See attached full document for specific suggested changes to Policy LP1.		0707-06.M23 Wain Estates NS Pre Submission Reg 19 Local Plan 12.12.25 with Appendices.pdf

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					requirement of more than 30% creates viability issues; indeed, the evidence demonstrates 'relatively challenging viability' even at 25% affordable housing: "In scenario 1 [2,800 dwellings], positive viability can be seen where 10% affordable housing is assumed but viability becomes marginal with 25% affordable housing except at the highest value level tested. Scenario 2 [3,300 dwellings] shows slightly stronger results with 25% affordable housing potentially being viable at the mid to higher value part of the tested values range. In any event, it appears that as much as 35% affordable housing is unlikely to be viable (without some form of change to infrastructure/ values or cost assumptions and / or significant additional subsidy) in either scenario – although some level of 'additionality' beyond the development funded AH levels / tenure make up should not be ruled out as the LP framework acknowledges…" It is critical that any percentage sought is viability tested, with the final position based on all other infrastructure and obligations sought from the development. Masterplan, Delivery Plan and Design Codes Draft Policy LP1 states "A single masterplan covering the entire allocation and proposed development, delivery plan and supporting design codes will be prepared to guide its coordinated and comprehensive development and the creation of a sustainable community. This will include a phasing strategy linking the delivery of development parcels to infrastructure provision." Together, the consortium – the three main land promoters Wain Estates, Ainscough Strategic Land and Bloor Homes South West – have and are continuing to work together to prepare a single comprehensive masterplan for the strategic location. We also recognise that there are additional landowners within the strategic location who have also expressed an interest in bringing their land forward for development. The consortium and other land owners and promoters are engaging with the Council in the preparation of its emerging draft SPD for Wolvershill (north of Banwell). It is the consortium's intention that the emerging masterplan will cover the whole Wolvershill strategic location. We welcome this engagement and collaboration with the Council and support the requirement of draft Policy LP1 to prepare a single masterplan and delivery plan. It is important that these plans are prepared in parallel with the Examination of the Plan to ensure timely delivery of the dwellings within the Plan period. Wain Estates supports the insertion of supporting text which allows for further guidance in the form of a Masterplan Framework or SPD to be prepared providing further detail for the allocation. This ensures flexibility in the determination of application proposals at Wolvershill. Extensive work has been undertaken on a Strategic Design Code for Wolvershill strategic location by the consortium which can be referenced by the policy and its supporting text. Whilst Bloor as a housebuilder is preparing a detailed design code for its site this is not possible for Wain Estates and ASL as land promoters and a degree of flexibility is therefore required in the draft policy to			

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					respond to this. Further design coding can be undertaken to inform reserved matters when the housebuilder is known. Wain Estates therefore requests that this element of draft Policy LP1 is amended (see attached full document for suggested changes). Complement Banwell Village “The new development must complement Banwell village in respect of the scale and range of facilities and encourage integration between the existing and new communities” We support this element of the draft Policy. Banwell Bypass “The proposed development is reliant upon, and must be integrated effectively with the design and delivery of the Banwell Bypass” We support this element of the draft Policy. It is essential that Banwell bypass enables access for pedestrians and cyclists between Banwell and Wolvershill. Transport consultants for the consortium are continuing to engage regularly with the Council and highway officers overseeing the Banwell bypass project. Strategic Gap “A Strategic Gap is defined between the new development area and Banwell to retain the character and setting of Banwell” Whilst the provision of the Strategic Gaps is accepted, there is greater need for flexibility within draft Policies LP1 and also LP10: Strategic Gaps to allow for the provision of community facilities and other active Green Infrastructure uses that will provide beneficial amenity for the communities of Banwell and Wolvershill. The Strategic Gap should not be unusable space that separates the two communities. Sensitively Responding to Existing Uses Policy LP1 requires development proposals to demonstrate how they have sensitively responded to existing uses on site including existing business and residential areas. Wain Estates does not object to this although these matters would be considered in detail at Reserved Matters stage and broader related issues are being considered as part of our outline submission. Walking and Cycling Routes “The creation of attractive, easily accessible, safe and direct walking, wheeling (wheelchairs, mobility scooters and other wheel-based mobility aids), and cycling routes linking the new development with local facilities, within Banwell and into Weston-super-Mare, Parklands, and Worle, including the three M5 crossing points (two road bridges and a direct cycle/pedestrian access into ParklandsVillage). This is likely to require alterations to the future role and function of a section of Wolvershill Road to facilitate active			

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					travel in the centre of the development in order to achieve this. Creation of new cycle and pedestrian links to Parklands to be delivered during the initial phases of residential development;” The draft Policy requires the facilitation of active travel at the centre of the development. We support this element of the draft Policy. The emerging masterplan and draft SPD for Wolvershill must maximise the use of these connections including the crossing points over the M5, which mean that the strategic location is not isolated by the M5. Public Transport “The creation of effective public transport links into Weston-super-Mare, Parklands, and Worle, employment areas and other destinations such as railway stations, transport hubs (including designated bus corridors) and improving accessibility for existing Banwell residents” We support this element of the draft Policy. Transport consultants for the consortium are continuing to engage regularly with the Council and highway officers to deliver effective public transport links. Densities The draft Policy states that development at Wolvershill will comprise predominately medium to high densities. Whilst Wain Estates does not object in principle to higher densities, we would suggest that the draft Policy is amended to clarify that higher densities are encouraged at the western edge adjacent to the noise barrier. (See attached full document for suggested changes). Transport Measures, IDP and J21A J21A Draft Policy LP1 has been amended: “Provision of a package of transport measures as identified in the Infrastructure Delivery Plan including provision of a transport hub at the local centre, delivery of key access junctions onto the Banwell Bypass and wider transport mitigation schemes. Development proposals should ensure that any future planning and delivery of a new motorway junction on the M5 south of J21 is not precluded;” The Council’s evidence base does not clearly justify the requirement for a new motorway junction on the M5 south of J21 – known at J21A - at Wolvershill strategic location and it is noted that National Highways has not requested that one is planned for and delivered now or in the future. For these reasons, whilst Wain Estates does not object to this element of the draft Policy in principle, we would object to future planning for a new motorway junction at this location if it precludes the planning and delivery of the other requirements of draft Policy LP1, particularly for the required housing and employment. IDP The draft Infrastructure Delivery Plan (IDP) October 2025 provides an overarching strategy for the delivery of various types of			

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					infrastructure related to Wolvershill strategic location. It identifies infrastructure: transport, education, environmental, social and utilities. The IDP also includes a schedule of projects/improvements proposed, relevant to Wolvershill. The majority of these projects and improvements relate to improving transport links and ensuring the allocation provides active travel routes to and from the site. Wain Estates has no objection to this in principle and details of active travel measures are being discussed with the Council as part of the outline application. We would also like to add that detail measures/ design would be provided at Reserved Matters stage. The other remaining projects and improvements relate to major transport schemes such as the Banwell Bypass which is currently being delivered. There is also no further comment regarding the traffic signal improvements proposed at the bypass. The IDP includes extensive provision for transport measures including active travel off site and these interventions require further critical review and costing. This must form part of the viability testing to inform the overall package of planning obligations sought from Wolvershill. This process will be undertaken as part of the determination of the Consortium's outline planning applications. National Landscape "The development must respect the landscape setting, including minimising any adverse impact on the Mendip Hills National Landscape through sensitive design" We support this element of the draft Policy. Please also see our below response to draft Policy DP39, which fails to allow for allocations for development in the Plan including at our site at Wolvershill (north of Banwell) where there will be views of the National Landscape. The wording of draft Policy LP1 recognises this and is supported. Local Centre "The creation of a mixed-use local centre focused on Wolvershill Road to form the heart of the new community with a high quality public realm, planned with the provision of a community space from the outset of development but with the ability to grow and develop in step with the development and its needs. Other mixed uses to include retail, business space appropriate to a local centre location, extra care accommodation, healthcare provision, family and children's centre services, residential, and a transport hub, all set within a high-quality public realm with public space and appropriate species selection and planting of trees;" We support this element of the draft Policy. The masterplan and draft emerging SPD show a local centre. This is informed by a 'Community Facilities Assessment' (April 2022, Lichfields) that was submitted by the consortium along with previous representations on the draft Preferred Options Local Plan. Routes to Parklands and Worle			

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					“The creation of safe, attractive and direct walking, wheeling (wheelchairs, mobility scooters and other wheel-based mobility aids), cycling and public transport links to existing facilities at Parklands and Worle. This is likely to require alterations to the future role and function of Wolvershill Road in order to achieve this” We support this element of the draft Policy. Liveable Neighbourhoods “Liveable neighbourhoods within the scheme should be planned for to ensure convenient and safe walking and cycling access to the local centre and key facilities” We support this element of the draft Policy. Ecology, Habitat and Nature Park “The development must deliver ecological, habitat and environmental enhancement, particularly in relation to horseshoe bats, linking habitat between the scarp and along key green corridors between new development and Banwell. The eastern fringe of the development in particular will be a focus for ecological and environmental mitigation, with provision of a new North Somerset Nature Park to provide bat mitigation, provision of land for biodiversity and habitat enhancement. ‘Dark corridors’ for bats will be provided on agreed green corridors within and adjacent to the development effectively integrating with mitigation agreed through the Banwell Bypass project;” Wain Estates supports this requirement and has no comment on the proposed wording. The ecology parameters form a key part of the masterplan framework with a number of east to west bat corridors through the strategic location. Clarity would be welcomed regarding the North Somerset Nature Park in terms of who is responsible for delivering and managing this facility. Clarity is also required regarding its timescale for delivery given that the Council notes that this is the preferred means of achieving mitigation for horseshoe bats. Green Infrastructure “Green infrastructure should form an interconnected and multifunctional network throughout the development and where appropriate with integrated sustainable drainage systems including rain gardens and other features. Additional woodland and tree planting surrounding and throughout the development will be required, including as part of the landscaping adjacent to the M5 motorway;” We support this element of the draft Policy. The consortium will continue engagement with the Council in the preparation of the masterplan and emerging draft SPD for Wolvershill. “Defined areas of green infrastructure should be planted with wildflower species within a wider natural landscape setting”			

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					We object to this element of the draft Policy because it is unnecessary and vague and is already required by other draft Policies. We request that this text is deleted from draft Policy LP1. Setting of Historic Farmsteads “The setting of historic farmsteads will be sensitively addressed including through the creation of open space designed around these features to provide a visual buffer, allowing their historical significance to be reflected, contributing to the wider sense of place. Additional design measures will be required to address these assets including appropriate materials and design styles, lower surrounding development heights, and lower density of street patterns allowing for views to the features and to avoid overdominance of them;” Wain Estates requests that the above element of the draft Policy is deleted. The setting of these assets will be considered through the general heritage policies of the Plan as well as the NPPF and PPG. This will ensure that they only need to be sensitively addressed if their significance merits this. Climate Change Resilience “A strategy to support and maximise climate change resilience will be required including an approach to maximising carbon storage and other measures across the development with exploration of opportunities for community-based renewable energy generation;” Wain Estates objects to this new policy requirement for climate resilience, sustainable energy and building performance are covered by other draft Policies. There is a risk that this element of draft Policy LP1 will require provision in addition to other draft Policies and impact on development viability. Heritage “Where appropriate, heritage and archaeological features will be integrated into the development including any identified archaeology that should be reflected in the new development including appropriate interpretation to maximise the recreational and educational value of the assets;” We request that this element of the draft Policy is amended, (see attached document for suggested changes). Employment Draft Policy LP1 states “The provision of a minimum of 3ha of new employment delivered through the creation of a new business park and potential for smaller-scale business land provision as part of the mixed-use local centre”. This is broadly in line with draft Policy SP9, which includes a requirement to strengthen and reinforce the role of Weston-super-Mare as the principal economic centre alongside housing growth with 43.6 ha of employment proposed for the settlement. We also note the latest Employment Land Supply Background Paper			

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					(2025) which forms part of the evidence base. In section 4.4 it states that studies/evidence: “Reconfirmed business land opportunities at Weston-super-Mare, that is preferred over Wolvershill”. As a result, the employment allocated at Wolvershill has been reduced to 3ha. We agree with the findings of the evidence and support allocation of employment that can be viably delivered. On this basis, Wain Estates supports this element of draft Policy LP1 in principle. A reduction in employment at Wolvershill also allows for the future planning and delivery of a new motorway junction on the M5 south of J21 is not precluded. (see our comments below on J21A). Our only requested change is to delete “a minimum of” to ensure consistency with draft Policy SP9. “Effective management and treatment of surface water, controlling run-off into surrounding watercourses and integrating into the green infrastructure network. Provision of sustainable drainage adjacent to new highway will also be supported;” We support this element of the draft Policy. The consortium will continue engagement with the Council in the preparation of the masterplan and emerging draft SPD for Wolvershill. Rainwater “Rainwater should be treated as a resource and proposals should maximise its reuse;” Wain Estates considers that rainwater can be adequately covered in the general development management policies of the Plan. It is noted that none of the other strategic locations include this requirement. Recreation “Provision for recreation including indoor facilities as part of a new community hall, outdoor sports pitches and changing facilities, three outdoor tennis courts, a skatepark, and a multi-use games area.” Wain Estates supports the provision for formal recreation opportunities at Wolvershill and along with Ainscough Strategic Land and Bloor Homes South West has had extensive discussions with NSC including its Leisure Team and made extensive provision within the masterplan framework and associated planning applications. All aspects of NSC requests for the site are currently addressed through the Consortium’s proposals though we query the specific requirement to provide three tennis courts as we do not consider there to be sufficient evidence to substantiate this. This is a late addition to the policy and to the discussions in relation to the three planning applications. We are advised that this would include three outdoor tarmac floodlit tennis courts to Sport England standards with 3m fencing and installed with an LTA approved automatic gate access system. A facility would have an online booking system and be managed by the community or trust. To inform this request NSC Leisure has liaised with the LTA. In correspondence NSC has referred to its Playing Pitch Strategy			

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					(which does not form part of the evidence base) which we are informed recommends working with the LTA to identify a location within Weston-super-Mare for a 3-court site to address the increase in demand that is likely to be generated by housing development in the area. The need for this facility clearly arises across a far wider catchment and would be to address existing gaps in provision which would be exacerbated by new development proposed within the Local Plan. There are a number of proposed allocations within the wider Weston-super-Mare area as well as Council owned land including parks which could address this specific need which should not fall to the Wolvershill development. There is no evidence to justify its requirement as part of draft LP1 policy and further justification is required with the relevant documents added to the evidence base. In addition, it is not clear why floodlighting would be essential for this facility, on the basis that outdoor tennis facilities are most likely to be well used and attractive in the spring and summer months, when darkness is less of a restriction on useability. Given the acknowledged ecological sensitivity of the Wolvershill site, it is considered that any provision to be made should not be contingent on the provision of floodlighting. If it is, then the allocation site is very restricted in relation to where the tennis courts could be provided; for example, the land to the south of the bypass where the football pitches are to be provided is not suitable for floodlighting. To ensure that the most appropriate recreation facilities in the most appropriate locations can be provided, Wain Estates requests that this element of draft Policy LP1 is amended to make it clear that provision can be provided on or off-site: “Provision for on-site, or contributions to off-site, recreation including indoor facilities as part of a new community hall, outdoor sports pitches and changing facilities, three outdoor tennis courts, a stakepark, and a multi-use games area.” Education Draft Policy LP1 identifies the principles with which the development must comply, including the following in relation to education provision: “Educational facilities located within the new development, including delivery of three 420 place primary schools (to include early years provision in line with government requirements) within a safe walking route from the new homes, access to additional early years settings and walkable access to services used by children and families within a reasonable distance;” “Financial contribution towards off-site secondary, special educational needs and Post 16 education provision;” Wain Estates supports the revised wording for this element of the draft policy in terms of secondary school provision, as previously the text required the applicant to investigate or deliver additional secondary capacity on site. This has now changed to provide financial contributions towards off-site secondary provision. This approach is supported as the number of homes proposed does not generate the need for a new secondary school on site. In relation to primary school provision, draft Policy LP1 now outlines			

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					a requirement for the provision of “three 420 place primary schools…within a safe walking route from the new homes…”. This has been adapted from the previous consultation draft, which required the allocation to provide “up to 1,260 primary school places across two to three primary schools”. Whilst the total number of primary school places that are required remains unchanged (equivalent to six forms of entry), the previous requirement provided for considerably more flexibility in respect of the way in which the primary education facilities would be provided. We note that there has been no explanation or justification for this change in approach. Further, draft Policy LP1 refers to 3 x 2FE schools, but then in the supporting text requires that “…each new primary school should be accommodated on a minimum site size of 2.4 hectares”. 2.4ha is the site area required for a 3FE school (exceeding the requirements stipulated in the area guidelines for mainstream schools prepared by the Department for Education and the Education Funding Agency, which refers to 2.23ha for a 3FE school, and 1.6ha for a 2FE school. We object to this revised policy text and the supporting text as it does not provide sufficient flexibility in how pupil places can be provided on site. This should be via x2 schools, capable of delivering up to 3FE, each with a site area of up to 2.4ha. Policy LP1 should simply require up to 1,260 pupil places for 3,300 dwellings, with the supporting text stating that a 3FE school requires a land area of 2.4ha. Lichfields’ previous Education Reviews (April 2022 and May 2023) concluded there is a requirement for two primary schools only, with the land provided to NSC with a financial contribution towards construction and fit out, to ensure equity of this infrastructure delivery across the site. This remains Lichfields’ position, as set out in detail in the appended Education Review (November 2025) – see Appendix 3 – which states: 1.Detailed analysis clearly shows there is a need to provide 5-6 forms of entry (6FE for the 3,300 home expanded allocation figure, albeit some would be beyond the plan period). 2.This would be best delivered across two primary schools, meeting the statutory maximum walking distances, and making most efficient use of land. 3.Each of ASL and Bloor’s applications include 2.4ha of land for a primary school, which would allow up to 3FE to be delivered at each; this is sufficient to meet need for 1,260 pupils from 3,300 homes. 4.It is our position that the first school to open should provide 3FE, likely required in circa 2030/31. 5.The second school to open should provide 2FE but with the land provided to expand to 3FE if/when required, likely to open in 2037/38 (when the first school is at c. 92% capacity). 6.The Consortium should gift the land for the school sites to NSC and then make a financial contribution via S106 to fund delivery of the new schools (contributions sought from all applications within the strategic growth location). Gypsy and Traveller Pitches			

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					“Provision should be made for a minimum of 18 gypsy and traveller pitches within the site, or alternatively through the provision of suitable land offsite along with a financial contribution to support delivery.” Wain Estates accepts that financial contributions for Gypsy and Traveller pitches are required, however, the Policy should be amended to require financial contributions only as there is no scope within the allocation to provide these. The draft Policy should also be amended so that it is for the Council – not developers - to identify and deliver the site/pitches, with no further involvement from developers. In the supporting text it is also mentioned that pitches should be delivered on-site, this wording should also be removed to allow for off-site contributions. This element of draft Policy LP1 should be amended (see attached document for suggested changes). Landscaped Noise Barrier Along M5 “The development will be located having regard to any noise or other environmental impacts, and suitable mitigation will be delivered to address any impacts including provision of a landscaped noise bund barrier designed for its attractiveness and wildlife value located adjacent to the M5. This feature should respond to the topography of the site, be of varying width, and should facilitate the delivery of a recreational cycle and walking route surrounding the Wolvershill development;” Wain Estates’ specialist consultants – Architect, Landscape, Noise, Ecologist, Arboriculturist – are preparing the design of a landscaped noise barrier located along the M5. The landscaped barrier and strip will provide noise mitigation, landscaping, habitat retention and creation for attractiveness and wildlife and biodiversity value along its length. It will facilitate a recreational route. The linear landscaped strip alongside the west boundary and M5 will provide a variable width due to the pattern of hedgerows which will be retained or replanted; the site’s contours; and topography. This variable width is not less that 30m, averaging between 35 and 40m and has wider areas up to 100m. The landscaped strip is wider than is required – at its narrowest width – to accommodate connectivity along the western boundary of the strategic location from the North Somerset and Mendip Bat SAC that is located south of the strategic location. Noise consultant Hydrock has undertaken noise modelling based on noise level data measured on site to demonstrate that the noise barrier as proposed provides sufficient mitigation to allow BS 8233:2014 internal noise level criteria to be achieved within proposed dwellings provided suitable acoustic façade specifications are provided. Whilst this element of draft Policy LP1 is supported we request that the wording is amended to refer to a landscaped noise barrier instead of bund. This allows flexibility for a noise barrier consisting of a bund and fence on top, which would be screened by planting, and would safely restrict access to the M5 motorway.			

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					“The development will be located having regard to any noise or other environmental impacts, and suitable mitigation will be delivered to address any impacts including provision of a landscaped noise bund barrier designed for its attractiveness and wildlife value located adjacent to the M5. This feature should respond to the topography of the site, be of varying width, and should facilitate the delivery of a recreational cycle and walking route surrounding the Wolvershill development;” Character Areas “The creation of distinct character areas across the development, particularly distinct residential neighbourhoods, with materials, and design, referencing the local context and demonstrating best practice in placemaking. To include high quality design solutions for access points into the site, the local centre, business sites, and the immediate vicinity of educational buildings.” We support this element of the draft Policy. Development Phasing The justification text of the draft Policy refers to development phasing and that that the IDP sets out broad phasing of infrastructure. It states that planning applications are expected to reflect the IDP and phasing outlined in the schedules. Several estimated timeframes for the major infrastructure projects are vague and it is unclear at this point whether they can be achieved, these dates should be scrutinised in more detail at examination. With regards to specific schemes outlined in the IDP phasing, scheme SO14 states the skate park/wheel park area of 2882m2 is required with a proposed concrete skate park of around 570m2. These proposed areas are excessive and Wain Estates object; it has already been agreed with Officers that reduced skate park area of 458m2 is acceptable and SO14 should be amended to reflect this along with removal of the 2882m2 requirement. Wain Estates would also request that scheme ENV17 (noise barrier) delivery is amended to prior to occupation on a phased basis. Therefore, timing should be phased pre-occupation approach.			
Policy LP5: Housing, employment and mixed use allocations	No	• Effective					We are pleased that draft Policy LP5, Schedule 1 lists sites including our site at Wolvershill (north of Banwell) strategic location for 3,300 dwellings. These sites including Wolvershill strategic location will assist in meeting the high levels of market and affordable housing needs across North Somerset. Where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interested parties about the nature and scale of development.	0707-06.M23 Wain Estates NS Pre Submission Reg 19 Local Plan 12.12.25 with Appendices.pdf

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							The draft Policy highlights that developments must take account of the site-specific requirements set out in the draft schedules to the emerging Local Plan. Draft Schedule 1 concerns “Proposed large sites for residential development” and defers to draft Policy LP1 for site-specific requirements. Draft Schedule 2 “Proposed employment sites” states that the site is to provide 3ha of employment land. Please see our detailed comments in respect of these requirements under draft Policy LP1.	
Policy LP6: Educational, sporting, leisure and community use allocations	No	• Effective			Please see our comments on educational, sporting, leisure, and community uses under draft Policy LP1.			0707-06.M23 Wain Estates NS Pre Submission Reg 19 Local Plan 12.12.25 with Appendices.pdf
Policy LP9: Extent of the Green Belt	No	• Effective			Please see our comments on the Green Belt under draft Policy SP7.			0707-06.M23 Wain Estates NS Pre Submission Reg 19 Local Plan 12.12.25 with Appendices.pdf
Policy LP10: Strategic gaps	No	• Effective			Whilst the provision of Strategic Gaps is accepted in principle, there is greater need for flexibility within draft Policy LP10 to allow for the provision of community facilities and other active Green Infrastructure uses that will provide beneficial amenity for those communities adjoining strategic gaps. Please see our further comments on Strategic Gaps under draft Policy LP1.			0707-06.M23 Wain Estates NS Pre Submission Reg 19 Local Plan 12.12.25 with Appendices.pdf
Policy LP11: Transport infrastructure, allocations and safeguarding	No	• Effective				We support the allocation and safeguarding of land identified in draft Policy LP11, Schedule 7 for the delivery of J21 Bypass Scheme and Banwell bypass. The J21 Bypass Scheme should be planned and designed to accommodate the Wolvershill (north of Banwell) strategic location. Banwell bypass will reduce traffic congestion and pollution at Banwell and will enable access to Wolvershill (north of Banwell) strategic location. Please see our further comments		0707-06.M23 Wain Estates NS Pre Submission Reg 19 Local Plan 12.12.25 with Appendices.pdf

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						on transport infrastructure under draft Policy LP1.		
Policy DP6: Net zero construction	No	• Effective			As noted above there are a number of potential issues with the requirements set out in Policy DP6. In the first instance the Government's December 2023 WMS and subsequent legal challenges and opinions note that local policies can be put in place where they are consistent with national policy and are appropriately evidenced. There are a number of other issues with the requirements of Policy DP6 and focus on minimising energy demand which are contrary to the WMS and the evidence set out in the 2023 FHS and FBS consultation and not consistent with the approach set out through National Policy. We also have concerns about how the viability of Policy DP6 has been considered, noting that the costs used do not align with the Government's FHS and FBS consultation. In this context a number of recommendations are set out above and the changes proposed are set out below to ensure that Policy DP6 aligns with national guidance, is deliverable and viable.	See below proposed changes to the wording to ensure that Policy DP6 aligns with national guidance, and is deliverable and viable (amendment proposed as follows -see attachment for marked up copy): Policy DP6: Net Zero Construction All development must be designed to minimise its impact on the environment and create high quality internal and external spaces for people to use. Proposals must demonstrate that all resources are used efficiently, as part of the construction and operation of a building. ■ All development must follow the principles of the energy hierarchy to ensure that the design of a building prioritises energy reduction through highly energy efficient fabric measures, lighting, ventilation, and orientation. Once energy demand is minimised and efficiency design measures are in place, renewable energy technologies will be used to meet residual energy demand. ■ All new buildings will be required to achieve net zero operational energy compliance in respect of regulated energy and minimise embodied carbon. ■ All new development should seek to minimise embodied carbon in respect of both upfront (emissions associated with raw materials, transportation, manufacturing and construction) and whole life carbon. For development of more than 50 dwellings, or in excess of 5,000m² nonresidential floorspace, full planning applications, or Reserved Matters applications must be accompanied by an embodied carbon assessment		0707-06.M23 Wain Estates NS Pre Submission Reg 19 Local Plan 12.12.25 with Appendices.pdf

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						which demonstrate that upfront carbon emissions do not exceed 750kg CO2e/m². ■ The retention of existing buildings will usually be given preference to their demolition. Retrofitting energy efficiency measures in existing buildings will be supported and significant weight will be given to the benefits of development resulting in considerable improvements to energy efficiency. All proposals must demonstrate high standards of insulation and Passivhaus Enerphit standards are encouraged. Net Zero Operational Energy: Residential In order to demonstrate compliance with the net zero operational energy requirement, all new residential buildings must demonstrate through an energy statement, that the following have been achieved: ■ No on-site use of fossil fuels; ■ Meet the requirements of the FHS; ■ On-site renewable energy generation is provided in line with the Future Homes Standard ■ Alternatively, compliance can be demonstrated through Passivhaus Plus Standard accreditation, using the Passivhaus Planning Package. Net Zero Operational Energy: Non-Residential In order to demonstrate net zero operational energy, all new non-residential buildings must demonstrate through an energy statement, that the following have been achieved: ■ No use of on-site fossil fuels; ■ Energy use is minimised as far		

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						as practical and feasible, appropriate to the end use; ■ On-site renewable energy generation is provided in line with the Future Buildings Standard Alternatively, compliance can be demonstrated by using BREEAM Excellent level accreditation, where feasible targeting an outstanding level for energy use (Credit Ene01). An alternative compliance route may be allowed with prior agreement. Renewable Energy Offsetting Where feasible and viable residual energy demand should be met through the generation of onsite renewable energy, but if this is not technically feasible, the requirement may be met elsewhere by means of offsite renewable energy generation, either through a contribution to the Council's offsetting scheme or via a renewable energy generation scheme approved by the Local Authority. All development must demonstrate measures to minimise potable water use, residential development should aim to achieve an estimated water consumption of no more than 100 litres/person/day, and non-residential development should aim to achieve the equivalent of 2 BREEAM Version 6 Wat 01 Water Efficiency credits. All measures will optimise water use systems and may include rainwater harvesting and other mechanisms for recycling and reusing water on-site. All development will need to demonstrate measures to reduce the risk of the building overheating. Energy use intensity and space heating targets should be prioritised regardless of any		

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						district heating connection and all reasonable efforts should be made to meet these requirements prior to buildings connecting to a district heating network. Connection to any district heating network should follow the guidance set out as part of the FHS and FBS to ensure development is connecting to low carbon heat. See attached full representation for proposed modifications to the policy wording.		
Policy DP8: Efficient use of land	No	• Effective			We support the Council's intention to require developments to make effective and efficient use of land. Notwithstanding this, the minimum target density of 40 dph might not be desirable in all locations as a comprehensive and well considered design approach. The justification to draft Policy DP8 clarifies that this is an average density target but the draft Policy is not clear. We recommend that draft Policy DP8 is amended to be consistent with the justification.	Amendment proposed as follows (see attachment for marked up copy): "…The minimum target density will be 40 dwellings per hectare, but this should be higher at accessible locations. This is an average and the appropriate density will vary depending on local circumstances. In all cases density should respect and complement the character of the surrounding area."		0707-06.M23 Wain Estates NS Pre Submission Reg 19 Local Plan 12.12.25 with Appendices.pdf
Policy DP15: Active and sustainable transport	No	• Effective			See comments on transport provision under LP1 - see document attached.			0707-06.M23 Wain Estates NS Pre Submission Reg 19 Local Plan 12.12.25 with Appendices.pdf
Policy DP37: Trees, Woodlands and Hedges	No	• Effective			Please see our comments on trees under draft Policy LP1.			0707-06.M23 Wain Estates NS Pre Submission Reg 19 Local Plan 12.12.25 with Appendices.pdf
Policy DP39: Mendip Hills Area of Outstanding Natural Beauty	No	• Effective			Draft Policy DP39 requires that development proposals conserve and enhance the National Landscape and that "Major development within the Mendip Hills National Landscape will not be permitted other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest." The draft Policy fails to allow for allocations for development in the Plan including at our site at Wolvershill (north of Banwell) where there will be views of the AONB. Draft Policy LP1 recognises this and states "The development must respect the landscape setting,	We recommend that draft Policy DP39 is amended to be consistent with draft Policy LP1, as follows (amendment proposed as follows - see attachment for marked up copy): "Development proposals on sites that are not allocated by Policies LP1 and LP2 of the Plan that		0707-06.M23 Wain Estates NS Pre Submission Reg 19 Local Plan 12.12.25 with Appendices.pdf

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					including minimising any adverse impact on the Mendip Hills National Landscape through sensitive design.”	affect the Mendip Hills National Landscape must conserve and enhance its landscape and scenic beauty and enhance its wildlife and cultural heritage, taking into account the economic and social well-being of the area. Development proposals on land that is allocated by Policies LP1 and LP2 must respect the landscape setting, including minimising any adverse impact on the Mendip Hills National Landscape through sensitive design. Major development will not be permitted other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest…”		
Policy DP43: Affordable housing (including rural exception schemes)	No	• Effective					Draft Policy DP43 states that affordable housing will be required on developments of 10 dwellings or more or with a site area of 0.5 hectares or more and five dwellings or more within the Mendip Hills National Landscape. This is appropriate. The previous version of the draft Policy expected developments to provide 38.5% affordable housing on greenfield sites and 20% on previously developed land. This has now been reduced to 30% and NPPF Golden Rules have also been included in the policy. Wain Estates supports this reduction in line with the latest Housing Needs Assessment. We also welcome that applicants will be able to use Local Housing Needs Assessment, data from the housing needs register and local housing needs surveys to justify the precise size and type of affordable housing to be provided on individual sites. This is a broad and appropriate range of data sources. We are also pleased that draft Policy DP43 sets out a preferred housing mix to provide a starting point for discussions. We welcome the opportunity to respond to consultation on the emerging draft affordable housing SPD.	0707-06.M23 Wain Estates NS Pre Submission Reg 19 Local Plan 12.12.25 with Appendices.pdf

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Policy DP44: Gypsies, Travellers and Travelling Showpeople.	No	• Effective			Draft Policy 44 states that according to the latest Gypsy and Traveller Assessment there is an identified need for an additional 129 pitches in the district. It then refers to schedule 8 which identifies sites. It goes on to state “as well as provision of pitches as part of the early phases of development of the Wolvershill and Woodspring Strategic Locations.” For reasons already set out in our response to draft Policy LP1 Wain Estates objects to the allocation of pitches at the Wolvershill allocation and suggest the demand is met through contributions with the Council leading on identifying and delivering the pitches. It is therefore suggested that references to pitches being delivered at Wolvershill are deleted.	Wain Estates objects to the allocation of pitches at the Wolvershill allocation and suggest the demand is met through contributions with the Council leading on identifying and delivering the pitches. It is therefore suggested that references to pitches being delivered at Wolvershill are deleted.		0707-06.M23 Wain Estates NS Pre Submission Reg 19 Local Plan 12.12.25 with Appendices.pdf
Policy DP45: Residential space standards	No	• Effective			Draft Policy DP45 states that “Planning applications for new residential development (including residential conversions) should meet the Nationally Described Space Standards (NDSS).” A blanket application of the Nationally Described Space Standards (NDSS) across all residential development could undermine the viability of many development schemes. This will potentially result in fewer homes being delivered as optional technical standards have implications for build costs and sales values, with implications in turn for development viability. It is possible that many eligible households in North Somerset may not desire, or require housing that meets the NDSS, as it may result in for example, higher rental and heating costs. We therefore recommend that meeting the NDSS is not made mandatory unless it can be demonstrated that there is a clear need for such a standard in dwellings in North Somerset.	We therefore recommend that meeting the NDSS is not made mandatory unless it can be demonstrated that there is a clear need for such a standard in dwellings in North Somerset.		0707-06.M23 Wain Estates NS Pre Submission Reg 19 Local Plan 12.12.25 with Appendices.pdf
Policy DP46: Housing Type and Mix	No	• Effective			Draft Policy DP46 seeks: “On developments of 10 or more dwellings proposals will be expected to demonstrate that they have taken account of local needs evidence to, where appropriate, make provision for: • A proportionate and appropriate mix of types and sizes of homes to address local needs and meet the requirements of the population across all stages of their lives. This includes bungalows, smaller properties suitable for downsizing or first time buyers, retirement accommodation and accessible homes. In areas where there is an existing over provision of one housing size new developments should limit the number of those size properties proposed in their schemes to ensure a broader mix • across the area; and • An appropriate proportion of self-build and custom build plots based on the local need identified on the council’s self-build register…” Whilst we appreciate that paragraph 63 of the NPPF (December 2024) requires “the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies…” which includes older persons housing and people wishing to commission or build their own homes, the Council has provided limited evidence to justify the qualifying site threshold of only 10 or more dwellings for each of these requirements. It is noted that the threshold has reduced	Draft Policy DP46 fails to clarify whether the above requirements should be applied to developments on land allocated by draft Policies LP1, LP2, LP3 and LP4, including at our site at Wolvershill (north of Banwell) strategic location. Draft Policy LP1 does not specify that provision should be made at Wolvershill for older persons housing and self and custom build plots and it does not specify the mix of bedrooms. Draft Policy DP46 should clarify this taking into account viability.		0707-06.M23 Wain Estates NS Pre Submission Reg 19 Local Plan 12.12.25 with Appendices.pdf

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					significantly from 100 dwellings in the previous draft Preferred Options Local Plan. This creates uncertainty for developers. The Council should ensure that the Local Plan will result in a wide range of older persons housing and self and custom build housing opportunities. In order to provide homes for older people, the Council should allocate sites for older persons housing. Draft Policy DP46 fails to clarify whether the above requirements should be applied to developments on land allocated by draft Policies LP1, LP2, LP3 and LP4, including at our site at Wolvershill (north of Banwell) strategic location. Draft Policy LP1 does not specify that provision should be made at Wolvershill for older persons housing and self and custom build plots and it does not specify the mix of bedrooms. Draft Policy DP46 should clarify this taking into account viability.			
Policy DP47: Older Persons Accommodation	No	• Effective			Please see our comments on older persons accommodation under draft Policy DP46*. As the Local Plan progresses and the Council's consideration evolves, further technical and design evidence will be supplied at the appropriate stage of the emerging Plan process. We welcome the opportunity to continue to engage with Officers. *Comments on draft policy DP46 copied below: Draft Policy DP46 seeks: "On developments of 10 or more dwellings proposals will be expected to demonstrate that they have taken account of local needs evidence to, where appropriate, make provision for: • A proportionate and appropriate mix of types and sizes of homes to address local needs and meet the requirements of the population across all stages of their lives. This includes bungalows, smaller properties suitable for downsizing or first time buyers, retirement accommodation and accessible homes. In areas where there is an existing over provision of one housing size new developments should limit the number of those size properties proposed in their schemes to ensure a broader mix • across the area; and • An appropriate proportion of self-build and custom build plots based on the local need identified on the council's self-build register…" Whilst we appreciate that paragraph 63 of the NPPF (December 2024) requires "the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies…" which includes older persons housing and people wishing to commission or build their own homes, the Council has provided limited evidence to justify the qualifying site threshold of only 10 or more dwellings for each of these requirements. It is noted that the threshold has reduced significantly from 100 dwellings in the previous draft Preferred Options Local Plan. This creates uncertainty for developers. The Council should ensure that the Local Plan will result in a wide			0707-06.M23 Wain Estates NS Pre Submission Reg 19 Local Plan 12.12.25 with Appendices.pdf

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					range of older persons housing and self and custom build housing opportunities. In order to provide homes for older people, the Council should allocate sites for older persons housing. Draft Policy DP46 fails to clarify whether the above requirements should be applied to developments on land allocated by draft Policies LP1, LP2, LP3 and LP4, including at our site at Wolvershill (north of Banwell) strategic location. Draft Policy LP1 does not specify that provision should be made at Wolvershill for older persons housing and self and custom build plots and it does not specify the mix of bedrooms. Draft Policy DP46 should clarify this taking into account viability.			

Name: Wain Homes **I.D:** 63043809

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SP3: Spatial strategy	No	• Positively prepared • Justified • Effective	No	No		Policy SP3 states that “Priority will be given to locating new residential and mixed-use development in or close to urban areas where there is an existing or proposed wide range of facilities, services and jobs, and there are opportunities to encourage active and sustainable travel, particularly at locations which are currently, or have the potential to be, well served by public transport.…Beyond strategic development areas the amount of development at villages and in the countryside will relate to local community needs.” Wain Homes considers that Policy SP3 does not define an effective and justified spatial strategy to guide the distribution of development and assess proposed allocations. The absence of a settlement hierarchy means that the spatial strategy does not clearly define the urban areas where development is to be prioritised. It leaves much open to interpretation and is not effective for selecting sites, and in the event that any future shortfall in housing land supply requires additional sites to be identified. The Spatial Strategy Site Selection and Capacity Paper published alongside the Pre submission Plan states that the following sequential approach was taken to site selection: • Step 1: Existing commitments and windfall • Step 2: Urban intensification and previously developed land • Step 3: Sites that are well related to towns and urban areas outside the Green Belt • Step 4: Sites that are well related to larger more sustainable villages outside of the Green Belt • Step 5: Sites in the Green Belt that are well related to towns and urban areas • Step 6: Sites in the Green Belt that are well related to larger more sustainable villages The spatial strategy expressed by Policy SP3, as drafted, does not correlate with these steps. It does not define the role of larger more sustainable villages, which appear to have been passed over. This is apparent in the distribution of growth shown in Policy SP8, which shows only 12% of growth overall in villages and the fact that suitable sites, including Wain Homes site (HE20800) have been discounted. This is fundamental to the soundness of the plan as it undermines the Council's contention that they cannot accommodate any of Bristol's unmet need. It also undermines the case that exceptional circumstances exist to release Green Belt sites for residential development. SP3 states that “Beyond strategic development areas the amount of development at villages and in the countryside will relate to local community needs”. This does not reflect the evidence that some of the larger villages are amongst the most sustainable locations in North Somerset. Villages such as Yatton have direct train access in to the centre of Bristol and are sustainable locations to accommodate housing needs beyond that of the local community, including some of the unmet needs of Bristol. Suitable sites outside of the Green Belt, including HE20800, should be allocated in line with Step 4 of the sequential approach. The Spatial Strategy Site Selection and Capacity Paper identifies a total of 42 villages. These are broken down into 4 categories based on their relative sustainability. The spatial strategy expressed in SP3 does not differentiate between these villages despite there being significant variation in sustainability. Again, as a result, the approach underutilises some of the most sustainable locations in North Somerset.		North Somerset Local Plan Regulation 19 Wain Homes.pdf

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						Overall, Wain Homes considers SP3 to be unsound as it not effective, justified or positively prepared. To remedy this, SP3 should be re-drafted to refer to a settlement hierarchy that clearly identifies the locations where new development will be prioritised and this should include larger more sustainable villages.		
SP7: Green Belt	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No		This section sets out representation in relation to Policy SP7 Green Belt. SP7 states that “changes to the Green Belt made in this plan are a result of exceptional circumstances and land will be released from the Green Belt for residential development”. Wain Homes acknowledges that North Somerset is a highly constrained area and that, with the increased housing requirement, some release of Green Belt land for residential development is likely to be required in sustainable locations. However, exceptional circumstances have not been fully evidenced and justified through the preparation of the Pre-submission Local Plan in accordance with NPPF paras 145 to 147.. NPPF para 147 states that “before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.” Accordingly, the Council must be able to demonstrate that the Pre-submission Plan has allocated all suitable non Green Belt sites that are sustainably located in accordance with the emerging Plans' spatial strategy. However, as we will discuss further in representations related to Schedule 1, Wain Homes site, referred to in the consultation as Stowey Road, Yatton (HE20800), has not been allocated despite being suitable and sustainably located in accordance with the spatial strategy. The site has been erroneously omitted from the plan on the basis of flood risk. However, evidence provided in support of these representations demonstrates that up to 130 homes can be delivered on areas of the site that are not at risk of flooding. In addition, NPPF para 146 states that in the case that exceptional circumstances are based on meeting identified need for homes, Green Belt alterations should seek to meet those needs in full. However, as we have discussed in our representations relating to the SA and Duty to Cooperate, the Council have not fully explored options to accommodate unmet need from Bristol. Having regard to the above Wain Homes considers that Policy SP7 is neither justified nor positively prepared and is therefore unsound.		North Somerset Local Plan Regulation 19 Wain Homes.pdf
SP8: Housing	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No		This section sets out representations in relation to Policy SP8: Housing. Policy SP8 states that Land will be identified to secure the delivery of a minimum of 23,700 dwellings within North Somerset 2026-2041, equivalent to 1,580 dwellings per annum. This is the local housing need figure derived by the standard method as set out in the Local Housing Needs Assessment (September 2025). The NPPF is clear that the local housing need figure derived from the standard method is the minimum number of homes needed. Para 62 of the NPPF states that “in addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.” As we have set out in our representations to the SA and Duty to Cooperate, the Pre-submission Plan is not positively prepared, as options to accommodate Bristol's unmet need have not been robustly explored. Notwithstanding the above, the Council should seek to identify a supply of new homes that exceeds the minimum standard method figure to provide a buffer, should any identified sources of supply fail to come forward or deliver the anticipated amount of homes within the plan period. The table contained within SP8, showing the broad distribution of new developments, identifies a supply of 24,495 homes, which equates to a 3% buffer over the standard method-derived figure. The justification text states that these figures include anticipated small-scale windfall. Wain Homes considers that 3% is insufficient to ensure the delivery of the plan, especially given its reliance upon large strategic development locations. In response to the previous Additional Sites consultation, we set out that Wain Homes supports the principle of identifying strategic growth locations, as such locations can provide the critical mass of development required to deliver significant new infrastructure. However, we have concerns that an over-reliance on strategic growth locations could negatively affect the deliverability of the plan and result in fundamental issues of soundness. These concerns have not been addressed as the Pre-submission Plan relies on two new strategic locations (Wolvershill and Woodspring) to provide 6,800 new homes or 28% of the identified housing land supply. It is fundamental to the soundness of the plan that the deliverability of these sites is robustly evidenced and interrogated at Examination. In our view, the necessary standard of evidence has not been published alongside the Pre-submission Plan. Of particular concern is the expectation that these sites will deliver 3,300 and 3,500 homes respectively, within the 15-year plan period. Widely recognised evidence found in the most up-to-date edition of		North Somerset Local Plan Regulation 19 Wain Homes.pdf

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						Lichfields Start to Finish, suggest this is highly unlikely. Large-scale strategic sites have extended lead-in times with complex land assembly, master-planning, consenting and infrastructure delivery processes, followed by extended build-out times. Lichfields Start to Finish found that sites of 1,000+ dwellings take on average five years to obtain detailed planning permission, then a further 1.3 to 1.6 years to deliver the first dwelling. Thereafter, the average annual build-out rate range for schemes of 2,000+ dwellings was between 100-188 dwellings per annum. Even if these sites were to benefit from detailed planning permission, had delivered their first dwelling by the beginning of the plan period, and could be assumed to deliver at the upper average build-out rate of 188 homes per dwelling, they would only deliver 2,760 homes each during the plan period. However, in reality, these sites are unlikely to benefit from detailed planning permission at the beginning of the plan period, and so will inevitably deliver far fewer homes, if indeed they come forward. The Council must provide a fully evidenced housing trajectory for the plan period. The table contained within SP8 shows that just 2,948 homes or 12% of the overall identified development, goes to villages and rural areas. This includes existing commitments and windfalls. This category covers 40 villages (Assuming Pill/Easton-in Gordano and Backwell are excluded) and includes a number of larger villages that are identified as sustainable in their own right within the Spatial Strategy Site Selection and Capacity Paper. As set out in our representations to SP3, this demonstrates that the spatial strategy is underutilising some of the most sustainable locations within North Somerset. In particular, Wain Homes considers that Yatton, which has a railway station, access to a wide range of services, facilities and employment opportunities and suitable sites such as HE20800, can and should accommodate more development. The supply identified in SP8 includes anticipated windfalls. The Spatial Strategy Site Selection and Capacity Paper states that this is an allowance of 200 homes per annum or 3000 homes over the plan period. The paper states, “this is largely trend based with a small uplift to account for national policy changes that are expected to lead to an increased yield from small sites.” However, the specific evidence for this allowance has not been published alongside the Pre-submission Plan. The Council should provide further evidence demonstrating how this allowance has been arrived at, confirming windfall delivery over an appropriate period of time and the extent and rationale for the policy based uplift. SPA8 states that “For designated neighbourhood plan areas, the minimum housing requirement will be determined on the basis of the local plan allocations, existing commitments and estimated windfall.” The Council should provide a schedule setting out the minimum housing requirements for neighbourhood plan areas. Overall, Wain Homes considers Policy SP8 to be unsound as it is not positively prepared, justified or effective.		
Policy LP1: Strategic location: Wolvershill (north of Banwell)						Policy LP1 states that a new mixed-use strategic location is proposed at Wolvershill (north of Banwell) to accommodate around 3,300 dwellings, including 990 affordable homes. It is a central element of the spatial strategy and evidencing its delivery is fundamental to the soundness of the plan. As set out in our representations to SP8, the Council has not provided evidence of the anticipated delivery from this site.Policy LP1 states that “a single masterplan covering the entire allocation and proposed development, delivery plan and supporting design codes will be prepared to guide its coordinated and comprehensive development and the creation of a sustainable community.” However, outline planning applications have been submitted ahead of any development delivery plan and the formulation of a single masterplan, which brings into question the effectiveness of this requirement of the policy and raises questions about the timescales required to secure detailed planning permissions. As we noted in our representations to the SA, the assessment against Objective 1.4 indicates that infrastructure requirements for the site were not assessed at SA stage. The Infrastructure Delivery Plan published in October 2025, reveals the high levels of infrastructure investment required. The Additional Sites Viability Addendum also published in October 2025, concludes that viability is challenging on the site and it does not provide evidence that the 30% affordable housing requirement of LP1 will be deliverable. Overall, while Wain Homes supports the principle of development in this sustainable location, it has significant concerns that the amount of homes attributed to this site in Policy SP8 will not come forward within the plan period. Further evidence should be provided for Examination, including a site specific topic paper, delivery programmes and statements of common ground with the various controlling interests and infrastructure providers.		North Somerset Local Plan Regulation 19 Wain Homes.pdf
Policy LP2: Strategic location:						A new mixed-use strategic growth location is proposed at Woodspring on land released from the Green Belt at the allocation defined on the Policies Map to accommodate up to 3,500 dwellings. However, the Council has not provided evidence of the deliverability of development at this location. As per our comments in relation to SP8, Wain Homes has		North Somerset Local Plan

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Woodspring (south west of Bristol)						significant concerns that the number of homes attributed to the location will not come forward, if at all. Policy LP2 states that in accordance with the 'Golden Rules' set out in the NPPF, development on this released Green Belt site will be required to deliver 50% affordable housing. The Additional Sites Viability Addendum indicates at best marginal viability at the upper end of the values range tested. Serious question marks must therefore hang over the deliverability of any development at this location. Policy LP2 states that developers must work together to produce a single masterplan and design code for the allocated area. Currently, no planning applications or scoping opinion requests have been submitted in relation to the development locations. Without any evidence to the contrary, it must be assumed that achieving any detailed planning permissions will take in excess of five years. It seems highly unlikely that any homes will be delivered in this location before the early 2030's. As a result, even in best case scenarios, delivery of up to 2,000 homes during the plan period appears highly optimistic. Overall, Wain Homes has significant concerns about deliverability of development in this location and the amount of homes attributed to this site in Policy SP8. Further evidence should be provided for Examination, including a site specific topic paper, delivery programmes and statements of common ground with the various controlling interests and infrastructure providers.		Regulation 19 Wain Homes.pdf
Policy LP5: Housing, employment and mixed use allocations	No	• Positively prepared • Justified	No	No		This section sets out representations in relation to the allocation of sites as set out in Schedule 1 and in particular, the omission of Land at Stowey Road, Yatton (also known as Land at Claverham Road. Land at Stowey Road is well related to Yatton and located outside of the Green Belt. The site was identified as Potentially Suitable in the previous Additional Sites Consultation. Yatton is a Category A village as set out in the Spatial Strategy Site Selection and Capacity Paper, which is considered to be relatively sustainable in its own right with a range of easily accessible services and facilities and good public transport links to towns. This places the Site at Step 4 of the sequential approach to site selection set out in the paper, meaning it should be selected before any Green Belt sites, in accordance with the Council's own methodology. A table related to Step 4 in the Spatial Strategy Site Selection and Capacity Paper, provides a summary of the reasons sites have been discounted or allocated. For land at Stowey Road (HE208000) it states: "Site passed the SHLAA and further constraints assessment; however, flood risk constrains the developable area to the extent that the site is not suitable for allocation." This assessment is at odds with the SA assessment of the site against Objective 3.2 Contribute to reducing vulnerability to tidal and fluvial flooding, without increasing flood risk elsewhere. Also minimise surface water flood risk and harm to water quality and availability, which states that "The site is not within an area identified as being at risk of flooding from fluvial or tidal sources or surface water and is not within a Source Protection Zone." Wain Homes considers that the site has been erroneously discounted, as it is possible for development of the site to avoid areas of flood risk, leaving sufficient developable area to deliver up to 130 homes as shown on the Site Layout Plan provided in Appendix 1. Accordingly, the site should be allocated for residential development of up to 130 homes. Wain Homes is currently preparing a full planning application, following positive pre application advice, which it intends to submit early in the new year. As such, detailed site surveys and assessments have been undertaken to demonstrate the suitability and deliverability of development. The site comprises circa 7.5 hectares of agricultural fields. The site previously had one residential dwelling fronting onto Claverham Road, however, this has been demolished. The site is bounded on 3 sides by "Rhynes" which form part of a managed network of ditches maintained by the North Somerset Levels, Internal Drainage Board. The extracts below are taken from the "flood maps for planning" and indicate the proposed locations of development are wholly within flood zone 1. There is a possible localised area of surface water flood risk, however, a site specific Flood Risk Assessment will be produced and demonstrate there is no built development or access routes with areas of flood risk, accordingly, the sequential test and exception test are not required to be applied. The Strategic Flood Risk Assessment 2025 maps (see extract below), showing Tidal Flood Zone 3a, including climate change at 2125 and 2139 (undefended) on the northern 3 fields of the site. However, as shown in the Site Layout Plan at Appendix 1,		North Somerset Local Plan Regulation 19 Wain Homes.pdf

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						development will avoid these areas. Surface Water Drainage Maintenance and Management Plans are being developed that will set out a detailed scheme for the maintenance and management for every element of the surface water drainage system. It will also provide a SuDS Maintenance Checklist, to enable maintenance inspections to be recorded for review and remediation by the owner and other third parties. Overall, the evidence clearly demonstrates that the site has been erroneously discounted on the grounds of flood risk. This has fundamental implications for the soundness of the plan, having regard to the issues we have raised in our representations to the SA, the Duty to Cooperate, SP3 Spatial strategy, SP7 Green Belt and SP8 Housing Requirement.		
Policy DP53: Best and most versatile land	No	‣ Justified ‣ Effective	No	No		This section sets out representations in relation to development management policy. DP53 Best and Most Versatile Land. Policy DP53 states that Grade 1 and 2 BMV land will be safeguarded from development except in limited circumstances. Similarly development on sites of one hectare or more on Grade 3a BMV land will only permitted in limited circumstances. Wain Homes considers that Policy DP53 is not sound as it is not consistent with national policy. NPPF para 187b sets out that planning policies and decisions should contribute to and enhance the natural and local environment by "recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland." The provisions of Policy DP53 are significantly more restrictive than national policy and in effect, represent a blanket ban of residential development on sites containing BMV. In practice many sites will contain a blend of BMV and non BMV land. Detailed investigations are required to confirm the quality of soils shown in predictive mapping. As drafted the restrictions of Policy DP53 would apply to sites containing any BMV, even though it may only be a small component of the overall site. Furthermore consideration must also be given to whether its economically viable agricultural land. Overall, while consideration should be given to the harm of losing BMV land, it should be a matter of planning balance overall.		North Somerset Local Plan Regulation 19 Wain Homes.pdf

Name: Wain Homes (Severn Valley) Limited **I.D:** 41434017

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SP3: Spatial strategy	No	‣ Justified ‣ Effective	Yes	Yes	The Spatial Strategy [SP3] provides the policy framework to meet the identified housing needs which is set out at Policy SP8 [Housing]. SP8 confirms that the Local Plan must provide for a minimum of 23,700 new homes (1,580 per annum) over the Plan period 2026-2041. This level of growth is derived from the Local Housing Needs assessment (LHN) as calculated through the Standard Method. This Reg 19 Local Plan seeks to respond positively to this housing challenge by ensuring that that the full LHNA is addressed. This is the correct approach and is supported. The scale of housing that needs to be delivered across the plan period to 2041 should be set in the context of historic delivery rates. Between 2006-2024 a total of 15,019 homes have been delivered, an average of c.835 dwellings per year. This rate of delivery is below that set out in the adopted Core Strategy (2006-2026) which requires an average annual delivery rate of 1,049 dwellings. This means that at 18yrs into the current plan period, housing delivery is c.3,836 dwellings below where it should be at this stage and requires completion rates to more than double annually if the Core Strategy housing requirement is going to be addressed in the current plan period to 2026. This demonstrates the challenges faced historically within North Somerset in terms of meeting the identified housing need.	The principles and objectives of the Spatial Strategy are supported. However, there is concern that the spatial distribution of development is informed by a site selection process which is inconsistent and not justified. As a strategic location, opportunities to support sustainable development options at Nailsea should be maximised and based on a sound process through which sites are assessed. Our representations set out concerns regarding the site selection process in respect of Land Northeast Nailsea which we consider is based on an inconsistent approach and excludes this site, which if allocated, would be entirely consistent with the overarching approach set out in the Spatial Strategy. As such, the selection and assessment of site options at Nailsea should be revisited to ensure this is based on sound basis.		North Somerset LP Reg 19 Blue Fox Planning obo Wain Homes Severn Valley.pdf

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					Further evidence of the failure to deliver sufficient housing in North Somerset can be found within the latest published data on housing delivery (Residential Land Survey and Housing Land Supply Position Report – April 2024). This shows that in the last monitoring year (2023/ 24), 753 dwellings were completed. It is only in the monitoring year 2007/ 08 that North Somerset has delivered an annual rate of delivery that is anywhere near the annualised rate that required through the LHNA, where the district achieved 1,474 dwellings in that year. Since 2020, housing delivery has averaged 916 dwellings each year, equal to 60% of the rate that is required to meet the full LHNA annualised requirement. The most up to date assessment of housing land supply for North Somerset (2024-2029) identifies a supply of just 3.88yrs(1), although the Annual Monitoring Report (2024) notes that through recent planning appeals, housing land supply for the district has been assessed as being 2.79yrs. It is therefore clear that there is an immediate and urgent need to support a step-change in housing delivery and for this to be maintained at levels significantly above historic completion rates. To achieve this the Spatial Strategy should provide a positive policy framework that maximises opportunities for sustainable development opportunities to come forward in the immediate and longer term. Policy SP3 (Spatial Strategy) confirms that 'priority' will be given to locating new residential and mixed-use development in or close to urban areas where there is an existing or proposed wide range of facilities, services and jobs and where there are opportunities to encourage active and sustainable travel, particularly at those locations well served by public transport. This is a logical and sound approach and will assist in achieving sustainable patterns of development and will support the role and function of existing settlements. The Spatial Strategy is derived through a 'sequential approach' where development is to be prioritised to the most sustainable locations, focusing development at the towns and urban areas, the starting point being those locations outside of the Green Belt. As part of the Spatial Strategy is it accepted within this Reg 19 consultation that due to the constraints across the North Somerset area, including areas at risk of flooding and the Mendip National Landscape designation, it is not possible to meet housing need outside of the Green Belt. As such, this Reg 19 accepts that 'exceptional circumstances' apply and that this requires the release of land from the Green Belt. This approach is supported. In this context it follows that where suitable Green Belt development locations are consistent with the overarching principles of the Spatial Strategy, to direct growth to the main settlements and where their contribution to the purposes of the Green Belt is not significant, then such opportunities should be brought forward through the allocation of sites within this Regulation 19 Local Plan. This is even more compelling for those Green Belt sites which have been assessed through the evidence prepared for this consultation, to be capable of being identified as 'grey belt' land. The principal location for new development is Weston-super-Mare which is proposed to accommodate 7,730 dwellings (32% of total housing). Alongside this, the Local Plan identifies four strategic development locations which includes Nailsea and Backwell which is identified within Policy SP8 as providing 3,728 dwellings (15% of total housing provision). (1 - Residential Land Survey and Housing Land Supply Position Report April 2024) The scale of housing to be accommodated at Nailsea and Backwell (3,728) is only marginally higher than that which is proposed to be delivered at the			

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					Woodspring (southwest Bristol) allocation. As one of the identified strategic development locations it is considered that the level of development directed to Nailsea/Backwell is artificially constrained and premised on a site selection process, in the context of HE20223, which is flawed and lacks any justification. In doing so, creating a policy context which limits development opportunities at Nailsea which is not supported by evidence. (PLEASE SEE ATTACHED DOCUMENT)			
SP8: Housing	No	‣ Justified ‣ Effective	Yes	Yes	The Spatial Strategy [SP3] provides the policy framework to meet the identified housing needs which is set out at Policy SP8 [Housing]. SP8 confirms that the Local Plan must provide for a minimum of 23,700 new homes (1,580 per annum) over the Plan period 2026-2041. This level of growth is derived from the Local Housing Needs assessment (LHN) as calculated through the Standard Method. This Reg 19 Local Plan seeks to respond positively to this housing challenge by ensuring that that the full LHNA is addressed. This is the correct approach and is supported. The scale of housing that needs to be delivered across the plan period to 2041 should be set in the context of historic delivery rates. Between 2006-2024 a total of 15,019 homes have been delivered, an average of c.835 dwellings per year. This rate of delivery is below that set out in the adopted Core Strategy (2006-2026) which requires an average annual delivery rate of 1,049 dwellings. This means that at 18yrs into the current plan period, housing delivery is c.3,836 dwellings below where it should be at this stage and requires completion rates to more than double annually if the Core Strategy housing requirement is going to be addressed in the current plan period to 2026. This demonstrates the challenges faced historically within North Somerset in terms of meeting the identified housing need. Further evidence of the failure to deliver sufficient housing in North Somerset can be found within the latest published data on housing delivery (Residential Land Survey and Housing Land Supply Position Report – April 2024). This shows that in the last monitoring year (2023/24), 753 dwellings were completed. It is only in the monitoring year 2007/08 that North Somerset has delivered an annual rate of delivery that is anywhere near the annualised rate that required through the LHNA, where the district achieved 1,474 dwellings in that year. Since 2020, housing delivery has averaged 916 dwellings each year, equal to 60% of the rate that is required to meet the full LHNA annualised requirement. The most up to date assessment of housing land supply for North Somerset (2024-2029) identifies a supply of just 3.88yrs(1), although the Annual Monitoring Report (2024) notes that through recent planning appeals, housing land supply for the district has been assessed as being 2.79yrs.	The principles and objectives of the Spatial Strategy are supported. However, there is concern that the spatial distribution of development is informed by a site selection process which is inconsistent and not justified. As a strategic location, opportunities to support sustainable development options at Nailsea should be maximised and based on a sound process through which sites are assessed. Our representations set out concerns regarding the site selection process in respect of Land Northeast Nailsea which we consider is based on an inconsistent approach and excludes this site, which if allocated, would be entirely consistent with the overarching approach set out in the Spatial Strategy. As such, the selection and assessment of site options at Nailsea should be revisited to ensure this is based on sound basis.		North Somerset LP Reg 19 Blue Fox Planning obo Wain Homes Severn Valley.pdf

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					It is therefore clear that there is an immediate and urgent need to support a step change in housing delivery and for this to be maintained at levels significantly above historic completion rates. To achieve this the Spatial Strategy should provide a positive policy framework that maximises opportunities for sustainable development opportunities to come forward in the immediate and longer term.			
Policy LP3: Strategic location: Nailsea and Backwell	No	• Justified • Effective	Yes	Yes	Policy LP3 is intended to provide the strategic policy framework for future development at the Nailsea and Backwell strategic growth location, comprising 3,278 dwellings - 15% of the total LHN for the district. 1.2 This level of development is to be provided through extant planning permissions and new allocations. Schedule 1 to this Regulation 19 Local Plan identifies 1,817 dwellings at Nailsea and 1,683 dwellings at Backwell. This equates to a total of 3,500 dwellings, with a further 228 identified through windfall. 1.3 The Spatial Strategy Site Selection and Capacity Paper (October 2025) explains that individual sites have been assessed through the SHLAA which determines whether sites should be discounted due to constraints. Sites which pass the 'first sieve' are then subject to a secondary constraints assessment, those sites which pass both stages of assessment are taken forward to the "further assessment" stage as explained within the Site Selection and Capacity Paper. 1.4 Site HE20233 passed both the 'first sieve' and the secondary assessment but is then discounted at the 'further assessment' Stage with the SHLAA Appendix 1 ('Site data and assessment') referencing 'heritage' as the justification for it being discounted. Heritage is noted as being a secondary constraint that 'significantly affects' the site and its suitability for development. Paragraph 1.5 of the SHLAA Appendix 2 ('further site assessment') lists HE20233 as a site location that has been excluded through the 'further assessment' stage. 1.5 It is evident that the principal justification given for excluding site HE20233 relates to heritage constraints. This is confirmed at Table E.1 of the Sustainability Appraisal (SA) Report which sets out the Council's reasons for selecting or rejecting site options, for site HE20233 the reason that is given is as follows: "The site was discounted as part of the Further SHLAA Assessment as a result of heritage constraints." 1.6 The SA Residential Proformas produced as part of the supporting evidence base assesses HE20233 against SA Objective 3.5 (Heritage) and concludes that the site will have a 'significant negative' (--) effect and has been assessed as 'red' in relation to potential effect on setting. There is no detail as to the nature of this	The principles and objectives of the Spatial Strategy are supported. However, there is concern that the spatial distribution of development is informed by a site selection process which is inconsistent and not justified. As a strategic location, opportunities to support sustainable development options at Nailsea should be maximised and based on a sound process through which sites are assessed. Our representations set out concerns regarding the site selection process in respect of Land Northeast Nailsea which we consider is based on an inconsistent approach and excludes this site, which if allocated, would be entirely consistent with the overarching approach set out in the Spatial Strategy. As such, the selection and assessment of site options at Nailsea should be revisited to ensure this is based on sound basis.		North Somerset LP Reg 19 Blue Fox Planning obo Wain Homes Severn Valley.pdf

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					effect or any reference to which heritage asset(s) this conclusion is based. 1.7 Table D1 of the SA sets out the site assessment criteria and against SA Objective 3.5 it explains that the approach taken is to: “Draw on the ‘RAG’ rating of the Council’s historic environment officers regarding potential effects of development at site options.” 1.8 The source of this assessment is simply given as being the “Council’s historic environment ratings”. Within the main SA Report [paragraph 5.46] it states that: “Judgements about the likely effects of the residential site options on the historic environment have been based on information provided by North Somerset Council. Sites have been rated by North Somerset Council as either red, amber or green in relation to the likely effects on the historic environment.” 1.9 The SA goes on [paragraph 5.47] to explain that where a site is scored ‘red’, this means that development at these sites “is expected to result in harm to the setting of one or more heritage asset(s) with little chance of mitigation through masterplanning.” 1.10 No further information is presented within the evidence base that supports this this conclusion. The SA implies that there has been consideration as to the opportunities for mitigation, However, no information has been presented to explain how such conclusions were reached which is a significant failure of the site selection process. 1.11 For site HE20233 the assessment related to heritage impacts is absent of any meaningful evidence to explain how and why the assessment process considers heritage assets (and setting) to be a constraint of such significance to discount the entirety of this site as an appropriate development location. 1.12 It is noted that a Historic Environment Assessment (October 2025) has been prepared which is intended to provide additional analysis of the potential impact on heritage assets (including below ground) and their settings. However, the October 2025 Assessment only subjects those sites which are identified as proposed allocations to further detailed assessment. Therefore, for Site HE20233, due to it being excluded at the SHLAA ‘further assessment’ stage, on heritage grounds, has not been subject to any detailed assessment. 1.13 Land which forms site HE20233 has been consistently promoted by Wain Homes and has also been subject to an EIA Screening Opinion (LPA Ref: 24/P/2701/EA1) and pre-application advice (LPA Ref: 25/P/0475/PR2).			

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					1.14 In issuing their formal EIA Screening Opinion, the Council concluded that the proposals will most likely give rise to “localised impacts”, noting that there is potential for negative impacts upon the Scheduled Monument [ref: 1011259, a Deserted Medieval Village], but concluded that the proposals would not constitute EIA development. For heritage impacts, the EIA Screening Opinion concluded that a Heritage Statement, with an archaeological desk-based assessment and geophysical survey would need to accompany any planning application. A similar requirement was also identified through the pre-application process, noting that this pre-application response did not conclude that heritage assets render the site unsuitable for development. 1.15 Given the EIA Screening and Pre-Application process for site HE20233, this brings in to question the basis for discounting this site on heritage grounds, which is particularly relevant given the apparent absence of any detailed analysis presented as part of this Regulation 19 consultation to justify the approach. There is a reliance on a “officer assessment” which is not presented in any of the supporting documents, and which appears to be a key driver in the scoring of this site as (--) through the SA and its rejection at the SHLAA Further Assessment Stage. 1.16 It is noted that land to the west of HE20233 (Site HE20136) which is a proposed allocation, through the SA process has the same score against SA Objective 3.5, i.e. Significant negative (--) ‘red’, yet this this is not applied as a constraint that renders the site unsuitable for development, with it being a proposed allocation (‘Land north of Nailsea’) to provide for 381 dwellings. This also raises questions as to the assumption in the SA that a ‘red’ score means there ‘is little chance of mitigation through masterplanning’. This has been applied to HE2033 as a reason to reject this site option, yet for other sites which are proposed to be allocated, there is greater flexibility and acceptance of the potential for mitigation. This represents an inconsistent approach which lacks any evidence to explain why sites which have the same SA score are treated so differently. 1.17 Another example of the inconsistencies in the approach regarding heritage matters and site HE20233 can be found within the October 2025 Historic Environment Assessments background paper. Within this document it sets out a high-level summary of the heritage context for the proposed Woodsprings allocation and states that: “A large area of this site has high heritage			

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					sensitivity and there is potential for harm to a number of highly graded heritage assets. A detailed design code and a heritage-led masterplan will be required to mitigate harm" (Page 10 October 205 Historic Environment Assessments) 1.18 The same summary/assessment is also given to the proposed allocation on Land to the East of Backwell, there being a 'high' heritage sensitivity that should been addressed through the masterplanning process. This reinforces our concerns that the extent to which heritage matters dictate whether a site option is suitable is applied inconsistently throughout the site selection process and results in a flawed assessment process that is neither justified or effective, rendering the process unsound. 1.19 It is understood that the process of identifying sites as allocations to meet the growth requirements over the plan period requires planning judgement to be made, but this does not negate the need for consistency in the approach. It is fundamentally flawed to apply constraints across sites on an inconsistent basis, particularly where there is a lack of information/evidence to support the judgments made and how a constraint is considered to be absolute on one site, yet a consideration that needs to be carefully managed and addressed through the development on another. 1.20 Through the SA process, against the SA objectives for Site HE20233 significant effects (--) are also identified against the following objectives: - ◈ 1.3 Promote the optimal use of land which supports regeneration, maximises re-use of previously developed (brownfield) land and protects the rural economy ◈ 3.4 Objective 3.4: Minimise impact on and where appropriate enhance sensitive landscapes 1.21 Despite this SA scoring (i.e. the same as for the heritage SA objective), these are not advanced as matters which form the basis for rejecting this land as a suitable development option. This raises further concerns as to the assessment process, as it appears that identified significant effects (--) carry differing weight in the assessment process, whereby such a level of effect against one SA objective (SA Objective 3.5) can render an entire site option unsuitable, but for other significant effects (such as SA Objective 1.3), this does not provide a basis on which is site is deemed to be unacceptable.			

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					1.22 In respect of SA Objective 1.3, as a greenfield site negative effects are identified automatically, the significance of any effect is determined by the agricultural land classification, with those site options which are subgrade 3 scoring [--?] and those which are grade 1 or 2 scoring [--]. 1.23 The SA residential proforma for site HE20233 concludes that the site contains land classified as grade 1-2, however this is based on broad DEFRA Mapping which also indicates that the site contains areas of subgrade 3. Irrespective of its precise agricultural land classification the Best and Most Versatile Agricultural Land Topic Paper [October 2025] recognises that a significant number of proposed allocations are on land which is classified as BMV (subgrade 1, 2 and 3a), it is evidently not a constraint that is unique to Site HE20233, nor is it a basis upon which this site was discounted as a potential allocation within the Regulation 19 Local Plan. 1.24 In respect of SA Objective 3.4 [Landscape] the sensitivity of Site HE20233 should be considered in the wider context of the landscape around Nailsea. The March 2018 Landscape Sensitivity Assessment which forms the basis of the SA assessment identifies all land around Nailsea and Backwell, including land which is proposed to be allocated as being of ‘high sensitivity’. It is therefore not applied as a constraint to development on sites which this Regulation 19 Local Plan has deemed appropriate for allocation. 1.25 Alongside those SA objectives where site HE20233 is assessed as having negative effects, the site scores positively against a range of SA objectives, these being: ◈ 1.1: Ensure a range of job opportunities are easily accessible without having to use a car ◈ 1.2: Provide opportunities to improve economic wellbeing and reduce inequalities by providing good access to education and training. ◈ 2.2: Deliver affordable or specialist housing where it is most needed to meet the needs of North Somerset’s population ◈ 2.3: Achieve reasonable access to a wide range of community, Education, town centre and healthcare facilities. ◈ 2.5: Achieve healthy living opportunities promoting good access to healthcare centres, open spaces, Public Rights of Way, Walking and cycling opportunities, and outdoor leisure activities ◈ 3.3: Reduce the need to travel by car to minimise environmental impacts of			

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					unsustainable forms of travel, including transport related carbon emissions and air pollution. Ensure good access to infrastructure that promotes travel by active modes (walking and cycling). 1.26 Through the SA process it is clear that Site HE20233 is well located to support a sustainable pattern of development, noting that against a range of SA objectives, the assessment recognises that the site provides opportunity to access a range of services and facilities by sustainable means. 1.27 Through the EIA Screening process (24/P/2701/EA1), the historic environment context of site HE20233 was set out and it was explained that the site contains a scheduled ancient monument, “Deserted medieval settlement 300m ESE of Wraxall House (NHLE)”. This asset is barely (if at all) appreciable from the ground or within satellite imagery. The significance of this asset is wholly derived from its buried archaeological and historic interests. Moreover, the proposed development area does not extend on to the land of the Scheduled Monument. 1.28 Through the proposed development, opportunities exist to enhance both the understanding of this asset, and improve appreciation of it, resulting in a direct and clear benefit associated with this asset. The presence of this asset within the site area does not automatically require an EIA which should be based on judgment as to whether the likely effects will be significant. Necessary controls and assessments related to this asset and its setting can be adequately addressed through the submission of relevant heritage and archaeological assessments as part of a planning application. It was the conclusion of North Somerset Council through the EIA Screening process that the proposals would not give rise to a level of effect that would warrant this to be considered through an Environmental Statement, with the potential for negative effects to be considered through the normal planning application submissions. 1.29 This demonstrates that the Reg 19 site assessment process is flawed and inconsistent with recent, and more detailed assessments undertaken by the Council on heritage matters through the EIA Screening process. 1.30 In respect of other heritage assets, within 1km of the site there are 19 Listed			

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					Buildings. The closest Listed Building is Grade II Wraxall House (NHLE 1311646), located just outside of the western site boundary. There is little intervisibility between Wraxall House and the majority of the site, with intervisibility limited to the north-east of this asset and the south western corner of the site. 1.31 To the north of the Site is a cluster of Listed Buildings within Wraxall village, including the Grade I Listed Church of All Saints (NHLE 1158033). Whilst the Site is not visible from the church at ground level, some (albeit limited) visibility of the church tower may be possible from within the Site itself. This view however is not considered to be a key view of the asset which contributes to any material extent to its significance and any potential changes to this view, as a result of development within the Site, would not harm the significance of the Church or preclude development. 1.32 In respect of the Grade II Listed Wraxall Church of England Primary School (NHLE 1320984) there may be a degree of intervisibility with the site. However, the key views of the asset from Bristol Road to the north can be preserved. It is not anticipated that this intervisibility would preclude development within the Site. Likewise, distanced views from Grade II Listed Former Boys School and Old School House (NHLE 1146521) to the east would not be anticipated to preclude development. 1.33 The remaining Listed Buildings within proximity share no intervisibility with the Site and it would be anticipated that their settings would be unaffected by development on the scale proposed. One Registered Park is located c.1km to the east of the Site; Grade II* Tyntesfield (NHLE 1000570). 1.34 Through a sensitive design scheme and detailed assessment of heritage assets and their setting, there are opportunities to support development at site HE20233 without resulting in a level of harm that would indicate that development should be restricted. Such assessments do not constitute a significance of likely effects that would warrant assessment and consideration through the EIA process. This was accepted by the Council in their EIA Screening Opinion. 1.35 Through the pre-application process (25/P/0475/PR2) the impact on heritage,			

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					conservation and archaeology was identified as a matter that would require any future planning application to include a Heritage and Archaeological Assessment. This pre-application process did not conclude that the development at site HE20233 would be unsuitable due to the impacts on heritage assets. 1.36 Therefore, for the Reg 19 site selection process to conclude that site HE20233 is constrained by heritage assets to such an extent as to render the site unsuitable for development, is entirely at odds with the Council's own assessment of this site through the EIA Screening and pre-application process. It demonstrates the failures of the site selection process as it relates to site HE20233. 1.37 Land at HE20233 is therefore considered to represent a genuine development opportunity which, in contrast to the Reg 19 site assessments process, can support a pattern of development that responds positively and sensitively to known heritage assets and their setting. 1.38 Furthermore, as recognised through this Regulation 19 consultation, the site is capable of being identified as 'grey belt' owing to the weak contribution this land makes to the purposes of the Green Belt. This, alongside it's edge of settlement location at a strategic location for growth over the plan period, supports our position that this land represents a suitable, sustainable and deliverable site option and should be identified through this Local Plan as an allocation. 1.39 The accompanying Vision Document sets out the emerging development proposals, with details focusing on the landscape, as well as access and movement through the site and connecting to the existing networks, avoidance of areas of flood risk and the sensitive accommodation and protections to identified heritage assets. 1.40 The Vision Document formed the basis of the representations submitted at previous Local Plan stages, and through the EIA Screening and Pre-Application process. Whilst proposals continue to evolve, in summary the Vision includes: ◈ Approximately 120 dwellings with associated open space; ◈ Access via Bristol Road/Clevedon Road (B3130), along with potential pedestrian links to existing neighbourhoods and networks; ◈ Hierarchy of streets, creating a legible residential environment. A main street, with connected residential streets and followed by shared surface streets and private drives at the edge of the development area; ◈ Associated landscaping and ecological enhancements; and ◈ Incorporating existing heritage assets into proposals and landscape			

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					strategy. 1.41 Alongside this Vision, an Opportunities and Constraints Plan and Illustrative Masterplan illustrate how a development scheme may come forward. 1.42 In the context of the significant uplift in housing delivery needed to meet the LHN, Site HE20233 represents a genuinely deliverable and sustainable development opportunity that can be delivered in the short term, in a manner that is entirely consistent with the overarching principles of the Spatial Strategy. The decision to discount this site through the preparation of this Reg 19 Local Plan has been demonstrated within these representations as being flawed and unsound. 1.43 To address this, the site assessment for HE20233 should be revisited and a consistent approach applied to the significance of constraints, in this case heritage assets, so that this land is considered on a fair and equitable basis. In doing so, it is our position that this would support the decision for this site to be identified as a proposed allocation within this Local Plan. 1.44 PLEASE SEE ATTACHED DOCUMENT			
Policy LP15: Local Green Space	No	‣ Justified ‣ Effective	Yes	Yes	As currently drafted the wording of LP15 creates uncertainty as to how it is to be implemented. It states that planning permission will not be granted “except in very special circumstances for development which adversely affects a designated Local Green Space”. As worded, this is not specific to land which forms a LGS designated area and could be interpreted as applying to any land which is not part of an LGS. There is serious concern that LP15 is seeking to introduce an ‘exceptional circumstances’ policy test on land which does not form part of a designated LGS. 1.2 If LP15 it is intended to apply to sites both within and outside of a LGS, then this cannot be supported as it would be an approach that goes far beyond what is set out in national policy (NPPF, paragraph 107). It would introduce a policy assessment that appraises a non LGS site against the criteria which informed the LGS designation, this cannot be a sound approach. This is not the intent of national policy, the criteria and rational for LGS applies only to the land formally designated. 1.3 The supporting text to LP15 states that when deciding whether a proposal adversely affects an area of LGS, the Council will have regard not only to its underpinning characteristics, such as beauty and historic importance, but also whether any proposals “detract from the LGS by harming its openness or undeveloped nature”. Such an approach cannot be supported, if this is retained, it creates an unjustified policy burden on land outside, but in close proximity to, a LGS and introduces an artificial and direct relationship between land that forms an LGS and land outside of this area. 1.4 It effectively elevates the significance of land outside of an LGS to LGS status, by attributing the contribution such land makes to the LGS even when	The policy wording should be clear that this applies to proposals within land that is designated as a Local Green Space.		North Somerset LP Reg 19 Blue Fox Planning obo Wain Homes Severn Valley.pdf

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					such land does not form part of the LGS designation. This is neither the intent nor correct application of the LGS policy framework. Land which underpins the basis for its LGS is designated in accordance with paragraph 107 of the NPPF (December 2024) which is a specific assessment of the land to be designated as LGS. Land outside of an LGS is not governed by the LGS system, However LP15 elevates the significance of such land and will determine its suitability for development based on its impact on an LGS. 1.5 As an example, Site HE20233 borders the extent of The Elms LGS, if applied in its current form, any proposals for development at Site HE20233 will be assessed against its impact on land which forms the LGS at 'The Elms'. In this case land at HE20233 was previously advanced by the Wraxall and Failand Neighbourhood Plan as land that would form an extension to the existing LGS. The conclusions of the Neighbourhood Plan Examiner was that land at HE20233 failed to demonstrate those characteristics that would justify its designation as LGS and therefore recommended that the proposals to extend the LGS were removed. 1.6 Through the Wraxall and Neighbourhood Plan process, it was clearly shown that HE20233 does not host those key attributes that would justify its designation as a LGS. There is concern that LP15 will introduce a policy framework that will determine the suitability of land such as HE20233 on the basis on the criteria and characteristics of the adjacent Elms LGS. This approach is inconsistent with national policy and introduces a policy consideration that extends beyond the framework for LGS designations. 1.7 PLEASE SEE ATTACHED DOCUMENT			
Policy DP53: Best and most versatile land	No	‣ Justified ‣ Effective	Yes	Yes	The supporting text to Policy DP53 acknowledges that the Local Plan allocates land which is located on higher quality agricultural land, i.e. BMV land, and explains that the purpose of this policy to is "protect remaining BMV land from speculative development". This is effectively introducing a two-tier framework aimed at restricting speculative development. Given the historic failure of North Somerset Council to meet its identified housing needs, and the significant uplift now required, DP53 will introduce a restrictive policy framework that may frustrate wider opportunities for development, particularly in circumstances where the Local Plan is failing to meet its identified housing needs. This policy seeks to impose a highly restrictive policy framework relating to BMV on land which is not allocated. For subgrade 1 and 2, Policy DP53 is highly restrictive on the basis that this is a "finite resource", this is despite specific allocations proposed through this Local Plan being located in areas of Grade 1, such as Land East Backwell and areas of Grade 2, Land South of Nailsea. In both cases, the October 2025 BMV background paper, explains that the loss of BMV is outweighed by wider sustainability benefits and key infrastructure delivery. For Grade 1 and 2 BMV land there is no recognition within Policy DP53 in respect of the consideration of wider sustainability benefits, where proposals may come forward and include land which is classified as BMV. Whilst DP53 does allow for some limited forms of development on unallocated land which is BMV, it effectively imposes a moratorium on residential development on land classified as Grade 1 and 2. A moratorium which is not applied in the process of identifying allocations within this Re	Reference to the "The sustainability benefits of the proposal clearly outweigh the long-term loss of the best and most versatile agricultural land" should be applied to all grades of BMV Land.		DP53 Blue Fox Planning obo Wain Homes Severn Valley.pdf

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					19 plan, which includes land of the highest agricultural value. For sub-grade 3a (which is still BMV), there is more flexibility in the wording of Policy DP53, where it confirms that if the sustainability benefits of the proposal clearly outweigh the long-term loss of BMV then development may be permitted. The NPPF does not seek to imposes a blanket restriction on development on BMV land, of any grade, rather it sets out that areas of poorer quality land should be preferred to those of higher quality (NPPF, footnote 65). The intent of DP53 is not objected to as a matter of principle, however there is concern that the approach is too restrictive and fails to set in a place a policy framework that is consistent with the NPPF. Therefore, Policy DP53 should be revised such that the consideration of wider sustainability benefits, as part of the planning balance, should be applied to BMV of all grades. PLEASE SEE ATTACHED DOCUMENT			

Name: Wall Holdings Ltd **I.D:** 62993313

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SP1: Sustainable Development	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Policy SP1 (Sustainable Development) The provisions of the Plan do not comply with the definition of sustainable development that it has set for itself since it fails to contribute to meeting the substantial unmet housing needs arising from within the neighbouring urban area of Bristol. Furthermore, through failing to uphold the spatial strategy it will fail to prioritise sustainable modes of travel and therefore fail to respond to the imperatives of climate change, and result in the unnecessary and unjustified release of land from the Green Belt	Incorporate in the Plan the changes sought to Policy SP8, as follows: Amend the Plan to meet the minimum housing need of 25,300 homes (1,600 per annum) for the period 2026-2042. • Add a minimum additional requirement of 1,600 homes to allow for the Plan to look ahead at least 15 years from the date of adoption. • Review the requirement to meet a proportion of Bristol City's unmet housing needs and include the requirement in the overall housing quantum to be delivered during the Plan period. • Remove Woodspring,		Representations_final.pdf

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						Wolvershill and Pill / Easton-in-Gordano as separate locations in the schedule incorporated in the Policy, and which is inconsistent with other strategic policies, and apportion the growth to the 'Villages and Rural Areas' location. • Review the apportionment of growth to meet North Somerset's needs between the 'towns' and 'villages and rural areas' locations, and revise the distribution to a ratio of 80:20 to deliver the intentions of the spatial strategy. • Review the apportionment of growth to Green Belt locations. • Increase the distribution to the towns, and in particular the allocation of small to medium size sites at Weston-super-Mare (including the Weston Villages) that can deliver homes quickly and therefore contribute to the five year supply of deliverable housing land, to provide homes for needs arising during the current plan post-2027. • Delete sites with planning permission from the site allocations. • Incorporate a delivery trajectory to identify a supply of specific, deliverable sites for years one to five of the plan period.		

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SP3: Spatial strategy	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Policy SP3 (Spatial Strategy) The provisions of the plan do not afford priority to locating new residential development in, or close to, urban areas and such locations outside the Green Belt. On the contrary they distribute a disproportionate amount of development to the villages and rural areas, including Green Belt locations, in direct conflict with the strategic intentions and objectives of the spatial strategy.	Review, and adjust, the distribution of housing growth between the 'towns' and 'villages and rural areas' locations. • Review and prioritise housing growth at the towns on land outside the Green Belt in accordance with the sequential approach to site selection that underpins the spatial strategy.		Representations_final.pdf
SP5: Towns	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The policy requires amending to acknowledge the need for development outwith settlement boundaries in order to deliver the needs for housing in full.	Amend the wording of Policy SP5 to support proposals for new development 'at' Weston-super-Mare (including the Weston Villages), Clevedon, Nailsea and Portishead, and to delete the words 'within the settlement boundaries of'.		Representations_final.pdf
SP7: Green Belt	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	SP7 (Green Belt) Exceptional circumstances have not been demonstrated to justify the release of land from the Green Belt ahead of suitable alternatives at the main towns. Release of land from the Green Belt is only justified to meet unmet housing needs arising from the adjacent City of Bristol, for which the Plan is not currently making any provisions	Remove reference to Land at Woodspring, Pill / Easton-in-Gordano and Land at Nailsea / Backwell from the list of land to be released from the Green Belt.		Representations_final.pdf
SP8: Housing	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Policy SP8 (Housing) The Council's acceptance on this occasion that it must plan to meet the local housing need deriving from the standard method is welcomed. However, it is a minimum requirement that must be met during the plan period. To ensure that it is 'met', the Council should therefore be planning to exceed the minimum figure to allow for implementation and delivery failures for which there is a past track record in North Somerset. The adjoining administrative area (Bristol City Council) has a significant unmet need for homes, which provides compelling reason and justification for uplifting the housing requirement for North Somerset above the standard method figure. The particular need is for more houses rather than apartments, which can only realistically be achieved on greenfield sites around the fringes of the city in areas more suited to medium and lower density housing. To comply with the NPPF requirement for the Plan to look ahead for a minimum period of 15 years from the date of adoption, the Plan period will need to be extended by at least a year, to 2042. Research from elsewhere, and past evidence from North Somerset's previous plan-making activities, confirms that adoption by the end of 2027 may be ambitious, and failing which would result in a necessary plan period extension by two years. Extension of the plan period by a year will require provision for an additional 1,600 dwellings based on the standard method, and therefore an	Amend the Plan to meet the minimum housing need of 25,300 homes (1,600 per annum) for the period 2026-2042. • Add a minimum additional requirement of 1,600 homes to allow for the Plan to look ahead at least 15 years from the date of adoption. • Review the		Representations_final.pdf

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					extension by two years would increase the requirement by an additional 3,200 homes. The broad distribution of housing proposed in the Plan will not deliver the spatial strategy priority to locate new residential development in, or close to, urban areas. Over 51% of the proposed housing growth is directed to the 'villages and rural areas' location based on a proper assessment against the Council's settlement hierarchy. Other than Weston-super-Mare, the other three towns are punching well below their weight and not performing their intended roles in the spatial strategy as the most sustainable, and therefore priority, locations for growth. The failure to allocate sites such as the Land South of Laney's Drove is illustrative of how the allocation and distribution of development is inconsistent with the spatial strategy and sequential approach to site selection that the Council has set for itself. It is in accordance with national policy and precepts of good planning to capitalise upon the substantial investment in infrastructure and other facilities that has already been made. Moreover, sites such as the Land South of Laney's. Drove are priority locations ahead of development at the larger, more sustainable villages outside the Green Belt, and Green Belt locations. The Land South of Laney's Drove was erroneously discounted from further consideration through the SHLAA for reasons which are inconsistent with allocations elsewhere and do not justify discounting housing development opportunities in the most sustainable locations. There is an evident need to accommodate growth in flood risk zones given the circumstances in North Somerset, as evidenced through both the Regulation 19 Plan and previous Plans. Moreover, it has been demonstrated that the site would be safe for its lifetime. The need to allocate sites in flood risk zones, where they would be safe for their lifetime, in order to meet the housing needs of the district, was endorsed by the Inspector in the Appeal decision relating to Land at Rectory Farm, Yatton, and very recently by the Inspector in determining the Appeal at Police Maintenance Depot, Stuart Road, Weston-super-Mare It is also clear that it is necessary to utilise land in strategic gaps to accommodate growth in sustainable locations, and therefore the automatic exclusion of sites such as the Land South of Laney's Drove on the basis that it is within a strategic gap is both unjustified, and again, inconsistent with the intended allocation of land in strategic gaps elsewhere (in particular the nearby site at Elm Grove Nursery). More fundamentally, blanket restraint designations of this nature have no locus in current national policy, and their retention is therefore inconsistent with it and unjustified. Nothwithstanding, and without prejudice to, the foregoing, sites such as Land South of Laney's Drove can be developed without prejudicing the continued separation of Locking from the urban area of Weston-super-Mare. At a time when the Government has introduced changes to national policy relating to Green Belts, which is the most stringent of all restraint designations, to facilitate its objective to significantly boost housing delivery and at sustainable locations, it would seem unjustifiable, and inherently wrong, to maintain designations that effectively impose a blanket restraint on development at some of the most sustainable locations that is more restrictive than Green Belt policies. The evidence therefore indicates that there are alternative options at Weston-suer-Mare which are a better fit with the spatial strategy and the sequential approach to site selection that the Council has set for itself, that will enable the Council to meet the housing needs that emerge from the standard method without land-take from the Green Belt. In turn, that would release the Green Belt locations adjacent to the Bristol urban area to accommodate unmet needs arising from Bristol City Council to which the Plan is not currently proposing to contribute. Finally, the housing provisions of the Plan are inconsistent with national policy since it fails to incorporate a delivery trajectory to identify a supply of specific, deliverable sites for years one to five of the plan period, as required.	requirement to meet a proportion of Bristol City's unmet housing needs and include the requirement in the overall housing quantum to be delivered during the Plan period. • Remove Woodspring, Wolvershill and Pill / Easton-in-Gordano as separate locations in the schedule incorporated in the Policy, and which is inconsistent with other strategic policies, and apportion the growth to the 'Villages and Rural Areas' location. • Review the apportionment of growth to meet North Somerset's needs between the 'towns' and 'villages and rural areas' locations, and revise the distribution to a ratio of 80:20 to deliver the intentions of the spatial strategy. • Review the apportionment of growth to Green Belt locations. • Increase the distribution to the towns, and in particular the allocation of small to medium size sites at Weston-super-Mare (including the Weston Villages) that can deliver homes quickly and therefore contribute to the five year supply of deliverable housing land, to		

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						provide homes for needs arising during the current plan post-2027. • Delete sites with planning permission from the site allocations. • Incorporate a delivery trajectory to identify a supply of specific, deliverable sites for years one to five of the plan period.		
Policy LP5: Housing, employment and mixed use allocations	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Policy LP5 (Housing and Employment Allocations / Schedule 1) The proposed allocations will not result in sufficient plan led growth in accordance with the spatial strategy. Much of the identified growth at Weston-super-Mare is already committed, and the town is not fulfilling its strategic potential as a priority focus for the district's growth, nor is growth allocated in accordance with the sequential approach that affords priority to non-Green Belt locations. There are reasonable alternative, non-Green Belt opportunities at Weston-super- Mare, in particular small and medium sized sites in highly sustainable locations that have been automatically, inconsistently and erroneously, excluded from further consideration through the SHLAA on grounds of their location within areas of flood risk and/or strategic gaps.	Allocate the Land South of Laney's Drove for residential development. Remove sites with extant planning permissions from Schedule 1 and the Policies Map.		Representations_final.pdf
Policy LP10: Strategic gaps	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	Policy LP10 (Strategic Gaps) Strategic gaps, used to protect settlement character, are inconsistent with sustainable development principles and national policy. The Council's justification for retaining them is inadequate, and fails to have regard to the clear findings of the Inspector when examining the Site Allocations Plan. Strategic gaps act as a barrier to sustainable development by precluding reasonable alternatives. If retained, they should be substantially reduced, particularly in locations like Weston-super-Mare, where they impose significant restraints on development and are prejudicial to delivering growth in accordance with the spatial strategy.	Delete Policy LP10 from the Plan and remove the Strategic Gap designations from the Policies Map; • In the alternative, critically review the spatial extent of the strategic gaps, particularly at Weston-super-Mare, to remove land that can reasonably be developed to deliver housing growth at the most sustainable locations in accordance with the settlement hiearchy / spatial strategy; • In particular, removal of the Land South of Laney's Drove to the north west of Elm Grove Nuseries which does not make an essential		Representations_final.pdf

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						contribution to maintaining separation from the wider urban area of Weston-super-Mare.		

Name: Warwick Leaman **I.D:** 62485185

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SP10: Transport	No	• Positively prepared • Effective	No	Unsure	You are not thinking about the risk to life of all the additional traffic blocking up the roads heading to Weston General Hospital. In the past few years, we have had the developments at Wentworth Drive, Devils Bridge and the Bleadon Quarry all feeding cars onto the A370 by the hospital. I live at Hillcote and walk everywhere and I have not seen one person walking out of any of the three developments, they all drive because it is too far to walk. Your new Pre-submission Plan has three possible sites, Uphill Grange, Uphill, Land at Bridgwater Road and Land at Leighton Crescent which will feed even more congestion to the roundabout by the hospital. If you've seen the ambulances struggling to get through the traffic, its just a nightmare for them and these three possible locations for more housing will be a serious risk to lives. Even a few seconds of delay can make the difference of life or death. Please remove these sites from your proposals.	Remove the three sites detailed above, as ambulances are seriously struggling to get to the hospital already let alone with another few hundred cars adding to the problem.	The rest of the plans seem ok to me.	

Name: Wayne Davey **I.D:** 31058625

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Vision, Strategic Priorities and Sustainability Objectives	No	• Justified	Unsure	Unsure	The preamble says the following: "The Local Plan will provide a positive vision for the future of North Somerset, a framework for addressing housing needs, employment requirements and other priorities and a mechanism through which local communities can help shape their surroundings. The heart of the planning system is the delivery of sustainable development which comprises interdependent economic, social and environmental objectives. The local plan provides the local expression of what sustainable development means for North Somerset. It must be positively prepared (to address objectively assessed needs), justified (an appropriate strategy based on reasonable evidence), effective (deliverable over the plan period) and consistent with national policy.". To me this is not fully a positive vision and is not justified. The evidence is that new development (i.e new buildings) are less sustainable than using existing buildings. I don't believe it is 'postively prepared' as i don't believe the needs have been objectively assessed. It seems a national figure has been plucked out of the air, and distributed to different areas such as North Somerset on an opaque basis which does not designed to tie in with local need.			
SP10: Transport	No	• Effective	Unsure	Unsure	Most of the general words supporting active travel are sound, it is the lack of detail that is unsound because they make the plan ineffective. I'm mostly interest in the routes in and around Pill as that's where I live. I currently commute by bike to Bristol most weekdays. As far as I can read (and there is a real lack of clarity in this plan), there are vague suggestions for what could be done but the only commitment appears to be to protect the two routes listed in schedule 7. One of which, the River Avon Pill Path, is almost entirely OUTSIDE the management of North Somerset. This fact is not noted as far as I can see. Also, the two other key routes available do not even appear to be protected per schedule 7.: A369 pavement shared path to Ashton Court - not quite to Bristol notably! Path to Portishead To my mind each of these will be made significantly worse by the planned development unless there is a strong commitment to protecting, and ideally enhancing, them. Why worse? Dangerous construction traffic (these trucks are statistically more likely to kill cyclists), higher traffic loading on A369 - it's already a challenge to safely cross the A369 on the traffic island (which is not even big enough to safely accommodate a regular bike) without waiting for ages either at the edge or on the tiny island.	Amongst a range of other issues I think there should be detailed commitments on active travel that have been sensibly worked out with the input of local active travel users.		Additional travel notes.pdf

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					The railway plans are likely to severely hamper, or even end, usage of the Pill Path (and probably the Portishead path too). Last time there was construction preparation activity along that area (2023 I think) the path was dangerously cut up. I tried reporting it everywhere - note it was ineffective reporting it to North Somerset Council because it is outside your management - a fact which does not seem to be acknowledged appropriately in your plan. On page 279 the plan says “improvements and/or contributions towards River Avon Trail to Bristol required”. However there is no outline of what these might be, or what North Somerset’s ability to impose them is. There are LOADS of improvements that could be made - it’s too narrow, bumpy, muddy, wet, dark for most people to even contemplate using as a commuter route. I love it but can only use it for 6 months of the year due to those reasons. Finally there is an exciting pipe dream idea in the plan (p279) mentioning a crossing over Markham Brook. Done well, this could enable good local active travel opportunities. However, there appears to be no commitment to do so. It really has the look of a last minute idea, thrown into the plan and is a good example of the lack of thought and local consultation that seems to have gone into LP4. I cannot imagine funding would be found for this - bearing in mind that it would need to be a high crossing over Markham Brook which is ancient woodland.			
Policy LP4: Strategic location: Pill and Easton-in-Gordano	No	• Positively prepared • Justified • Effective	Unsure	Unsure	Most of the general words supporting active travel are sound, it is the lack of detail that is unsound because they make the plan ineffective. I’m mostly interest in the routes in and around Pill as that’s where I live. I currently commute by bike to Bristol most weekdays. As far as I can read (and there is a real lack of clarity in this plan), there are vague suggestions for what could be done but the only commitment appears to be to protect the two routes listed in schedule 7. One of which, the River Avon Pill Path, is almost entirely OUTSIDE the management of North Somerset. This fact is not noted as far as I can see. Also, the two other key routes available do not even appear to be protected per schedule 7.: A369 pavement shared path to Ashton Court - not quite to Bristol notably! Path to Portishead To my mind each of these will be made significantly worse by the planned development unless there is a strong commitment to protecting, and ideally enhancing, them. Why worse? Dangerous construction traffic (these trucks are statistically more likely to kill cyclists), higher traffic loading on A369 - it’s already a challenge to safely cross the A369 on the traffic island (which is not even big enough to safely accommodate a regular bike) without waiting for ages either at the edge or on the tiny island. The railway plans are likely to severely hamper, or even end, usage of the Pill Path (and probably the Portishead path too). Last time there was construction preparation activity along that area (2023 I think) the path was dangerously cut up. I tried reporting it everywhere - note it was ineffective reporting it to North Somerset Council because it is outside your management - a fact which does not seem to be acknowledged appropriately in your plan. On page 279 the plan says “improvements and/or contributions towards River Avon Trail to Bristol required”. However there is no outline of what these might be, or what North Somerset’s ability to impose them is. There are LOADS of improvements that could be made - it’s too narrow, bumpy, muddy, wet, dark for most people to even contemplate using as a commuter route. I love it but can only use it for 6 months of the year due to those reasons. Finally there is an exciting pipe dream idea in the plan (p279) mentioning a crossing over Markham Brook. Done well, this could enable good local active travel opportunities. However, there appears to be no commitment to do so. It really has the look of a last minute idea, thrown into the plan and is a good example of the lack of thought and local consultation that seems to have gone into LP4. I cannot imagine funding would be found for this - bearing in mind that it would need to be a high crossing over Markham Brook which is ancient woodland.	Commitment to detailed active travel plans that are locally supported		Additional travel notes.pdf

Name: Wendy Beer **I.D:** 21403553

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP11: Transport infrastructure, allocations and safeguarding					What are you doing about the escalating situation on the B3130 route through the village of Tickenham? Today, from my 2 bed Victorian cottage,very close to the road, I've witnessed a serious build up of traffic, which is becoming an all too familiar site, now with the building of yet more houses in the area, Tickenham included. The misery it's causing is a downright disgrace. Am I right in assuming that NSDC has granted permission for traffic lights on the B3130 to support a development of more houses along this stretch of highway, adding to the chaos due to a police incident on the M5? I've no doubt that when the developers have finished digging up the road to lay services to these new properties, in time potholes will start to appear, because of disturbance to the road surface. It's suffering enough due to the excessive weight of the ever increasing size and number of goods lorries that rattle along the B3130, not to mention the weight of EVs (cars) I am fed up with the lack of alternative routes to and from the M5 motorway. When are the powers that be going to wake up to the fact that with the ever increasing volume of traffic along the B3130 upgrading of alternative existing roads need to be in place before more houses? Nailsea Wall is a road that should now be improved so that it can be used to reduce congestion on the B3130. Developers ought to be forced to build the infrastructure needed, at their own expense, such as new roads, before being given the nod of approval to build houses. When my parents lived in the village of Tickenham at least 50 years ago, a bypass was proposed. The opportunity was there to build one. Instead, the years have passed and the situation on the B3130 has turned into a nightmare for residents and motorists. It's grossly unfair to expect residents to carry on putting up with the behaviour of planners, who appear to have little regard for the environment and the quality of life of those who live beside roads that simply can no longer accommodate traffic sustainably or safely. Every day pedestrians are putting their lives at risk in the village where the pavements are either narrow or do not exist. Why doesn't the government bring into habitable use redundant buildings in cities and towns instead of concreting over the countryside? Whilst I'm at it, why on earth are local authorities allowing people to buy up pretty bungalows to turn into what I can only describe as ugly mansions in a village setting? Is it just about making a quick buck?			

Name: Wessex Water **I.D:** 21470177

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP10: Strategic gaps	No	• Consistent with national policy			We do not believe the policy to be consistent with national policy. Paragraph 11 of the NPPF requires plans to 'align growth and infrastructure'. To support the growth identified in the Local Plan, Wessex Water needs to plan and deliver new infrastructure. The Strategic Gap policy as currently worded may prevent us from gaining planning consent for essential infrastructure development which is not covered by our permitted development rights. We deliver infrastructure in a way which is sensitive to landscape setting, but we can be restricted by operational and health and safety requirements. It is not always possible to locate infrastructure outside of strategic gaps as the siting of new infrastructure may be influenced by factors such as the location of the existing network and topography. Paragraph 8 of the NPPF sets out the three overarching objectives of achieving sustainable development. Infrastructure provision meets all of these.	We would like an additional bullet point added to the list 'Development will only be permitted where' to identify that an exception will be made for essential infrastructure development where this cannot be located elsewhere'		

Name: Will Jones **I.D:** 58627009

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively	Unsure	Unsure	Objection to Proposed Development in Backwell I am a resident of Backwell, and I object strongly to the proposal for an additional 1,000 houses. My many reasons for			

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		prepared • Justified • Effective • Consistent with national policy			objecting are below: 1. Loss of Grade 1 Agricultural Land & Environmental Damage The development proposes building on Grade 1 agricultural land — nationally recognised as “best and most versatile”. Only around 7% of North Somerset’s land falls into this high-quality category. Permanently removing productive farmland undermines long-term food security, especially at a time when Government policy specifically says such land must be protected. The land also supports significant wildlife habitats and biodiversity. The proposed area is used by protected bat species, including Lesser and Greater Horseshoe Bats, which rely on this land for feeding. Destroying these habitats contributes to further biodiversity decline in what is already one of the world’s most nature-depleted countries. 2. Backwell Already Has 800 Houses Approved — This Proposal Is Excessive Backwell already has around 800 homes approved, representing approximately a 40–50% increase in village size before any new proposals are even considered. Adding another 1,000 houses would effectively double Backwell’s size in a very short period, which is completely disproportionate for a small village. No other village in North Somerset is being asked to take this level of growth. Backwell’s allocation would rise to 7% of the district’s total housing numbers, surpassing even some towns. 3. No Confirmed Funding or Feasibility for the New Road The development relies heavily on a new road, yet: - There is no confirmed funding - No feasibility study - No engineering solution for crossing or going under the railway - No timescale for delivery This road is fundamental to making the development work, yet it remains entirely uncertain. Without guaranteed funding and proven deliverability, the housing proposal itself cannot be considered realistic or sound. 4. Transport Network Already Under Severe Strain Backwell’s road network is already stretched. Station Road, Backwell Common and Chapel Hill regularly experience congestion, especially at peak times. When the M5 is shut, the A370 becomes gridlocked, often at a complete standstill. Adding thousands more daily vehicle movements would make the situation significantly worse. The train station is frequently over capacity, with a car park that is regularly full and still inaccessible for many people with mobility issues or prams. Pavements in parts of the village are extremely narrow and unsafe for two people to pass comfortably. This development would create traffic and transport pressures that simply cannot be absorbed. 5. Local Infrastructure Cannot Support This Level of Growth Backwell does not have the infrastructure to handle such rapid expansion: - No supermarket or meaningful retail offering - Limited parking and over-subscribed station facilities - Narrow pavements unsafe for pedestrians - Schools already operating near or at capacity - Very limited healthcare provision - No leisure, community, or youth facilities being expanded There is no committed investment to expand schools, medical services or local amenities. The Infrastructure Delivery Plan lacks detail, costings or funding guarantees.			

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					6. Flood Risk Is Not Properly Addressed Large parts of the surrounding area – including Backwell Common and the fields near Backwell Lake – are on or adjacent to floodplains and already flood regularly. Hard surfacing from housing and roads will make this worse. There is no robust drainage strategy or mitigation plan showing how flood risk will be prevented for existing residents and the new development. 7. No Demonstrated Need or Viability for an Extra 1,000 Houses No evidence of genuine housing need has been provided to justify such a large allocation for Backwell. The village is not an employment hub; most people commute to Bristol, Weston or further afield, creating additional traffic and reliance on transport infrastructure that is already struggling. There is also no analysis of the social impact on a community that would undergo an 80–100% population increase in a single local plan period. 8. Overall Level of Growth Is Unsustainable and Undeliverable The sheer volume of housing proposed, on top of the already approved 800 homes is destabilising for a village of Backwell's size. With no confirmed road, no infrastructure funding, significant environmental impact and disproportionate growth levels, the proposal is not sustainable, not deliverable, and not justified. These plans represent overwhelming and irreversible overdevelopment. They would destroy protected farmland, exacerbate flooding, overwhelm local services, worsen traffic, damage wildlife, and fundamentally change Backwell's character — all without the guaranteed infrastructure needed to support them. For these reasons, I strongly urge the Planning Inspector to reject this allocation.			

Name: Will Lewis **I.D:** 58467137

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SP6: Villages and rural areas	Unsure		Unsure	Unsure	Opposition to two speculative developments in Claverham: As a resident of Claverham, I have become aware of 2 speculative development proposals to build on two sites in the village: 1.Litchfield acting as Latimer Developments Limited intend to submit a planning application to build 120 houses on land off the High Street, starting at Jasmine Lane opposite the historic St Barnabas church, going around the edge of the village past the Scout Hut and behind Dunsters Road. 2.Wain Homes intend to submit a planning application to build 130 houses on land towards the Moor on the north side of Claverham Road with access via the recently demolished house. Please be aware that these developments are not in scope of the 'North Somerset Local Plan 2041 - pre-submission plan (reg 19). See attached document for full representation.			Residents comments to NSLocal Plan 2041 - Policy SP6 Villages and rural areas.docx

Name: William Charnock **I.D:** 51240993

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Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	This part of the plan seems to consist of over rapid over development combined with destruction of prime agricultural land and loss of the protected and other species which forage and depend on it Consultation is welcome if it is genuine but a rapid increase in the number of dwellings in Backwell is already approved and it will take time for all the existing infrastructure and social adjustments to take place. It would seem prudent to reduce drastically the rate of development of the village beyond the 800 additional houses for which planning permission has already been granted. The rate of proposed development is remarkably high compared with other parts of North Somerset. There are many issues relating to land usage east of Backwell. It is well known that this area consists of the highest quality farmland, that it is prone to flooding and is the foraging ground for rare and protected species of bat not just from the Brockley roost but also from Tyntesfield. I have a summer bat roost in my garden and it is clearly getting less and less use as a result of so much recent development. Owls, buzzards and ravens are becoming rare on Backwell Hill and a number of garden bird species once common eg nuthartch have also disappeared. I do not believe mitigation measures can work with this scale of development The proposal for five hectares of this valuable land to be used for light industry seems inappropriate given the availability of land in Coles quarry for which I understand there is already some planning provision which has not been utilized for years. There is also still some unused space in the Cheston Combe industrial site. If the propose development did go ahead this five hectares would be better employed as protected open space. In short and in summary the development seems unnecessary, destructive of valuable land and environmental assets, and liable to exacerbate existing problems' of flooding and social infrastructural difficulties of absorbing ne w communities. I have touched on aspects of particular concern to me but there many other drawbacks that a and railway station an d the lack of any coherent justoification.			

Name: William David Billington **I.D:** 62738625

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP10: Transport	No	• Effective	Unsure	Yes	There are very serious traffic issues associated with these proposed plans for the Pill and Easton-in-Gordano villages. The A369 from Portishead to Bristol and including the J19 roundabout on the M5 is already exhibiting major traffic problems leading to congestion up to Clifton Suspension Bridge and Rownham Hill. This road has apparently already been deemed to be at maximum capacity. With the added possibility of an additional 1100 homes plus 1601 dwellings in Portishead the traffic situation on the A369 would be intolerable. The Highways Authority need to be consulted at an early stage.	Reduce the number of proposed sites for development to a level appropriate to the capacity of the local road systems.		

Name: William Hall **I.D:** 58602337

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Vision, Strategic Priorities and Sustainability Objectives	No	• Consistent with national policy	No	No	I consider the Plan not sound, not legally compliant, and not fully compliant with the Duty to Cooperate with respect to the proposed allocations at Tower Farm and Black Rock. Soundness: The Plan is not positively prepared because it does not demonstrate that all reasonable alternatives have been considered. Higher-density development on brownfield sites or other lower-impact locations could meet housing needs without harming valuable natural areas or creating additional community safety risks.	Remove Tower Farm and Black Rock from the Local Plan. Focus development on brownfield and lower-impact sites that do not threaten nationally important ecological assets, create severe transport issues, or increase flood risk.	I support the overall vision and aims of the Plan, including its commitment to high-quality, sustainable development, regeneration of existing towns, and protection of valued areas. I also welcome the Plan's focus on creating accessible, sustainable communities that address climate change and promote well-being.	

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					The Plan is not justified because the evidence base is insufficient. There is no clear demonstration that these sites can be developed without causing serious environmental, landscape, or ecological harm. The sites border Weston Big Wood, Nightingale Valley, and the Gordano Valley corridor — ecologically sensitive areas whose protection is not adequately addressed. The Plan is not effective because safe and suitable access to the sites is not demonstrated. Existing congestion from school traffic on The Downs already creates unsafe conditions, which would be worsened by additional development. Flood risk has not been fully assessed or mitigated. The Plan is not consistent with national policy. Allocating Green Belt land without exceptional circumstances, and failing to address ecological, transport, and flood risks, conflicts with the NPPF's principles for sustainable development. Legal Compliance: Exceptional circumstances for removing land from the Green Belt have not been demonstrated, contrary to national guidance. Environmental and flood risk assessments are incomplete, failing statutory obligations to protect Sites of Special Scientific Interest and manage flood risk. Evidence of safe and deliverable access is insufficient, meaning the Plan does not comply with legal obligations to ensure safe development. Duty to Cooperate: The Plan does not adequately demonstrate engagement with statutory bodies and neighbouring authorities on the specific environmental, transport, and flood risk impacts of these allocations. Impacts on local infrastructure, school safety, and nationally important ecological assets have not been jointly assessed, which is required under Section 33A of the Planning and Compulsory Purchase Act.	Provide full and robust environmental assessments for any sites proposed for allocation, including impacts on ancient woodland, SSSIs, ecological corridors, and landscape buffers. Demonstrate safe and suitable access for any proposed development and assess impacts on existing road safety, particularly at school pick-up zones. Engage statutory bodies and neighbouring authorities to address environmental, transport, and flood risk issues, in compliance with the Duty to Cooperate.		
Strategic Priorities	No	Positively prepared	No	No	Green Belt removal without exceptional circumstances Incomplete environmental and flood risk evidence Unsafe access and existing school traffic issues Lack of adequate consultation with statutory bodies and neighbouring authorities	Remove Tower Farm and Black Rock from the Local Plan. Focus housing development on brownfield and lower-impact sites that do not threaten nationally important ecological assets, create severe transport issues, or increase flood risk. Provide full and robust	I support the overall vision and aims of the Plan, including its focus on sustainable, high-quality development, regeneration of existing towns, and protection of valued areas. I also welcome the Plan's objective to create accessible, sustainable communities that address climate change and promote well-being.	

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						environmental assessments for any proposed allocations, including impacts on ancient woodland, SSSIs, ecological corridors, and landscape buffers. Demonstrate safe and suitable access, and assess the impact on existing road safety, particularly around school pick-up zones. Engage statutory bodies and neighbouring authorities to mitigate environmental, transport, and flood risk impacts.		
Sustainable development objectives	No	• Positively prepared	No	No	Housing and economic objectives could be met on brownfield or lower-impact land. Tower Farm and Black Rock unnecessarily threaten the Green Belt and ecological assets. Environmental objectives are not met: Weston Big Wood, Nightingale Valley, and the Gordano Valley corridor are inadequately protected, biodiversity and landscape impacts are insufficiently assessed, and flood risk is not mitigated. Social objectives are compromised: school traffic congestion on The Downs creates unsafe conditions, reducing access to community facilities, and impacting well-being. Transport and travel objectives are not met: safe access to the sites is not demonstrated, walking and cycling opportunities are restricted by steep gradients and congestion.	Remove Tower Farm and Black Rock from the Local Plan. Focus development on brownfield and lower-impact sites that meet sustainable development objectives without harming Green Belt, ecological, or landscape assets. Provide full environmental and flood risk assessments for any proposed allocations. Demonstrate safe and suitable access for all development, including mitigation of school traffic congestion. Ensure consultation with statutory bodies and neighbouring authorities to address environmental, transport, and flood risk issues.	I support the overall vision and objectives of the Plan to deliver sustainable, high-quality development that regenerates existing towns, protects valued areas, and promotes well-being. I also support objectives to enhance access to green spaces, community facilities, and promote sustainable travel where this does not conflict with environmental protection.	
Strategic Policies	No	• Positively prepared	No	No	The Plan fails to meet the tests of soundness and legal compliance for the following reasons: Housing and infrastructure: Alternatives on brownfield or lower-impact sites have not been fully considered. Environmental protection: Weston Big Wood, Nightingale Valley, and the Gordano Valley corridor are inadequately protected. Biodiversity, landscape, and flood risks are insufficiently assessed. Transport and safety: School traffic on The Downs is already unsafe, and the Plan does not provide evidence of safe,	Remove Tower Farm and Black Rock from the Local Plan. Focus development on brownfield and lower-impact sites that meet housing, economic, and sustainability objectives without harming Green Belt or ecological assets. Provide full environmental and	I support the overall vision of the Local Plan to deliver sustainable, high-quality development, regenerate existing towns, protect valued areas, and promote well-being. I support strategic policies that aim to enhance access to green spaces, community facilities, and promote sustainable travel, provided they do not conflict with environmental and safety protections.	

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					deliverable access to Tower Farm or Black Rock. Duty to Cooperate: Consultation with statutory bodies and neighbouring authorities regarding ecological, transport, and flood risk impacts is insufficient.	flood risk assessments for any proposed allocations. Demonstrate safe and suitable access for all development and assess the impact on existing school traffic and road safety. Ensure consultation with statutory bodies and neighbouring authorities to mitigate environmental, transport, and flood risk impacts.		
Land at Tower Farm	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	The North Somerset Local Plan 2041: Pre-submission Plan is not sound, not legally compliant, and not in compliance with the Duty to Cooperate for the following reasons: Green Belt & exceptional circumstances: The Plan allocates Tower Farm (and similar sites) without demonstrating exceptional circumstances for removal from the Green Belt, contrary to national policy. Other brownfield or lower-impact sites could meet housing needs without harming protected land. Environmental protection: Tower Farm is adjacent to Weston Big Wood, Nightingale Valley, and the Gordano Valley corridor, which are nationally and locally important ecological areas. Proposed ecological buffers are insufficient, and long-term management is not clearly enforceable. Biodiversity, geodiversity, and landscape impacts have not been fully assessed. Transport & safety: School traffic on The Downs already creates severe congestion and unsafe conditions during pick-up and drop-off, despite long-standing voluntary mitigation requests. Additional housing would worsen these hazards. Proposed active travel connections and bus service contributions do not adequately address the risks. Flood risk: The site slopes towards lower areas of Portishead, and surface water runoff mitigation has not been fully assessed or evidenced. The Plan does not demonstrate that flood risk can be managed without increasing risks elsewhere. Deliverability: Safe and suitable access for vehicles, walking, and cycling is not demonstrated. Duty to Cooperate: There is insufficient evidence of engagement with statutory bodies or neighbouring authorities on environmental, transport, and flood risk impacts.	Remove Tower Farm and similar high-impact Green Belt sites from the Plan. Prioritise brownfield and lower-impact sites for housing allocations to meet needs sustainably. Conduct comprehensive independent assessments of ecology, biodiversity, landscape, flood risk, and transport before any allocation. Secure enforceable long-term management of ecological buffers and mitigation measures. Demonstrate safe and deliverable access for vehicles, walking, and cycling, including mitigation of school traffic hazards. Ensure full engagement with statutory bodies and neighbouring authorities to comply with the Duty to Cooperate.	Support the Plan’s overall objectives to create sustainable, high-quality, liveable neighbourhoods, improve access to facilities, promote regeneration, and support climate resilience, provided these do not conflict with Green Belt, ecological protection, public safety, or flood risk requirements.	
Black Rock, north of Clevedon Road	No	• Positively prepared	No	No	Climate resilience: Flood risk has not been fully assessed or mitigated at Tower Farm and Black Rock. Transport and liveable neighbourhoods: School traffic on The Downs is already unsafe, and the steep gradient restricts walking and cycling, undermining sustainable transport objectives.	Remove Tower Farm and Black Rock from the Local Plan. Prioritise brownfield and lower-impact sites to meet housing, economic, and sustainability objectives.	I support the Plan’s high-level objectives to deliver sustainable, high-quality development, create liveable neighbourhoods, and improve access to facilities. I support policies aimed at climate resilience, efficient land use, regeneration of town centres, and promotion of walking, cycling, and public	

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					Housing and community needs: Alternative sites with lower environmental impact are not sufficiently considered. Affordable and specialist housing could be delivered elsewhere without harming Green Belt or ecological assets. Environmental protection: Weston Big Wood, Nightingale Valley, and the Gordano Valley corridor are inadequately protected. Biodiversity, landscape, and ecological integrity are at risk. Efficient land use: The Plan allocates largely undeveloped Green Belt instead of maximising previously developed brownfield land.	Conduct full environmental, ecological, and flood risk assessments for all proposed allocations. Demonstrate safe and suitable access to new developments and mitigate existing school traffic hazards. Ensure consultation with statutory bodies and neighbouring authorities on environmental, transport, and flood risk matters.	transport where these do not conflict with environmental or safety protections.	

Name: William Jones **I.D:** 31035265

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP2: Strategic location: Woodspring (south west of Bristol)	Yes		Yes	Yes				
Policy LP2: Strategic location: Woodspring (south west of Bristol)	Yes		Yes	Yes		I am writing in respect of Policy LP2 Woodspring development and the development of 3500 houses and associated infrastructure on green belt that has significant value in respect of water courses, ancient woods, fields and wildlife corridors. If the land is to be developed then it should be to a high standard that recognises climate change challenges and the need for a people first community with sustainability at its heart and ease of walking/cycling/ with access to local services/shops/schools/doctors surgery etc. In respect of the proximity of the proposed site to the hamlet of Yanley then there are some very specific concerns: 1. The need for an extended wildlife/green corridor running the length of Yanley Ridge that restricts any new development including gardens to a level of 50m below the site boundary. 2. Yanley Lane be closed to all through traffic but remains accessible for walkers/cyclists/horse riders/farmers and emergency vehicles. 3. Footpaths are retained 4. Spring Lines and water issues are identified and a suitable plan implemented to deal with increasing levels of flash flooding 5. Old establishes trees are identified and protected It is essential that a working party be established to work with the developer comprising of all stakeholders		

Name: William Nelson **I.D:** 62659457

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Land at Tower	No	• Positively	No	No	The North Somerset Local Plan 2041 is not sound or legally compliant on many issues, these are being set out clearly with the proposed allocation of land at Tower Farm, Portishead for residential development within the emerging North Somerset Local Plan.			

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Farm		prepared • Justified • Effective • Consistent with national policy			The proposed development fails to meet planning policy compliance, has a significant environmental impact, infrastructure capacity issues, and does not meet sustainable development principles. 1. Conflict with National and Local Planning Policy • Green Belt Protection: Tower Farm lies within the Green Belt. The NPPF (paragraphs 147–151) states that Green Belt boundaries should only be altered in exceptional circumstances, which must be fully evidenced and justified. No such evidence has been provided. The fundamental aim of Green Belt policy is to prevent urban sprawl and safeguard the countryside from encroachment (NPPF para. 142–145). • Green Belt Review Findings: The Council's own review acknowledges Tower Farm's openness and landscape sensitivity. Even if harm is rated "low," NPPF requires all reasonable alternatives (brownfield sites, higher-density urban development) to be exhausted first—this has not been demonstrated. • Local Plan Strategic Policies: o SP1 – Sustainable Development: Requires development to meet sustainability objectives and minimize environmental harm. o SP2 – Climate Change: Mandates development that supports carbon reduction and resilience. o SP7 – Green Belt: Reinforces national policy by restricting inappropriate development in the Green Belt. o DP12 – Development in the Green Belt: States that proposals in the Green Belt will only be permitted in very special circumstances, which are absent here. Including Tower Farm fails the tests of soundness under the NPPF and Local Plan because it undermines strategic Green Belt objectives and disregards sustainable development principles. Environmental and Ecological Harm • NPPF Paragraphs 180–182 require planning decisions to protect and enhance biodiversity, prevent harm to irreplaceable habitats, and deliver net gains for nature. Tower Farm borders Weston Big Wood, an ancient woodland and SSSI, and forms part of the Gordano Valley ecological corridor. Development would fragment habitats and cause irreversible harm, contrary to these provisions. • Local Plan Policy SP11 – Historic and Natural Environment and DP5 – Climate Change Adaptation and Resilience require safeguarding of ecological networks and adaptation to climate impacts. This proposal conflicts with both. Infrastructure Deficit • Transport (Policy SP10 and DP14–DP17): Development must minimize carbon impact by prioritizing walking, cycling, and public transport. Tower Farm is remote from the proposed railway station and lacks sustainable transport links, increasing car dependency and emissions. Landscape and Heritage Impact • Local Plan Policy DP38 (Landscape Protection) and Portishead Neighbourhood Plan Policies PEN2 and PEN6 emphasize safeguarding green spaces and heritage assets. Tower Farm's elevated position means development would permanently alter the rural character and harm views over the Gordano Valley. • NPPF Paragraph 174: Development should recognize the intrinsic character and beauty of the countryside. Tower Farm would erode this by introducing large-scale housing into a sensitive rural fringe. Unsustainable Location • Policy SP1 (Sustainable Development) and SP2 (Climate Change) prioritize development that minimizes car dependency and maximizes public transport use. • Tower Farm is over 2km from the proposed railway station and on steep terrain, discouraging walking and cycling to the town centre. • Vehicular traffic would funnel through The Downs and Tower Road, worsening congestion near High Down School and Portishead town centre, which already suffers severe traffic issues. • Policy SP2 & DP6 (Net Zero Construction): Requires developments to minimize carbon emissions and support sustainable			

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					transport. • Tower Farm’s car-dependent nature undermines these objectives and North Somerset’s Climate Emergency commitments. Alternative Approach: Sheepway Road This site, located between Sheepway Road and the railway line, is approximately 500 metres from the proposed Portishead railway station. Although the site has previously been discounted due to flood risk this could be mitigated against and it offers significant advantages over Tower Farm: • Excellent Rail Accessibility: Ideal for rail-based commuting into Bristol, reducing car dependency and supporting NPPF paragraph 105 and Local Plan SP10 (Transport). • Minimal Traffic Impact: Vehicular access would avoid Portishead town centre, which already suffers severe congestion. • Pedestrian-Friendly Location: The site is on flat terrain, making walking and cycling to the town centre practical and attractive—unlike Tower Farm’s steep incline. • Policy Alignment: o DP8 – Efficient Use of Land o DP15–DP17 – Active and Sustainable Transport If this site (or similar) near to the Portishead Railway Station cannot be brought forward I would stress for a further densification of the Wyndham Way site. Wyndham Way • Proximity to to Portishead Railway Station providing direct access into Bristol City Centre. • Brownfield Regeneration: The site comprises previously developed land, avoiding harm to the Green Belt and ecological corridors. • Town Centre Integration: Supports vitality of Portishead’s High Street and Marina, aligning with SP4 (Placemaking) and SP10 (Transport). Policy Support • Local Plan: o LP20 – Wyndham Way: Requires efficient land use, increased connectivity, and mixed-use development. o DP8 – Efficient Use of Land: Encourages higher densities in sustainable locations. o DP15–DP17 – Active and Sustainable Transport: Prioritizes walking, cycling, and public transport. • Neighbourhood Plan Objective O12: Calls for a connected, vibrant town centre and integration with the transport hub. National and Best Practice Principles • NPPF Paragraph 105: Promotes development that reduces car dependency and supports sustainable transport. Practical Measures • Increase housing density at Wyndham Way by: o Allowing mid-rise apartments (6–10 storeys). o Reducing parking minimums and introducing mobility hubs. o Integrating affordable housing and co-working spaces to create inclusive communities. • Transit-Oriented Development Benefits: o Reduces greenhouse gas emissions and congestion. o Stimulates local economy and job creation. o Improves quality of life through walkable, mixed-use communities. Conclusion The Tower Farm proposal: • Breaches NPPF paragraphs 147–151 and 180–182. • Conflicts with Local Plan policies SP1, SP2, SP7, SP10, SP11, DP6, DP12. • Threatens protected habitats and landscapes. • Exacerbates infrastructure deficits. • Contradicts sustainability and climate goals. For these reasons housing delivery for Portishead should be in locations that are closer to the proposed railway station and existing infrastructure. No modification short of removing the allocation entirely would make this site appropriate. Given its direct adjacency to			

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					ancient woodland, its loss would be irreversible and cannot be mitigated sufficiently. The land should instead be retained as undeveloped green space. I do not support the the North Somerset Local Plan 2041 for the Tower Hill Farm location.			

Name: Winford Parish Council **I.D:** 28893793

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Policy LP9: Extent of the Green Belt	Unsure		Unsure	Unsure	Felton Common is covered by the Green Belt but we believe that the Local Plan should specifically mention it as a Common and a local Nature Reserve and Site of Nature Conservation Interest, and include a specific policy to safeguard it as a Common.			Winford Parish Councils Response to NSCs Local Plan 2041, 2nd December 2025.docx
Policy LP13: Air safety	Unsure		Unsure	Unsure	Bristol Airport have issued a consultation with regard to Runway Approach Lighting on Felton Common, a public open space within a defined Air Safety Zone. WPC question whether Felton Common and the proposed replacement land will become at higher risk due to lower approach altitudes.			

Name: Winifred Watts **I.D:** 62799521

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective	Unsure	Unsure	The land between Backwell and Nailsea is one big drain. If it is covered with the amount of concrete required for this proposal it will be like putting a plug in the drain and have irreversible consequences in the future. In the past this land has frequently flooded. Please do not touch these green fields, they are there for a definite purpose and currently serve to act as an effective flood plain which is even more necessary with the current climate change challenges we face.			

Name: Woodstock Homes (Land west of Butts Batch, Wrington) **I.D:** 58594049

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Strategic Priorities	No	‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	Please see representations document. Despite Wrington being a well-served settlement with a primary school, local shops, medical facilities, bus services, and connections via the A38, the Local Plan allocates no growth at all to the village, nor does it review the long-standing, restrictive settlement boundary where Wrington's boundary is simply listed as "Retained and reviewed existing boundary". The complete omission of growth in Wrington is inconsistent with the Council's own Strategic Priorities. For example, Strategic Priority SP1 aims to deliver sustainable development by directing growth to the "most sustainable locations," yet the Plan contradicts this by imposing a blanket prevention of growth in Wrington under LP7 and SP6, despite the village's clear sustainability credentials. In respect of the housing requirement that Policy SP8 sets out, while we welcome the change in approach that now utilises the SM to determine the minimum requirement, we still have some residual concerns that no allowance is made to address unmet needs arsing in Bristol City's administrative boundaries, the scale of windfall provision and the reliance on large strategic sites at Banwell and Woodspring.	Please see representations document.		829 A5 OA 111225 Representations to Reg 19 Local Plan.pdf North Somerset Local Plan Pre-submission Plan - Representation form Part B.pdf

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SP1: Sustainable Development	No	• Justified • Effective • Consistent with national policy	Unsure	Unsure	Please see representations document The Vision for the North Somerset Local Plan 2041 outlines a broad ambition to deliver sustainable growth, direct development to appropriate locations, and meet the needs of existing and future communities. However, when read alongside the Strategic Policies (SP1 -SP10), the Sustainability Appraisal (SA) findings, and the settlement hierarchy implied through Schedule 5, it becomes clear that the approach taken in relation to sustainable rural settlements, particularly Wrington, does not reflect or support the stated vision. The Strategic Priorities reinforce this misalignment. Strategic Priority SP1 aims to deliver sustainable development by directing growth to the “most sustainable locations,” yet the Plan contradicts this by imposing a blanket prevention of growth in Wrington under LP7 and SP6, despite the village’s clear sustainability credentials. The complete omission of growth in Wrington is therefore inconsistent with the Council’s own Strategic Priorities.	The complete omission of growth in Wrington is inconsistent with the Council’s own Strategic Priorities.		829 A5 OA 111225 Representations to Reg 19 Local Plan.pdf North Somerset Local Plan Pre-submission Plan - Representation form Part B.pdf
SP3: Spatial strategy	No	• Justified • Effective • Consistent with national policy	Unsure	Unsure	Please see representations document Policy SP3 (Spatial Strategy) states that “most development which takes place [in rural villages] will be at the relatively more sustainable villages”. Wrington is demonstrably such a settlement and currently, Policy CS32 (Service Villages) identifies Wrington as one of the district’s Service Villages, with CS14 (Distribution of new housing) offering a distinction between these and other less sustainable settlements in the settlement hierarchy. Policy CS32 also states that development within or adjoining the settlement boundary will be supported where it enhances overall sustainability and respects local character. The PSP makes no distinction between villages, rural settlements or service centres with the exception of Schedule 6 which identifies a hierarchy of town, district and local centres. Wrington is recognised here as a local centre with DP26 stating “it is important to maintain the viability and vitality of these local centres for the communities they serve”. Despite this, Wrington is allocated no development, other than an existing extant permission for 37 dwellings located circa 300m outside of the settlement boundary to the northeast, which directly contradicts the stated intention of SP3. Other comparable, or less sustainable settlements such as Churchill have a higher level of growth allocated to them (290 dwellings in the case of Churchill). The failure to allocate any meaningful growth to Wrington also renders the Strategic Policies internally inconsistent. SP6 states that development within villages must “reflect local community needs” and connect to facilities via sustainable modes. However, the Plan prevents any ability for Wrington to meet such needs in practice because LP7 restricts all development outside the outdated boundary and no meaningful allocations are made. This internal contradiction between the aims of SP6 and the spatial reality created by LP7 undermines the coherence and effectiveness of the strategic policies as a whole. NPPF paragraph 83 requires planning policies to promote sustainable development in rural areas by supporting housing “where it will enhance or maintain the vitality of rural communities.” It states that “planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services”. By limiting Wrington to windfall development within a tightly drawn boundary, the Plan is inconsistent with the national requirement to ensure rural vitality.	By limiting Wrington to windfall development within a tightly drawn boundary, the Plan is inconsistent with the national requirement to ensure rural vitality.		829 A5 OA 111225 Representations to Reg 19 Local Plan.pdf North Somerset Local Plan Pre-submission Plan - Representation form Part B.pdf
SP6: Villages and rural areas	No	• Justified • Effective • Consistent with national policy	Unsure	Unsure	NSC state that development should be focused on locations that “maximise opportunities to reduce the need to travel” provide access to services, and support patterns of sustainable development. This is reiterated in the justification to Policy SP5 (Towns) and SP6 (Villages and Rural Areas), which emphasise the importance of accessible locations with good walking, cycling and public transport connections. However, despite Wrington meeting these criteria, being a well-served settlement with a primary school, local shops, medical facilities, bus services, and connections via			829 A5 OA 111225 Representations to Reg 19 Local Plan.pdf North Somerset Local Plan Pre-submission Plan -

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					the A38, the Local Plan allocates no growth at all to the village, nor does it review the long-standing, restrictive settlement boundary where Wrington's boundary is simply listed as "Retained and reviewed existing boundary".			Representation form Part B.pdf
SP8: Housing	No	• Justified • Effective • Consistent with national policy	Unsure	Unsure	In respect of the housing requirement that Policy SP8 sets out, while we welcome the change in approach that now utilises the SM to determine the minimum requirement, we still have some residual concerns that no allowance is made to address unmet needs arsing in Bristol City's administrative boundaries, the scale of windfall provision and the reliance on large strategic sites at Banwell and Woodspring. In respect of unmet needs, we will not be presenting evidence on this point, but we are aware of the representations of others and share similar concerns this has not been accounted for. Windfalls seem to account for 2,928 of the total supply proposed by the council, which equates to 12.4% of the total. Given that windfalls are an unplanned and not necessarily reliable source of supply, we suggest that they should not be relied on to such a significant degree and instead should be seen to be a 'top-up' in supply, that provides further flexibility if they come forward. In our experience maximum allowances of 10% for windfalls are normally more typical, with many authorities' plans even allowing for a lower proportion than that. In addition to the above, this approach fails to acknowledge that historic windfall delivery occurred within a markedly different policy context. Under the adopted Core Strategy, policies such as CS32 (Service Villages) amongst others expressly support "development within or adjoining the settlement boundary" where it enhances sustainability and respects local character. This policy approach enables a consistent pipeline of small and medium◈scale edge-of-settlement schemes across the district, including in sustainable villages such as Wrington, a designated Service Village with strong facilities and employment opportunities. By contrast, the PSP introduces a materially different framework. The emerging policies collectively remove this positive presumption for development adjoining settlement boundaries, and instead restricts windfall almost exclusively to sites within tightly drawn boundaries. The settlement boundary for Wrington has not been amended, despite its clear suitability for meeting local needs. The Council is therefore relying on historic windfall delivery while simultaneously removing the very policy mechanisms that previously enabled such sites to come forward. This represents a logical inconsistency: windfall rates achieved under CS32 cannot be assumed to continue when the policy basis that generated them has been withdrawn. The result is an artificially inflated windfall allowance which overstates the reliability of this source and risks undermining the soundness of the plan. A more cautious windfall allowance, or preferably, the identification of additional small and medium allocations in sustainable settlements such as Wrington, is required to ensure the plan is positively prepared and deliverable. Accordingly, we suggest that the council reconsider this allowance and allocate further tangible sites to replace what is an unplanned and unreliable source of supply that might render achieving the minimum development requirements of NSC difficult to achieve. Finally, while we support the provision of large strategic sites to ensure a broad portfolio of allocation types and also to provide a reliable long term supply, the council needs to accept that delivery on such sites takes time, with required infrastructure usually meaning that first completions will be many years in the future. Both the Banwell and Woodspring strategic sites are yet to obtain planning permission. Lichfield's 'Start to Finish' assessment (3rd Addition – March 2024) makes it clear that statistically, sites in such a position are not expected to start delivering homes for 6.7 years after the validation of the first planning application. The Banwell site has been subject to a planning application for nearly one year, but Woodspring is yet to be subject to an application. Therefore, even assuming a quicker than average delivery of first completions on these sites (say 5 years) over the remaining 10 years of the plan these sites would	We urge the Council to allocate, sustainable, non-Green Belt, non-strategic sites, such as Land West of Butts Batch, to ensure that SP8 can be delivered as intended. Without such allocations, SP8's delivery strategy is not justified or effective.		829 A5 OA 111225 Representations to Reg 19 Local Plan.pdf North Somerset Local Plan Pre-submission Plan - Representation form Part B.pdf

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					average 330 dwellings and 350 dwellings per year respectively. This rate of average completions would significantly exceed the national average on sites of 2,000 dwellings which equate to 100-188 dpa according to Lichfield's analysis. This underlines that overreliance on these sites to deliver a five-year housing land supply in particular would be foolhardy. We urge the Council to allocate, sustainable, non-Green Belt, non-strategic sites, such as Land West of Butts Batch, to ensure that SP8 can be delivered as intended. Without such allocations, SP8's delivery strategy is not justified or effective.			
Policy LP5: Housing, employment and mixed use allocations	No	• Justified • Effective • Consistent with national policy	Unsure	Unsure	Please see representations document In the context of the Local Plan, land west of Butts Batch, Wrington represents a deliverable, proportionate and sustainable opportunity for early housing delivery in a Service Village that the Council's own evidence identifies as accessible and well-served within North Somerset. Notwithstanding this, the Pre-Submission Plan allocates no growth to Wrington and retains an outdated settlement boundary. The deliverability of Land West of Butts Batch, supported by pre-application engagement and an imminent planning application, reinforces the case for the site's inclusion as an allocation to ensure the Local Plan is positively prepared, justified, effective and consistent with national policy	Please see representations document The deliverability of Land West of Butts Batch, supported by pre-application engagement and an imminent planning application, reinforces the case for the site's inclusion as an allocation to ensure the Local Plan is positively prepared, justified, effective and consistent with national policy		829 A5 OA 111225 Representations to Reg 19 Local Plan.pdf North Somerset Local Plan Pre-submission Plan - Representation form Part B.pdf
Policy LP7: Settlement boundaries	No	• Justified • Effective • Consistent with national policy	Unsure	Unsure	Please see representations document Policy SP6 states that development within villages must "reflect local community needs" and connect to facilities via sustainable modes. However, the Plan prevents any ability for Wrington to meet such needs in practice because LP7 restricts all development outside the outdated boundary and no meaningful allocations are made. This internal contradiction between the aims of SP6 and the spatial reality created by LP7 undermines the coherence and effectiveness of the strategic policies as a whole.	Please see representations document		829 A5 OA 111225 Representations to Reg 19 Local Plan.pdf North Somerset Local Plan Pre-submission Plan - Representation form Part B.pdf
Policy DP6: Net zero construction	No	• Justified • Effective • Consistent with national policy	Unsure	Unsure	Please see representations document Policy DP6 introduces a wide range of locally specific energy and carbon requirements that go significantly beyond national Building Regulations. While the principle of supporting sustainable construction is recognised, the policy is not justified by proportionate evidence. It requires developments to achieve "net zero operational energy", impose ultra-low energy use thresholds, and minimise embodied carbon, but provides no clear viability evidence demonstrating that these expectations can realistically be delivered across all development typologies in North Somerset. The Council's own viability assessment confirms that achieving the performance standards implied by DP6 will add 4–9% to base build costs for residential development. This uplift sits on top of the recently introduced national Part L 2021 requirements, which themselves represent a 31% reduction in energy use ahead of the Future Homes Standard. Importantly, the assessment notes that BCIS data has not yet adjusted to reflect these new national standards, meaning that the additional DP6 cost impacts are likely underestimated at this stage. The assessment also records that the embodied carbon requirement, added late to the policy, was treated as having only a "nominal" viability cost rather than being independently tested or sensitivity modelled. This is material: DP6 now requires embodied carbon assessments for schemes of 50 dwellings or more, setting specific $kgCO_2e/m^2$ thresholds without any robust evidence that such requirements are viable on non-strategic, medium-sized sites. The assessment further acknowledges that the short-term economic context, including high	Please see representations document To be sound, the policy requires refinement, and further viability testing, particularly in relation to the deliverability of small and medium sized sites in sustainable locations.		829 A5 OA 111225 Representations to Reg 19 Local Plan.pdf North Somerset Local Plan Pre-submission Plan - Representation form Part B.pdf

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					construction inflation, is likely to make viability “challenging in some cases”, particularly outside the strongest value areas. For sustainable rural settlements such as Wrington, this is a critical issue. The Local Plan allocates no growth to Wrington and relies instead on small and medium-sized sites to provide early and flexible supply, likely to be provided by SME builders. Yet DP6 introduces additional costs, reporting requirements and design burdens that disproportionately affect exactly these types of sites, which do not benefit from strategic-scale economies. The risk is that DP6 makes smaller, more deliverable sites less viable, thereby undermining the effectiveness of SP8 and the overall deliverability of the Local Plan. Given these concerns, we consider DP6 to be not justified, not effective, and not consistent with national policy, particularly as the Government intends the Future Homes Standard to regulate energy performance at a national level. To be sound, the policy requires refinement, and further viability testing, particularly in relation to the deliverability of small and medium⟐sized sites in sustainable locations.			
Policy DP26: Local centres	No	• Justified • Effective • Consistent with national policy	Unsure	Unsure	Please see representations document Wrington is recognised as a local centre with DP26 stating “it is important to maintain the viability and vitality of these local centres for the communities they serve”. Despite this, Wrington is allocated no development, other than an existing extant permission for 37 dwellings located circa 300m outside of the settlement boundary to the northeast, which directly contradicts the stated intention of SP3. Other comparable, or less sustainable settlements such as Churchill have a higher level of growth allocated to them (290 dwellings in the case of Churchill)	Please see representations document		829 A5 OA 111225 Representations to Reg 19 Local Plan.pdf North Somerset Local Plan Pre-submission Plan - Representation form Part B.pdf
Policy DP53: Best and most versatile land	No	• Justified • Effective • Consistent with national policy	Unsure		Please see representations document Policy DP53 seeks to safeguard Grades 1, 2 and 3a agricultural land and introduces a strict set of criteria which significantly restrict the potential for development on BMV land. While the protection of BMV land is supported in principle, the approach taken in DP53 goes beyond national policy and risks unnecessarily constraining otherwise sustainable development opportunities. The NPPF requires decision makers to consider the economic and other benefits of BMV land, but also explicitly states at footnote 65 that where significant development of agricultural land is necessary, areas of poorer quality land should be preferred. The NPPF does not impose an absolute bar on development of BMV land, nor require the stringent protection mechanisms set out in DP53. The inflexibility of DP53 is problematic in a district such as North Somerset where the spatial strategy already severely constrains opportunities for growth. Many sustainable rural settlements, including Wrington, are surrounded by a mix of Grades 2, 3a and 3b land. If DP53 is applied rigidly, it will effectively rule out proposals on even small pockets of BMV land, regardless of whether the majority of a site is lower grade, or whether the scheme delivers significant sustainability benefits such as affordable housing, accessible village growth or early delivery of new homes. This contradicts the more balanced approach envisaged by the Framework, which clearly anticipates that some BMV land may be required where necessary to deliver sustainable development. DP53 also fails to acknowledge the practical reality that ALC mapping at a site level often reveals a mosaic of grades, with small and irregular pockets of Grade 3a occurring within wider areas of Grade 3b or lower. The approach taken in DP53 would treat such sites as if they were entirely BMV, meaning that minor inclusions of 3a land could preclude development entirely or severely constrain	Please see representations document DP53 should be amended to provide greater flexibility, consistent with the NPPF. The policy should distinguish between significant areas of BMV land and small inclusions, and should recognise that sustainable development proposals may justify the loss of limited areas of 3a land where wider benefits clearly outweigh the harm, as set out in footnote 58 of the Framework. Without such modifications, DP53 is not justified, not effective, and not consistent with national policy		829 A5 OA 111225 Representations to Reg 19 Local Plan.pdf North Somerset Local Plan Pre-submission Plan - Representation form Part B.pdf

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					masterplanning. This is directly at odds with national policy and risks undermining good place-making by forcing layouts to “work around” small fragments of higher-grade soil, regardless of whether these areas are functionally or visually significant. For Wrington, this is particularly relevant. The settlement has not been identified for any planned growth despite being a sustainable Service Village, and the Local Plan relies on windfall to meet local needs. Yet DP53 would make windfall or edge-of settlement opportunities more difficult to deliver if any part of a site contains small pockets of 3a land. This further reduces the already limited scope for new homes in Wrington and directly undermines the deliverability of the spatial strategy and the flexibility required by SP8. DP53 should therefore be amended to provide greater flexibility, consistent with the NPPF. The policy should distinguish between significant areas of BMV land and small inclusions, and should recognise that sustainable development proposals may justify the loss of limited areas of 3a land where wider benefits clearly outweigh the harm, as set out in footnote 58 of the Framework. Without such modifications, DP53 is not justified, not effective, and not consistent with national policy			

Name: Woodstock Homes Ltd (multiple sites) **I.D:** 51446561

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SP3: Spatial strategy	No	• Effective • Consistent with national policy	Unsure	Unsure	StokesMorgan are North Somerset based planning consultants acting for numerous SME’s and landowners in North Somerset including Woodstock Homes who have sites in Yatton, Banwell Sandford (HE201022) and Wrington (HE20198). This representation objects to the Spatial Strategy set out in Strategic Policy SP3 of the North Somerset Local Plan 2041, specifically the proposed allocation of the Woodspring (southwest of Bristol) site for 3,500 dwellings and the failure to allocate sufficient land elsewhere to ensure a sustainable and complaint approach to development delivery. Once more, the Council is concentrating all its resources into just a select few options which creates massive risk give infrastructure requirements and limits delivery to just a few select national housebuilders. It is submitted that the Sandford HE201022 and Wrington HE20198 should be included within the allocation, while the Woodspring (south west of Bristol) allocation for 3,500 houses should be excluded due to its failure to meet “grey belt” criteria and its substantial harm to Green Belt purposes, particularly urban sprawl and Purpose A. As evidenced in the 2025 Stage 2 Green Belt Assessment. Woodspring is deemed to only have a moderate impact to Green Belt Purpose A. This cannot possibly be an accurate assessment but one we suspect has been retrofitted by the LPA to ensure the longstanding site allocation meets the grey belt tests in the NPPG. This prevents other more sustainable options from being delivered. SP3 observes that rural development is often less sustainable because of greater reliance on cars, so any new growth should address local needs. Yet, the current strategy—with its strict allocations and boundaries—does not effectively support sustainable rural communities like Dundry, Wrington, Clapton in Gordano, Failand,	Modification The modification required to address the objection centres on revising the North Somerset Local Plan 2041 so that it does not focus the majority of housing growth on a limited number of large strategic sites, particularly Woodspring (southwest of Bristol). Instead, the plan should allocate land at more sustainable locations such as Sandford (HE201022) and Wrington (HE20198), which better meet local needs and respect Green Belt criteria. Furthermore, the settlement hierarchy and restrictive boundaries must be relaxed to enable proportional growth in villages that already demonstrate sustainability, allowing for expansion through infilling and rounding off at their edges. This approach would promote a more balanced and resilient delivery of development, support the vitality of rural communities, and reduce reliance on national housebuilders. In summary, the plan should be modified to: (1) exclude Woodspring from the primary allocation due to its adverse impact on Green Belt purposes; (2) include Sandford and Wrington sites within the allocation; and (3) allow sustainable villages to grow through appropriate allocations and more flexible boundaries. This would ensure that development is distributed more fairly and sustainably across North Somerset, reflecting both local needs and strategic priorities.		

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					Winford, Barrow Gurney, and Felton. Such rigidity limits the organic growth necessary for the health of villages, community organizations, sports clubs, and local builders. Many of these villages already benefit from schools and bus services, which could be further supported and expanded. They also make use of delivery options, remote work, school transportation, and the community West Link bus service. These settlements should therefore be given proportional opportunities for growth, either through appropriate allocation or by allowing expansion via infilling and rounding off at their edges. The settlement hierarchy and restrictive boundaries effectively preclude development in most villages, leading to an overreliance on large strategic sites and undermining the plan's stated objectives of sustainable, accessible growth.			
SP6: Villages and rural areas	No	• Effective • Consistent with national policy	No	No	Objection to SP6: Villages and rural areas New development within the settlement boundaries of villages as defined on the Policies Map and listed in Schedule 5 will be supported where defined criteria are met. In response, the current strategy—with its strict allocations and boundaries—does not effectively support sustainable rural communities like Dundry, Wrington, Clapton in Gordano, Failand, Winford, Barrow Gurney, and Felton. Such rigidity limits the organic growth necessary for the health of villages, community organizations, sports clubs, and local builders. Many of these villages already benefit from schools and bus services, which could be further supported and expanded. They also make use of delivery options, remote work, school transportation, and the community West Link bus service. These settlements should therefore be given proportional opportunities for growth, either through appropriate allocation or by allowing expansion via infilling and rounding off at their edges. The settlement hierarchy and restrictive boundaries largely prevent development in most villages, resulting in an overdependence on large strategic sites and undermining the plan's aim for sustainable and accessible growth. The Plan contradicts itself by broadly prohibiting growth in Villages under LP7 and SP6, even where villages meet sustainability criteria. Completely excluding growth opportunities in and around villages is inconsistent with the Council's own Strategic Priorities. This approach moves away from CS32, which permitted some flexibility where development within or adjacent to settlement boundaries will be supported if it improves overall sustainability and respects local character. Again, the fundamental flaw is reliance on few strategic sites in the control of national housebuilders or promoters.	Modification The change that should be made, as argued in the provided context, is to revise the North Somerset Local Plan 2041 so that it does not concentrate nearly all housing growth into a small number of large strategic sites, particularly Woodspring (southwest of Bristol). Instead, the plan should allocate sites such as Sandford (HE201022) and Wrington (HE20198), which are considered more sustainable and better aligned with local needs and Green Belt criteria. Additionally, the settlement hierarchy and restrictive village boundaries should be relaxed to allow for proportional growth in villages that already demonstrate sustainability, either through new allocations or by permitting infilling and rounding off at their edges. This approach would diversify development delivery, support the vitality of rural communities, and reduce dependence on major national housebuilders.		
SP7: Green Belt	No	• Effective • Consistent with national policy	No	Unsure	Objection to SP7: Green Belt We are planning consultants for numerous SME's and landowners in North Somerset including Woodstock Homes who have sites in Yatton, Sandford (HE201022) Banwell (HE2098) and Wrington (HE20198). These comments are submitted on behalf of Woodstock Homes and StokesMorgan. This representation objects to the SP7 of the North Somerset Local Plan 2041, specifically the proposed allocation of the Woodspring (southwest of Bristol) site for 3,500 dwellings and the failure to	Modification The modification that should be made is to adjust the North Somerset Local Plan 2041 so that housing growth is not almost exclusively concentrated within a few large strategic sites, such as Woodspring (southwest of Bristol). Instead, the plan ought to allocate additional, more sustainable sites like Sandford (HE201022) and Wrington (HE20198), which are better aligned with local needs and Green Belt policies. Furthermore, the settlement hierarchy and restrictive village boundaries should		

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					allocate sufficient land elsewhere to ensure a sustainable and complaint approach to development delivery. As we have stated in Reps to SP3, the Council is concentrating all its resources into just a select few options which creates massive risk, relies on difficult infrastructure requirements, and limits delivery to just a few select national housebuilders. It is argued that the Woodspring (southwest of Bristol) allocation for 3,500 houses should be excluded due to its failure to meet “grey belt” criteria and the significant impact it would have on Green Belt objectives, particularly with respect to urban sprawl and Purpose A. According to the 2025 Stage 2 Green Belt Assessment, Woodspring is assessed as having a moderate impact on Green Belt Purpose A (the prevention of urban sprawl). However, this assessment does not appear consistent with the likely effects of the proposal. The development would connect to Colliters Way and the Epic campus, resulting in an expansion of the Bristol conurbation to the southwest and increasing the city's footprint by approximately 1.84 km by 1.27 km. It is therefore suggested that the assessment may have been influenced by efforts to justify the long-standing site allocation under the grey belt criteria outlined in the NPPG. This allocation, or the potentially erroneous classification as grey belt, limits the delivery of other viable sites—such as Woodstock Homes in Sandford (HE201022) Banwell (HE2098) and Wrington (HE20198)—which do meet the required criteria.	be relaxed, enabling proportional growth in already sustainable villages through new allocations or by allowing modest infilling and rounding off at their edges. This would support rural vitality, diversify housing delivery, and reduce overreliance on national housebuilders.		
Policy LP5: Housing, employment and mixed use allocations	No • Effective • Consistent with national policy		No	Unsure	We act for Woodstock Homes who have an option to development land at Land to The North of Greenhill Road Sandford HE201022 (planning application 20/P/1120/OUT) and are preparing to apply for 37 dwellings. Our clients strongly object to North Somerset Council’s proposal to designate the land to the north of Greenhill Road, Sandford, as a strategic green gap. It is important to note that this site has already been assessed positively within the Broad Locations and sifting assessments of the North Somerset Housing Land Availability Assessment 2025. The land in question s both suitable and available for development and could deliver 37 much-needed new homes, helping to meet local housing demand without compromising the essential separation between Sandford and Churchill. The National Planning Policy Framework (NPPF) does not specifically promote the designation of strategic green gaps between villages as a formal policy tool. Instead, it focuses on broader objectives such as directing new housing development towards established settlement boundaries and safeguarding the countryside from inappropriate development. Furthermore, there are well established planning policies that seek to protect important landscape features and to ensure that design and layouts are appropriate to their context. The policy explains that strategic gaps are needed to keep settlements distinct. Our view is that these policies largely duplicate existing countryside and development control policies, which already address coalescence, landscape protection, and inappropriate development. As such, adding a strategic gap policy offers little extra protection or clarity and instead adds unnecessary complexity. In particular, the proposed strategic gap at Sandford in North Somerset	As per attached document.	Modification Remove policy LP10	

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					lacks clear justification, as there is no substantial evidence showing current policies are insufficient, nor robust criteria supporting its necessity. Local allocations include Mendip Hills National Landscape and Churchill Conservation Area. These are suitable landscape constraints in close proximity to the proposed area for the green gap. In addition, there are policies such as Policy DP36: Biodiversity net gain, Policy DP37: Trees, woodlands and hedges, Policy DP38: Landscape, Policy DP39: Mendip Hills National Landscape, Policy DP40: Built heritage which will offer similar protection. LP10 explains that Strategic gaps have a broad similarity to some of the purposes of Green Belts to prevent merging of settlements. This is incorrect and out-of-date. The NPPF 2024 introduced grey belt criteria which effectively allows pragmatic development on the edges of villages where the golden rules are met. The strategic gap has no such criteria. Furthermore, we note that NS Council has discontinued the presumption in favour of applications for housing on land adjacent to villages, which was previously permitted under adopted LP policy CS32 allowing up to 25 houses adjoining service villages. Therefore, we are of the view that the proposed Strategic Gap policy is superfluous or redundant given the use of other planning policy tools that allow an assessment of individual site circumstances. The use of multiple criteria, such as the 12 listed in the Strategic gaps background paper (Nov 2023) to assess a green gap , reflect general characteristics that apply to much rural land adjacent to villages. As a result, policy emphasis should remain on the settlement boundary approach and evidence-based landscape protection, rather than the creation of strategic green gaps as an additional mechanism. Our view is that the designation as a green gap is therefore unnecessary and unjustified when balanced against the identified housing need and robust site and policy assessment evidence.			
Policy LP5: Housing, employment and mixed use allocations					Promotion of additional residential sites as referred to in comments on other policies: Land north of Greenhill Road, Sandford (HE201022) South of Knightcott Road Banwell (HE2098) and West of Butts Batch Wrington (HE20198)			
Policy LP7: Settlement boundaries	No	• Effective • Consistent with national policy	No	No	Objection to Policy LP7 – Settlement Boundaries We object to Policy LP7 because it imposes overly restrictive settlement boundaries that effectively exclude any growth in villages outside these tightly drawn limits. This approach prevents organic growth, which is essential for maintaining the vitality and sustainability of rural communities. Villages need the flexibility to accommodate modest development that supports local services, housing needs, and community resilience. Small-scale growth is particularly important for SME builders and for young and older people who wish to remain in their villages, maintaining family and community ties. By enforcing rigid boundaries, LP7 risks stagnation, undermines local character, and fails to reflect the principles of sustainable development outlined in national planning policy.	Modification We request that the Local Plan revises LP7 to allow for proportionate, well-designed growth in villages beyond the current settlement boundaries, ensuring rural areas can thrive and adapt to future needs.		

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					Furthermore, the policy takes a blinkered approach to accessibility in an age where modern solutions—such as home deliveries, high-speed internet, and electric vehicles powered by photovoltaic (PV) systems—are transforming rural living. These innovations reduce reliance on traditional transport and make rural development more sustainable than ever before.			
Policy LP7: Settlement boundaries	No	• Effective • Consistent with national policy	No	Unsure	Objection to Policy LP7 – Settlement Boundaries We object to Policy LP7 because it imposes overly restrictive settlement boundaries that effectively exclude any growth in villages outside these tightly drawn limits. This approach prevents organic growth, which is essential for maintaining the vitality and sustainability of rural communities. Villages need the flexibility to accommodate modest development that supports local services, housing needs, and community resilience. Small-scale growth is particularly important for SME builders and for young and older people who wish to remain in their villages, maintaining family and community ties. By enforcing rigid boundaries, LP7 risks stagnation, undermines local character, and fails to reflect the principles of sustainable development outlined in national planning policy. Furthermore, the policy takes a blinkered approach to accessibility in an age where modern solutions—such as home deliveries, high-speed internet, and electric vehicles powered by photovoltaic (PV) systems—are transforming rural living. These innovations reduce reliance on traditional transport and make rural development more sustainable than ever before.	Modification We request that the Local Plan revises LP7 to allow for proportionate, well-designed growth in villages beyond the current settlement boundaries, ensuring rural areas can thrive and adapt to future needs.		
Policy LP10: Strategic gaps	No	• Effective • Consistent with national policy	No	Unsure	We act for Woodstock Homes who have an option to development land at Land to The North of Greenhill Road Sandford HE201022 (planning application 20/P/1120/OUT) and are preparing to apply for 37 dwellings. Our clients strongly object to North Somerset Council's proposal to designate the land to the north of Greenhill Road, Sandford, as a strategic green gap. It is important to note that this site has already been assessed positively within the Broad Locations and sifting assessments of the North Somerset Housing Land Availability Assessment 2025. The land in question s both suitable and available for development and could deliver 37 much-needed new homes, helping to meet local housing demand without compromising the essential separation between Sandford and Churchill. The National Planning Policy Framework (NPPF) does not specifically promote the designation of strategic green gaps between villages as a formal policy tool. Instead, it focuses on broader objectives such as directing new housing development towards established settlement boundaries and safeguarding the countryside from inappropriate development. Furthermore, there are well established planning policies that seek to protect important landscape features and to ensure that design and layouts are appropriate to their context. The policy explains that strategic gaps are needed to keep settlements distinct. Our view is that these policies largely duplicate existing countryside and development control policies, which already	Modification Remove policy LP10 (see attachment)	Modification Remove policy LP10	Policy LP10.pdf

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					address coalescence, landscape protection, and inappropriate development. As such, adding a strategic gap policy offers little extra protection or clarity and instead adds unnecessary complexity. In particular, the proposed strategic gap at Sandford in North Somerset lacks clear justification, as there is no substantial evidence showing current policies are insufficient, nor robust criteria supporting its necessity. Local allocations include Mendip Hills National Landscape and Churchill Conservation Area. These are suitable landscape constraints in close proximity to the proposed area for the green gap. In addition, there are policies such as Policy DP36: Biodiversity net gain, Policy DP37: Trees, woodlands and hedges, Policy DP38: Landscape, Policy DP39: Mendip Hills National Landscape, Policy DP40: Built heritage which will offer similar protection. LP10 explains that Strategic gaps have a broad similarity to some of the purposes of Green Belts to prevent merging of settlements. This is incorrect and out-of-date. The NPPF 2024 introduced grey belt criteria which effectively allows pragmatic development on the edges of villages where the golden rules are met. The strategic gap has no such criteria. Furthermore, we note that NS Council has discontinued the presumption in favour of applications for housing on land adjacent to villages, which was previously permitted under adopted LP policy CS32 allowing up to 25 houses adjoining service villages. Therefore, we are of the view that the proposed Strategic Gap policy is superfluous or redundant given the use of other planning policy tools that allow an assessment of individual site circumstances. The use of multiple criteria, such as the 12 listed in the Strategic gaps background paper (Nov 2023) to assess a green gap , reflect general characteristics that apply to much rural land adjacent to villages. As a result, policy emphasis should remain on the settlement boundary approach and evidence-based landscape protection, rather than the creation of strategic green gaps as an additional mechanism. Our view is that the designation as a green gap is therefore unnecessary and unjustified when balanced against the identified housing need and robust site and policy assessment evidence.			
Oxford Plasma, Yatton	Unsure		Unsure	Unsure	Support for Allocation – Oxford Plasma Technology, North End Road, Yatton We act for Woodstock Homes who strongly support the allocation of the Oxford Plasma Technology site for residential development in the Local Plan. This site represents a sustainable and strategic opportunity for housing delivery in Yatton for several reasons: • Previously Developed Land: The site is a brownfield location formerly occupied by Oxford Instruments, within Yatton's settlement boundary and close to local amenities and public transport links, including the railway station and bus routes. Redevelopment aligns with NPPF objectives to make effective use of previously developed land. • Established Planning History: Outline permission for up to 55 dwellings was granted in 2006 and extended in 2011. The site was allocated in the Replacement Local Plan (Site H86) and carried forward in subsequent policy documents, confirming its suitability for housing.	The allocation should be confirmed and carried forward into the plan to ensure delivery of much-needed affordable housing and sustainable growth in Yatton.		

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					• Affordable Housing Delivery: The proposed scheme will deliver 58 dwellings, now confirmed as 100% affordable housing through partnership with Alliance Homes, responding to acute local need and supported by grant funding. This exceeds policy requirements and contributes significantly to meeting housing targets in North Somerset. • Economic and Social Benefits: Redevelopment will regenerate a redundant industrial site, support local construction jobs, and provide high-quality, energy-efficient homes. It enables families to remain in the community and promotes social sustainability. • Design and Infrastructure: The scheme will incorporate landscaping, biodiversity enhancements, and public open space, complementing Yatton's character while addressing modern housing needs. Recommendation:			

Name: Wraxall and Failand Parish Council **I.D:** 7800929

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SP3: Spatial strategy	No	• Justified • Effective	Unsure	Yes	The principles are supported. However, the justification is not, particularly with regard to Nailsea and Backwell being designated as a Strategic Location. The lack of local employment opportunities results in residents commuting, which stretches the rural road network to capacity in places and cannot properly serve Nailsea.	The preferred option is to remove Nailsea and Backwell as a strategic location and to reallocate the housing development to one that better fits the sustainability development objectives.		Wraxall & Failand Parish Council Position Paper - North Somerset Local Plan 2041 - 11 Dec 2025.pdf
SP7: Green Belt	No	• Justified • Effective	Unsure	Yes	NSC mapping shows a parcel of land to the north of Nailsea removed from the Green Belt for housing development. It is denoted as Nailsea – Parcel 1: Land North of Nailsea' in the Stage 2 Green Belt Assessment page 60 and re-classified as Grey Belt. The Green Belt Assessment also re-classifies 'Nailsea – Parcel 2: Land North East of Nailsea' as Grey Belt. It would have a direct impact on the openness of the valley of the Land Yeo and would create urbanisation from Nailsea into rural Wraxall land. Currently, there is a strong sense of separation, as for Parcel 1 the existing housing is only partially visible from the B3130 travelling south over a short distance and for Parcel 2 when travelling west over a short distance. Both parcels of land are in an area defined by North Somerset Landscape Sensitivity Assessment dated March 2018 as of 'High' sensitivity. They are also identified as 'Focus areas for nature recovery' in the Open Data Portal for the West of England Mayoral Combined Authority. Considering the guidance for the potential impact of development on the openness of the Green Belt (at Paragraph: 013 Reference ID: 64-013-20250225 Green Belt - GOV.UK), it is likely that the openness will be undermined and traffic by those commuting will increase through the parish of Wraxall & Failand. Further information is provided in the W&F PC Position paper.	To re-consider the classification of these parcels of land with respect to the openness of the Green Belt		Wraxall & Failand Parish Council Position Paper - North Somerset Local Plan 2041 - 11 Dec 2025.pdf
SP9: Employment	No	• Justified • Effective	Unsure	Yes	Nailsea & Backwell land allocation is 6.1 ha. Schedule 2 states that provision is made in LP3 and site boundaries will be identified through master planning and planning applications. LP3 states that land is to be identified as part of planned growth to the east of Backwell and north of Nailsea. The North Somerset Employment Land Evidence Report dated 27 June 2025 section 3.6 and Table 3 (pages 15 and 16) propose a potential location to the north east of Nailsea, near the Baker Hughes site of c. 5 to 7.5 ha for light industrial use. This parcel of land, currently in the Green Belt, is shown as Grade 3 on the Agricultural Land Classification (ALC) Map South West Region (ALC006). The Employment Land Evidence Report fails to consider the flood zone, and historic monuments) and the high-risk coalmining areas. The NSC Policies map does not show parcel 2 used being removed from	To provide clarity where additional employment land is to be sited in a location that is not in the Green Belt and is complaint with Policy DP53: Best and most versatile land.		Wraxall & Failand Parish Council Position Paper - North Somerset Local Plan 2041 - 11 Dec

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					the Green Belt and proposed for Employment land. The topography (on the side of hill also limits the extent of the site for development. It is submitted that this parcel of land is unsuitable for employment land for all the reasons stated in W&F PC Position paper.			2025.pdf
SP10: Transport	No	• Justified • Effective	Unsure	Yes	The principles of SP10 are supported but there is no provision for supporting the proposed development around the strategic location of Nailsea and Backwell. The aim of improving public transport is laudable. However, it is not an attractive option for those residents commuting from Nailsea and Backwell in terms of journey time or frequency. Existing bus services are subsidised but in the current financial climate an improvement is not likely to be considered commercially viable. It would be difficult for any development proposals to predict in a Travel Plan where their residents will be commuting, given the lack of employment opportunities in Nailsea & Backwell. Further information is in the W&F PC Position paper			Wraxall & Failand Parish Council Position Paper - North Somerset Local Plan 2041 - 11 Dec 2025.pdf
Policy LP3: Strategic location: Nailsea and Backwell	No	• Justified • Effective	Unsure	Yes	There are few employment opportunities around Nailsea and Backwell. From the 2011 census 43% of those travelling to work commute out of this location (fig 2.3 Nailsea and Backwell Transport Strategy) of these 74% drive a car or van (fig 2.2). Further development in Nailsea is likely to result in increased commuting to Bristol with a significant impact on our parish. It is recognised in the Transport Strategy documentation that public transport and active travel from Nailsea present a significant challenge to be suitable alternatives. The East of Backwell Cross Rail Link with an estimated cost of £30m is seen as the only viable option. However, in the justification for DP14, developers are to expected to make a contribution to highway infrastructure; it is considered that this is unlikely to be sufficient for the strategic rail crossing to proceed and without a contribution from central government. In the current financial climate, this is considered to be unlikely. It is submitted that Policy LP3 and its justification are not sound, as the employment and travel constraints do not make Nailsea a sustainable location. See attached W&F PC Position paper.	The preferred option is to remove Nailsea and Backwell as a strategic location and to reallocate the housing development to one that better fits the sustainability development objectives. If this is not accepted, then although it is stated that housing proposals will be required to positively contribute to the delivery of infrastructure, it is requested that the rate of development should depend on improvements to infrastructure being completed, particularly the strategic rail crossing.		Wraxall & Failand Parish Council Position Paper - North Somerset Local Plan 2041 - 11 Dec 2025.pdf
Policy DP14: Highway safety, traffic and provision of infrastructure associated with development	No		Unsure	Yes	The policy is unclear whether the infrastructure is off-site. The justification implies that it is and that developers are to expected to make a contribution to highway infrastructure. For Nailsea & Backwell it is considered that this is unlikely to be sufficient for the strategic rail crossing to proceed and without a contribution from central government. In the current financial climate, government funding is considered to be unlikely. Further information is in the W&F PC Position paper.			Wraxall & Failand Parish Council Position Paper - North Somerset Local Plan 2041 - 11 Dec 2025.pdf
Policy DP53: Best and most versatile land	No	• Effective	Unsure	Yes	The NSC mapping does not reflect the detailed analysis (at para 6.2 and Drawing 1 in Agricultural Land Classification on Land north of Nailsea by Soil Environment Services Ltd dated October 2023 for PA 24/P/1586/OU2) which shows that 33% of the land is either Grade 2 or Grade 3a which falls into the Best and Most Versatile (BMV) category agricultural land, which should be protected under this policy. Further information is provided at the W&F PC Position paper.			Wraxall & Failand Parish Council Position Paper - North Somerset Local Plan 2041 - 11 Dec 2025.pdf

Name: Wrington Parish Council **I.D:** 1019201

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Sustainable development objectives							Sustainable Development Objectives The purpose of the planning system is to contribute to the achievement of sustainable development. This is delivered through the preparation and implementation of plans which seek to balance economic, social and environmental objectives. The Local Plan sets out what sustainable development means for North Somerset. A Sustainability Appraisal (SA) prepared in parallel with the plan making process provides a mechanism through which sustainability effects can be described, analysed and compared. The process of undertaking a SA involves the identification of sustainability objectives which are used to measure and monitor the success of the plan. We recognise Sustainable Appraisal objectives used to assess the local plan are: • Ensure a range of job opportunities are easily accessible without having to use a car. • Provide opportunities to improve economic wellbeing and reduce inequalities by providing good access to education and training opportunities. • Promote the optimal use of land which supports regeneration, maximise re-use of previously developed (brownfield) land and protects the rural economy. • Promote development which requires a deliverable level of high quality and sustainable infrastructure. •Boost delivery and meet the housing need identified within the plan period. • Deliver affordable or specialist housing where it is most needed to meet the needs of North Somerset's population. • Achieve reasonable access to a wide range of community, educational, town centre and healthcare facilities. • Enhancing community cohesion and community facilities provision including cultural facilities. • Achieve healthy living opportunities, promoting good access to healthcare centres, open spaces, public rights of way, walking and cycling opportunities, and outdoor leisure activities. • Reduce carbon emissions by supporting appropriate decentralised renewable energy generation. • Minimise vulnerability to all forms of flooding, now or in the future, without increasing flood risk elsewhere. Also minimise harm to water quality and availability. • Reduce the need to travel by car to minimise environmental impacts of unsustainable forms of travel, including transport related carbon emissions and air pollution. • Ensure good access to infrastructure that promotes travel by active modes (walking and cycling). Minimise impact on, and where appropriate enhance, sensitive landscapes. • To conserve and enhance historic assets, heritage assets and their settings. • Protect and where possible enhance biodiversity, geodiversity and green infrastructure and allow its adaptation to climate change, particularly with respect to protected habitats and species. In particular we are supportive of the following: • To promote sustainable development and address the climate		

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							emergency. • To deliver the zero carbon ambition by maximising the opportunities for low carbon development and the use of renewable energy. • To develop new and existing communities in a way which enhances health and wellbeing, reduces inequalities and is child and family friendly. • To increase the number and range of job opportunities across the district, particularly at the towns to give people the opportunity to work near to where they live. • To prioritise the location of new development close to places with a wide range of services, facilities and job opportunities. • To address the decline in the town centres of Weston-super-Mare, Clevedon, Nailsea and Portishead through supporting regeneration and place-making initiatives which revitalise these places as the focus for retailing, community uses, housing and jobs • To reduce car use, encourage walking and cycling, and high quality and effective public transport. • To deliver a diverse range of housing in a variety of tenures, sizes and forms, particularly genuine affordable housing, to meet future needs of North Somerset residents at locations where they are most needed. • To deliver essential new strategic transport infrastructure to support new development and enable more sustainable travel options. • To deliver higher residential densities through good design, particularly at town centres, transport hubs and on brownfield sites. • To provide essential infrastructure in step with development, both transport infrastructure and community infrastructure such as schools, healthcare facilities and community centres. • To prioritise the importance and delivery of green spaces when considering new development, support priority habitats and species, and safeguard areas at risk of flooding.	
SP6: Villages and rural areas							We support this Policy and especially note that ‘Rural buildings which have an existing permission to be converted to residential use will not be granted permission to be rebuilt and replaced to create a new build dwelling.’ We feel this will importantly help to retain the character and history of the local area.	
SP7: Green Belt							Despite pressures, North Somerset has generally been efficient at protecting Green Belt for both the local and wider area south of Bristol. This has meant whilst having a fast- expanding airport, key road infrastructure such as the M5 and A38 and an expanding City of Bristol it has provided a landscape and protected nature that both residents and visitors enjoy and who gain health benefits. The additional North Somerset housing numbers and proposals to expand further Bristol Airport require the best possible strategic solutions. We are pleased to see new areas of Green Belt proposed. Open green space of all types are vital for the health and wellbeing of the population.	
Policy LP3: Strategic location: Nailsea and Backwell					We note that this location contains loss of North Somerset’s most best and versatile land. We question whether increased numbers closer to the south Bristol boundary would produce a better outcome in terms of protecting quality land and achieving a more sustainable location.			

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Policy LP7: Settlement boundaries					We support the principle of Settlement Boundaries providing guidance and certainty for Parishes and residents for the life of the Local Plan. We have concerns in connection with Paragraph 2 of the policy 'The extension of residential curtilages, including the extension into the countryside of the curtilage of a dwelling located within a settlement boundary, will be permitted provided that it would not harm the character of the surrounding area of the living conditions of adjoining occupiers'. We fear this could lead to abuse of the settlement boundary and the certainty that Settlement Boundaries provide. There is currently provision for land outside policy in use for 10 years without complaint from the wider community to be approved. We find it unnecessary for this addition to the Policy for Settlement Boundaries.			
Policy LP12: Bristol Airport					With Bristol Airport within our Parish we naturally have enormous concerns for the impact it has on the immediate vicinity and on the wider North Somerset community. We appreciate national policy dictates support of expanding airports but would want to see greater recognition of the impact this brings not just within the airport boundary but much wider. Most people would recognise that the location of this airport is not suitable alongside the environment and infrastructure constraints. Much more effort is required for proper investment and the will to encourage airport passengers who travel to the airport particularly from outside our local area to be provided with solutions other than the car. Increases in passenger numbers bring increasing pressures on our roads and local environment. North Somerset residents should not bear the burden of this damage.			
Policy LP13: Air safety						We are appreciative of the necessity of this Policy and are therefore supportive but it illustrates once again the impact having Bristol Airport in this location brings with it.		
Policy DP12: Development in the Green Belt							We strongly support the emphasis in this Policy to protect the Green Belt whilst giving clear guidance on what is acceptable.	
Policy DP20: Airport related car parking					We understand the importance of having this Policy but are disappointed that it appears to anticipate the potential need for offsite airport parking that is not just related to accommodation. The emphasis requires to be on a proper public transport system reducing the need for offsite airport parking. Without this, we will continue to damage our environment and the quality of life for local residents and wider community.			
Policy DP34:							We support this policy as an important contribution to the health	

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Green infrastructure							of the population.	
Policy DP35: Nature conservation							We are appreciative of the efforts of a wider range of contributors to Nature Conservation in and around North Somerset and recognition this Policy gives to its importance.	
Policy DP49: Healthy Places							We support this Policy which we feel is essential in the long-term health and wellbeing of the population.	
Policy DP53: Best and most versatile land							Countryside Policies – We are broadly supportive of the Polices within this Section. Policy 53 – Best and most versatile land We very much support the protection contained in this Policy. The loss of our best and most versatile land is unacceptable. We are a small country with a rising population in an unsettled world. We must retain our quality land for food production in order to be properly sustainable and less reliant on external sources. Food has been identified as one of the 13 critical national infrastructures (see https://www.npsa.gov.uk/about-npsa/critical-national-infrastructure).	

Name: Y Carolan **I.D:** 62773473

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Policy LP3: Strategic location: Nailsea and Backwell	No	• Justified	Unsure	Unsure	Village status as a thriving community will be changed. Green spaces supporting wildlife, Backwell communities wellbeing to balance life and work will be compromised. An already thriving community that is currently forced to endure long waits to join traffic flow on A370 to reach schools, colleges and work. Adding more to the local population will only compound this.			

Name: YACWAG **I.D:** 39307969

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Vision, Strategic Priorities and Sustainability Objectives		• Positively prepared			The statement should be amended to include " responsible attitude to nature recovery"			
Strategic Priorities	No	• Positively prepared	Unsure	Unsure		Amend first sentence to state " nature and climate emergencies" They are related issues but the need for nature recovery is as important and also importantly something that we do have a lot		

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						more control of through appropriate land use.		
SP2: Climate Change	Unsure	• Positively prepared	Unsure	Unsure		Re DP35 Best and most versatile land Grade 1 and 2 BMV land. Support this proposal but only if no risk of an in combination impact on landscape and nature recovery. It should not be used for development especially for solar panels.		
Policy LP9: Extent of the Green Belt	No		No	No	The housing development proposals in relation to Tower Farm and Black Rock, through removing Green Belt protection strikes at the heart of North Somerset's Nature recovery strategy and nature conservation policies.They are not consistent with the council's own policies in respect of the nature and climate emergencies in terms of their impact on nationally protected sites. National sites should be accorded significant buffer zones. We have seen elsewhere in North Somerset where development has been allowed on the edge of SSSIs. In Yatton at Rectory Farm for example a development is currently underway within a a few metres of a SSSI and Local Nature Reserve. The draft plan proposal is totally contrary to any semblance of a nature recovery strategy in North Somerset.			
Policy LP10: Strategic gaps	Unsure		Unsure	Unsure	Agree that the strategic gap between Yatton and Congresbury should be maintained. However the in combination impact of development in this area is not solely a landscape issue it is also an ecologically sensitive area. Development in this area would have a negative impact and harm the North Somerset and Mendip Bats SAC which is of local, regional, national and European importance through the disturbance of bat foraging and commuting. It forms an important corridor for nature.	See comment above include reference to protect area for protection of rare species Greater and lesser Horseshoe bats as well as maintaining landscape free of development.		
Policy LP23: Monaghan Mushrooms, Stock Lane Langford Broad Location	Unsure	• Positively prepared	Unsure	Unsure		Expansion of development in this area would have an impact on a significant are of woodland. This would be detrimental to the North Somerset and Mendip Bats SAC and would result in an in combination negative impact taken with other approved development on the site and nearby.		

Name: Yatton Parish Council **I.D:** 3106433

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
SP2: Climate Change						1. We are pleased to see that Yatton Station is intended to become a transport hub. Part of this should be the establishment of good public transport links with a frequent bus service (i.e. at least 2 buses per hour) serving Clevedon, Weston-super-Mare and Bristol. The provision of free parking at the station would make a significant positive difference to its usefulness as a hub and also to the lives of Yatton residents living near the station. 2. Yatton Parish Council agrees that land south of Nailsea and west of Backwell should be designated as Green Belt. 3. The existing Strategic Gap between Yatton and Congresbury should be retained and a new Strategic Gap, between Yatton and Kenn, should be designated. 4. Land off The Batch should be used to expand the doctor's surgery, not for a		

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						primary school. Policy SP2: Climate Change Yatton Parish Council recommends a number of green measures when they respond to planning applications. It would be good to see a similar code embedded in North Somerset Council's planning process, but in the form of conditions that must be met.		
SP7: Green Belt						1. We are pleased to see that Yatton Station is intended to become a transport hub. Part of this should be the establishment of good public transport links with a frequent bus service (i.e. at least 2 buses per hour) serving Clevedon, Weston-super-Mare and Bristol. The provision of free parking at the station would make a significant positive difference to its usefulness as a hub and also to the lives of Yatton residents living near the station. 2. Yatton Parish Council agrees that land south of Nailsea and west of Backwell should be designated as Green Belt. 3. The existing Strategic Gap between Yatton and Congresbury should be retained and a new Strategic Gap, between Yatton and Kenn, should be designated. 4. Land off The Batch should be used to expand the doctor's surgery, not for a primary school. Policy SP7: Green Belt Yatton Parish Council is in favour of taking a fresh look at areas designated as Green Belt with a view to targeting development to areas where it is needed rather than just fitting it in where existing constraints are minimal: the latter approach has served Yatton, particularly, very badly in the past and the village has been disfigured by a number of large, dense, identikit housing developments. The land north of Colliter's Way is well-connected, close to a good range of facilities, and a better location for new development than infill in already crowded villages		
SP10: Transport						1. We are pleased to see that Yatton Station is intended to become a transport hub. Part of this should be the establishment of good public transport links with a frequent bus service (i.e. at least 2 buses per hour) serving Clevedon, Weston-super-Mare and Bristol. The provision of free parking at the station would make a significant positive difference to its usefulness as a hub and also to the lives of Yatton residents living near the station. 2. Yatton Parish Council agrees that land south of Nailsea and west of Backwell should be designated as Green Belt. 3. The existing Strategic Gap between Yatton and Congresbury should be retained and a new Strategic Gap, between Yatton and Kenn, should be designated. 4. Land off The Batch should be used to expand the doctor's surgery, not for a primary school. Policy SP10: Transport Yatton Station is a valuable local resource but it is badly compromised by a lack of connecting public transport services. This is not what a sustainable transport network looks like. Furthermore, it forces people to drive to the station, increasing congestion on local roads and thus compromising bus services. Yatton Station should be configured as a local transport hub with free parking and good connections to bus, walking and wheeling routes.		
Policy LP9: Extent of						1. We are pleased to see that Yatton Station is intended to become a transport hub. Part of this should be the establishment of good public transport links with a frequent bus service (i.e. at least 2 buses per hour) serving Clevedon,		

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the Green Belt						Weston-super-Mare and Bristol. The provision of free parking at the station would make a significant positive difference to its usefulness as a hub and also to the lives of Yatton residents living near the station. 2. Yatton Parish Council agrees that land south of Nailsea and west of Backwell should be designated as Green Belt. 3. The existing Strategic Gap between Yatton and Congresbury should be retained and a new Strategic Gap, between Yatton and Kenn, should be designated. 4. Land off The Batch should be used to expand the doctor's surgery, not for a primary school. Policy LP6: Extent of the Green Belt Yatton Parish Council agrees that land south of Nailsea and west of Backwell should be designated as Green Belt. Residents of the parish make use of these areas and would prefer to see them protected from development.		
Policy LP10: Strategic gaps					1. We are pleased to see that Yatton Station is intended to become a transport hub. Part of this should be the establishment of good public transport links with a frequent bus service (i.e. at least 2 buses per hour) serving Clevedon, Weston-super-Mare and Bristol. The provision of free parking at the station would make a significant positive difference to its usefulness as a hub and also to the lives of Yatton residents living near the station. 2. Yatton Parish Council agrees that land south of Nailsea and west of Backwell should be designated as Green Belt. 3. The existing Strategic Gap between Yatton and Congresbury should be retained and a new Strategic Gap, between Yatton and Kenn, should be designated. 4. Land off The Batch should be used to expand the doctor's surgery, not for a primary school	1. We are pleased to see that Yatton Station is intended to become a transport hub. Part of this should be the establishment of good public transport links with a frequent bus service (i.e. at least 2 buses per hour) serving Clevedon, Weston-super-Mare and Bristol. The provision of free parking at the station would make a significant positive difference to its usefulness as a hub and also to the lives of Yatton residents living near the station. 2. Yatton Parish Council agrees that land south of Nailsea and west of Backwell should be designated as Green Belt. 3. The existing Strategic Gap between Yatton and Congresbury should be retained and a new Strategic Gap, between Yatton and Kenn, should be designated. 4. Land off The Batch should be used to expand the doctor's surgery, not for a primary school Policy LP7: Strategic Gaps The existing Strategic Gap between Yatton and Congresbury should be retained. A new Strategic Gap, between Yatton and Kenn, should be designated. This would serve to protect land east of the B3133 near North End Yatton from development, as well as the corridor of land either side of the B3133 towards Clevedon. These areas are essential if the rural nature of Yatton, much valued by its residents according to opinion surveying during the Neighbourhood Plan process, is to be retained		

Name: Yulia Zubinska **I.D:** 62790113

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Land at Tower Farm	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	No	No	The allocation of Land at Tower Farm is unsound because it is not justified, not consistent with national policy, not positively prepared and not effective. The site is directly adjacent to Weston Big Wood, an ancient woodland and a nationally important ecological habitat. Development here would cause irreversible ecological damage, including risk to woodland hydrology, wildlife connectivity and the Gordano Valley ecological network. No robust alternatives assessment has been provided, despite the loss of best and most versatile agricultural land (Grade 2/ 3a) and the high sensitivity of this location. The allocation also conflicts with NPPF paragraphs 180–182, which require avoiding harm to irreplaceable habitats such as ancient woodland.			

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					Infrastructure in Portishead is already under significant pressure. Additional development in this location would increase car dependency, worsen congestion on the A369 corridor, and undermine sustainable travel objectives. Delivery of this allocation depends on multiple unresolved infrastructure requirements, including new school provision, transport improvements, ecological buffers and long-term habitat management, none of which are secured. For these reasons, the allocation cannot be considered sound or deliverable. No modification would make this allocation acceptable. Due to its direct adjacency to ancient woodland, the environmental risks are irreversible and cannot be mitigated. The allocation should be removed entirely from Schedule 1 and the land should be retained as open countryside and green space, in line with biodiversity objectives and national policy requirements for protecting irreplaceable habitats. I do not support the North Somerset Local Plan 2041 for the Tower Farm allocation.			

Name: Yvonne Herrington **I.D:** 18467361

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	There is no need for additional 1000 houses. Backwell is not an employment hub In your proposed plan you state that Grade 1 agricultural land should be protected and the proposed land is just that! The government states that we must protect our best and most versatile land Engineering the proposed under over the railway will be very costly and its not clear who will pay for this? Backwell has not been given extra investment in health, school or infrastructure The area is prone to flooding There is no guarantees for new funding of infrastructure or even mention of who is providing this The railway station is not fit for being a transport hub at its present state. The platforms are too short and there is no access for people with mobility issues on one side of the track Backwell has been allocated more than enough houses.			

Name: Zack Taylor **I.D:** 63084993

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Land at Tower Farm					I am writing to object to the proposed allocation of Tower Farm and Black Rock for housing development in the emerging North Somerset Local Plan 2041 (Pre-submission, Regulation 19). These sites lie in the Green Belt on the edges of Portishead and should be removed from the plan for the following reasons: Unsuitable Location and Lack of Sustainable Infrastructure Portishead has experienced significant housing growth in recent decades with limited corresponding improvements to transport and community infrastructure. Road networks — especially Clevedon Road and Bristol Road — already struggle during peak times due to school traffic, commuters to Bristol, and vehicles accessing the M5. Introducing hundreds of additional homes at Tower Farm and Black Rock would exacerbate congestion, increase journey times, and reduce road safety, failing the Local Plan's soundness requirements on transport and accessibility. The promised railway link has repeatedly been delayed or lost funding, so it cannot be relied upon to mitigate such impacts. Green Belt, Environmental and Ecological Harm Both sites were designated as Green Belt in the 1980s to protect landscape openness and natural habitats. National planning policy allows Green Belt removal only where exceptional circumstances are demonstrated — and no such circumstances have been properly justified here.			

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					The planned developments would sever vital parts of the Gordano Valley green corridor and harm Weston Big Wood, a Site of Special Scientific Interest (SSSI) and ancient woodland. Expert evidence and local environmental advocates have highlighted risks to biodiversity, including rare flora and fauna, and the need for buffer zones around protected sites. Recent consultation feedback makes clear that ecological impacts have not been adequately addressed. Affordability and Housing Mix Concerns While there is a clear need for new housing in North Somerset, the current proposals at Tower Farm and Black Rock focus largely on larger dwellings that do not meet the urgent local need for genuinely affordable two- and three-bedroom homes. Building high-value homes on these Green Belt sites will do little to help local people get onto the housing ladder. Instead, the plan should prioritise brownfield sites and mixed-use development, such as around the Old Mill area, where smaller homes could be delivered alongside workspace without destroying valued green space. Health, Well-Being and Loss of Public Access to Green Space Access to open countryside and woodland around Portishead has significant value for residents' physical and mental health. During the Covid-19 pandemic, public policy emphasised the importance of green spaces for well-being — a priority that seems to have been overlooked in these proposals. Threatening access to popular natural spaces like Weston Big Wood undermines resident well-being, especially at a time of ongoing pressure on NHS mental health services. Safety Risks and Emergency Services Additional traffic from new housing would add pressure to already busy local roads. The police headquarters and fire service on Black Rock and Valley Road depend on these routes for rapid response. Increased congestion raises the risk of delays for emergency responders attending urgent calls, particularly during peak travel times. Inadequate Consideration of Alternatives There are alternative brownfield and lower-impact sites within Portishead and North Somerset that have not been fully explored or maximised in the housing strategy. The council has not demonstrated that these alternatives could not meet housing needs without the environmental and infrastructure costs associated with undermining the Green Belt. Conclusion For the above reasons — including unsustainable transport impacts, unacceptable greenbelt and ecological harm, failure to address housing affordability, negative effects on community well-being, and poor consideration of alternatives — I strongly object to the allocation of Tower Farm and Black Rock in the North Somerset Local Plan 2041. I urge the council to remove these sites from the plan and instead focus development on genuinely sustainable locations.			
Black Rock, north of Clevedon Road					I am writing to object to the proposed allocation of Tower Farm and Black Rock for housing development in the emerging North Somerset Local Plan 2041 (Pre-submission, Regulation 19). These sites lie in the Green Belt on the edges of Portishead and should be removed from the plan for the following reasons: Unsuitable Location and Lack of Sustainable Infrastructure Portishead has experienced significant housing growth in recent decades with limited corresponding improvements to transport and community infrastructure. Road networks — especially Clevedon Road and Bristol Road — already struggle during peak times due to school traffic, commuters to Bristol, and vehicles accessing the M5. Introducing hundreds of additional homes at Tower Farm and Black Rock would exacerbate congestion, increase journey times, and reduce road safety, failing the Local Plan's soundness requirements on transport and accessibility. The promised railway link has repeatedly been delayed or lost funding, so it cannot be relied upon to mitigate such impacts. Green Belt, Environmental and Ecological Harm Both sites were designated as Green Belt in the 1980s to protect landscape openness and natural habitats. National planning policy allows Green Belt removal only where exceptional circumstances are demonstrated — and no such circumstances have been properly justified here.			

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					The planned developments would sever vital parts of the Gordano Valley green corridor and harm Weston Big Wood, a Site of Special Scientific Interest (SSSI) and ancient woodland. Expert evidence and local environmental advocates have highlighted risks to biodiversity, including rare flora and fauna, and the need for buffer zones around protected sites. Recent consultation feedback makes clear that ecological impacts have not been adequately addressed. Affordability and Housing Mix Concerns While there is a clear need for new housing in North Somerset, the current proposals at Tower Farm and Black Rock focus largely on larger dwellings that do not meet the urgent local need for genuinely affordable two- and three-bedroom homes. Building high-value homes on these Green Belt sites will do little to help local people get onto the housing ladder. Instead, the plan should prioritise brownfield sites and mixed-use development, such as around the Old Mill area, where smaller homes could be delivered alongside workspace without destroying valued green space. Health, Well-Being and Loss of Public Access to Green Space Access to open countryside and woodland around Portishead has significant value for residents' physical and mental health. During the Covid-19 pandemic, public policy emphasised the importance of green spaces for well-being — a priority that seems to have been overlooked in these proposals. Threatening access to popular natural spaces like Weston Big Wood undermines resident well-being, especially at a time of ongoing pressure on NHS mental health services. Safety Risks and Emergency Services Additional traffic from new housing would add pressure to already busy local roads. The police headquarters and fire service on Black Rock and Valley Road depend on these routes for rapid response. Increased congestion raises the risk of delays for emergency responders attending urgent calls, particularly during peak travel times. Inadequate Consideration of Alternatives There are alternative brownfield and lower-impact sites within Portishead and North Somerset that have not been fully explored or maximised in the housing strategy. The council has not demonstrated that these alternatives could not meet housing needs without the environmental and infrastructure costs associated with undermining the Green Belt. Conclusion For the above reasons — including unsustainable transport impacts, unacceptable greenbelt and ecological harm, failure to address housing affordability, negative effects on community well-being, and poor consideration of alternatives — I strongly object to the allocation of Tower Farm and Black Rock in the North Somerset Local Plan 2041. I urge the council to remove these sites from the plan and instead focus development on genuinely sustainable locations.			

Name: Zara White **I.D:** 62851105

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land north of Churchill Avenue	No	• Justified	No	No	This site should be protected as a local green space. It belongs to the people of clevedon, not the council, and provides an open space for children to play. It is also a vital area for wildlife - I have personally seen an otter in this section of the river, and there are great crested newts which are a protected species. There are other much more suitable sites for development within Clevedon - most obviously the site off Millcross which has been left untouched for sixteen years,	This site should be protected as a local green space. It belongs to the people of clevedon, not the council, and provides an open space for children to play. It is also a vital area for wildlife - I have personally seen an otter in this section of the river, and there are great crested newts which are a protected species. There are other much more suitable sites for development within Clevedon - most obviously the site off Millcross which has been left untouched for sixteen years,	This site should be protected as a local green space. It belongs to the people of clevedon, not the council, and provides an open space for children to play. It is also a vital area for wildlife - I have personally seen an otter in this section of the river, and there are great crested newts which are a protected species. There are other much more suitable sites for development within Clevedon - most obviously the site off Millcross which has been left untouched for sixteen years,	

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					this should be the first area to be built on.	this should be the first area to be built on.	this should be the first area to be built on.	

Name: Zehra Tahtakilic **I.D:** 51427393

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
Land south of Nailsea	No	• Positively prepared • Justified • Effective • Consistent with national policy	No	No	This area is prone to flooding which you acknowledge. I am aware that some homes in Backwell that are close to behind the lake already have issues with flooding. The proposed area is just not fit for building in my opinion. We're talking about adding lots of concrete to a flood zone so that left over areas of earth will reach saturation much quicker. I don't think it would make for sound, flood-proof homes. Also, building there would go a long way towards blurring the border between Nailsea and Backwell.	I don't think this area is safe to build homes due to flood risks. I doubt that can be legally compliant. I have no suggestions to mitigate for this site. I just think it's wrong/unsafe building on a flood zone.		
Land east of Backwell	No	• Positively prepared • Justified • Effective • Consistent with national policy	Unsure	Unsure	I think not sound due to housing need being closer to employment hubs such as Portishead, Clevedon and Weston-super- Mare. The plan to build in Backwell will only increase a commuter belt without any local jobs. Backwell has multiple other sites approved for housing, which currently adds about 800 dwellings to a small village with small infrastructure (narrow roads etc) which have little to no scope to improve do to natural limitations. So the 1,5 times increase in houses already planned is likely to put an unreasonable pressure on the infrastructure already. The village cannot sustain any more dwellings. Also flooding is a regular issue in certain areas including homes and roads. Backwell Common itself is regularly prone to flooding. I'm not convinced that concreting large portions if land is going to improve this. The land proposed is currently actively in use as agricultural land, as such is valuable for our food production. There is limited land if similar value across North Somerset.	I think Backwell has already been allocated much more than it's fair share of housing. Especially compared to other larger towns in NS which have most of the jobs. Backwell will likely only grow as a commuter belt. My thought are that numbers need to be revised to reflect the housing need in NS better, in line with where jobs are and where can take a larger portion of housing more safely (considering flood risks) and efficiently (considering infrastructure that has actual potential to develop that can cope with such numbers).		

Name: Zoe Chalk **I.D:** 62843009

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Land at Tower Farm	No	• Justified	Unsure	No	'valued areas will be protected. People’s well-being, a strong sense of community, opportunity and fairness will be at the heart of all development in North Somerset.' The plans to develop Black Rock and Tower farm directly contravene this commitment from North Somerset Council. Both are adjacent to Weston Big Wood, a site of SSSI. Ancient woodland that has been recognised as being of strategic interest and part of the protected Green belt since the 1980s. National Guidelines state that Greenbelt can only be developed in' exceptional circumstances' and this has not been demonstrated when there are other development opportunities on brownfield sites in Portishead and across the whole of North Somerset. Preventing the destruction of irreplaceable greenbelt would be to the benefit of all, with the exception of developer's profits. The woodland itself supports a vast array of wildlife from bats, through funghi to apex predators such Buzzards and Kestrels. The woodland is accessible to all and we simply cannot lose or endanger this resource. This is not progress, this is destruction. This is at a time when	The proposed developments at Black Rock and Tower Farm need to removed to protect this ancient woodland and precious natural resource. Development proposals should be fully explored on Brownfield sites across the county.	The proposals at both Black Rock and Tower Farm are not sound as they do not meet the exceptional circumstances for allowing destruction of Greenbelt land and the transport and traffic impacts on the town would not meet ANY soundness test or measure.	

Policy or Site	Consider the plan sound?	The plan is unsound because it is not:	Legally Compliant?	Duty to Co-operate?	Plan is not sound, not legally compliant or not in compliance with the Duty to Cooperate	Suggested modifications	Comments of support	Attachments
					the 2023 State of Nature report described the UK as 'one of the most nature depleted countries on Earth' I cannot comprehend why North Somerset council would wish to allow more destruction. Neither of the proposed sites are within a sensible walking distance from the town centre. They are not served with a regular bus service. When the X5 service does run, it stops at 18:00. This means that residents who are older or with young families will necessarily have to drive, on roads that are already saturated by traffic. Over the last 20 years Portishead has had a threefold increase in population with absolutely no change whatsoever in infrastructure. The new railway will bring limited relief due to its tiny capacity. Arguably, it just brings the town to the level it should have been before the development of the Marina. We only have 2 health centres and 1 pharmacy serving a population of over 27,000. The secondary school, Gordano is at over 2000 pupils with no expansion or development planned. I note that there are no proposals to increase employment within Portishead, meaning more people will have to commute to surrounding towns, further burdening our infrastructure. There is a huge need for safe, secure, affordable housing in North Somerset but this cannot be at the expense of precious ancient woodland and greenbelt because it is an easy option for developers. It begs the question of what is tangible progress			
Black Rock, north of Clevedon Road	No	• Justified	Unsure	No	'valued areas will be protected. People's well-being, a strong sense of community, opportunity and fairness will be at the heart of all development in North Somerset.' The plans to develop Black Rock and Tower farm directly contravene this commitment from North Somerset Council. Both are adjacent to Weston Big Wood, a site of SSSI. Ancient woodland that has been recognised as being of strategic interest and part of the protected Green belt since the 1980s. National Guidelines state that Greenbelt can only be developed in' exceptional circumstances' and this has not been demonstrated when there are other development opportunities on brownfield sites in Portishead and across the whole of North Somerset. Preventing the destruction of irreplaceable greenbelt would be to the benefit of all, with the exception of developer's profits. The woodland itself supports a vast array of wildlife from bats, through funghi to apex predators such Buzzards and Kestrels. The woodland is accessible to all and we simply cannot lose or endanger this resource. This is not progress, this is destruction. This is at a time when the 2023 State of Nature report described the UK as 'one of the most nature depleted countries on Earth' I cannot comprehend why North Somerset council would wish to allow more destruction. Neither of the proposed sites are within a sensible walking distance from the town centre. They are not served with a regular bus service. When the X5 service does run, it stops at 18:00. This means that residents who are older or with young families will necessarily have to drive, on roads that are already saturated by traffic. Over the last 20 years Portishead has had a threefold increase in population with absolutely no change whatsoever in infrastructure. The new railway will bring limited relief due to its tiny capacity. Arguably, it just brings the town to the level it should have been before the development of the Marina. We only have 2 health centres and 1 pharmacy serving a population of over 27,000. The secondary school, Gordano is at over 2000 pupils with no expansion or development planned. I note that there are no proposals to increase employment within Portishead, meaning more people will have to commute to surrounding towns, further burdening our infrastructure. There is a huge need for safe, secure, affordable housing in North Somerset but this cannot be at the expense of precious ancient woodland and greenbelt because it is an easy option for developers. It begs the question of what is tangible progress	The proposed developments at Black Rock and Tower Farm need to removed to protect this ancient woodland and precious natural resource. Development proposals should be fully explored on Brownfield sites across the county.	The proposals at both Black Rock and Tower Farm are not sound as they do not meet the exceptional circumstances for allowing destruction of Greenbelt land and the transport and traffic impacts on the town would not meet ANY soundness test or measure.	

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Land east of Backwell	No	‣ Positively prepared ‣ Justified ‣ Effective ‣ Consistent with national policy	Unsure	Unsure	I am not against development and support everyone having a home but the scale of the development proposed and many already approved in Backwell is untenable- the village is already set to increase by 40% without any support for infrastructure, school places, medical facilities. This is a higher number of houses than any other village in North Somerset. The proposed road, while being expensive and unfeasible, would not alleviate congestion or safety concerns. Furthermore I do not see a need or viability analysis for an additional 1000 houses. Finally I have grave concerns around the development of Grade 1 Agricultural Land currently used for food crops and grazing- only 7% of this land is currently left in North Somerset. Development would destroy valuable wildlife habitats and bio diversity and threaten the Brockley Maternity Roost and SSSI with rare Lesser and Greater Horseshow Bats relying on the land for food. Not to mention the increase risk of flooding, already a huge problem in the area. These plans turn Backwell from a small striving community village into the population of a town without any services, employment or investment.			

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